

ATTACHMENT 6
PRIVACY IMPACT ASSESSMENT

06.1 HHS Privacy Impact Assessment (Form) / NIH NIAAA NESARC3 Study Management System (Item)

Form Report, printed by: Anderson, Pamela, Dec 3, 2010

PIA SUMMARY					
1					
<p>The following required questions with an asterisk (*) represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget (OMB) and public posting in accordance with OMB Memorandum (M) 03-22.</p> <p>Note: If a question or its response is not applicable, please answer "N/A" to that question where possible. If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of personally identifiable information (PII). If no PII is contained in the system, please answer questions in the PIA Summary Tab and then promote the PIA to the Senior Official for Privacy who will authorize the PIA. If this system contains PII, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.</p>					
2	Summary of PIA Required Questions				
*Is this a new PIA?					
Yes					
If this is an existing PIA, please provide a reason for revision:					
*1. Date of this Submission:					
Oct 15, 2010					
*2. OPDIV Name:					
NIH					
*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):					
09-25-0200					
*5. OMB Information Collection Approval Number:					
TBD					
*6. Other Identifying Number(s):					
Westat Internal Project ID 8690					
*7. System Name (Align with system item name):					
NIH NIAAA National Epidemiologic Survey on Alcohol and Related Conditions III Study Management System (NESARC3-SMS)					
*9. System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:					
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Point of Contact Information					
POC Name	Bridget Grant, Ph.D, Ph.D				
*10. Provide an overview of the system:					
<p>The information is collected under 42 USC 285n and participation in the NESARC-III is voluntary. The information contains PII and information is shared in accordance with the guidance in the System of Records Notice 09-25-0200. The NESARC-III is a nationally representative survey of the U.S. population (N=46,500). The NESARC-III will collect information on alcohol use practices and alcohol use disorders and their associated physical (e.g. liver cirrhosis) and psychological (e.g. depressed mood) disabilities and also DNA through saliva samples. There are two small methodological components (N=1700) that collect information on reliability and validity. The major purpose of the information is to determine the prevalence, distribution, treatment and health disparities and economic costs and to identify environmental and genetic risk factors and their interactions for these conditions.</p>					
*13. Indicate if the system is new or an existing one being modified:					
New					
*17. Does/Will the system collect, maintain (store), disseminate and/or pass through PII within any database(s), record(s), file(s) or website(s) hosted by this system?					
<p>TIP: If the answer to Question 17 is "No" (indicating the system does not contain PII), only the remaining PIA Summary tab questions need to be completed and submitted. If the system does contain PII, the full PIA must be completed and submitted. (Although note that "Employee systems," – i.e., systems that collect</p>					

PII "permitting the physical or online contacting of a specific individual ... employed [by] the Federal Government – only need to complete the PIA Summary tab.)
Yes
17a. Is this a GSS PIA included for C&A purposes only, with no ownership of underlying application data? If the response to Q.17a is Yes, the response to Q.17 should be No and only the PIA Summary must be completed.
No
*19. Are records on the system retrieved by 1 or more PII data elements?
Yes
*21. Is the system subject to the Privacy Act? (If the response to Q.19 is Yes, the response to Q.21 must be Yes and a SORN number is required for Q.4)
Yes
*23. If the system shares or discloses PII, please specify with whom and for what purpose(s):
Information stored in the system is shared in accordance with the routine uses outlined in NIH Systems of Record Notice 09-25-0200.
*30. Please describe in detail: (1) The information the agency will collect, maintain, or disseminate (clearly state if the information contained in the system ONLY represents federal contact data); (2) Why and for what purpose the agency will use the information; (3) Explicitly indicate whether the information contains PII; and (4) Whether submission of personal information is voluntary or mandatory:
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*31. Please describe in detail any processes in place to: (1) Notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection); (2) Notify and obtain consent from individuals regarding what PII is being collected from them; and (3) How the information will be used or shared. (Note: Please describe in what format individuals will be given notice of consent [e.g., written notice, electronic notice, etc.]):
Individuals whose information is in the system only interact with the system to respond to the surveys. No changes will be made to the information that they provide. Respondents are notified and consent is obtained regarding PII collected from them through advance letters, informational study materials and written notice on consent. The information will be used for research purposes and shared in accordance with the guidance in System of Records Notice 09-25-0200.
*32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)
No
*37. Does the website have any information or pages directed at children under the age of thirteen?
No
*50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN)
Yes
*54. Briefly describe in detail how the PII will be secured on the system using administrative, technical, and physical controls:
Information will be secured on the system through access controls, personnel security awareness and training, regular auditing of information and information management processes, careful monitoring of a properly accredited NESARC3-SMS information system, control of changes to the system, by appropriate planning and testing of configuration management and contingency processes, by ensuring that all users of the NESARC3-SMS are properly identified and authorized for access and are aware of and acknowledge the system rules of behavior, by ensuring that any contingency or incident is handled expeditiously, properly maintaining the system and regulating the environment it operates in, by controlling media, by evaluating risks and planning for information management and information system operations, by ensuring that the system and any exchange of information is protected, by maintaining the confidentiality and integrity of the NESARC3-SMS, and by adhering to the requirements established in the contract and statement of work.

PIA REQUIRED INFORMATION

1	HHS Privacy Impact Assessment (PIA)
<p><i>The PIA determines if Personally Identifiable Information (PII) is contained within a system, what kind of PII, what is done with that information, and how that information is protected. Systems with PII are subject to an extensive list of requirements based on privacy laws, regulations, and guidance. The HHS Privacy Act Officer may be contacted for issues related to Freedom of Information Act (FOIA) and the Privacy Act. Respective Operating Division (OPDIV) Privacy Contacts may be contacted for issues related to the Privacy Act. The Office of the Chief Information Officer (OCIO) can be used as a resource for questions related to the administrative, technical, and physical controls of the system. Please note that answers to questions with an asterisk (*) will be submitted to the Office of Management and Budget (OMB) and made publicly available in accordance with OMB Memorandum (M) 03-22.</i></p>	
<p><i>Note: If a question or its response is not applicable, please answer "N/A" to that question where possible.</i></p>	

2	General Information										
<p><i>*Is this a new PIA?</i></p> <p>Yes</p> <p><i>If this is an existing PIA, please provide a reason for revision:</i></p>											
<p><i>*1. Date of this Submission:</i></p> <p>Oct 15, 2010</p>											
<p><i>*2. OPDIV Name:</i></p> <p>NIH</p>											
<p><i>3. Unique Project Identifier (UPI) Number for current fiscal year (Data is auto-populated from the System Inventory form, UPI table):</i></p> <p>TBD</p>											
<p><i>*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):</i></p> <p>09-25-0200</p>											
<p><i>*5. OMB Information Collection Approval Number:</i></p> <p>TBD</p>											
<p><i>5a. OMB Collection Approval Number Expiration Date:</i></p>											
<p><i>*6. Other Identifying Number(s):</i></p> <p>Westat Internal Project ID 8690</p>											
<p><i>*7. System Name: (Align with system item name)</i></p> <p>NIH NIAAA National Epidemiologic Survey on Alcohol and Related Conditions III Study Management System (NESARC3-SMS)</p>											
<p><i>8. System Location: (OPDIV or contractor office building, room, city, and state)</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2">System Location:</td> </tr> <tr> <td>OPDIV or contractor office building</td> <td>Westat Inc. 1600 Research Blvd</td> </tr> <tr> <td>Room</td> <td>2011</td> </tr> <tr> <td>City</td> <td>Rockville</td> </tr> <tr> <td>State</td> <td>MD</td> </tr> </table>		System Location:		OPDIV or contractor office building	Westat Inc. 1600 Research Blvd	Room	2011	City	Rockville	State	MD
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POC Name	Bridget Grant, Ph.D, Ph.D										
<p><i>The following information will not be made publicly available:</i></p>											

POC Title	Chief, Laboratory of Epidemiology and Biometry
POC Organization	DHHS/NIH/NIAAA
POC Phone	(301) 443-7370
POC Email	

**10. Provide an overview of the system: (Note: The System Inventory form can provide additional information for child dependencies if the system is a GSS)*

The information is collected under 42 USC 285n and participation in the NESARC-III is voluntary. The information contains PII and information is shared in accordance with the guidance in the System of Records Notice 09-25-0200. The NESARC-III is a nationally representative survey of the U.S. population (N=46,500). The NESARC-III will collect information on alcohol use practices and alcohol use disorders and their associated physical (e.g. liver cirrhosis) and psychological (e.g. depressed mood) disabilities and also DNA through saliva samples. There are two small methodological components (N=1700) that collect information on reliability and validity. The major purpose of the information is to determine the prevalence, distribution, treatment and health disparities and economic costs and to identify environmental and genetic risk factors and their interactions for these conditions.

SYSTEM CHARACTERIZATION AND DATA CATEGORIZATION

1 System Characterization and Data Configuration

11. Does HHS own the system?

Yes

11a. If no, identify the system owner:

12. Does HHS operate the system? (If the system is operated at a contractor site, the answer should be No)

No

12a. If no, identify the system operator:

Westat, Inc 1600 Research Blvd, Rockville, MD 20850

*13. Indicate if the system is new or an existing one being modified:

New

14. Identify the life-cycle phase of this system:

Development/Acquisition

15. Have any of the following major changes occurred to the system since the PIA was last submitted?

No

Please indicate "Yes" or "No" for each category below:	Yes/No
Conversions	No
Anonymous to Non-Anonymous	No
Significant System Management Changes	No
Significant Merging	No
New Public Access	No
Commercial Sources	No
New Interagency Uses	No
Internal Flow or Collection	No
Alteration in Character of Data	No

16. Is the system a General Support System (GSS), Major Application (MA), Minor Application (child) or Minor Application (stand-alone)?

Major Application

*17. Does/Will the system collect, maintain (store), disseminate and/or pass through PII within any database(s), record(s), file(s) or website(s) hosted by this system?

Yes

TIP: If the answer to Question 17 is "No" (indicating the system does not contain PII), only the remaining PIA Summary tab questions need to be completed and submitted. If the system does contain PII, the full PIA must be completed and submitted. (Although note that "Employee systems," – i.e., systems that collect PII "permitting the physical or online contacting of a specific individual ... employed [by] the Federal Government – only need to complete the PIA Summary tab.)

Please indicate "Yes" or "No" for each PII category. If the applicable PII category is not listed, please use the Other field to identify the appropriate category of PII.

Categories:	Yes/No
Name (for purposes other than contacting federal employees)	Yes
Date of Birth	Yes
Social Security Number (SSN)	No

Photographic Identifiers	No
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	Yes
Personal Phone Numbers	Yes
Medical Records Numbers	No
Medical Notes	No
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	No
Web Uniform Resource Locator(s) (URL)	No
Personal Email Address	Yes
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No
Other	No

17a. Is this a GSS PIA included for C&A purposes only, with no ownership of underlying application data? If the response to Q.17a is Yes, the response to Q.17 should be No and only the PIA Summary must be completed.

No

18. Please indicate the categories of individuals about whom PII is collected, maintained, disseminated and/or passed through. Note: If the applicable PII category is not listed, please use the Other field to identify the appropriate category of PII. Please answer "Yes" or "No" to each of these choices (NA in other is not applicable).

Categories:	Yes/No
Employees	No
Public Citizen	Yes
Patients	No
Business partners/contacts (Federal, state, local agencies)	No
Vendors/Suppliers/Contractors	No
Other	No

*19. Are records on the system retrieved by 1 or more PII data elements?

Yes

Please indicate "Yes" or "No" for each PII category. If the applicable PII category is not listed, please use the Other field to identify the appropriate category of PII.

Categories:	Yes/No
Name (for purposes other than contacting federal employees)	Yes

Date of Birth	No
SSN	No
Photographic Identifiers	No
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	Yes
Personal Phone Numbers	Yes
Medical Records Numbers	No
Medical Notes	No
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	No
Web URLs	No
Personal Email Address	No
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No
Other	No

20. Are 10 or more records containing PII maintained, stored or transmitted/passed through this system?

Yes

*21. Is the system subject to the Privacy Act? (If the response to Q.19 is Yes, the response to Q.21 must be Yes and a SORN number is required for Q.4)

Yes

21a. If yes but a SORN has not been created, please provide an explanation.

INFORMATION SHARING PRACTICES

1 Information Sharing Practices

22. Does the system share or disclose PII with other divisions within this agency, external agencies, or other people or organizations outside the agency?

Yes

Please indicate "Yes" or "No" for each category below:	Yes/No
Name (for purposes other than contacting federal employees)	Yes
Date of Birth	No
SSN	No
Photographic Identifiers	No
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	Yes
Personal Phone Numbers	Yes
Medical Records Numbers	No
Medical Notes	No
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	No
Web URLs	No
Personal Email Address	No
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No
Other	No

*23. If the system shares or discloses PII please specify with whom and for what purpose(s):

Information stored in the system is shared in accordance with the routine uses outlined in NIH Systems of Record Notice 09-25-0200.

24. If the PII in the system is matched against PII in one or more other computer systems, are computer data matching agreement(s) in place?

No

25. Is there a process in place to notify organizations or systems that are dependent upon the PII contained in this system when major changes occur (i.e., revisions to PII, or when the system is replaced)?

No

26. Are individuals notified how their PII is going to be used?

Yes

26a. If yes, please describe the process for allowing individuals to have a choice. If no, please provide an explanation.

A Privacy Act Notification Statement pursuant to Privacy Act 5 USC 552a Section (b)(3) is provided in written form to the individual through an advance letter prior to the survey.

27. Is there a complaint process in place for individuals who believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate?

Yes

27a. If yes, please describe briefly the notification process. If no, please provide an explanation.

Individuals can contact the project at any time to redress their grievances and make any corrections. Information regarding this process is available in the documentation provided to the participant. The notification process is described in SORN 09-25-0200. The process includes detailed information on who to contact, form of notification request, verification of identity, conditions for granting access to information, and procedures for reviewing the records and informing the subject individual.

28. Are there processes in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy?

Yes

28a. If yes, please describe briefly the review process. If no, please provide an explanation.

PII is reviewed for integrity, accuracy and relevance through system consistency checking procedures as part of the process of contacting and interviewing the participants.

29. Are there rules of conduct in place for access to PII on the system?

Yes

Please indicate "Yes," "No," or "N/A" for each category. If yes, briefly state the purpose for each user to have access:

Users with access to PII	Yes/No/N/A	Purpose
User	Yes	Project staff members have access to the PII in order to contact participants and prepare for participant interviews.
Administrators	Yes	Manage Westat resources supporting or included in the NESARC3-SMS
Developers	Yes	Extract and utilize participant information for phone, mail, and email contacts and other routine information management tasks.
Contractors	Yes	Westat, a contracted research organization, is conducting the field of work.
Other		

*30. Please describe in detail: (1) The information the agency will collect, maintain, or disseminate (clearly state if the information contained in the system ONLY represents federal contact data); (2) Why and for what purpose the agency will use the information; (3) Explicitly indicate whether the information contains PII; and (4) Whether submission of personal information is voluntary or mandatory:

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*31. Please describe in detail any processes in place to: (1) Notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection); (2) Notify and obtain consent from individuals regarding what PII is being collected from them; and (3) How the information will be used or shared. (Note: Please describe in what format individuals will be given notice of consent [e.g., written notice, electronic notice, etc.]

Individuals whose information is in the system only interact with the system to respond to the surveys. No changes will be made to the information that they provide. Respondents are notified and consent is obtained regarding PII collected from them through advance letters, informational study materials and written notice on consent. The information will be used for research purposes and shared in accordance with the guidance in System of Records Notice 09-25-0200.

WEBSITE HOSTING PRACTICES

1 Website Hosting Practices

**32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)*

No

Please indicate "Yes" or "No" for each type of site below. If the system hosts both Internet and Intranet sites, indicate "Yes" for "Both" only.	Yes/ No	If the system hosts an Internet site, please enter the site URL. Do not enter any URL(s) for Intranet sites.
Internet	No	
Intranet	No	
Both	No	

33. Does the system host a website that is accessible by the public and does not meet the exceptions listed in OMB M-03-22?

Note: OMB M-03-22 Attachment A, Section III, Subsection C requires agencies to post a privacy policy for websites that are accessible to the public, but provides three exceptions: (1) Websites containing information other than "government information" as defined in OMB Circular A-130; (2) Agency intranet websites that are accessible only by authorized government users (employees, contractors, consultants, fellows, grantees); and (3) National security systems defined at 40 U.S.C. 11103 as exempt from the definition of information technology (see section 202(i) of the E-Government Act.).

Yes

34. If the website does not meet one or more of the exceptions described in Q. 33 (i.e., response to Q. 33 is "Yes"), a website privacy policy statement (consistent with OMB M-03-22 and Title II and III of the E-Government Act) is required. Has a website privacy policy been posted?

Yes

35. If a website privacy policy is required (i.e., response to Q. 34 is "Yes"), is the privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)?

No

35a. If no, please indicate when the website will be P3P compliant:

The web site links to the NIH policy which is P3P compliant.

36. Does the website employ tracking technologies?

Yes

Please indicate "Yes", "No", or "N/A" for each type of cookie below:	Yes/No/N/A
Web Bugs	No
Web Beacons	No
Session Cookies	Yes
Persistent Cookies	No
Other	

**37. Does the website have any information or pages directed at children under the age of thirteen?*

No

37a. If yes, is there a unique privacy policy for the site, and does the unique privacy policy address the process for obtaining parental consent if any information is collected?

38. Does the website collect PII from individuals?

No

Please indicate "Yes" or "No" for each category below:	Yes/No
Name (for purposes other than contacting federal employees)	No
Date of Birth	No
SSN	No
Photographic Identifiers	No
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	No
Personal Phone Numbers	No
Medical Records Numbers	No
Medical Notes	No
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	No
Web URLs	No
Personal Email Address	No
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No
Other	No

39. Are rules of conduct in place for access to PII on the website?

Yes

40. Does the website contain links to sites external to HHS that owns and/or operates the system?

No

40a. If yes, note whether the system provides a disclaimer notice for users that follow external links to websites not owned or operated by HHS.

ADMINISTRATIVE CONTROLS

1	Administrative Controls
<i>Note: This PIA uses the terms "Administrative," "Technical" and "Physical" to refer to security control questions—terms that are used in several Federal laws when referencing security requirements.</i>	
41. Has the system been certified and accredited (C&A)?	
No	
41a. If yes, please indicate when the C&A was completed (Note: The C&A date is populated in the System Inventory form via the responsible Security personnel):	
41b. If a system requires a C&A and no C&A was completed, is a C&A in progress?	
Yes	
42. Is there a system security plan for this system?	
Yes	
43. Is there a contingency (or backup) plan for the system?	
Yes	
44. Are files backed up regularly?	
Yes	
45. Are backup files stored offsite?	
Yes	
46. Are there user manuals for the system?	
No	
47. Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been trained and made aware of their responsibilities for protecting the information being collected and maintained?	
Yes	
48. If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?	
Yes	
49. Are methods in place to ensure least privilege (i.e., "need to know" and accountability)?	
Yes	
49a. If yes, please specify method(s):	
There are user roles defined for the NESARC3-SMS. These roles ensure that access privileges are narrowly defined, and that only those staff members that need certain types of access are granted that access. In addition to limiting functions, physical access controls limit access to the system. Accountability is assured through strict authentication and authorization and the use of audit logs that exist for applications, systems and network infrastructure components.	
*50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN):	
Yes	
50a. If yes, please provide some detail about these policies/practices:	
PII maintained in the NESARC3-SMS is retained for the duration of the fielding of the survey, and will be destroyed at the end of data collection in accordance with contract provisions and NIAAAA direction.	

TECHNICAL CONTROLS

1 Technical Controls

51. Are technical controls in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system?

Yes

Please indicate "Yes" or "No" for each category below:	Yes/No
User Identification	Yes
Passwords	Yes
Firewall	Yes
Virtual Private Network (VPN)	Yes
Encryption	Yes
Intrusion Detection System (IDS)	Yes
Common Access Cards (CAC)	Yes
Smart Cards	No
Biometrics	No
Public Key Infrastructure (PKI)	Yes

52. Is there a process in place to monitor and respond to privacy and/or security incidents?

Yes

52a. If yes, please briefly describe the process:

Westat Systems group is responsible for monitoring and responding to any security incident in collaboration with the NESARC3-SMS project group. The systems group employs various tools like Snort, regularly scheduled internal and external agency network vulnerability scans etc. to stay on top of any security threat. All privacy and/or security incidents, or suspected incidents, must be reported promptly to the NIAAA ISSO, and the NIAAA Project Officer. The IC ISSO is responsible to be the principal IC contact for coordination, implementation, and enforcement of this policy with the NIH Sr. ISSO and IC stakeholders.

PHYSICAL ACCESS

1 Physical Access

53. Are physical access controls in place?

Yes

Please indicate "Yes" or "No" for each category below:	Yes/No
Guards	Yes
Identification Badges	Yes
Key Cards	Yes
Cipher Locks	Yes
Biometrics	No
Closed Circuit TV (CCTV)	Yes

*54. Briefly describe in detail how the PII will be secured on the system using administrative, technical, and physical controls:

Information will be secured on the system through access controls, personnel security awareness and training, regular auditing of information and information management processes, careful monitoring of a properly accredited NESARC3-SMS information system, control of changes to the system, by appropriate planning and testing of configuration management and contingency processes, by ensuring that all users of the NESARC3-SMS are properly identified and authorized for access and are aware of and acknowledge the system rules of behavior, by ensuring that any contingency or incident is handled expeditiously, properly maintaining the system and regulating the environment it operates in, by controlling media, by evaluating risks and planning for information management and information system operations, by ensuring that the system and any exchange of information is protected, by maintaining the confidentiality and integrity of the NESARC3-SMS, and by adhering to the requirements established in the contract and statement of work.

APPROVAL/DEMOTION					
1	System Information				
System Name:	NIH NIAAA National Epidemiologic Survey on Alcohol and Related Conditions III Study Management System (NESARC3-SMS)				
2	PIA Reviewer Approval/Promotion or Demotion				
Promotion/Demotion:	Promote				
Comments:					
Approval/Demotion Point of Contact:					
Date:	Oct 15, 2010				
3	Senior Official for Privacy Approval/Promotion or Demotion				
Promotion/Demotion:	Promote				
Comments:					
4	OPDIV Senior Official for Privacy or Designee Approval				
Please print the PIA and obtain the endorsement of the reviewing official below. Once the signature has been collected, retain a hard copy for the OPDIV's records. Submitting the PIA will indicate the reviewing official has endorsed it					
This PIA has been reviewed and endorsed by the OPDIV Senior Official for Privacy or Designee (Name and Date):					
Name: _____ Date: _____					
<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Name:</td> <td>Karen Plá</td> </tr> <tr> <td>Date:</td> <td style="text-align: right;">Dec 2, 2010</td> </tr> </table>		Name:	Karen Plá	Date:	Dec 2, 2010
Name:	Karen Plá				
Date:	Dec 2, 2010				
5	Department Approval to Publish to the Web				
Approved for web publishing					
Date Published:					
Publicly posted PIA URL or no PIA URL explanation:					

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PIA Percentage Complete:	100.00
PIA Missing Fields:	