



**DATE:** March 26, 2012

**TO:** Patti Weber, DrPH  
SBIR Development Research Center  
National Cancer Institute

**FROM:** NIH Privacy Act Officer

**SUBJECT:** Applicability of the Privacy Act:  
"Solar Cell: A Mobile UV Manager for Smart Phones Phase II"

I have reviewed the NCI submission to conduct a randomized study with pre-test and post-test assessment to OMB. The information collected will be used to test the hypothesis that the *Solar Cell* mobile application will reduce adult sunburn prevalence (primary outcome) and increase frequency of sun protection behavior (secondary outcome).

I have determined that the Privacy Act will not apply to this data collection. Although personally identifiable information (PII) data will be collected for this NCI-sponsored project, the research group at the contracting firm of Klein Buendel will own and maintain the data. NCI will not receive any data, or even a summary of the data. NCI will not store, access or control the data in any way.

The frequency of sun protection behaviors will be obtained by asking respondents to report how many days and hours they were outdoors in the sun and the number of hours they spent practicing sun protection. Respondents will rate the overall usability of the mobile application, overall evaluation of *Solar Cell*, and the usefulness of various types of advice displayed by *Solar Cell*.

Data collection will be conducted using an online electronic survey system through password-protected web servers using Secure Socket Layer (SSL) encryption. Two separate databases, one with PII about the panel and another with survey responses, will be maintained. Data will be identified by an ID and will never reveal any PII about study participants. Participants assigned to the treatment group will be given a link at the completion of their pre-test that will include their ID number. When they follow this link on their mobile phone to download the *Solar Cell* application, their ID number will be linked to their mobile phone number to allow their survey data to be linked to their application usage data. Usage data will be stripped of mobile numbers and only identified with ID numbers before given to researchers for analysis.

If you have any questions, please contact my office at (301) 402-6201.

Karen M. Plá

cc: Vivian Horovitch-Kelley, Project Clearance Liaison, NCI