

Attachment A.10.2: Letter from the NIH Privacy Officer



DATE: October 6, 2014

TO: Patricia Labosky, Ph.D.
Division of Program Coordination, Planning, and Strategic Initiatives
Office of the Director
National Institutes of Health

FROM: NIH Privacy Act Officer

SUBJECT: Applicability of the Privacy Act: "The National Cross-site Evaluation of the Broadening Experiences in Scientific Training (BEST) Program"

I have reviewed the NIH submission to OMB referenced above. As part of the evaluation, data will be collected from three populations at institutions receiving BEST awards. The purpose is to identify best practices in the field of biomedical training which will be accomplished by assessing two desired outcomes for trainees (graduate students and postdoctoral scientists), and one desired outcome for the grantee institution (Principal Investigators, or PIs).

Evaluation data will be collected via online surveys, phone interviews and data forms. A seven character alphanumeric evaluation ID will be assigned to each trainee and will be used to de-identify survey data. The NIH Center for Information Technology (CIT) will develop all seven (7) online surveys. The surveys contain voluntary questions regarding the respondent's demographics such as race, ethnicity, sex, age, as well as work related information such as type of employer and career field. The surveys will be completed by participants and non-participants of the BEST program, and will be administered by NIH or the grantees, on behalf of NIH. After the trainees leave the grantee institution, NIH will administer the post-exit surveys.

The data form, surveys and phone interviews will be used to assess outcomes such as the creation of institutional infrastructure to continue BEST-like activities after the grant ends, understanding of and attitudes toward career opportunities, confidence to make decisions, reduced time to postdoctoral positions and research productivity.

The trainees and PIs will be informed that their responses to the data collection efforts will only be disclosed to authorize users for analysis and reporting. Authorized users include the NIH contractor implementing the evaluation and authorized staff at NIH. The data collected will be stored in the secure server of the NIH Office of Strategic Coordination (OSC). A password-protected directory will be created and only authorized users will have access to the data. The grantee, NIH and the contracting firm will enter into a Data Sharing Agreement (DSA) and use the NIH Secure Email/File Transfer Service (SEFT) to share survey data. Any publications of the collected information will report the data in aggregate and will not contain any identifying information.

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Since participants will be followed every six months for fifteen years after they graduate or exit the grantee institution via email, and possibly Facebook, I have determined that the Privacy Act will apply to this data collection.

The data collection is covered by NIH Privacy Act Systems of Record 09-25-0156, "*Records of Participants in Programs and Respondents in Surveys Used to Evaluate Programs of the Public Health Service, HHS/PHS/NIH/OD.*"

If you have questions, please contact me at (301) 402-6201.

A handwritten signature in black ink, appearing to read "Karen M. Plá". The signature is written in a cursive style with a large initial "K" and a distinct "P".

Karen M. Plá

Enclosure

cc: Mikia Currie, OD PRA Liaison (w/o enclosure)