

Privacy Impact Assessment Form

v 1.43

Status

Form Number

Read Only

Form Date

Read Only

Question

Answer

1 OPDIV:

Read Only - OPDIV

NIH

2 PIA Unique Identifier:

Read Only - PIA Unique ID

2a Name:

Read Only - Name

NIH/NCI Innovative Molecular Analysis
Techniques (SMART)

3 The subject of this PIA is which of the following?

- General Support System (GSS)
- Major Application
- Minor Application (stand-alone)
- Minor Application (child)
- Electronic Information Collection
- Unknown

3a Identify the Enterprise Performance Lifecycle Phase of the system.

Implementation

3b Is this a FISMA-Reportable system?

- Yes
- No

4 Does the system include a Website or online application available to and for the use of the general public?

- Yes
- No

5 Identify the operator.

- Agency
- Contractor

6 Point of Contact (POC):

POC Title

POC Name

POC Organization

POC Email

POC Phone

7 Is this a new or existing system?

- New
- Existing

8 Does the system have Security Authorization (SA)?

- Yes
- No

8a Date of Security Authorization

9/20/2012

11 Describe the purpose of the system.

To collect and store existing grant data and new to be collected survey data.

12	Describe the type of information the system will collect, maintain (store), or share. (Subsequent questions will identify if this information is PII and ask about the specific data elements.)	Grant data including: grant applications, grant award data, review scores, PI information (name, e-mail and phone numbers); Survey data (qualitative data)																												
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	The system includes NCI IMAT data that is downloaded from IMPACII. Additional data will be collected from NIH staff and PIs of the grants regarding the status of their inventions and technologies.																												
14	Does the system collect, maintain, use or share PII?	<input checked="" type="radio"/> Yes <input type="radio"/> No																												
15	Indicate the type of PII that the system will collect or maintain.	<table border="0"><tr><td><input type="checkbox"/> Social Security Number</td><td><input type="checkbox"/> Date of Birth</td></tr><tr><td><input checked="" type="checkbox"/> Name</td><td><input type="checkbox"/> Photographic Identifiers</td></tr><tr><td><input type="checkbox"/> Driver's License Number</td><td><input type="checkbox"/> Biometric Identifiers</td></tr><tr><td><input type="checkbox"/> Mother's Maiden Name</td><td><input type="checkbox"/> Vehicle Identifiers</td></tr><tr><td><input checked="" type="checkbox"/> E-Mail Address</td><td><input checked="" type="checkbox"/> Mailing Address</td></tr><tr><td><input checked="" type="checkbox"/> Phone Numbers</td><td><input type="checkbox"/> Medical Records Number</td></tr><tr><td><input type="checkbox"/> Medical Notes</td><td><input type="checkbox"/> Financial Account Info</td></tr><tr><td><input type="checkbox"/> Certificates</td><td><input type="checkbox"/> Legal Documents</td></tr><tr><td><input type="checkbox"/> Education Records</td><td><input type="checkbox"/> Device Identifiers</td></tr><tr><td><input type="checkbox"/> Military Status</td><td><input type="checkbox"/> Employment Status</td></tr><tr><td><input type="checkbox"/> Foreign Activities</td><td><input type="checkbox"/> Passport Number</td></tr><tr><td><input type="checkbox"/> Taxpayer ID</td><td><input type="text" value="Other..."/></td></tr><tr><td><input type="text" value="Other..."/></td><td><input type="text" value="Other..."/></td></tr><tr><td><input type="text" value="Other..."/></td><td><input type="text" value="Other..."/></td></tr></table>	<input type="checkbox"/> Social Security Number	<input type="checkbox"/> Date of Birth	<input checked="" type="checkbox"/> Name	<input type="checkbox"/> Photographic Identifiers	<input type="checkbox"/> Driver's License Number	<input type="checkbox"/> Biometric Identifiers	<input type="checkbox"/> Mother's Maiden Name	<input type="checkbox"/> Vehicle Identifiers	<input checked="" type="checkbox"/> E-Mail Address	<input checked="" type="checkbox"/> Mailing Address	<input checked="" type="checkbox"/> Phone Numbers	<input type="checkbox"/> Medical Records Number	<input type="checkbox"/> Medical Notes	<input type="checkbox"/> Financial Account Info	<input type="checkbox"/> Certificates	<input type="checkbox"/> Legal Documents	<input type="checkbox"/> Education Records	<input type="checkbox"/> Device Identifiers	<input type="checkbox"/> Military Status	<input type="checkbox"/> Employment Status	<input type="checkbox"/> Foreign Activities	<input type="checkbox"/> Passport Number	<input type="checkbox"/> Taxpayer ID	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>	<input type="text" value="Other..."/>
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<input checked="" type="checkbox"/> E-Mail Address	<input checked="" type="checkbox"/> Mailing Address																													
<input checked="" type="checkbox"/> Phone Numbers	<input type="checkbox"/> Medical Records Number																													
<input type="checkbox"/> Medical Notes	<input type="checkbox"/> Financial Account Info																													
<input type="checkbox"/> Certificates	<input type="checkbox"/> Legal Documents																													
<input type="checkbox"/> Education Records	<input type="checkbox"/> Device Identifiers																													
<input type="checkbox"/> Military Status	<input type="checkbox"/> Employment Status																													
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16	Indicate the categories of individuals about whom PII is collected, maintained or shared.	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Public Citizens <input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input checked="" type="checkbox"/> Vendors/Suppliers/Contractors <input type="checkbox"/> Patients Other <input type="text"/>																												
17	How many individuals' PII is in the system?	<input type="text" value="100-499"/>																												
18	For what primary purpose is the PII used?	<input type="text" value="To conduct a process and outcome evaluation of the NCI IMAT program."/>																												
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	<input type="text" value="Ongoing monitoring of NCI IMAT program outcomes."/>																												
20	Describe the function of the SSN.	<input type="text" value="Not Applicable"/>																												
20a	Cite the legal authority to use the SSN.	<input type="text" value="Not Applicable"/>																												

21 Identify **legal authorities** governing information use and disclosure specific to the system and program. In process of obtaining IRB and OMB clearance for the primary data collection (survey). Archival data is available through IMPACII queries and approved through eRA.

22 Are records on the system retrieved by one or more PII data elements? Yes
 No

22a Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or identify if a SORN is being developed. Published:
Published:
Published:
 In Progress

23 Identify the sources of PII in the system.

	Directly from an individual about whom the information pertains
<input type="checkbox"/>	In-Person
<input type="checkbox"/>	Hard Copy: Mail/Fax
<input type="checkbox"/>	Email
<input checked="" type="checkbox"/>	Online
<input type="checkbox"/>	Other
	Government Sources
<input checked="" type="checkbox"/>	Within the OPDIV
<input type="checkbox"/>	Other HHS OPDIV
<input type="checkbox"/>	State/Local/Tribal
<input type="checkbox"/>	Foreign
<input type="checkbox"/>	Other Federal Entities
<input type="checkbox"/>	Other
	Non-Government Sources
<input type="checkbox"/>	Members of the Public
<input type="checkbox"/>	Commercial Data Broker
<input type="checkbox"/>	Public Media/Internet
<input type="checkbox"/>	Private Sector
<input type="checkbox"/>	Other

23a Identify the OMB information collection approval number and expiration date. N/A

24 Is the PII shared with other organizations? Yes
 No

24a Identify with whom the PII is shared or disclosed and for what purpose.

- Within HHS
- Other Federal Agency/Agencies
- State or Local Agency/Agencies
- Private Sector

24b	Describe any agreements in place that authorizes the information sharing or disclosure (e.g. Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).											
24c	Describe the procedures for accounting for disclosures											
25	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.	Individuals who apply for grants are notified at the time of grant application and award. Individuals who participate in the survey will be notified at the point of survey response										
26	Is the submission of PII by individuals voluntary or mandatory?	<input checked="" type="radio"/> Voluntary <input type="radio"/> Mandatory										
27	Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	Individuals may opt-out of participating in the survey, submitting a grant application or receiving a grant award from the NIH.										
28	Describe the process to 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 original collection). Alternatively, describe why they cannot be notified or have their consent obtained.	Individuals who participate in the online survey are notified and are requested to affirm their participation (obtain consent) before filling out the survey. Individuals who submit grant applications and submit progress reports are notified through the electronic grant systems.										
29	Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate. If no process exists, explain why not.	If an individual believes their PII has been inappropriately obtained the project manager is responsible for investigating their claim and sharing those findings with the individual who has shared their concern. If the investigation proves inconclusive the data will be de-identified or removed entirely from the dataset.										
30	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. If no processes are in place, explain why not.	The government project manager will perform annual reviews of the PII contained in the system including reviewing permissions and access to the information. The SharePoint system used to store the data follows the more rigorous process associated with maintaining the NIH Active Directory. Individuals who have access to the data and leave the NIH will automatically be removed. The data integrity will be compared against reports generated from the eRA IMPACII reporting systems (QVR and RePORT)										
31	Identify who will have access to the PII in the system and the reason why they require access.	<table border="1"> <tr> <td data-bbox="722 1444 966 1507"><input type="checkbox"/> Users</td> <td data-bbox="966 1444 1396 1507"></td> </tr> <tr> <td data-bbox="722 1507 966 1654"><input checked="" type="checkbox"/> Administrators</td> <td data-bbox="966 1507 1396 1654">NCI Program Staff - to supplement missing data, oversee the contract and ensure the data's accuracy and integrity</td> </tr> <tr> <td data-bbox="722 1654 966 1728"><input type="checkbox"/> Developers</td> <td data-bbox="966 1654 1396 1728"></td> </tr> <tr> <td data-bbox="722 1728 966 1812"><input checked="" type="checkbox"/> Contractors</td> <td data-bbox="966 1728 1396 1812">Ripple Effect, to upload, develop and analyze the data</td> </tr> <tr> <td data-bbox="722 1812 966 1877"><input type="checkbox"/> Others</td> <td data-bbox="966 1812 1396 1877"></td> </tr> </table>	<input type="checkbox"/> Users		<input checked="" type="checkbox"/> Administrators	NCI Program Staff - to supplement missing data, oversee the contract and ensure the data's accuracy and integrity	<input type="checkbox"/> Developers		<input checked="" type="checkbox"/> Contractors	Ripple Effect, to upload, develop and analyze the data	<input type="checkbox"/> Others	
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<input checked="" type="checkbox"/> Contractors	Ripple Effect, to upload, develop and analyze the data											
<input type="checkbox"/> Others												

32 Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Only the government COTR and approved members of the contractor project team may access PII. NCI program staff who oversee and monitor the grants may also have access to the grant data and only have access to the synthesized and de-identified survey data.
33 Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.	Name is available to all the project members as described in 32. Contractors have additional access to e-mail, phone and address of grantees which is necessary for the survey data collection process. This includes distributing the survey via e-mail and following up via postal mail, phone and e-mail to ensure a sufficient response rate.
34 Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.	All system contractors are required to sign an agreement developed by eRA that says that they agree to protect grant data. In addition, project members will be notified in writing prior to the survey data collection process their responsibilities for protecting the information collected.
35 Describe training system users receive (above and beyond general security and privacy awareness training).	Contractor conducts a privacy awareness seminar before data collection for surveys.
36 Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	<input checked="" type="radio"/> Yes <input type="radio"/> No
37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	At the close of the project, the intention is that all records maintaining an association of individual responses with the respondents themselves will be destroyed.
38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Access to the system is controlled by NIH active directory authentication and HHS PIV card authentication. Individuals who access the system, must have an NIH ID badge which requires additional levels of administrative approval. Access to the software will be granted with approval from the NIH government contracting officer.

REVIEWER QUESTIONS: The following section contains Reviewer Questions which are not to be filled out unless the user is an OPDIV Senior Officer for Privacy.

Reviewer Questions	Answer
1 Are the questions on the PIA answered correctly, accurately, and completely?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>	
2 Does the PIA appropriately communicate the purpose of PII in the system and is the purpose justified by appropriate legal authorities?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>	
3 Do system owners demonstrate appropriate understanding of the impact of the PII in the system and provide sufficient oversight to employees and contractors?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>	

Save

Reviewer Questions		Answer
4	Does the PIA appropriately describe the PII quality and integrity of the data?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
5	Is this a candidate for PII minimization?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
6	Does the PIA accurately identify data retention procedures and records retention schedules?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
7	Are the individuals whose PII is in the system provided appropriate participation?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
8	Does the PIA raise any concerns about the security of the PII?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
9	Is applicability of the Privacy Act captured correctly and is a SORN published or does it need to be?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
10	Is the PII appropriately limited for use internally and with third parties?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
11	Does the PIA demonstrate compliance with all Web privacy requirements?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
12	Were any changes made to the system because of the completion of this PIA?	<input type="radio"/> Yes <input type="radio"/> No
Reviewer Notes <input type="text"/>		
General Comments	<input type="text"/>	

Save

OPDIV Senior Official
for Privacy Signature

HHS Senior
Agency Official
for Privacy

From: Suzanne Milliard <milliards@mail.nih.gov>
Date: Monday, January 11, 2016 at 12:24 PM
To: "Dickherber, Tony (NIH/NCI) [E]" <anthony.dickherber@nih.gov>
Cc: Vivian Horovitch-Kelley <horovitchkelly@mail.nih.gov>
Subject: RE: PII question - IMAT evaluation

Hi Tony-

Yes, we do have the PIA. Unfortunately, NIH has been in flux as far as the online system for maintaining these PIAs, so as of now, it will move no further up the chain...this should not keep you from moving forward on your project, since we do have a PIA in hand. Once NIH gets a new Privacy Officer and they determine not only how these PIAs will be housed, but also provide training to all of the ICs, these PIAs will start to be reviewed at higher levels. I don't have a timeframe on that...we are still awaiting a replacement for Karen Pla who retired in the Fall.

Hope this update helps. Let me know if you need anything else.

Suzy