

**06.1 HHS Privacy Impact Assessment (Form) / NIH NIMH NIMH  
Headquarters Network [System] (Item)**

Primavera  
ProSight

Form Report, printed by: Hermach, William, Oct 31, 2012

**PIA SUMMARY**

1

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.

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.

**2 Summary of PIA Required Questions**

\*Is this a new PIA?

No

If this is an existing PIA, please provide a reason for revision:

PIA Validation

\*1. Date of this Submission:

Jul 17, 2012

\*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):

09-25-0036

\*5. OMB Information Collection Approval Number:

N/A

\*6. Other Identifying Number(s):

N/A

\*7. System Name (Align with system item name):

NIMHnet

\*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:

Point of Contact Information	
POC Name	John Harris

\*10. Provide an overview of the system:

The system is a General Support System (GSS) and does not directly collect or store information.

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

Existing

\*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?

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.)

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.

*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):
The system shares and discloses PII with NIMH staff and research partners in support of the NIMH mission. Reference SOR #: 09-25-0036
*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:
The system is a General Support System (GSS) and does not directly collect or store information. The applications/systems residing on the GSS collect and store information. Therefore, individual PIAs have been prepared and submitted for the applications/systems residing on this GSS.
*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.]):
The NIMH procedures involve notification and consent to submit PII to the system during the grant application and administrative processes. Potential grantees must consent to provide PII to the system in order to apply for NIMH grants. NIMH staff consent to have PII stored in the system as a condition of employment during the hiring process. NIMH Web communications staff notifies individuals when major system changes or data use changes occur.
*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)
Yes
*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:
The PII will be secured on the system using DHHS, NIH and NIMH administrative policies, NIHnet and NIMHnet technical controls, and encryption of sensitive data. The NIMHnet incorporates role based access controls with the principle of least privilege access and limited personnel physical access to the data center systems via card key.

**PIA REQUIRED INFORMATION**

**1 HHS Privacy Impact Assessment (PIA)**

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.

Note: If a question or its response is not applicable, please answer "N/A" to that question where possible.

**2 General Information**

\*Is this a new PIA?

No

If this is an existing PIA, please provide a reason for revision:

PIA Validation

\*1. Date of this Submission:

Jul 17, 2012

\*2. OPDIV Name:

NIH

3. Unique Project Identifier (UPI) Number for current fiscal year (Data is auto-populated from the System Inventory form, UPI table):

\*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):

09-25-0036

\*5. OMB Information Collection Approval Number:

N/A

5a. OMB Collection Approval Number Expiration Date:

\*6. Other Identifying Number(s):

N/A

\*7. System Name: (Align with system item name)

NIMHnet

8. System Location: (OPDIV or contractor office building, room, city, and state)

<b>System Location:</b>	
<b>OPDIV or contractor office building</b>	NIMH Headquarters Atrium and NSC buildings
<b>Room</b>	6001 Executive Blvd. and 6101 Executive Blvd.
<b>City</b>	Rockville
<b>State</b>	MD

\*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:

<b>Point of Contact Information</b>	
<b>POC Name</b>	John Harris

The following information will not be made publicly available:

<b>POC Title</b>	NIMH CIO
<b>POC Organization</b>	ORM/IRTMB
<b>POC Phone</b>	301-443-8101
<b>POC Email</b>	Harrisjo@mail.nih.gov

*\*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 system is a General Support System (GSS) and does not directly collect or store information.

**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:

Name: John Harris  
 Component: National Institutes of Health  
 Address: 6101 Executive Blvd  
 Suite 374  
 Rockvill, MD 20852  
 Phone: 301-443-8101  
 Email: harrisjo@mail.nih.gov  
 FAX:

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

Yes

12a. If no, identify the system operator:

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

Existing

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

Operations/Maintenance

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)?

General Support System

\*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
-------------	--------

<b>Name (for purposes other than contacting federal employees)</b>	Yes
<b>Date of Birth</b>	Yes
<b>Social Security Number (SSN)</b>	No
<b>Photographic Identifiers</b>	Yes
<b>Driver's License</b>	No
<b>Biometric Identifiers</b>	No
<b>Mother's Maiden Name</b>	No
<b>Vehicle Identifiers</b>	No
<b>Personal Mailing Address</b>	Yes
<b>Personal Phone Numbers</b>	Yes
<b>Medical Records Numbers</b>	Yes
<b>Medical Notes</b>	Yes
<b>Financial Account Information</b>	Yes
<b>Certificates</b>	No
<b>Legal Documents</b>	Yes
<b>Device Identifiers</b>	No
<b>Web Uniform Resource Locator(s) (URL)</b>	Yes
<b>Personal Email Address</b>	Yes
<b>Education Records</b>	Yes
<b>Military Status</b>	Yes
<b>Employment Status</b>	Yes
<b>Foreign Activities</b>	No
<b>Other</b>	Employment history and other professional qualifications

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.

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).

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

\*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	Yes
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	Yes
Financial Account Information	Yes
Certificates	No
Legal Documents	No
Device Identifiers	No
Web URLs	No
Personal Email Address	Yes
Education Records	Yes
Military Status	No
Employment Status	No
Foreign Activities	No
Other	Scientific Discipline and Areas of Expertise

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

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

The system shares and discloses PII with NIMH staff and research partners in support of the NIMH mission. Reference SOR #: 09-25-0036

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?

Yes

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)?

Yes

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.

There is privacy policy and privacy act note on the applicable web pages, with a link to information on whom to contact for help.

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 notify the main NIMH contact number, Webmaster or CIO

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.

Program Officers and administrative staff regularly review and update the information.

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	Administrative functions, information dissemination and grants review
Administrators	Yes	Systems Administration
Developers	Yes	Application Development
Contractors	Yes	Systems and Applications Development
Other	No	N/A

\*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:

The system is a General Support System (GSS) and does not directly collect or store information. The applications/systems residing on the GSS collect and store information. Therefore, individual PIAs have been prepared and submitted for the applications/systems residing on this GSS.

\*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.]

The NIMH procedures involve notification and consent to submit PII to the system during the grant application and administrative processes. Potential grantees must consent to provide PII to the system in order to apply for NIMH grants. NIMH staff consent to have PII stored in the system as a condition of employment during the hiring process. NIMH Web communications staff notifies individuals when major system changes or data use changes occur.

**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)*

Yes

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.
<b>Internet</b>	Yes	www.nimh.nih.gov
<b>Intranet</b>	Yes	
<b>Both</b>	Yes	

*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)?*

Yes

*35a. If no, please indicate when the website will be 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
<b>Web Bugs</b>	No
<b>Web Beacons</b>	No
<b>Session Cookies</b>	Yes
<b>Persistent Cookies</b>	No
<b>Other</b>	N/A

*\*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?*

Yes

Please indicate "Yes" or "No" for each category below:	Yes/No
--	--------

<b>Name (for purposes other than contacting federal employees)</b>	Yes
<b>Date of Birth</b>	No
<b>SSN</b>	No
<b>Photographic Identifiers</b>	No
<b>Driver's License</b>	No
<b>Biometric Identifiers</b>	No
<b>Mother's Maiden Name</b>	No
<b>Vehicle Identifiers</b>	No
<b>Personal Mailing Address</b>	Yes
<b>Personal Phone Numbers</b>	Yes
<b>Medical Records Numbers</b>	No
<b>Medical Notes</b>	Yes
<b>Financial Account Information</b>	No
<b>Certificates</b>	No
<b>Legal Documents</b>	No
<b>Device Identifiers</b>	No
<b>Web URLs</b>	No
<b>Personal Email Address</b>	Yes
<b>Education Records</b>	No
<b>Military Status</b>	No
<b>Employment Status</b>	No
<b>Foreign Activities</b>	No
<b>Other</b>	Scientific Discipline and Research Areas of Expertise

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?

Yes

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.

Yes

## ADMINISTRATIVE CONTROLS

1

### Administrative Controls

*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.*

41. Has the system been certified and accredited (C&A)?

Yes

41a. If yes, please indicate when the C&A was completed:

Dec 7, 2011

41b. If a system requires a C&A and no C&A was completed, is a C&A in progress?

Not Applicable

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?

Yes

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):

Only preauthorized users have access to the system and therefore access to the data. Only authorized system administrators have access to modify or delete the data.

\*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:

The NIH Records Retention Policy provides detail about the retention and destruction of PII in the system.

## 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)	No
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:

The NIH Incident Handling Procedures; The NIH Incident Response Team (IRT) handles all security incidents.

**PHYSICAL ACCESS**

**1 Physical Access**

53. Are physical access controls in place?

Yes

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

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

The PII will be secured on the system using DHHS, NIH and NIMH administrative policies, NIHnet and NIMHnet technical controls, and encryption of sensitive data. The NIMHnet incorporates role based access controls with the principle of least privilege access and limited personnel physical access to the data center systems via card key.

**APPROVAL/DEMOTION**

**1 System Information**

**System Name:** NIMHnet

**2 PIA Reviewer Approval/Promotion or Demotion**

**Promotion/Demotion:** Promote

**Comments:**

**Approval/Demotion Point of Contact:** William Hermach

**Date:** Jul 17, 2012

**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:** \_\_\_\_\_

<b>Name:</b>	Karen Plá
<b>Date:</b>	Sep 28, 2012

**5 Department Approval to Publish to the Web**

**Approved for web publishing**

**Date Published:**

**Publicly posted PIA URL or no PIA URL explanation:**

<b>PIA % COMPLETE</b>
-----------------------

<b>1</b>	<b>PIA Completion</b>
<b>PIA Percentage Complete:</b>	100.00
<b>PIA Missing Fields:</b>	