



**DATE:** March 23, 2016

**TO:** Allison Scott, Ph.D.  
Program Leader, Diversity Program Consortium, National Institute of General  
Medical Sciences (NIGMS)

**FROM:** NIH Privacy Act Officer

**SUBJECT:** Applicability of the Privacy Act: Evaluation of the Enhancing Diversity of the NIH-  
funded Workforce Program for the NIGMS

I have reviewed the NIGMS submission to OMB referenced above. The project involves the collection of personally identifiable information that is needed in order to meet the requirement for formal evaluation of the Building Infrastructure Leading to Diversity (BUILD) and National Research Mentoring Network (NRMN) initiatives under the NIH-funded cooperative agreement awarded to the Coordination and Evaluation Center (CEC) at the University of California, Los Angeles (UCLA). To complete the required evaluation, individual-level data are needed from faculty, students (undergraduate and graduate), and post-doctoral scientists participating in activities implemented by the institutions receiving BUILD awards and their partners, NRMN award and institutional-level data from institutions participating in the BUILD initiative.

The collection will include various sources of data needed for the proposed BUILD and NRMN evaluations. These sources include on-line and/or paper surveys administered to students/mentees and faculty/mentors, requests for institutional/administrative data from BUILD sites as well as more qualitative data to be collected during proposed site visits and case studies. In addition to these primary data sources, the CEC will also request secondary data available from BUILD and NRMN.

I have determined that the Privacy Act will apply to this data collection, which includes the collection of personally identifiable information such as name, email address, phone number, and user code. Although the data will be aggregated such that no personal information can be obtained from data reports or any published material, data linking the subject user code with identifiers and all printed records will be stored in a manner such that restricted information (e.g., name, address, contact information) will be stored in a different system from study data such as survey responses.

The restricted information will be stored in a system behind the CEC firewall which operates on a private IP range. Only local users can access these IP addresses and the number of authorized users will be strictly limited. The study data will be maintained in a separate system requiring authorized users using encryption. Any paper files used for data collection shall be stored in locked cabinets with access limited and controlled as with electronic data.

The BUILD students and faculty and NRMN mentors, mentees, and trainees will be informed that their responses to the data collection efforts are only to be disclosed to authorized users for analysis and reporting. The CEC at UCLA will be responsible for ensuring the security of the data. Authorized users include the CEC implementing the evaluation, authorized staff at the NIH, and Principal Investigators and staff for the BUILD institutions and NRMN network that are involved in the local evaluation.

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) 496-4606.



Celeste Dade-Vinson  
NIH Privacy Act Officer

Enclosure

cc: Tammy Dean-Maxwell, Project Clearance Liaison, NIGMS  
(w/o enclosure)