



DATE: January 7, 2015

TO: Suzanne White
Chief Grants Management Officer
National Heart, Lung and Blood Institute

FROM: NIH Privacy Act Officer

SUBJECT: Applicability of the Privacy Act: Electronic Prior Approval Submission System (ePASS)

I have reviewed the NHLBI submission to OMB referenced above. The project involves the development of an online system, ePASS, for NIH awardees to submit requests for post award modifications requiring prior approval. The portal will support the electronic submission and tracking of requests, which is currently performed manually.

NIH policy requires applicant institutions and grantees to request prior approval for specific actions such as the use of unobligated balances or carryover, change of Principal Investigator (PI) or key personnel, change in effort of key personnel, training grant waivers, significant rebudgeting, additional no cost extensions, and change of scope.

The system will not be used to initiate questions to the grantees and will not collect or solicit information from the public or other stakeholders. To make a request, the grantee's Authorized Organizational Representative (AOR) will log into ePASS using their designated NIH eRA Commons credentials and search for their grant using the PI's first or last name and or their grant number. ePASS will be pre-populated with information from the IMPAC 2 database.

Once a grant is located by the PI's name or grant number, the requestor will select and submit their specific request which will be automatically forwarded to the official grant file for documentation of the action. No personally identifiable information (PII) will be collected during the request submission process. The information collected in the request will be maintained in the official grant file and stored on protected NIH servers available to the Program Official (PO) and Grants Management Specialist (GMS) at NCI to make a final determination regarding the request.

Page 2 - Applicability of the Privacy Act: Electronic Prior Approval Submission System (ePASS)

I have determined that the Privacy Act will apply to this data collection due to the fact that the information stored in ePASS is designed to be retrieved by a personal identifier.

This data collection will be covered by NIH Privacy Act Systems of Record 09-25-0036, "Extramural Awards and Chartered Advisory Committees (IMPAC 2), Contract Information (DCIS), and Cooperative Agreement Information, HHS/NIH."

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

Karen M. Plá

Enclosure

cc: Kevin Purkiser, NHLBI PRA/OMB (w/o enclosure)