

Privacy Impact Assessment Form

v 1.47.4

Question

Answer

1	OPDIV:	NIH
2	PIA Unique Identifier:	P-4977306-113940
2a	Name:	NCI Electronic Individual Development Plan
3	The subject of this PIA is which of the following?	<input type="radio"/> General Support System (GSS) <input type="radio"/> Major Application <input type="radio"/> Minor Application (stand-alone) <input checked="" type="radio"/> Minor Application (child) <input type="radio"/> Electronic Information Collection <input type="radio"/> Unknown
3a	Identify the Enterprise Performance Lifecycle Phase of the system.	Operations and Maintenance
3b	Is this a FISMA-Reportable system?	<input type="radio"/> Yes <input checked="" type="radio"/> No
4	Does the system include a Website or online application available to and for the use of the general public?	<input type="radio"/> Yes <input checked="" type="radio"/> No
5	Identify the operator.	<input checked="" type="radio"/> Agency <input type="radio"/> Contractor
6	Point of Contact (POC):	POC Title: Director POC Name: Jonathan Wiest POC Organization: Center for Cancer Training POC Email: jonathan.wiest@nih.gov
	POC Phone	240-276-5628
7	Is this a new or existing system?	<input type="radio"/> New <input checked="" type="radio"/> Existing <input type="radio"/> Yes
8	Does the system have Security Authorization (SA)?	No
8a	Date of Security Authorization	Dec 31, 2018
11	Describe the purpose of the system.	The electronic Individual Development Plan (eIDP) system is used by training programs across National Cancer

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.)	The majority of the Personally Identifiable Information (PII) information comes from NIH Enterprise Directory (NED), the NIH Fellowship Payment System (FPS), and NIH nVision.																										
13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	The electronic Individual Development Plan (eIDP) system is used by training programs across National Cancer Institute (NCI) organizations to help Cancer Research Training Award																										
14 Does the system collect, maintain, use or share PII?	<p style="text-align: right;">Yes <input type="radio"/> No</p>																										
15 Indicate the type of PII that the system will collect or maintain.	<table border="0"> <tr> <td><input checked="" type="checkbox"/> Social Security Number</td> <td><input type="checkbox"/> Date of Birth</td> </tr> <tr> <td><input type="checkbox"/> Driver's License Number</td> <td><input type="checkbox"/> Photographic Identifiers</td> </tr> <tr> <td><input checked="" type="checkbox"/> Mother's Maiden Name</td> <td><input type="checkbox"/> Biometric Identifiers</td> </tr> <tr> <td><input checked="" type="checkbox"/> E-Mail Address</td> <td><input type="checkbox"/> Vehicle Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Phone Numbers</td> <td><input type="checkbox"/> Mailing Address</td> </tr> <tr> <td><input type="checkbox"/> Medical Notes</td> <td><input type="checkbox"/> Medical Records</td> </tr> <tr> <td><input type="checkbox"/> Certificates</td> <td>Number <input type="checkbox"/> Financial</td> </tr> <tr> <td><input type="checkbox"/> Education Records</td> <td>Account Info <input type="checkbox"/> Legal</td> </tr> <tr> <td><input type="checkbox"/> Military Status</td> <td>Documents</td> </tr> <tr> <td><input type="checkbox"/> Foreign Activities</td> <td><input type="checkbox"/> Device Identifiers</td> </tr> <tr> <td><input type="checkbox"/> Taxpayer ID</td> <td><input type="checkbox"/> Employment</td> </tr> <tr> <td>Gender</td> <td>Status <input type="checkbox"/> Passport</td> </tr> <tr> <td>Race and ethnicity</td> <td>Number</td> </tr> </table> <p><input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/> Social Security Number	<input type="checkbox"/> Date of Birth	<input type="checkbox"/> Driver's License Number	<input type="checkbox"/> Photographic Identifiers	<input checked="" type="checkbox"/> Mother's Maiden Name	<input type="checkbox"/> Biometric Identifiers	<input checked="" type="checkbox"/> E-Mail Address	<input type="checkbox"/> Vehicle Identifiers	<input type="checkbox"/> Phone Numbers	<input type="checkbox"/> Mailing Address	<input type="checkbox"/> Medical Notes	<input type="checkbox"/> Medical Records	<input type="checkbox"/> Certificates	Number <input type="checkbox"/> Financial	<input type="checkbox"/> Education Records	Account Info <input type="checkbox"/> Legal	<input type="checkbox"/> Military Status	Documents	<input type="checkbox"/> Foreign Activities	<input type="checkbox"/> Device Identifiers	<input type="checkbox"/> Taxpayer ID	<input type="checkbox"/> Employment	Gender	Status <input type="checkbox"/> Passport	Race and ethnicity	Number
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<input checked="" type="checkbox"/> E-Mail Address	<input type="checkbox"/> Vehicle Identifiers																										
<input type="checkbox"/> Phone Numbers	<input type="checkbox"/> Mailing Address																										
<input type="checkbox"/> Medical Notes	<input type="checkbox"/> Medical Records																										
<input type="checkbox"/> Certificates	Number <input type="checkbox"/> Financial																										
<input type="checkbox"/> Education Records	Account Info <input type="checkbox"/> Legal																										
<input type="checkbox"/> Military Status	Documents																										
<input type="checkbox"/> Foreign Activities	<input type="checkbox"/> Device Identifiers																										
<input type="checkbox"/> Taxpayer ID	<input type="checkbox"/> Employment																										
Gender	Status <input type="checkbox"/> Passport																										
Race and ethnicity	Number																										
16 Indicate the categories of individuals about whom PII is collected, maintained or shared.	<p><input checked="" type="checkbox"/> Employees</p> <p><input type="checkbox"/> Public Citizens</p> <p><input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies)</p> <p><input type="checkbox"/> Vendors/Suppliers/Contractors</p> <p><input type="checkbox"/> Patients</p> <p>Other</p>																										
17 How many individuals' PII is in the system?	500-4,999																										
18 For what primary purpose is the PII used?	The PII information used by the eIDP system identifies NCI Trainees and Fellows that need to create an Individual Development Plan (IDP). The PII data is used to identify the NCI staff. The gender and race of the staff is used for aggregate data reporting.																										
19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	N/A																										
20 Describe the function of the SSN.	N/A																										

20a Cite the **legal authority** to use the SSN.

N/A

21 Identify **legal authorities** governing information use and disclosure specific to the system and program 241(d), 281. 42 U.S.C.

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: 09-25-0216 NIH Electronic Directory (NED)

Published:

Published:

In Progress

23 Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Hard Copy: Mail/Fax

Email

Online

Other

Government Sources

Within the

OPDIV

OPDIV

State/Local/Tribal

Foreign

Other Federal Entities

Other Non-Government Sources

Members of the

Public Commercial Data

Broker Public Media/Internet

Private Sector

Other

eIDPI Identify the OMB information collection approval number and expiration date for

An OMB collection approval number is not needed as the Website/Database only uses the PII of federal employees

internal use only.

24 Is the PII shared with other organizations?

Yes No



<p>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.</p>	<p>PII data is sourced from existing, assess and approved NIH systems (NED, FPS, NIH nVision). Trainees will enter additional PII information that is not found in any NIH systems (gender, race, and ethnicity, at their option). The Trainees will submit the completed IDP for approval. The individuals will review all data that the system stores prior to their approval of the final submitted IDP.</p> <p>Sources systems maintain their own HHS Approved Privacy Impact Assessments, including all legal authorities documented.</p>	
<p>26 Is the submission of PII by individuals voluntary or mandatory?</p>	<p><input checked="" type="radio"/> Voluntary <input type="radio"/> Mandatory</p>	
<p>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.</p>	<p>It is optional for the Trainees to complete an IDP. However, this can potentially disqualify them from the fellowship program since it is a requirement of the program.</p> <p>Information that is pulled from source systems offer opt-out options during their PII submission processes. All source systems maintain their own HHS Approved PIAs, with legal authorities documented.</p>	
<p>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.</p>	<p>NCI Trainees will have the opportunity to view changes to their PII information during the IDP renewal process. They will go through a submission and approval process for IDP renewals. They will know when a change occurs during the renewal period.</p> <p>Information that is pulled from source systems obtain consent during their PII submission processes. All source systems maintain their own HHS Approved PIAs, with legal authorities documented.</p>	
<p>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.</p>	<p>The eIDP System source of most of the PII data is from NIH systems. The additional PII information requested from the Trainee is optional. The Trainee does not have to enter the optional PII data. The Trainee can update their PII information by logging into NED and/or contacting their Administrative Officer to update incorrect PII data.</p>	
<p>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.</p>	<p>The PIA review will be conducted each time major eIDP functionalities are released that utilizes addition data (NED, nVision) or new PII data beyond the data included in the previous PIA. Minimally, a PIA review will be conducted yearly.</p>	

<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<input checked="" type="checkbox"/> Users <input checked="" type="checkbox"/> Administrators <input checked="" type="checkbox"/> Developers <input type="checkbox"/> Contractors <input type="checkbox"/> Others	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Trainees, mentors, administrative officers complete and view the eIDP as it goes through the system.</td> </tr> <tr> <td style="padding: 2px;">Responsible for access control.</td> </tr> <tr> <td style="padding: 2px;">Testing and customer defect resolution.</td> </tr> <tr> <td style="padding: 2px;"> </td> </tr> <tr> <td style="padding: 2px;"> </td> </tr> </table>	Trainees, mentors, administrative officers complete and view the eIDP as it goes through the system.	Responsible for access control.	Testing and customer defect resolution.		
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<p>32 Describe the procedures in place to determine which system users (administrators, developers, Owner contractors, etc.) may access PII.</p>	<p>All requests for access to the eIDP system will be assigned an appropriate profile (role) and approved by the System before being implemented by the technical support team.</p>						
<p>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.</p>	<p>Role based access controls are used to limit users' access to PII based on their defined job function and system role.</p>						
<p>34 Identify training and awareness provided to system 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 Awareness maintained.</p>	<p>The NIH Security Awareness Training course is used to satisfy this requirement. According to NIH policy, all use NIH applications must attend security awareness training every year. There are four categories of mandatory IT training (Information Security, Counterintelligence, Privacy and Records Management). Training is completed on the http://irtsectraining.nih.gov site with valid NIH credentials.</p>						
<p>35 Describe training system users receive (above and beyond general security and privacy awareness training).</p>	<p>None.</p>						
<p>36 Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p style="text-align: center;"> <input type="radio"/> No <input checked="" type="radio"/> Yes </p>						
<p>37 Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.</p>	<p>NCI's mission related training records are currently "unscheduled" and all related records should be retained permanently until such time as our agency records schedule is officially modified.</p> <p>NIH has a proposed Records Retention Schedule currently in the approval process with the National Archives and Records Administration (NARA). With a proposed disposition instruction of destroying 5 years after the cutoff of course material after it is superseded or becomes obsolete. Longer retention is authorized if required for business use.</p>						



38 Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Administrative Controls: Access to administrative features of the system will be controlled by Information System Security Officer (ISSO) and access permissions will be reviewed periodically to ensure that users are aged out of the system.

Technical Controls: it is operated within the NCI's LAN GSS, which provides numerous technical security controls on behalf

of its customers including firewalls, IDS/IPS, vulnerability scanners, centralized patching, host-based malware detection and prevention, and log aggregation and analyses.

The system is operated inside the NCI Managed Data Center, within a dedicated federally leased building with armed guards, badge access, video surveillance.

Physical Controls: TThe system is operated inside the NCI Managed Data Center, within a dedicated federally leased building with armed guards, badge access, video surveillance.

General Comments

This component is under the NCI Local Network General Support System (NCI Local Network GSS), whose Universal Unique Identifier (UUID) is: 93F1C7DB-B2F0-4282-9FAD-7168D5B63F91.

OPDIV Senior Official for Privacy Signature

Ralph D.
Ralph

Digitally signed by

D. French -S

Date: 2019.01.28 08:42:57 -05'00'

HHS Senior Agency Official for Privacy

Bridget M.

Guenther -S

Digitally signed by Bridget M. Guenther -S
DN: c=US, o=U.S. Government, ou=HHS, ou=OS, ou=People, 0.9.2342.19200300.100.1.1=2001734030, cn=Bridget M. Guenther -S
Date: 2019.02.01 20:45:13 -05'00'