DATE: January 31, 2020

TO: Allison Gammie, 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 for reinstatement 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.

I have determined that the Privacy Act will not apply to this data collection. As delineated in the CEC Funding Opportunity Announcement, "Awardee will retain custody of and have primary rights to the data and software developed under these awards, subject to Government rights of access consistent with DHHS, PHS, and NIH policies. The CEC and the consortium have developed a data sharing agreement among awardees. All de-identified evaluation-related data will be shared with the NIH at the conclusion of the award." During the funding period, CEC will have primary rights to the aggregated dataset of consortium-wide data, and the individual sites will have primary rights to all site-level data.

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

Celeste Dade-Vinson

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NIH Privacy Act Officer