

# Privacy Impact Assessment Form

v 1.47.4

Question	Answer
1 OPDIV:	NIH
2 PIA Unique Identifier:	P-9218201-570012
2a Name:  3 The subject of this PIA is which of the following?	<p>Electronic Research Administration <input type="radio"/></p> <p>General Support System <input checked="" type="radio"/></p> <p>(GSS) Major Application <input type="radio"/></p> <p>Minor Application (stand-alone) Minor Application <input type="radio"/></p> <p>(child) Electronic <input type="radio"/></p>
	<p>Information Collection <input type="checkbox"/></p> <p>Unknown <input type="checkbox"/></p>
3 Identify the Enterprise Performance Lifecycle Phase of the system.	<p>Operations and Maintenance <input checked="" type="radio"/></p>
3b Is this a FISMA-Reportable system?	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
4 Does the system include a Website or online application available to and for the use of the general public?	<p>Yes <input checked="" type="radio"/></p> <p>No <input type="radio"/></p>
5 Identify the operator.	<p>Agency <input type="checkbox"/></p> <p>Contract <input type="checkbox"/></p> <p>POC Title eRA ISSO</p> <p>POC Name Thomas Mason</p> <p>POC Organization</p>
6 Point of Contact (POC):	<p>HHS/NIH/OD/OER/ORIS/eRA POC Email Mason@mail.nih.gov</p>
	<p>POC Phone 301-451-9048</p>
7 Is this a new or existing system?	<p>New <input type="radio"/></p> <p>Existing <input checked="" type="radio"/></p> <p>No <input type="radio"/></p>
8 Does the system have Security Authorization (SA)?	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>
8a Date of Security Authorization	Apr 30, 2017

9 Interagency Uses

Indicate the following reason(s) for updating this PIA. Choose from the following options.

- PIA Validation (PIA Refresh/Annual Review)
- Significant System Management
- Change Anonymous to Non-Anonymous Data
- Alteration in Character of Anonymous Data
- New Public Access
- Internal Flow or Collection Conversion
- Commercial Sources

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Describe in further detail any changes to the system that have occurred since the last PIA. No changes have occurred that impact the PIA, however, they inadvertently did not indicate that the last 4 digits of the SSN are collected and stored.

No changes have occurred that impact the PIA, however, they inadvertently did not indicate that the last 4 digits of the SSN are collected and stored.

11

Describe the purpose of the system.

The Electronic Research Administration (eRA) provides critical Information Technology (IT) infrastructure to manage over \$30 billion in research and non-research grants awarded annually by NIH and other grantor agencies in support of the collective mission of improving human health. Agencies supported include: Agency for Healthcare Research and Quality (AHRQ) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Substance Abuse and Mental Health Services Administration (SAMHSA) Veterans Administration (VA)

eRA is recognized as an NIH Enterprise System and is a designated Center of Excellence by the U.S. Department of Health and Human Services (HHS). eRA is used as a grants management shared service provider by other federal agencies to manage their grants. The eRA system aligns with Grants.gov (the one-stop Web portal for finding and applying for federal grants), allowing for full electronic processing of grant applications from application submission through closeout of the grant award.

The eRA program is a component of the NIH Office of Extramural Research (OER), headquartered in Bethesda, Maryland. Additional program information can be found at the eRA home page, following this link, <https://era.nih.gov>.

The type of information eRA collects, stores and shares include personally identifiable information (PII). eRA has implemented role-based access controls which limits administration and user access. Authentication (allowing users to log in to the system) is handled by NIH Login, which is a secure, federated authentication system. Authorization (assigning roles and privileges to users) is handled within the eRA system.

Describe the type of information the system will collect, maintain (store), or share. (Subsequent questions will identify if this information is sensitive.)

12

13 Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

eRA supports the full grants life cycle and is used by applicants and grantees worldwide.

eRA maintains a variety of pre-award and award management records that contain information needed to process applications and manage grant awards across the award lifecycle.

The type of information eRA collects, stores and shares include personally identifiable information (PII) such as: name, e-mail address, phone numbers, education information, mailing address, ethnicity, gender, race, and last four digits of SSN.

Listed below are the categories of individuals, with pre-award and award management records collected about them:

Applicants for or Awardees of awards - pre-award and award management (awardees) information;

Individuals named in applications, , or awards - pre-award and award management (awardees) information;

Referees - pre-award information;

Peer Reviewers - pre-award information;

Individuals required to report inventions, award management information; and

Academic medical faculty, medical students and resident physicians - award management information.

eRA has implemented role-based access controls which limits administration and functional user privileges.

Authentication (allowing users to log in to the system) is handled by NIH Login, which is administered by CIT's Identity and Access Management Team. NIH Login has its own approved PIA and Authority to Operate. NIH Login permits authentication to eRA via PIV Cards (for agency users) and username/password for external (grantee) users. Passwords are stored by NIH Login and subject to their PIA.

Authorization (assigning roles and privileges to users) is handled within the eRA system, and the roles assigned to users are stored within the eRA database.

14 Does the system collect, maintain, use or share PII?

- Ye
- s
- No

1 5	Indicate the type of PII that the system will collect or maintain.	<input checked="" type="checkbox"/> Social Security Number <input checked="" type="checkbox"/> Name <input type="checkbox"/> Driver's License Number <input checked="" type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> E-Mail Address <input type="checkbox"/> Phone Numbers <input checked="" type="checkbox"/> Medical Notes <input type="checkbox"/> Certificates <input type="checkbox"/> Education Records <input type="checkbox"/> Military Status <input type="checkbox"/> Foreign Activities <input type="checkbox"/> Taxpayer ID  <input checked="" type="checkbox"/> Date of Birth <input type="checkbox"/> Photographic Identifiers <input type="checkbox"/> Biometric Identifiers <input checked="" type="checkbox"/> Vehicle Identifiers <input type="checkbox"/> Mailing Address <input type="checkbox"/> Medical Records Number <input type="checkbox"/> Financial Account Info <input type="checkbox"/> Legal Documents <input type="checkbox"/> Device Identifiers <input type="checkbox"/> Employment Status <input type="checkbox"/> Passport Number
1 6	Indicate the categories of individuals about whom PII is collected, maintained or shared.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Public <input type="checkbox"/> Citizens <input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input type="checkbox"/> Vendors/Suppliers/Contractors <input type="checkbox"/> Patients <input type="checkbox"/> Other
1 7	How many individuals' PII is in the system?	100,000-999,999



<p>18 For what primary purpose is the PII used?</p>	<p>The primary purpose of Personally Identifiable Information (PII) entered into eRA modules is for NIH grant proposal submission and administration business processes. When a user account is established at the request of the individual, PII is requested about users in the roles of applicants, awardees of the institutional organization staff and or key personnel. Submission of PII is voluntary; however, in order to process a transaction, most fields are required.</p> <p>The records contained within this system will pertain to the following categories of individuals:</p> <p>Applicants for or Awardees of awards - pre-award and award management (awardees) information;</p> <p>Individuals named in applications, or awards - pre-award and award management (awardees) information;</p> <p>Referees - pre-award information;</p> <p>Peer Reviewers - pre-award information;</p> <p>Individuals required to report inventions, award management information; and,</p> <p><del>Academic medical faculty, medical students</del> and resident physicians - award management information.</p>	
<p>19 Describe the secondary uses for which the PII will be used (e.g. testing, training or research)</p>	<p>As an NIH enterprise system and HHS Center of Excellence, eRA uses aggregate data (including <del>some PII</del>) for internal evaluation purposes: including trend analysis, budget and business forecasting.</p>	
<p>20 Describe the function of the SSN.</p>	<p><del>Full Social Security Numbers are not used within the system. The last 4 digits of the SSN are used to assist in identifying and disambiguating individuals.</del></p>	
<p>20 a Cite the <b>legal authority</b> to use the SSN.</p>	<p>Executive Order 9397</p>	

<p>21 Identify <b>legal authorities</b> governing information use and disclosure specific to the system and program.</p>	<p>The legal authorities to operate and maintain this Privacy Act records system are:          5 U.S. Code §301- U.S. Government Organization and Employees - Departmental Regulations          42 U.S.C. §§ 217a- Public Health Service Act - Advisory councils or committees          42 U.S.C. §§ 241 - Public Health Service Act Research and Investigations          42 U.S.C. §§ 281 - Public Health Service Act , Organization of the National Institutes of Health          42 U.S.C. §§ 282 Public Health Service Act Director NIH, 42 U.S.C. §§ 284 Public Health Service Act , Directors of National Research Institutes          42 U.S.C. §§ 284a Public Health Service Act Advisory Councils, 42 U.S.C. §§ 288 Public Health Service Act Kirschstein National Research Service Awards          44 U.S.C. §§ 3101 Presidential Review of Records, Records Management by Agency Heads          35 U.S.C. § 200-212 Patent Rights in inventions made with Federal Assistance,          48 C.F.R. Subpart 15.3 Source Selection in competitive negotiated acquisitions and 37 C.F.R. 401.1-16 Bayh-Dole Act          44 U.S.C. Sec. 2904 General Responsibilities for Records Management          44 U.S.C. Sec. 2906 Inspection of Agency Records</p>	<p> </p>
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<p>22 Are records on the system retrieved by one or more PII data elements?</p>	<p>Yes  <input type="radio"/> No</p>	<p> </p>
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<p>22a Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being used          Published: to cover the system or identify if a SORN is being developed.</p>	<p>Published: SORN 09-25-0225 "NIH Electronic Research Administration (eRA) Records, HHS/NIH/OD/OER</p> <p>SORN 09-25-0036 "NIH Extramural Awards and Chartered Advisory Committee (IMPAC II), Contract Information (DCIS), and Cooperative</p> <p>Published: <input type="text"/></p> <p><input type="checkbox"/> In Progress</p>	<p> </p>
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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 Other
  - HHS 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

23 a Identify the OMB information collection approval number and expiration date.

OMB # 0925-0001 Expiration Date:03/31/2020 OMB # 0925-0002 Expiration Date:03/31/2020

24 Is the PII shared with other organizations?

- Yes
- No



Within HHS

NIH Institutes and Centers (ICs) will have access for daily job duties supporting eRA award programs and related processes. Partnered agencies within HHS will have access to Personally Identifiable Information as well for the purpose of administering and facilitating joint grant and award programs.

Other Federal Agency/Agencies

For Agency partners using the eRA system, such as the Department of Defense (DoD) and Veterans Affairs (VA), access to PII will be for the purpose of administering and facilitating joint grant and award programs.

The Department of Justice (DoJ) or to a court or other adjudicative body when a potential violation of law has occurred, there is an ongoing litigation involving a participant of

an eRA program, or an employee is being represented by the DoJ or participating agency.

State or Local

24a Identify with whom the PII is shared or disclosed and

Agency/Agencies for what purpose.

When there is a violation of a law, disclosure may be made to the appropriate authority for enforcing, investigating, or prosecuting the violation.

record from this system may be disclosed for hiring or retention of an employee, the issuance or retention of a security clearance, the letting of a contract, or the issuance or retention of a license, grant or other benefit.

Private Sector

To a partnered research party for the purpose of participation in an eRA grant or award funded initiative. These parties are vetted by NIH and must abide by federal regulations, laws, and NIH mandated security, privacy, and records requirements.

To qualified experts not within the definition of agency employees as prescribed in agency regulations or policies to obtain their opinions on applications for grants, Cooperative Research and Development Agreements (CRADAs), inventions, or other awards as a part of the peer review process.

<p>24b Describe any agreements in place that authorizes the information sharing or disclosure (e.g. Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).</p>	<p>eRA has established documented formal Information Sharing Agreement (ISA) relationships with partnering organizations. Those ISAs are listed in the NIH System Authorization Tool (NSAT). eRA has ISAs with the following entities:</p> <p>Agency for Healthcare Research and Quality (AHRQ) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Grants.gov NIH Business System NIH Integrated Service Center Substance Abuse and Mental Health Services Administration (SAMHSA) Unified Financial Management System (UFMS) Veterans Administration (VA) eRA-DoD (USAMRMC-CDMRP) Interconnection eRA-and-Grants.gov</p> <p>Program Management Office Interconnection</p>	
<p>24c Describe the procedures for accounting for disclosures</p>	<p>All disclosures required by the Freedom of Information Act are logged by the Freedom of Information Act Office of the NIH Office of the Director. The log contains the following fields: name and address of requester, institution/organization, date requested, purpose of the request/the use of the information, release of PII (yes or no), if released the nature of the release (e.g. electronic, paper), name of recipient and address of recipient if different than the requester.</p> <p>Per language in the eRA Partner Agreements and Interconnection Security Agreements (ISAs), parties are required to report privacy breaches or suspected breaches to eRA within one (1) hour of detection.</p> <p>Disclosure of privacy information between systems is managed under routine use notices. In addition system logs maintain transaction information only (not the PII itself) as a record or accounting of each time it discloses information as part of routine use.</p>	
<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>Individuals are provided a privacy disclosure notice when accessing eRA modules. A privacy notice informs the individual that personal information will be collected.</p>	
<p>26 Is the submission of PII by individuals voluntary or mandatory?</p>	<p style="text-align: center;">Voluntary <input checked="" type="radio"/> Mandatory <input type="radio"/></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 opt-out, explain the reason.</p>	<p>Individuals opt-out of collection of personally identifiable information by not registering with eRA. Demographic information collection, provide a "do not wish to provide" option.</p>	
<p>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</p>	<p>An altered System of Records Notice (SORN) will be</p>	



published  
28 and/or data uses have changed since the notice at \_\_\_\_\_ in the Federal Register to provide notice of any significant the time of original collection). Alternatively, describe revision.  
why they cannot be notified or have their consent obtained.



<p>Describe the process in place to resolve an individual's concerns when they believe their PII has 29 been inappropriately obtained, used, or disclosed, or that the PII is inaccurate. If no process exists, explain why not.</p>	<p><b>CONTESTING RECORD PROCEDURE (REDRESS):</b></p> <p>As described in the exemption clauses of SORN 09-25-0225 certain material will be exempt from amendment; however, consideration will be given to all amendment requests addressed to the System Manager. Individuals whose information is contained in the records can write to the System Manager, reasonably identify the record and specify the information being contested, state the corrective action sought and the reason(s) for requesting the correction, and provide supporting information.</p> <p>The right to contest records is limited to information that is factually inaccurate.</p>
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<p>3 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>PII is obtained from the subject individual. They have unlimited access to the system through the eRA "Commons" to update or correct the information or to change their decision regarding use of the information as part of aggregate data.</p> <p>eRA performs regression testing to ensure functionality with every release to ensure PII is not compromised. eRA has reduced the PII collected as data and for display on forms within Commons. The policy office clears data collection efforts via OMB annually.</p> <p>In addition, the integrity, availability, and relevancy of PII in eRA is maintained via:  Daily and weekly backups.  Real-Time Data replication to an offsite location certified by NIH  Daily reviewed audit reports to determine if any unauthorized user(s) have accessed the system and/or database and if any system parameters have been modified without prior authorization on system and/or database  Annual recertification of users via designated NIH Institute Center or Office Coordinator.  Accounts identified as no longer required are</p>
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<p>31 Identify who will have access to the PII in the system and the reason why they require access.</p>	<p><input checked="" type="checkbox"/> Users</p> <p><input checked="" type="checkbox"/> Administrators</p> <p><input checked="" type="checkbox"/> Developers</p> <p><input checked="" type="checkbox"/> Contractors</p> <p>Others</p>	<p>External users (grantees) have access to PII they provided and will be able to update their PII only. Access to others' PII is restricted. Individuals may also</p> <p>Administrators have access to the entire system to ensure they are operating efficiently; patching and other maintenance related activities</p> <p>Developers have access to PII to develop new features and functionality to ensure data integrity and quality.</p> <p>Direct Contractors have access to PII to support users and to maintain system functionality.</p> <p>Referees – pre-award information; Peer Reviewers - pre-award information; For examples, individuals who will</p>	
<p>3 Describe the procedures in place to determine which system users 2 (administrators, developers, contractors, etc.) may access PII.</p>	<p>Access is strictly limited according to the principle of least privilege, which means giving a user only those privileges which are essential to that user's work.</p>		
<p>3 Describe the methods in place to allow 3 those with access to PII to only access the minimum amount of information necessary to perform their job.</p>	<p>eRA has implemented role-based access controls which limits administration and functional user privileges. Role based access has been implemented across eRA. Privacy and Security controls to ensure proper protection of information by allowing users only access to the minimum amount of PII necessary to perform their job.</p>		
<p>3 Identify training and awareness provided 4 to 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 maintained.</p>	<p>The NIH Security Awareness Training course is used to satisfy this requirement. According to NIH policy, all personnel who use NIH applications must attend security awareness training every year. There are four categories of mandatory IT training (Information Security, Counterintelligence, Privacy Awareness, and Records Management).</p>		
<p>3 Describe training system users receive 5 (above and beyond general security and privacy awareness training).</p>	<p>System users are provided guidance about proper usage of PII and privacy awareness. Users are also required to agree to the eRA Rules of Behavior and Data Access Agreements.</p>		
<p>3 Do contracts include Federal Acquisition 6 Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p style="text-align: center;">Ye s <input type="radio"/> No</p>		



Describe the process and guidelines in place with  
 37 regard to the retention and destruction of PI.  
 Cite specific records retention schedules.

Item E-0001 (DAA-0443-2013-0004-0001)  
 Official case files of construction, renovation,  
 endowment and similar grants.  
 Disposition: Temporary. Cut off annually following  
 completion of final grant-related activity that  
 represents closing of the case file (e.g., project  
 period ended). Destroy 20 years after cut-off;

Item E-0002 (DAA-0443-2013-0004-0002)  
 Official case files of funded grants, unfunded  
 grants, and award applications, appeals and  
 litigation records.  
 Disposition: Temporary. Cut off annually following  
 completion of final grant-related activity that  
 represents closing of the case file (e.g., end of  
 project period, completed final peer review,  
 litigation or appeal proceeding concluded).  
 Destroy 10 years after cut-off;

Item E-0003 (DAA-0443-2013-0004-0003)  
 Animal welfare assurance files.  
 Disposition: Temporary. Cut off annually following  
 closing of the case file. Destroy 4 years after cut-  
 off; and,

Item E-0004 (DAA-0443-2013-0004-0004)  
 Extramural program and grants management  
 oversight records.  
 Disposition: Temporary. Cut off annually. Destroy 3

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

Administrative Safeguards:

Controls to ensure proper protection of information and information technology systems include, but are not limited to, the completion of a: Security Assessment and Authorization (SA&A) package Privacy Impact Assessment (PIA)

Mandatory annual NIH Information Security and Privacy Awareness training - or comparable specific in-kind training offered by participating agencies that has been reviewed and accepted by the NIH eRA Information Systems Security Officer (ISSO)

The SA&A package consists of a:  
 Security Categorization  
 e-Authentication Risk Assessment System  
 Security Plan  
 Evidence of Security Control  
 Testing Plan of Action and Milestones Contingency Plan  
 Evidence of Contingency Plan Testing.

When the design, development, or operation of a system of records on individuals is required to accomplish an agency function, the applicable Privacy Act Federal Acquisition Regulation (FAR) clauses are inserted in solicitations and contracts.

Physical Safeguards:

Controls to secure the data and protect paper and electronic records, buildings, and related infrastructure against threats associated with their physical environment include, but are not limited to, the use of the HHS Employee Persona Identity Verification (PIV) ID and/or badge number and NIH key cards, security guards, cipher locks, biometrics, and closed-circuit TV. Paper records are secured under conditions that require at least two locks to access, such as in locked file cabinets that are contained in locked offices or facilities. Electronic media are kept on secure servers or computer systems.

Technical Safeguards:

eRA data is encrypted in transit, in use, and at rest. Controls executed by the computer system are employed to minimize the possibility of unauthorized access, use, or dissemination of the

data in the system. They include, but are not limited to user identification, password protection, firewalls, virtual private network, encryption, intrusion detection system, common access cards, smart cards, biometrics and public key infrastructure.

39 Identify the publicly-available URL:

[https://public.era.nih.gov/  
commons](https://public.era.nih.gov/commons) <https://iEdison.gov>  
<https://Edison.gov>



40 Does the website have a posted privacy notice?  Yes  No

40a Is the privacy policy available in a machine-readable format?  Yes  No

41 Does the website use web measurement and customization technology?  Yes  No

41a Select the type of website measurement and customization technologies is in use and if it is used to collect PII. (Select all that apply)

Technologies	Collects PII?
<input type="checkbox"/> Web beacons	<input type="radio"/> Yes <input checked="" type="radio"/> No
<input type="checkbox"/> Web bugs	<input checked="" type="radio"/> Yes <input type="radio"/> No
<input checked="" type="checkbox"/> Session Cookies	<input type="radio"/> Yes <input checked="" type="radio"/> No
<input type="checkbox"/> Persistent Cookies	<input type="radio"/> Yes <input checked="" type="radio"/> No
Other... N/A	

42 Does the website have any information or pages directed at children under the age of thirteen?  Yes  No

43 Does the website contain links to non-federal government websites external to HHS?  Yes  No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?  Yes  No

General Comments

OPDIV Senior Official for Privacy Signature

HHS Senior Agency Official for Privacy