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Privacy Impact Assessment Form

v 1.47.4

	Question	Answer
1	OPDIV:	NIH
2	PIA Unique Identifier:	P-3996611-590386
2a	Name:	CareerTrac
3	The subject of this PIA is which of the following?	○ General Support System (GSS) ○ Major Application ○ Minor Application (stand-alone) ◉ Minor Application (child) ○ Electronic Information Collection ○ Unknown
3a	Identify the Enterprise Performance Lifecycle Phase of the system.	Operations and Maintenance
3b	Is this a FISMA-Reportable system?	○ Yes ◉ No
4	Does the system include a Website or online application available to and for the use of the general public?	○ Yes ◉ No
5	Identify the operator.	◉ Agency ○ Contractor
6	Point of Contact (POC):	POC Title: Chief, Program Analysis Branch POC Name: Christie H. Drew POC Organization: NIH/NIEHS/DERT/PAB POC Email: drewc@niehs.nih.gov POC Phone: 984-287-3255
7	Is this a new or existing system?	○ New ◉ Existing
8	Does the system have Security Authorization (SA)?	◉ Yes ○ No
8a	Date of Security Authorization	05/09/2022

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9	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 ☐ Alteration in Character of Data ☐ New Public Access ☐ New Interagency Uses ☐ Internal Flow or Collection ☐ Conversion ☐ Commercial Sources
10	Describe in further detail any changes to the system that have occurred since the last PIA.	No major content changes since previous privacy impact assessment (PIA). The National Institutes of Environmental Health Sciences General Support System (NIEHS) is planning for two new demonstration projects with the National Institute of Diabetes and Digestive and Kidney Diseases (NIDDK) and the National Institute of Minority Health and Health Disparities (NIMHD) in 2024. The Office of Management and Budget (OMB) clearance obtained in 2021 includes NIDDK but not NIMHD. NIEHS will renew OMB clearance before either pilot is released.
11	Describe the purpose of the system.	CareerTrac tracks long-term trainee outcomes for specific trainees supported by the National Institutes of Environmental
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.)	CareerTrac collects, maintains and/or stores the following information: Trainees - First, Middle, and Last Name and Suffix, Email
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	CareerTrac tracks long-term trainee outcomes for specific trainees supported by NIEHS, NCI, NIGMS, and FIC. The system allows extramural and intramural PIs to track trainee's accomplishments. Most extramural PIs are required to track outcomes for 10-15 years as a condition of their grant award. The agency will use this information to evaluate the long-term outcomes of training program investments, such as trainee productivity, career outcomes and successes and make recommendations for improvement. The information may be
14	Does the system collect, maintain, use or share **PII**?	◉ Yes ○ No

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15	Indicate the type of PII that the system will collect or maintain.	☐ Social Security Number ☐ Date of Birth ☒ Name ☐ Photographic Identifiers ☐ Driver's License Number ☐ Biometric Identifiers ☐ Mother's Maiden Name ☐ Vehicle Identifiers ☒ E-Mail Address ☒ Mailing Address ☒ Phone Numbers ☐ Medical Records Number ☐ Medical Notes ☐ Financial Account Info ☐ Certificates ☐ Legal Documents ☒ Education Records ☐ Device Identifiers ☐ Military Status ☒ Employment Status ☐ Foreign Activities ☐ Passport Number ☐ Taxpayer ID Suffix, Training Experience, Work Information, Program Information Funding, Product of Policy Development, Students Mentored, Bibliography Country of Origin, Region, Institution/Department, Role
16	Indicate the categories of individuals about whom PII is collected, maintained or shared.	☒ Employees ☒ Public Citizens ☐ Business Partners/Contacts (Federal, state, local agencies) ☐ Vendors/Suppliers/Contractors ☐ Patients Other: Data from non-US citizens
17	How many individuals' PII is in the system?	10,000-49,999
18	For what primary purpose is the PII used?	PII is used for program evaluation.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	The secondary uses of PII are research and program improvement.
20	Describe the function of the SSN.	Not Applicable.
20a	Cite the **legal authority** to use the SSN.	Not Applicable.
21	Identify **legal authorities** governing information use and disclosure specific to the system and program.	5. U.S.C. 301; 42 U.S.C. secs. 217a, 241, 242, 248, 281, 282, 284, 284a, 285, 285b, 285c, 285d, 285e, 285f, 285g, 285h, 285i, 285j, 285k, 285l, 285m, 285n, 285o, 285p, 285q, 285r, 285s, 285t, 286, 287, 287b, 287c-21, 287d, 288, 35 U.S.C. 200-212, 48 CFR Subpart 15.3 and 37 CFR 401.1-16; and42 U.S.C. 217a, 241, 282(b)(6), 284a, and 288.

Save

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:	09-25-0014 Clinical Research: Student Records
		Published:	09-25-0036 Extramural Awards and Chartered Advisory Committees (IMPACII), Contract Information (DCIS), and Cooperative Agreement
		Published:	09-25-0225 NIH Electronic Research Administration (eRA)
			☐ 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 ☐ 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
23a	Identify the OMB information collection approval number and expiration date.		The Office of Management and Budget (OMB) approval number is 0925-0568, with an expiration date of 05/31/2024.
24	Is the PII shared with other organizations?		( ) Yes (•) No
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.		Trainees are notified at the time they are appointed to the program that PII will be collected, based on the conditions of their awards. For all other trainees entered into the system, CareerTrac will provide an electronic notification about the purpose of the PII collected, its use and how it will be shared.
26	Is the submission of PII by individuals voluntary or mandatory?		(•) Voluntary ( ) Mandatory

Save

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.	Trainees have the option not to participate in the program. If they choose to participate, PIs enter the information into CareerTrac and are required to report on trainee data. The appointment process (now managed through IMPAC II) includes a standard privacy statement informing trainees about the existence of the system and about the use of the information. Trainees may ask PI's to review their records, and may refuse to provide information, but they may not opt out of the system.
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.	NIEHS does not anticipate major changes to the system that would affect disclosure and/or changes in data use. However, if a major change in disclosure were to occur, users and trainees would be notified via email form letter based on the email listed in CareerTrac.
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.	The trainee will write to their PI who will in turn forward the request to CareerTrac staff. The trainee should reasonably identity the record and specify the information being contested, the corrective action sought, and the reasons for requesting the correction, along with supporting information to show how the record is inaccurate or incomplete. The right to contest records is limited to information which is incomplete or inaccurate.
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.	PIs have access to the system and are responsible for updating the information submitted. PIs can easily export trainee data from the system to provide the right of review. NIH program officials periodically review reports for the programs to ensure data quality.
31	Identify who will have access to the PII in the system and the reason why they require access.	☒ Users: Data entry, review, report and update. (Note: Users only have access to PII for the trainees associated with their ☒ Administrators: Manage user accounts, system level data, data analysis and integrity ☒ Developers: Application maintenance and enhancements ☒ Contractors: Direct Contractors may be users, administrators and or developers. ☒ Others: Program Officers have access to PII so that they can evaluate the effectiveness of training programs.
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Users are assigned access in the system based on their role in the organization and reporting process. These roles are strictly controlled through NIH IAM login and limit access with the

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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.	Users are assigned access in the system based on their role in the organization & reporting process. These roles are strictly controlled and limit access with the application.
34	Identify training and awareness provided 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.	According to NIH policy, all personnel who use NIH applications must attend security awareness training every year. There are five categories of mandatory information technology (IT) training (Information Security, Counterintelligence, Privacy Awareness, Records Management and Emergency Preparedness). NIEHS has annual and refresher training for security and privacy awareness via Collaborative Institutional Training Initiative (CITI).
35	Describe training system users receive (above and beyond general security and privacy awareness training).	CareerTrac staff regularly provide information sessions and training for users at grantee meetings and through webinars. NIEHS maintains robust help files, Frequently Asked Questions (FAQ) and have provided extensive tool tips within the system itself.
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	(●) Yes ( ) No
37	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	The post-award tracking requirements of the grant program requires that the awardee's career be tracked for at least 15 years after the grant. Records are retained and disposed of under the authority of the NIH Records Retention Schedule. Item 02-005, Official Case Files of Applications and Awards, Appeals, and Litigation Records for Grants, Cooperative Agreements, and Other Transaction Activities. Official case files of funded and unfunded grants and cooperative agreements, award applications, and appeals and litigation records. Records also include those supporting other transaction awards and activities. These records include, but are not limited to, the complete application(s), summary of review actions, award notices, progress reports, financial records, audit records, official correspondence, appeal documents, legal opinions and litigation documents, closeout documents, and all other related significant and supporting documents that pertain only to the particular grant and grant owner(s). This schedule allows for all records in a case file that are stored in the same system to co-mingle. Disposition: Cut off annually following completion of final award-related activity that represents closing of the case file (e.g., end of project period, completed final peer review, litigation or appeal proceedings concluded). Destroy 30 year(s) after cutoff. DAA-0443-2019-0008-0001

Save

38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Physical Controls: This system is located in the NIEHS datacenter that is on a Federal government campus, protected by armed guards, and behind secured doors where all entry and exit is tracked, monitored, and restricted to authorized individuals only (monitoring is 24/7). The facility is only open to authorized personnel whose access is monitored by locking doors with badge readers for both ingress and egress. Each discrete ingress and egress event is logged. The facility is under 24-hour surveillance by facilities security for security and environmental hazards. Technical Controls: The IT hardware and software used to host the protected survey information is segregated from default commodity public networks to prevent unauthorized or malicious access. Access controls lists and event logs are maintained and monitored to detect unauthorized, suspicious or malicious activity. Access lists are restricted to approved IT technical personnel. Two factor authentication must be used for access. File integrity and auditing software are employed on hardware. Administrative Controls: All technical personnel who access IT systems which contain protected information have met background investigation criteria for Public Trust positions. All personnel have taken mandatory security training and awareness classes and refreshers. Personnel accessing these systems use privileged and separate accounts for administrative access to systems. Security and Privacy Controls - Applied and Audited: The National Institute of Standards and Technology (NIST) is a non-regulatory federal agency within the United States Department of Commerce that provides guidance to help federal agencies manage their information security systems. NIST issues Special Publications (SP) to relay specific guidelines and/or standards. To help federal agencies meet requirements set by the Federal Information Security Management Act (FISMA), NIST SP 800-53 defines standards and guidelines for the protection of agency's and citizen's private data. It includes security and privacy controls to be implemented as part of an organization-wide process that manages information security and privacy risk. The NIST SP 800-53 security and privacy controls will be applied and audited.

General Comments	This component is under the NIEHS General Support System (GSS), whose Universal Unique Identifier (UUID) is:87E68CC3-BC8E-42BB-9425-7AEB9E6A370F.

OPDIV Senior Official for Privacy Signature	Dustin B. Close -S Digitally signed by Dustin B. Close -S Date: 2023.12.04 10:53:47 -05'00'	HHS Senior Agency Official for Privacy	Elizabeth E. Koran -S Digitally signed by Elizabeth E. Koran -S Date: 2023.12.26 16:30:01 -05'00'

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