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Privacy Impact Assessment Form

v 1.47.4

Status: Approve | Form Number: F-2023S | Form Date: 7/22/2024 10:40:40 AM

	Question	Answer
1	OPDIV:	NIH
2	PIA Unique Identifier:	P-4616945-251766
2a	Name:	Early Career Reviewers -Application Vetting System
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, IT Services and Solutions Branch POC Name: Leo Wu POC Organization: CSR/Division of Planning, Analysis and Information Management POC Email: Leowu@csr.nih.gov POC Phone: 301-435-1533
7	Is this a new or existing system?	○ New ◉ Existing
8	Does the system have Security Authorization (SA)?	◉ Yes ○ No

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8a	Date of Security Authorization	7/21/2021 12:00:00 AM
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.	The Early Career Reviewers (ECR) Application Vetting System no longer captures sensitive data to support NIH's Interest in Diversity, aesthetic enhancements, and/or additional questions to include applicant's program eligibility. This is now captured in Electronic Research Administration (eRA) Commons, which maintains its own unique privacy impact assessment (PIA), with all legal authorities documented.
11	Describe the purpose of the system.	The Center for Scientific Review (CSR), NIH is the gateway for NIH grant applications and their review for scientific merit. CSR
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.)	CSR collects information voluntarily provided by scientists applying to become Early Career Reviewers- as part of the NIH peer review process.
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	EAVS collects information from scientists, submitted as part of their application(s) to be considered as an Early Career Reviewer for CSR/NIH. This information is submitted voluntarily
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 ORCID ID, NIH Commons ID, Username and password CV or professional resume Title, keywords associated with their scientific expertise, Interest in CSR study sections
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
17	How many individuals' PII is in the system?	5,000-9,999
18	For what primary purpose is the PII used?	PII is used for verifying and assessing the applications of scientists who have applied to become ECRs with the CSR peer review process.
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	There are no secondary uses for PII within the CSR EVAS.
20	Describe the function of the SSN.	There is no function for Social Security Number (SSN) within the CSR EAVS.
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.	5. U.S.C. 301; 42 U.S.C. 217a, 241, 282(b)(6), 284a, and 288. 48 CFR Subpart 15.3 and Subpart 42.15.
22	Are records on the system retrieved by one or more PII data elements?	◉ Yes ○ No

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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:	SORN 09-25-0036 Extramural Awards and Chartered Advisory Committees (IMPAC 2), Contract Information (DCIS), and Cooperative
		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 ☒ 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.	OMB Control Number: 0925-0695, expiration 06-30-2026	
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.	Information is posted on the website when applicants fill out the online application and voluntarily give their personal information per the application request.	
26	Is the submission of PII by individuals voluntary or mandatory?	◉ Voluntary ○ Mandatory	
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.	The collection is voluntary as part of an application process. All applicants are aware that PII is required in order to assess their credentials for consideration as Early Career Reviewers in the NIH Peer Review Process. If they chose not to provide their information, they cannot enroll in the program.	

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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.	If major changes occur to the EAVS, CSR has the ability to contact each applicant and current participant through email, telephone, and hard copy paper, both regular and express delivery mail.
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.	Individuals can contact the CSR EAVS Point of Contact via email, the CSR Webmaster and/or the CSR Privacy Coordinator.
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.	The authorization of EAVS/ECR is done annually through the assessment of security/privacy National Institute of Standards and Technology (NIST) controls. Periodic audits are conducted to ensure the data's integrity, availability, accuracy and relevancy.
31	Identify who will have access to the PII in the system and the reason why they require access.	☒ Users: Scientific Review Officers to locate potential early career reviewers. Applicants can update and modify their individual records. ☒ Administrators: To administer/maintain the system. ☒ Developers: To maintain and enhance the system. ☒ Contractors: Direct contractors have access to administer, maintain and enhance the system. ☐ Others:
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Administrators, developers and direct contractors use least privilege, separation of duties and role-based security to ensure they are authorized to access PII.
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.	Determinations are made based on role-based access controls and least privilege. User rights are provisioned based on controls within the system, allowing users only access to the minimum amount of PII necessary to perform their job.
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).
35	Describe training system users receive (above and beyond general security and privacy awareness training).	Direct contractors who are tasked with development and administration work take their company specific security and privacy training, in addition to NIH required training. Administrators and Privileged Users require additional training specific to their roles and responsibilities.
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	◉ Yes ○ No

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37	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	Records are retained and disposed of under the authority of the NIH Records Retention Schedule. Item 01-003: Records of All Other Intramural Research Projects These records do not meet the retention criteria for Item I-0001 - Records of Intramural Research Records or for Projects of Historical Significance, or Item I-0002 - Research Records that Support Intellectual Property Rights. Intramural research records related to planning, development, oversight and execution of biomedical research projects and programs performed by NIH research staff, contractors or under collaborative research and development agreements (CRADAs). Disposition: Cut off annually at termination of project/ program or when no longer needed for scientific reference, whichever is longer. Destroy 7 years after cutoff. DAA-0443-2012-0007-0003
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	Technical Controls include Personal Identify Verification (PIV) Card/Smart card in addition to NIH IAM account for network authentication. Administrative Controls include role-based access. Contract clauses ensure adherence to privacy provisions and practices. Specific training materials have been developed. Physical Controls include Security guards, ID badges, Cipher locks and close circuit television (TV) at the data center.
39	Identify the publicly-available URL:	https://www.csr.nih.gov/EAVS/login
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

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		Technologies	Collects PII?
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)	☐ Web beacons	○ Yes ○ No
		☐ Web bugs	○ Yes ○ No
		☒ Session Cookies	○ Yes ◉ No
		☐ Persistent Cookies	○ Yes ○ No
		Other...	○ Yes ○ No
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
43a	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?		◉ Yes ○ No

General Comments	This component is under the Center for Scientific Review (CSR) General Support System (GSS) Sterling, whose Universal Unique Identifier (UUID) is: 6171C796-CF0B-48AB-98E4-165BC092A5B1.

OPDIV Senior Official for Privacy Signature	Dustin B. Close -S Digitally signed by Dustin B. Close -S Date: 2024.08.01 09:39:51 -04'00'	HHS Senior Agency Official for Privacy	Bridget M. Guenther -S Digitally signed by Bridget M. Guenther -S Date: 2024.08.28 15:37:32 -04'00'