

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/29/2026

**OPDIV:**

NIH

**Name:**

CRSS: OCRTME Training Program

**PIA Unique Identifier:**

P-1110930-742633

**The subject of this PIA is which of the following?**

Minor Application (stand-alone)

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Operations and Maintenance

**Is this a FISMA-Reportable system?**

No

**Does the system include a Website or online application available to and for the use of the general public?**

Yes

**Identify the operator.**

Agency

**Is this a new or existing system?**

Existing

**Does the system have Security Authorization (SA)?**

Yes

**Indicate the following reason(s) for updating this PIA.**

PIA Validation

**Describe in further detail any changes to the system that have occurred since the last PIA.**

This validation is intended to refresh content. There have been no substantial changes since the last assessment.

**Describe the purpose of the system.**

The Office of Clinical Research Training and Medical Education (OCRTME) Training Programs, also known as (aka) Clinical Research Student (CRS) records system, accepts applications from medical, dental, and veterinary students; and residents and physicians applying for training programs at the NIH Clinical Center (CC). In addition to collecting applications, the system generates surveys to accepted training program students, residents and physicians to evaluate the impact and effectiveness of the training programs and the compliance of graduate medical education training programs sponsored by the Clinical Center with the requirements of external accrediting organizations, specifically the Accreditation Council for Graduate Medical Education.

The OCRTME programs include:  
Medical Research Scholars Program  
Graduate Medical Education  
Clinical Electives Program  
Resident Electives Program  
Clinical Research Training Program and Medical Research Scholars Program (CRTP/MRSP) Alumni Survey  
Graduate Medical Education Alumni Survey

**Describe the type of information the system will collect, maintain (store), or share.**

The personally identifiable information (PII) collected includes name, personal mailing address, personal phone number, personal email address, educational records, employment status, and professional information (current profession, current curriculum vitae (CV)), citizenship status and references.

The information is used to process applicants for training programs sponsored by various Institutes, Centers and Offices (ICOs) within the NIH. The information is submitted voluntarily and is collected to determine the suitability for NIH clinical research training programs.

Individuals applying to the training programs are guided through the process for application on the OCRTME website. An active link to each training program includes the program's application and program requirements. Applicants do not have access to the information once it's submitted. If an update is needed, candidates email the support address and work with the support team. Those requiring access to this system log in using the NIH Identity, Credential, and Access Management (IAM) Services which maintains its own unique privacy impact assessment (PIA) on record, with all legal authorities documented. The purpose of IAM Services is to authenticate and authorize all users and computers in a Windows domain type network assigning and enforcing information security policies for all computers and installing or updating software. The IAM Services collects unique user credentials and stores them in an encrypted format. The IAM Service is an essential service which facilitates and governs network access to various resources.

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

The OCRTME Training Programs, aka CRS Records system, accepts applications from medical, dental, veterinary students; residents, and physicians applying for training programs at the NIH CC. In addition to collecting applications, the system generates surveys to accepted training program students, residents and physicians to evaluate impact and effectiveness of the training programs.

The OCRTME programs include:  
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Graduate Medical Education  
Clinical Electives Program  
Resident Electives Program  
CRTP/MRSP Alumni Survey  
Graduate Medical Education Alumni Survey

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NIH clinical research training programs.

Individuals applying to the training programs are guided through the process for application on the OCRTME website. An active link to each training program includes the program's application and program requirements. Applicants do not have access to the information once it's submitted. If an update is needed, they email the support address and work with the support team.

Those requiring access to this system log in using the NIH IAM Services which maintains its own unique PIA on record, with all legal authorities documented.

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

Yes

**Indicate the type of PII that the system will collect or maintain.**

Name

E-Mail Address

Mailing Address

Phone Numbers

Education Records

Employment Status

Professional information, citizenship status and references

**Indicate the categories of individuals about whom PII is collected, maintained or shared.**

Employees

Public Citizens

**How many individuals' PII is in the system?**

10,000-49,999

**For what primary purpose is the PII used?**

The information is used to process applicants for training and to evaluate the effectiveness / outcome of NIH clinical research training programs as well as compliance with other external accrediting organizations.

**Describe the secondary uses for which the PII will be used.**

NA

**Identify legal authorities governing information use and disclosure specific to the system and program.**

42 USC 241, 263, 282

**Are records on the system retrieved by one or more PII data elements?**

Yes

**Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.**

09-25-0014, Clinical Research: Student Records, HHS/NIH/OD/OIR/OE

**Identify the sources of PII in the system.**

Directly from an individual about whom the information pertains

In-Person

Hardcopy

**Identify the OMB information collection approval number and expiration date**

OMB Number: 0925-0698 (Application Process for Clinical Research Training and Medical Non-Educational Clinical Center and its impact on Course and Training Program Enrollment and Effectiveness). Expiration 10-31-2026

**Is the PII shared with other organizations?**

Yes

**Identify with whom the PII is shared or disclosed and for what purpose.**

**Describe any agreements in place that authorizes the information sharing or disclosure.**

There are no Memorandums of Understanding (MOUs) or Information Sharing Agreement (ISAs) for this system. The third-party web-application provider contract stipulates that service providers must follow all requirements in the Security and Privacy Language for Information and Information Technology Procurements and NIH Information Security Policy Handbook

**Describe the procedures for accounting for disclosures.**

The system owner regularly reviews and analyzes audit records for indications of inappropriate or unusual activity, investigates suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions (such as reporting security violations).

**Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

Individuals self-select for application and make the affirmative action to visit the NIH website(s) in question. Applicants are notified at the website that submission of information is voluntary, but necessary for program application and consideration.

**Is the submission of PII by individuals voluntary or mandatory?**

Voluntary

**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.**

Individuals may opt out by not applying to the program.

**Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.**

No changes to the OCRTME program are likely to occur. If a change were to occur, applicant data would then be used to notify and obtain consent from applicants for any new use.

**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.**

A Privacy Rights Complaint Form is available to individuals when they believe that their PII has been inappropriately used or disclosed. The Clinical Center's Privacy Office will review the complaint and respond to the concern within 30 business days. Complaints could also be submitted to the System

Manager, who would investigate and share findings with CC Information Systems Security Officer (ISSO) and CC Privacy Officer.

**Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.**

The system owner regularly reviews and analyzes audit records for indications of inappropriate or unusual activity, investigates suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions (such as reporting security violations). Much of the information in the system is maintained for archival purposes to determine who applied to the program in the past.

**Identify who will have access to the PII in the system and the reason why they require access.**

**Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.**

Access to PII is assigned to personnel based upon current job responsibilities. A standard NIH IAM Services account login is required to gain access to the stored PII data.

**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.**

Appropriate access is granted to the system based on predefined roles and job descriptions, and administrative access is limited to authorized employees based on current roles. Dual factor authentication with NIH Personal Identity Verification (PIV) card and NIH IAM Services account will occur at time of login to the NIH Network. System owners are responsible for creating the proper security groups within their systems with the applicable permissions for group members to enforce least privilege.

**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 manage or operate NIH applications must successfully complete annual security awareness training. Training is completed on the <http://irtsectraining.nih.gov> site with valid NIH credentials. Administrators and Privileged Users require additional training specific to their roles and responsibilities.

**Describe training system users receive (above and beyond general security and privacy awareness training).**

Application specific one-on-one peer training is provided as needed.

**Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?**

Yes

**Describe the process and guidelines in place with regard to the retention and destruction of PII.**

Records are retained and disposed of under the authority of the NIH Records Retention Schedule.

Item 06-601 Non-mission employee training program records.

Destroy when 3 years old, or 3 years after superseded or obsolete, whichever is appropriate, but longer retention is authorized if required for business use. DAA-GRS-2016-0014-0001

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

Physical controls: The information technology (IT) hardware used to host protected information is located in a secured datacenter facility. 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: IT hardware and software is segregated from public networks to prevent unauthorized or malicious access. Access to the system is controlled by NIH login which authenticates the user prior to granting 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 and privacy training classes and annual refreshers. Administrative personnel accessing these systems use privileged and separate accounts for administrative access.

**Identify the publicly-available URL:**

<https://ocrtmeapps.cc.nih.gov/mrsp>  
<https://ocrtmeapps.cc.nih.gov/gme>  
<https://ocrtmeapps.cc.nih.gov/rep/>  
<https://ocrtmeapps.cc.nih.gov/survey>

Note: web address is a hyperlink.

**Does the website have a posted privacy notice?**

Yes

**Is the privacy policy available in a machine-readable format?**

Yes

**Does the website use web measurement and customization technology?**

Yes

**Select the type of website measurement and customization technologies is in use and if it is used to collect PII.**

**Does the website have any information or pages directed at children under the age of thirteen?**

No

**Does the website contain links to non- federal government websites external to HHS?**

No

**Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?**

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