

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

08/28/2024

**OPDIV:**

NIH

**Name:**

Early Career Reviewers -Application Vetting System

**PIA Unique Identifier:**

P-4616945-251766

**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.**

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.

**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 organizes the peer review groups or study sections that evaluate the majority (75%) of the research grant applications sent to NIH. CSR also receives all grant applications for NIH, as well as other components of HHS. CSR has a mission to see that NIH grant applications receive fair, independent, expert, and timely peer reviews-free from inappropriate influences-so NIH can fund the most promising research.

The power that drives NIH is found in the collective efforts of people who submit, review, and administer NIH grant applications. As CSR continues to reach out to build productive partnerships, the Early Career Reviewer (ECR) program is critical to this effort. The ECR program was developed to identify and train qualified scientists who are early in their scientific careers and who have not had prior CSR review experience.

The Early Career Reviewer Application and Vetting System (EAVS ) collects information submitted by ECR applicants as part of their ECR application process. The information is transmitted to Scientific Review Officers (SROs) who vet the applications to determine if reviewers are an appropriate fit for their review panels. EAVS allows for a seamless provision of feedback to applicants regarding their eligibility. Applicants can access the EAVS online application on the CSR ECR website. EAVS also reduces burden on the applicant and is more efficient and cost-effective for CSR by reducing staff time to process applications and increases the speed of transmission of applications to SROs.

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

CSR collects information voluntarily provided by scientists applying to become Early Career Reviewers- as part of the NIH peer review process.

The system collects personally identifiable information (PII) and information related to the applicant's profession and scientific interest. Information collected includes applicants' full name, mailing address, email, phone number, professional title, keywords associated with their scientific expertise, interest in CSR study sections, Open Research and Contributor Identification (ORCID) and NIH Commons Identification (ID), curriculum vitae (CV) or professional resume, (which can include education records, employment history, publication history, grants received, and other professional activities and achievements).

To set up a new account, applicants must first have a NIH eRA Commons ID to login and complete the application. They then create a username and password within EAVS.

Authorized system administrators log in to ECR using the NIH Identity, Credential, and Access Management (IAM) Services which maintains its own unique privacy impact assessment (PIA) on record, including all legal authorities documented. The purpose of the IAM 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 collects unique usernames and passwords (user credentials) and stores them in an encrypted format. The IAM 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.**

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 through the EAVS online application system. The application request information such as applicants' professional activities and interest in CSR study sections. It also collects PII. Data is stored in a CSR federal data center and complies with all regulatory guidance for information security, privacy and records management.

The CSR EAVS collects information voluntarily provided by scientists applying to become Early Career Reviewers- as part of the NIH peer review process.

The system collects PII and information related to the applicant's profession and scientific interest.

Information collected includes applicants' full name, mailing address, email, phone number, professional title, keywords associated with their scientific expertise, interest in CSR study sections, ORCID and NIH Commons ID, CV or professional resume, (which can include education records, employment history, publication history, grants received, and other professional activities and achievements).

To set up a new account, applicants must first have a NIH eRA Commons ID to login and complete the application. They then create a username and password within EAVS.

Authorized system users log in using the NIH IAM Services which maintains its own unique PIA on record, including 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

ORCID ID, NIH Commons ID, Username and password

CV or professional resume

Title, keywords associated with their scientific expertise, Interest in CSR study sections

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

Public Citizens

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

5,000-9,999

**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.

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

There are no secondary uses for PII within the CSR EVAS.

**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.

**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.**

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

Directly from an individual about whom the information pertains

Email

Online

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

OMB Control Number: 0925-0695, expiration 06-30-2026

Within OpDiv

Other HHS OpDiv

Non-Governmental Sources

Public

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

No

**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.

**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.**

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.

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

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.

**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.**

Individuals can contact the CSR EAVS Point of Contact via email, the CSR Webmaster and/or the CSR Privacy Coordinator.

**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 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.

**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.**

Administrators, developers and direct contractors use least privilege, separation of duties and role-based security to ensure they are authorized to access PII.

Authorized system users log in using the NIH IAM Services which maintains its own unique PIA on record, including all legal authorities documented.

**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.

**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).

**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.

**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 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

**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.

**Identify the publicly-available URL:**

<https://www.csr.nih.gov/EAVS/login>

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 uner the age of thirteen?**

No

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

Yes

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

Yes