

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/09/2025

**OPDIV:**

NIH

**Name:**

NIH Office of Clinical Research Training Application

**PIA Unique Identifier:**

P-9429590-431234

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

Minor Application (child)

**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.**

There have been no major changes since the last assessment. This is a refresh of the content, a update to the points of contact, a name update, and a update of the assessment authorization date.

**Describe the purpose of the system.**

The purpose of the system is to provide the NIH Office of Clinical Research Education and Collaboration Outreach Training Application (OCRECO Training Application) to the NIH and the public. This application is a Learning Management system built leveraging Drupal Key features which include: administrative ability to create and manage courses, course registration for NIH and non-NIH (public) users, access to course materials for registered users, taking an exam and earning a certificate upon achieving a predetermined passing grade, quizzes, course and lecture evaluation, discussion boards, calendars, and dashboards for each course created, and reporting features for user and usage statistics.

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

Users are required to create an account with a login identification and password to log into the system. Registration is then required to access course materials. The registration form collects the following information: email, First Name, Last Name, Degree, State/Territory (if US resident), Country, ORCID (digital identifier for researchers), Are you taking this course for academic credit or as part of an education/training/certification program?, How did you hear about this course? Organizational affiliation, if applicable (NIH or Non-NIH, Institute/Center (if NIH), Company, Organization, and/or Department) and whether the participant would like to be a remote site liaison. Additionally, the system educational records (course and lecture evaluations, discussion board posts, and final exam results) and current academic/professional status.

System Admins log in 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 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.**

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**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  
Education Records  
login and password  
state, territory, and country  
ORCiD, course for academic credit or part of an education/training/certification program  
organizational affiliation  
current academic/professional status

**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?**

To provide identification for login accounts, emailing notifications, and placing students' names on passing exam certificates.

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

To allow the OCRECO administrative team to analyze and report demographic data and statistics for all course students to provide metrics and help improve future course offerings, for use within OCRECO.

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

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**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

Online

Government Sources

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

OMB Number 0925-0764

Expires 07/31/2027

**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.**

There is a warning notice and a Privacy Act statement on the log-in page of the training application.

**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.**

There is no opt-out option; individuals can choose to not register but will not have access to the course system.

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

If notification is required, individuals are notified via email.

**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 send inquiries to the OCRECO education inbox (ocreco-education@mail.nih.gov) or to the NIH Office of Clinical Research Education and Collaboration Outreach inbox (OCRECO@od.nih.gov).

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

OCRECO administration monitors and reviews the data annually. The NIH Center for Information Technology - Business Application Services (CIT-BAS) team performs periodic scans of the system to troubleshoot access and system issues.

**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.**

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.

**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.**

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.

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

Administrative users are provided training in the form of standard operating procedures. These trainings cover navigating the system, workflows and how to review and process annual courses, exam.

**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. 11-502, Customer/Client Records for Communications and Agency History**

Disposition Instructions:

Delete when superseded, obsolete, or when customer requests the agency to remove the records.

Disposition Authority:

DAA-GRS-2017-0002-0002

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

Administrative Controls:

Access requests are managed, validated, and audited by the OCR Support Team and scheduled audits are performed to ensure accounts are validated and/or revoked if needed. Access Disclosure Agreements are required for all users.

Technical Controls:

Access to the system is controlled by NIH log-in which authenticates the user prior to granting access. Access level and permissions are controlled by the system and based on user, role, organizational unit, and status of the report. All servers have been configured to remove all unused applications and system files and all local account access except when necessary to manage the system and maintain integrity of data.

Physical Controls:

The servers reside in the Center for Information Technology (CIT) Computer Room where policies and procedures are in place to restrict access to the machines. This includes guards at the front door and entrance to the machine room.

**Identify the publicly-available URL:**

[ocrtraining.cit.nih.gov](http://ocrtraining.cit.nih.gov)

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?**

Yes

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

Yes