

Attachment 3 -
HHS Privacy Impact Assessment (PIA) Form

Privacy Impact Assessment Form

v 1.47.4

Status

Form Number

Form Date

Question

Answer

1 OPDIV:

2 PIA Unique Identifier:

2a Name:

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.

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

- ☒ Accept
☐ Reject

5 Identify the operator.

- ☒ Agency
☐ Contractor

6 Point of Contact (POC):

POC Title POC Name POC Organization POC Email POC Phone

- ☒ Accept
☐ Reject

7 Is this a new or existing system?

- ☐ New
☒ Existing

8 Does the system have Security Authorization (SA)?

- ☒ Yes
☐ No

- ☒ Accept
☐ Reject

8a Date of Security Authorization

9	Indicate the following reason(s) for updating this PIA. Choose from the following options.	<input checked="" type="checkbox"/> PIA Validation (PIA Refresh/Annual Review) <input type="checkbox"/> Anonymous to Non-Anonymous <input type="checkbox"/> New Public Access <input type="checkbox"/> Internal Flow or Collection <input type="checkbox"/> Commercial Sources <input type="checkbox"/> Significant System Management Change <input type="checkbox"/> Alteration in Character of Data <input type="checkbox"/> New Interagency Uses <input type="checkbox"/> Conversion	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
		Other...	
10	Describe in further detail any changes to the system that have occurred since the last PIA.	No changes have been made.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
11	Describe the purpose of the system.	The purpose of the proposed information collection is for the selection of a new cohort of interns for the NIDA Summer Research Internship Program. Application forms to obtain information about the interns for this research experience are necessary, and NIDA will request clearance for any additional forms should new programs be introduced in the future.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
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.)	• Personal information (name, date of birth, gender, race, ethnicity (Hispanic or non-Hispanic); • Eligibility information (citizenship);	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
13	Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.	The information collected is available to NIH staff via an internal secure SharePoint site. The staff includes scientists, program officials, and analysts who review and evaluate	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
14	Does the system collect, maintain, use or share PII ?	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
15	Indicate the type of PII that the system will collect or maintain.	<input type="checkbox"/> Social Security Number <input checked="" type="checkbox"/> Name <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> E-Mail Address <input checked="" type="checkbox"/> Phone Numbers <input type="checkbox"/> Medical Notes <input type="checkbox"/> Certificates <input checked="" type="checkbox"/> Education Records <input type="checkbox"/> Military Status <input type="checkbox"/> Foreign Activities <input type="checkbox"/> Taxpayer ID Race/ethnicity Gender U.S. citizenship Other... Other...	<input checked="" type="radio"/> Accept <input type="radio"/> Reject

16	Indicate the categories of individuals about whom PII is collected, maintained or shared.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Public Citizens <input type="checkbox"/> Business Partners/Contacts (Federal, state, local agencies) <input type="checkbox"/> Vendors/Suppliers/Contractors <input type="checkbox"/> Patients Other <input type="text"/>	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
17	How many individuals' PII is in the system?	500-4,999	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
18	For what primary purpose is the PII used?	The information ensures that students applying to this program meet basic eligibility requirements; indicates their interest in substance abuse research, future career goals, and, if selected for the program, what research they prefer to conduct. The information also enables decision-making regarding which applicants will be selected for internships. In each case, completing the application is voluntary, but in order to receive due consideration, the prospective applicant must complete all fields required by the program.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
19	Describe the secondary uses for which the PII will be used (e.g. testing, training or research)	The information will/may also be used by NIDA for future planning and programmatic support, performance analysis, and to provide information to the Administration and to Congress if needed.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
20	Describe the function of the SSN.	N/A - We don't collect this information	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
20a	Cite the legal authority to use the SSN.	N/A - We don't collect this information	
21	Identify legal authorities governing information use and disclosure specific to the system and program.		<input checked="" type="radio"/> Accept <input type="radio"/> Reject
22	Are records on the system retrieved by one or more PII data elements?	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
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: <input type="text"/> Published: <input type="text"/> Published: <input type="text"/>	<input type="checkbox"/> In Progress

<p>23 Identify the sources of PII in the system.</p>	<p>Directly from an individual about whom the information pertains</p> <p> <input type="checkbox"/> In-Person <input type="checkbox"/> Hard Copy: Mail/Fax <input type="checkbox"/> Email <input checked="" type="checkbox"/> Online <input type="checkbox"/> Other </p> <p>Government Sources</p> <p> <input type="checkbox"/> Within the OPDIV <input type="checkbox"/> Other HHS OPDIV <input type="checkbox"/> State/Local/Tribal <input type="checkbox"/> Foreign <input type="checkbox"/> Other Federal Entities <input type="checkbox"/> Other </p> <p>Non-Government Sources</p> <p> <input checked="" type="checkbox"/> Members of the Public <input type="checkbox"/> Commercial Data Broker <input type="checkbox"/> Public Media/Internet <input type="checkbox"/> Private Sector <input type="checkbox"/> Other </p>	<p> <input checked="" type="radio"/> Accept <input type="radio"/> Reject </p>
<p>23a Identify the OMB information collection approval number and expiration date.</p>	<p>0925-0738, (Exp 12/31/2022)</p>	
<p>24 Is the PII shared with other organizations?</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>	<p> <input checked="" type="radio"/> Accept <input type="radio"/> Reject </p>
<p>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.</p>	<p>Notification is provided to all prospective applicants in the application overview section of the website and in the application questions themselves. The program overview explains that this program is to enhance the number of underrepresented minorities in biomedical research, applicants from all races and ethnicities are eligible to apply.</p>	<p> <input checked="" type="radio"/> Accept <input type="radio"/> Reject </p>
<p>26 Is the submission of PII by individuals voluntary or mandatory?</p>	<p> <input checked="" type="radio"/> Voluntary <input type="radio"/> Mandatory </p>	<p> <input checked="" type="radio"/> Accept <input type="radio"/> Reject </p>
<p>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.</p>	<p>Applicants have the option to select the "prefer not to answer" choice on race, ethnicity, gender PII questions.</p>	<p> <input checked="" type="radio"/> Accept <input type="radio"/> Reject </p>
<p>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.</p>	<p>We don't foresee any major changes to the system or application components.</p>	<p> <input checked="" type="radio"/> Accept <input type="radio"/> Reject </p>
<p>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.</p>	<p>The program director will investigate the cause for concern and take the necessary action to resolve the problem.</p>	<p> <input checked="" type="radio"/> Accept <input type="radio"/> Reject </p>

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 program assistant periodically monitors the data to ensure that it is still accessible for analysis.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
31	Identify who will have access to the PII in the system and the reason why they require access.	<input checked="" type="checkbox"/> Users Applicants and references are provided a link to the application site and will enter their information after establishing login credentials that include "strong" passwords that conform to standards used by the NIH Center for Information Technology. Applicants will only have access to their own applications once the application has been submitted. Letters of recommendation are submitted to NIDA and are entered into the internal NIDA SharePoint site that has restricted access.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
		<input checked="" type="checkbox"/> Administrators The information collected is available to selected NIH staff via an internal secure SharePoint site that requires a unique login identification token. Staff includes scientists, program officials, and analysts who review and evaluate assigned applications. Access to the SharePoint will be via protected login credentials. Privacy is assured to the extent provided by law.	
		<input type="checkbox"/> Developers <div></div>	
		<input type="checkbox"/> Contractors <div></div>	
		<input checked="" type="checkbox"/> Others The information collected is available to selected NIH staff via an internal secure SharePoint site that requires a unique login identification token. Staff includes scientists, program officials, and analysts who review and evaluate assigned applications. Access to the SharePoint will be via protected login credentials. Privacy is assured to the extent provided by law.	
32	Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The information collected is available to selected NIH staff via an internal secure SharePoint site that requires a unique login identification token. Staff includes scientists, program officials, and analysts who review and evaluate assigned applications. Access to the SharePoint will be via protected login credentials. Privacy is assured to the extent provided by law.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject

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.	The information collected is available to selected NIH staff via an internal secure SharePoint site that requires a unique login identification token. Staff includes scientists, program officials, and analysts who review and evaluate assigned applications. Staff are only given access to the applications they are assigned for review purposes. Staff do not have access to any other applications. Access to the SharePoint will be via protected login credentials. Privacy is assured to the extent provided by law.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
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.	Written instructions are provided to staff on how to access their batch of applications and that the applications are confidential.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
35	Describe training system users receive (above and beyond general security and privacy awareness training).	Written instructions are provided to staff on how to access their batch of applications and that the applications are confidential.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
36	Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
37	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.	Once the program has concluded the data goes into an archive folder that only the Program Director and Assistant can assess.	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
38	Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.	<p>The information collected is available to NIH staff via an internal secure SharePoint site that requires a unique login identification token. The staff includes scientists, program officials, and analysts who review and evaluate assigned applications. Access to the SharePoint will be via protected login credentials. Privacy is assured to the extent provided by law. Applicants and references are provided a link to the application site and will enter their information after establishing login credentials that include "strong" passwords that conform to standards used by the NIH Center for Information Technology. Applicants will only have access to their own applications once the application has been submitted. Letters of recommendation are submitted to NIDA and are entered into the internal NIDA SharePoint site that has restricted access.</p> <p>The information is collected and maintained in accordance with the DHHS Automated Information Systems Security Program Handbook. For all applications, the software is housed on an internal shared NIH server residing inside the NIH firewall.</p>	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
39	Identify the publicly-available URL:	https://nidaextshare.nida.nih.gov/SRIP/sitepages/application.aspx	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
40	Does the website have a posted privacy notice?	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
40a	Is the privacy policy available in a machine-readable format?	<input checked="" type="radio"/> Yes <input type="radio"/> No	

41	Does the website use web measurement and customization technology?	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
42	Does the website have any information or pages directed at children under the age of thirteen?	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
43	Does the website contain links to non- federal government websites external to HHS?	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
REVIEWER QUESTIONS: The following section contains Reviewer Questions which are not to be filled out unless the user is an OPDIV Senior Officer for Privacy.			
Reviewer Questions		Answer	
1	Are the questions on the PIA answered correctly, accurately, and completely?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		
2	Does the PIA appropriately communicate the purpose of PII in the system and is the purpose justified by appropriate legal authorities?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		
3	Do system owners demonstrate appropriate understanding of the impact of the PII in the system and provide sufficient oversight to employees and contractors?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		
4	Does the PIA appropriately describe the PII quality and integrity of the data?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		
5	Is this a candidate for PII minimization?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		
6	Does the PIA accurately identify data retention procedures and records retention schedules?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		
7	Are the individuals whose PII is in the system provided appropriate participation?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		
8	Does the PIA raise any concerns about the security of the PII?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes	<input type="text"/>		

Reviewer Questions		Answer	
9	Is applicability of the Privacy Act captured correctly and is a SORN published or does it need to be?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes			
10	Is the PII appropriately limited for use internally and with third parties?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes			
11	Does the PIA demonstrate compliance with all Web privacy requirements?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes			
12	Were any changes made to the system because of the completion of this PIA?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
Reviewer Notes			

General Comments			
OPDIV Senior Official for Privacy Signature		HHS Senior Agency Official for Privacy	

Third-Party Website Assessment PIA Form

v 1.47.4

Status		Form Number	Read Only	Form Date	Read Only
Question		Answer			
1	OPDIV:	Read Only - OPDIV			
2	TPWA Unique Identifier (UID):	Read Only - TPWA UID			
3	TPWA Name:	Read Only - TPWA Name			
4	Is this a new TPWA?	<input type="radio"/> Yes <input type="radio"/> No			
4a	Please provide the reason for revision				

5	Will the use of a third-party Website or application create a new or modify an existing HHS/OPDIV System of Records Notice (SORN) under the Privacy Act?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
5a	Indicate the SORN number (or identify plans to put one in place.)	SORN Number: <input type="text"/> If not published: <input type="text"/>	
6	Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
6a	Indicate the OMB approval number and approval number expiration date (or describe the plans to obtain OMB clearance.)	OMB Approval Number <input type="text"/> Expiration Date <input type="text"/> Explanation <input type="text"/>	
7	Does the third-party Website or application contain Federal Records?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
8	Point of Contact (POC):	POC Title <input type="text"/> POC Name <input type="text"/> POC Organization <input type="text"/> POC Email <input type="text"/> POC Phone <input type="text"/>	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
9	Describe the specific purpose for the OPDIV use of the third-party Website or application:	<input type="text"/>	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
10	Have the third-party privacy policies been reviewed to evaluate any risks and to determine whether the Website or application is appropriate for OPDIV use?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
11	Describe alternative means by which the public can obtain comparable information or services if they choose not to use the third-party Website or application:	<input type="text"/>	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
12	Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
13	How does the public navigate to the third party Website or application from the OPIDIV?	<input type="text"/>	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
13a	Please describe how the public navigate to the third-party website or application:	<input type="text"/>	
13b	If the public navigate to the third-party website or application via an external hyperlink, is there an alert to notify the public that they are being directed to a nongovernmental Website?	<input type="radio"/> Yes <input type="radio"/> No	
14	Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
14a	Provide a hyperlink to the OPDIV Privacy Policy:	<input type="text"/>	

15	Is an OPDIV Privacy Notice posted on the third-party Website or application?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
15a	Confirm that the Privacy Notice contains all of the following elements: (i) An explanation that the Website or application is not government-owned or government-operated; (ii) An indication of whether and how the OPDIV will maintain, use, or share PII that becomes available; (iii) An explanation that by using the third-party Website or application to communicate with the OPDIV, individuals may be providing nongovernmental third-parties with access to PII; (iv) A link to the official OPDIV Website; and (v) A link to the OPDIV Privacy Policy	<input type="radio"/> Yes <input type="radio"/> No	
15b	Is the OPDIV's Privacy Notice prominently displayed at all locations on the third-party Website or application where the public might make PII available?	<input type="radio"/> Yes <input type="radio"/> No	
16	Is PII collected by the OPDIV from the third-party Website or application?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
17	Will the third-party Website or application make PII available to the OPDIV?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
18	Describe the PII that will be collected by the OPDIV from the third-party Website or application and/or the PII which the public could make available to the OPDIV through the use of the third-party Website or application and the intended or expected use of the PII:		<input checked="" type="radio"/> Accept <input type="radio"/> Reject
19	Describe the type of PII from the third-party Website or application that will be shared, with whom the PII will be shared, and the purpose of the information sharing:		<input checked="" type="radio"/> Accept <input type="radio"/> Reject
19a	If PII is shared, how are the risks of sharing PII mitigated?		
20	Will the PII from the third-party Website or application be maintained by the OPDIV?	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Accept <input type="radio"/> Reject
20a	If PII will be maintained, indicate how long the PII will be maintained:		
21	Describe how PII that is used or maintained will be secured:		<input checked="" type="radio"/> Accept <input type="radio"/> Reject
22	What other privacy risks exist and how will they be mitigated?		<input checked="" type="radio"/> Accept <input type="radio"/> Reject
REVIEWER QUESTIONS: The following section contains Reviewer Questions which are not to be filled out unless the user is an OPDIV Senior Officer for Privacy.			
Reviewer Questions		Answer	

REVIEWER QUESTIONS: The following section contains Reviewer Questions which are not to be filled out unless the user is an OPDIV Senior Officer for Privacy.

1 Are the responses accurate and complete?

☐ Yes

☒ Accept

☐ No

☐ Reject

Reviewer
Notes

2 Is the TPWA compliant with all M-10-23 requirements, including appropriate branding and alerts?

☐ Yes

☒ Accept

☐ No

☐ Reject

Reviewer
Notes

3 Has the OPDIV posted an updated privacy notice on the TPWA and does it contain the five required elements?

☐ Yes

☒ Accept

☐ No

☐ Reject

Reviewer
Notes

4 Does the PIA clearly identify PII made available and/or collected by the TPWA?

☐ Yes

☒ Accept

☐ No

☐ Reject

Reviewer
Notes

5 Is the handling of PII appropriate?

☐ Yes

☒ Accept

☐ No

☐ Reject

Reviewer
Notes

General
Comments

OPDIV Senior Official
for Privacy Signature

HHS Senior
Agency Official
for Privacy