

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

04/05/2024

**OPDIV:**

NIH

**Name:**

NCI: Community Engagement Initiative Study

**PIA Unique Identifier:**

P-2052711-909951

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

Electronic Information Collection

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

Initiation

**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.**

Contractor

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

New

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

No

**Indicate the following reason(s) for updating this PIA.****Describe the purpose of the system.**

The National Cancer Institute (NCI) Community Engagement Initiative Study ("NCI-CEIS"), conducted by the Office of Workforce Planning and Development (OWPD) aims to acquire information on how current NCI employees and fellows from across various racial and ethnic groups experience their work environment. The information collected by the study will be used to help NIH and NCI identify and implement processes and policies with the greatest impact on improving employee inclusion and equity.

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

Information collected for the NCI study is gathered by way of screening surveys, interviews, and focus groups. The screening survey is conducted via an online tool or over the phone and used to determine which NCI staff should be included in the study.

Information collected in the survey includes name and contact information such as email and phone number; general personal data including age range, race, ethnicity, gender, sex at birth, preferred

pronoun, sexual orientation, disability status, and highest level of education completed; as well as work related data including NCI division, office, or center, employment type, federal employment category, workforce type, and United States Public Health Service Commissioned Corps status. Those who are chosen to participate in the study will be contacted for scheduling and receive a virtual meeting invitation.

The study includes 40 interviews and two focus groups with up to 10 participants each. Using Webex, respondents are encouraged – but not required - to keep their camera on throughout the virtual interview. With the participants permission, interviews are audio recorded and transcribed. Information collected during the interviews and focus groups includes a description of the individuals' roles and responsibilities, NIH and NCI work history, and responses to culture, and experience related questions as it pertains to work application and hiring, onboarding, management and support, development and promotion, retention, and suggestions for future improvements.

The vendor, Westat, stores the survey responses, interview and focus group recordings, and transcriptions on an NIH-external share drive and provides NCI with an aggregated summary and de-identified transcripts. The system also stores project documents, reporting and materials related to screening protocols, interview topics and guides, study plans, interview scheduling, security assessments, security training and clearance, and application and server scans.

Westat staff access the information system by logging into the Westat network using their username and password followed by multi-factor authentication. Once logged into the system, staff access to the project share drive and application database is controlled by permission granted by project directors or system managers.

Respondents will receive a web link to the screener survey. A username or password is not required to enter and complete the screener survey.

**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.**

y/n - age 18 by June 15 of the current year

NCI Division, Office, or Center, Federal Employment Category, Occupation

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

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

500-4,999

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

Contacting individuals for scheduling interviews and follow-up outreach, if needed.

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

Demographic analysis for reporting

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

42 U.S.C. 241(d)

**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.**

09-25-0156, Records of Participants in Programs and Respondents in Surveys Used to Evaluate

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

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

OMB No.: 0925-0642

Expiration Date: 03/31/2026

**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.**

An invitation to participate in the survey is sent to all potential respondents and includes a notice that personal information will be collected.

**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 provide their information. However, in doing so, they will not be able to participate in the study.

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

For potential major changes to the system (e.g., disclosure and/or data uses change), study protocol (involving the Westat Institutional Review Board (IRB)) will have protections and options in place for notifying the participants.

**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.**

For potential inappropriate use and disclosure of PII data, study protocol (involving the Westat IRB) will have protections and options in place for the protection of PII and process for addressing participant concerns.

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

System functionality, security and accuracy are tested during system development and subsequently tested at regular intervals throughout the study period.

**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 to only access the minimum amount of PII necessary to perform their job. Requests for new users and/or new roles for existing users are requested by designated organizational coordinators through a central management system and approved through a formal procedure ensuring appropriate role assignment and justified need for information.

**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 to only access 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.**

Westat personnel receive human subjects' protection, privacy awareness, computer security awareness, and are required to sign a non-disclosure agreement. In addition, Westat is required to complete the annual NIH security awareness training. There are five categories of mandatory information technology (IT) training (Information Security, Counterintelligence, Privacy Awareness, Records Management and Emergency Preparedness). 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).**

Westat personnel receive additional training specific to their role on the study. During training, detailed guidelines regarding use, protections, and handling of PII are clearly defined and relevant to the specific data to which the user will be exposed.

**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.**

General Records Schedule (GRS) 06-201 Workforce and Succession Planning Records. Destroy 3 years after issuing each new plan, but longer retention is authorized if required for business use. DAA-GRS-2017-0007-0002

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

Administrative Controls: Administrators control account request and approval; annual trainings for cybersecurity education and awareness, incident reporting (IR), and contingency planning (CP); and annual review of the IR and CP plans. Procedures for onboarding and terminating staff.

Technical Controls: Access to the information is controlled by role-based authentication. 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 contractor Westat's primary data center located in Rockville, Maryland and secondary data center hosted by CoreSite in Reston, Virginia. At both data centers, policies, systems and procedures are in place to restrict access to and safeguard the data centers such as the use of magnetic key cards by all staff to access buildings and diesel-powered backup generators support the continuous operation of the data centers in case of long-term utility power failures. The data centers operates 24 hours a day, seven days a week, with operators on site every day, including late evening shifts during the week.

**Identify the publicly-available URL:**

Intake Survey:

<https://www.researchsurveys.org/EFM/e/10DED05D13AC097C>

Available to anyone with the link.

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?**

No

**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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