Privacy Impact Assessment (PIA)
for the

Institute of Education Sciences Peer Review Information Management Online (PRIMO)

Nov 26, 2018

This PIA was originally approved on   Apr 21, 2015   and reviewed on   Nov 1, 2018   by the system owner certifying the information contained here is current and up to date.

Contact Point

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System Owner

Name/Title: Dr. Anne Ricciuti

Program Office: Institute of Education Sciences (IES)

Please submit completed Privacy Impact Assessments to the Privacy Safeguards Division at privacysafeguards@ed.gov.

*Please complete this **Privacy Impact Assessment (PIA)** on how personally identifiable information (PII) is collected, stored, protected, shared, and managed electronically by your system. You may wish to consult with your ISSO in completing this document. **If a question does not apply to your system, please answer with N/A.***

All text responses are limited to 1,500 characters. If you require more space, please contact the Privacy Safeguards Team.

1. Introduction

1.1 Describe the system including the system name, system acronym, and a brief description of the major functions.

Peer Review Information Management Online (PRIMO) is a web-based peer review application created for the Department of Education's Institute of Education Sciences (IES). PRIMO is used to assist IES staff members and contractor staff, who manage the peer review process, by systematically assembling and maintaining files that are necessary and appropriate to the entire IES scientific peer review life cycle. Once applications are imported from G5, the Department's grants management system, application compliance, panel creation and meeting logistics are managed through PRIMO. Peer reviewers use PRIMO to declare potential conflicts of interest, to access grant applications to be reviewed, and to submit their review critiques and scores. PRIMO is also used to capture review panel discussion summaries written by panel members, and for online scoring during panel meetings. Housed within the PRIMO application is an electronic database or module called the Applicant Notification System (ANS). The ANS enables applicants who have requested grant support or received grant support, or both, from IES to electronically access information related to the scientific peer review of their applications, including application status, scores, critiques, and summary statements. Also included in PRIMO is an electronic database of current, former, and potential new peer reviewers that includes information about individuals' areas of expertise and prior IES peer review service (if any). This database is used by IES staff to identify and recruit panel members who are appropriate for particular review activities.

1.2 Describe the purpose for which the personally identifiable information (PII)[1] is collected, used, maintained or shared.

There are two primary purposes for the PII that is collected and maintained in PRIMO. The first purpose is to assist IES staff, who manage the peer review process, by systematically assembling and maintaining files that are necessary and appropriate to the scientific peer review of grant applications and report manuscripts submitted to IES; this includes allowing IES staff to efficiently identify and recruit appropriate peer reviewers. As part of the peer review process, applications and report manuscripts are also available to assigned peer reviewers for their opinions and evaluations of those applications or report manuscripts. The second use, specific to the ANS, is to enable applicants who have requested grant support from IES to electronically access the reviews and scores for their applications following the scientific peer review.

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1 The term "personally identifiable information" refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc. https://www.whitehouse.gov/sites/default/files/omb/memoranda/fy2007/m07-16.pdf

1.3 Is this a new system, or one that is currently in operation?

Currently Operating System

1.4 Is this PIA new, or is it updating a previous version? If this is an update, please include the publication date of the original.

Updated PIA   Original Publication Date: 04/21/2015

1.5 Is the system operated by the agency or by a contractor?

Contractor

2. Legal Authorities and Other Requirements
If you are unsure of your legal authority, please contact your program attorney.

2.1 What specific legal authorities and/or agreements permit and regulate the collection and use of data by the system?

This system is authorized under the Education Sciences Reform Act of 2002 (ESRA), 20 U.S.C. 9501 et seq.

SORN

2.2 Is the information in this system retrieved by an individual's name or personal identifier such as a Social Security Number or other identification? Please answer **YES** or **NO**.

Yes

2.2.1 ☐ N/A   If the above answer is **YES** this system will need to be covered by a Privacy Act System of Records Notice(s) (SORN(s)).[2] Please provide the SORN name and number, or indicate that a SORN is in progress.

The ANS is covered under the system of records noticed entitled "Institute of Education Sciences Principal Investigator/Application File and Associated Records," dated October 12, 2012 (71 FR 62226-62228; Department of Education/IES SORN 18-13-26). IES is currently in the process of amending SORN 18-13-26 to include all parts of the PRIMO application.

Records Management

If you do not know your records schedule, please consult with your records liaison or send an email to *RMHelp@ed.gov.*

2.3 Does a records retention schedule, approved by the National Archives and Records Administration (NARA), exist for the records contained in this system? If yes, please provide the NARA schedule number.

Records are maintained and disposed of in accordance with the Department's Records Disposition Schedule for Discretionary Grant File Records and Related Records (ED 254A.1).

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[2] A System of Records Notice (SORN) is a formal notice to the public that identifies the purpose for which PII is collected, from whom and what type of PII is collected, how the PII is shared externally (routine uses), and how to access and correct any PII maintained by ED. https://connected.ed.gov/om/Documents/ SORN-Process.pdf

2.4 Is the PII contained in this system disposed of appropriately, and in accordance with the timelines in the records disposition schedule? Please answer **YES** or **NO**.

Yes

3. Characterization and Use of Information

Collection

3.1 List the specific personal information data elements (e.g., name, email, address, phone number, date of birth, Social Security Number, etc.) that the system collects, uses, disseminates, or maintains.

PII about peer reviewers and applicants is maintained in PRIMO. For peer reviewers this includes: names, titles, institutional or organizational affiliations, professional contact information (including email addresses, addresses, and telephone numbers), and descriptions of areas of expertise. Demographic information (race, ethnicity) is also collected voluntarily for current and former peer reviewers; if provided by reviewers this information is also maintained in PRIMO. Additional information such as employment histories, professional activities, and academic credentials may be included in resumes or CVs that have been provided by peer reviewers or downloaded from professional home pages of potential new peer reviewers. These documents are not searchable in PRIMO.

For applicants this includes: names, institutional or organizational affiliations, and professional contact information (including email addresses, business addresses, and business telephone numbers). Additional personally identifiable information is included in grant applications, primarily within biographical sketches; applications are maintained in the system but information from biographical sketches is not extracted from those applications. Typical additional elements included in biographical sketches are employment histories, professional activities (publications, conference presentations, professional service activities), academic credentials, and current and pending support from other grant programs.

3.2 Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2? Please answer **YES** or **NO**.

Yes

3.3 What are the sources of information collected (e.g., individual, school, another agency, commercial sources, etc.)?

For peer reviewers, individual reviewers are the primary sources of information collected. Potential peer reviewers (i.e., those who have not yet been asked for a peer review activity) may also submit their own information to PRIMO for consideration. Other potential new peer reviewers' information is collected from publicly available websites (professional home pages and resumes or CVs if available online).

All PII included within the ANS is drawn from applicants' research grant applications, which are submitted either directly by a principal investigator or (more commonly) by an academic institution or other organization that employs a principal investigator. Principal investigators are responsible for the content of their applications.

3.4 How is the information collected from stated sources (paper form, web page, database, etc.)?

For potential new peer reviews: There are two methods of collecting information on potential new peer reviewers. First, those interested in becoming peer reviewers may submit their own information via a web page accessed through PRIMO. Second, information found on publicly available websites (professional home pages and resumes or curricula vitae) is added to the reviewer database by IES staff.

For those who have been asked and agreed to serve as peer reviewers, additional information is collected via a web page/web form in PRIMO.

For applicants and principal investigators: Research grant applications are submitted electronically through Grants.gov. Elements of PII that are extracted from applications are obtained from the SF424 (R&R) Application for Federal Assistance standard form that is part of every grant application.

3.5 How is this information validated or confirmed?[3]

When a person agrees to participate as an IES peer reviewer, the individual is required to validate and confirm their information in the system. The reviewer also has the opportunity to provide additional information, such as an emergency contact, additional expertise, alternate phone and email address.

When principal investigators create accounts in ANS in order to view and track the review of their application(s), they are asked to verify their information (creating an account is not required for grant consideration).

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[3] Examples include form filling, account verification, etc.

Use

3.6 Describe how and why the system uses the information to achieve the purpose stated in
Question 1.2 above.

As noted in question 1.2, there are two primary uses for the information that is collected and maintained in PRIMO. The first purpose is to assist IES staff in conducting scientific peer review activities for grant applications and report manuscripts submitted to IES. IES staff use information provided by reviewers (e.g., expertise, experience, academic credentials) to build appropriate panels of reviewers that will review and critique the grant applicants and report manuscripts submitted to IES. As part of the peer review process, applicants' applications are also available electronically to peer reviewers for their opinions and evaluations of those applications and report manuscripts. The second use, specific to the ANS, is to enable applicants to electronically access the reviews and scores for their applications following the peer review of those applications for scientific merit. Additionally, contractor staff use reviewer information (e.g., contact email address, phone number, address, etc.) to reimburse reviewers for their time and effort on the panel or report review and travel expenses. The information that is included in the system is collected as part of the research grant and report manuscript scientific review process, and is necessary to support IES' program for funding education research. The use of PRIMO increases the efficiency of IES' scientific peer review process.

3.7 Is the project using information for testing a system or for training/research purposes? Please
answer YES or NO.

No

3.7.1 ☒ N/A   If the above answer is **YES,** what controls are in place to minimize the risk and
protect the data?

3.8 Does the system use "live" PII for the development or testing of another system? Please answer YES or NO.

> No

    3.8.1 ☒ N/A   If the above answer is **YES,** please explain.

Social Security Numbers

It is the Department's Policy that, in order to collect Social Security Numbers, the System Owner must state the collection is: 1) authorized by law, 2) necessary for an agency purpose, and 3) there is no reasonable alternative.

3.9 Does the system collect Social Security Numbers? Please answer **YES** or **NO**.

> No

    3.9.1 ☒ N/A   If the above answer is **YES,** explain the purpose for its collection, and how the SSN will be used. *Please note if the system collects SSNs, the PIA will require a signature by the Assistant Secretary or equivalent.*

3.10 ☒ N/A   Specify any alternatives considered in the collection of SSN and why the alternatives were not selected.

4. Notice

4.1 How does the system provide individuals notice about the collection of PII prior to the collection of information (i.e. written Privacy Act notice, link to a privacy policy, etc.)? If notice is not provided, explain why not.

A link to the website's privacy notice is posted on the PRIMO home page. Also, Grants.gov, through which grant applications are submitted, includes a link to its privacy policy from the website's home page.

4.2 ☐ N/A Provide the text of the notice, or the link to the webpage where the notice is posted.

PRIMO - https://iesreview.ed.gov/Home/PrivacyPolicy

Grants.gov - https://www.grants.gov/web/grants/privacy.html

4.3 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

An individual can decline an invitation to participate in IES' peer review. Additionally, there is some information that isn't required in a reviewer's profile. Basic contact information is required if a reviewer intends to participate in peer review, but they may opt out of providing additional information, such as an emergency contact person's name and information, alternate email address or phone number. Also, if an individual, when asked to do some peer review activity, indicates that he or she doesn't want to be considered for such activities, some minimal information is maintained in PRIMO in order to ensure that the individual is not re-contacted in the future.

Applicants may choose to include more or less information in the biographical sketches included in their applications, but once a principal investigator has submitted an application, all of the information included in that application becomes part of the record and is available to peer reviewers who are asked to evaluate the quality of the proposed research. PII that is extracted from the SF424 form is necessary for communications with applicants, and applicants cannot opt not to provide that information.

5. Information Sharing

Internal

5.1 Will information be shared internally with other ED organizations? Please answer **YES** or **NO**. If the answer is **NO**, please skip to Question 5.4.

No

5.2 ☒ N/A   What information will be shared and with whom?

5.3 ☒ N/A   What is the purpose for sharing the specified information with the specified internal organizations? Does this purpose align with the stated purpose in Question 1.2 above?

External

5.4 Will the information contained in the system be shared with external entities (e.g. another agency, school district, etc.)? Please answer **YES** or **NO**. If the answer is **NO**, please skip to Question 5.8.

Yes

5.5 ☐ N/A   What information will be shared and with whom? Note: If you are sharing Social Security Numbers, externally, please specify to whom and for what purpose.

External sharing and disclosure are limited to individuals directly involved with the peer review of research grant applications that have been submitted to the Institute. These include authorized staff members of IES' contractor for the peer review of research grant applications; peer reviewers, who have access limited to applications currently under review by the panel on which they are serving; and principal investigators and authorized representatives of applicant organizations, who only have access to information about applications that they have submitted.

5.6 ☐ N/A   What is the purpose for sharing the specified information with the specified external organizations? Does this purpose align with the stated purpose in Question 1.2 above?

The purposes are as stated in Question 1.2. IES' contractor maintains the system and conducts numerous activities to ensure efficient and appropriate processing and review of grant applications. Information is shared with peer reviewers to allow them to adequately evaluate the quality of the applications that they are asked to review. Authorized representatives and principal investigators are asked to create accounts in ANS so that they can obtain information about the review of their own grant applications in as timely a manner as possible.

5.7 ☐ N/A   How is the information shared and used by the external entity?

> All individuals accessing information from the system are required to have accounts in the system; the levels and types of access vary so that individuals have access only to the types of information that they need to conduct the activities for which they are authorized, and only for the amount of time that those activities are authorized.

5.8   ☐ N/A   Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding (MOU) or other type of approved sharing agreement with another agency? Please answer **YES** or **NO**.

> No

5.9   ☐ N/A   Does the project place limitation on re-disclosure? Please answer **YES** or **NO**.

> Yes

6. Redress[4]

6.1 What are the procedures that allow individuals to access their own information?

> Current peer reviewers have active PRIMO accounts that they can access with personalized login credentials to view and update the information that they submitted.
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> All of the information received from applicants is available to them in the ANS module. The results of peer review - scores and narrative critiques - are also available to them following the peer review. They can access all of this information directly by creating an account and logging in.

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[4] If the system has a System of Records Notice (SORN), please provide a link to the SORN in Question 6.1 and proceed to Section 7 - Safeguards.

6.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Current peer reviewers can make changes to their account once they are logged into PRIMO. Changes in contact information can also be made by contacting the help desk maintained by the contractor. Changes to other information included in a grant application cannot be made - grant applications cannot be modified once submitted.

6.3 How does the project notify individuals about the procedures for correcting their information?

Information about contacting the help desk is visible on the PRIMO website. There is also a user guide available for reviewers and applicants upon logging in to the system ("How to Update Your Personal Information").

7. Safeguards

If you are unsure which safeguards will apply, please consult with your ISSO.

7.1 Does the principal office work with their CSO/ISSO to build privacy & security into the system and build privacy extensions to the extent feasible? Please answer **YES** or **NO**.

Yes

7.2 What procedures or access controls are in place to determine which users may access the information and how does the project determine who has access?

The system enforces assigned authorizations by controlling access based on the individual's role in the review process. Each individual's access is determined by the system administration in conjunction with IES and other administrative staff. These rights are re-assessed periodically by PRIMO's administrator.

7.3 What administrative, technical, and physical safeguards are in place to protect the information?

The PRIMO application, hosted in the IES Data Center, offers a high degree of resistance to tampering and circumvention. In addition to computer system safeguards (FEDRAMP and FISMA requirements), access to PII in PRIMO software is restricted based on an individual's role. Access to PRIMO is carefully controlled and re-assessed periodically. All user passwords are salted and hashed using SHA-1 as well as randomized salts. Passwords must be changed every 90 days.

The system has share-level and file-level security utilizing New Technology File System (NTFS), which is built into the Windows Server 2012 R2 operating system. The system administrator grants or denies access to users or groups of users at the folder or file level. Several system groups are established within the Windows server to permit fine-grained control of user access to project folders. No other contractor users or groups of users will be given access to these folders or files.

7.4 Is an Authority to Operate (ATO) required? Please answer **YES** or **NO**.

Yes

7.5 Is the system able to provide account of any disclosures made? Please answer **YES** or **NO**.

Yes

7.6 Is the information in the system appropriately secured in accordance with the IT security requirements and procedures as required by federal law and policy? Please answer YES or NO.

Yes

7.7 Has a risk assessment been conducted where appropriate security controls to protect against that risk been identified and implemented? Please answer YES or NO.

Yes

7.8 Please describe any monitoring, testing or evaluation conducted on a regular basis to ensure the controls continue to work properly at safeguarding the information.

The PRIMO application is hosted on the IES Data Center (services provided by Amazon Web Services).The IES Data Center has undergone FISMA Moderate Certification and received an Authority to Operate (ATO) in November 2017. All documentation to support the IES Data Center ATO can be found in the Department's Cybersecurity Assessment and Management database (CSAM). The IES Data Center also undergoes a yearly FISMA Self-Assessment. There are multiple layers of firewalls, an Intrusion Detection System, Einstein Monitoring, and monthly security scanning. IESDC is hosted in Amazon GovCloud, which is FEDRAMP certified.

8. Auditing and Accountability

8.1 How does the system owner ensure that the information is used in accordance with stated practices in this PIA?

The system owner approves requests for access to the system, determines the level of access that should be granted, and requests that access be terminated for individuals who no longer have a need for such access (because they are no longer employed by the Institute, for example). The system owner works with her staff and with contractor staff to ensure that grant peer reviewers receive appropriate training and understand the rules for confidentiality involved with the peer review process. The system owner authorizes the timetable for release of peer review information (scores and critique summary statements) to applicants through the ANS.

8.2 What are the privacy risks associated with this system and how are those risks mitigated?

This system has minimal effect on the privacy of individuals. As an IT system, we do presume there is an inherent risk of data loss. However, the PII collected and stored in the system is mostly drawn from public websites, so the privacy risks are minimal. No information other than that which is collected or generated as part of the grant application submission and review process is included in the system. Also, the information collected is not used to link or cross-reference multiple databases. Access to information in the system is strictly controlled, and personal login credentials are established and maintained according to current government IT standards. Individuals with access to the system include: authorized staff members of the Institute and its contractor who have responsibilities related to the review of research grant applications and report manuscripts; peer reviewers, who have access limited to report manuscripts under review or applications currently under review by the panel on which they are serving; and principal investigators and authorized representatives of applicant organizations, who only have access to information about applications that they have submitted. Disclosure of personally identifying information from the system will be made only to the extent that there is a published routine use that is compatible with the statutory and program purposes for which the records were collected, or that the disclosure is otherwise authorized by the Privacy Act.