



## **Privacy Impact Assessment**

For

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

Date:

May 4, 2015

Point of Contact and System Owner:

**Dr. Anne Ricciuti**  
anne.ricciuti@ed.gov

Author:

**Ellie Pelaez**  
ellie.pelaez@ed.gov

**Institute of Education Sciences (IES)  
U.S. Department of Education**



## 1. System Information.

*Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions. Indicate whether the system is new or existing and whether or not the PIA is new or being updated from a previous version; specify whether the system is “agency” or “contractor.”*

This is a new Privacy Impact Assessment for an operational system. Peer Review Information Management Online (PRIMO) is a Web-based peer review system created for the Department of Education's Institute of Education Sciences (IES). PRIMO is used to assist in IES' entire peer review lifecycle. Once applications are imported from G5, the Department's grants management system, PRIMO manages application compliance, panel creation and meeting logistics, declaration of conflicts of interest, reviewer critiques and scoring, as well as panel reviews and summary statements.

Currently, PRIMO is managed by a contractor, SRA International, Inc.

## 2. Legal Authority.

*Cite the legal authority to collect and use this data. What specific legal authorities, arrangements, and/or agreements regulate the collection of information?*

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

## 3. Characterization of the Information.

*What elements of personally identifiable information (PII) are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number)? What are the sources of information (e.g., student, teacher, employee, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?*

Personally identifiable information about peer reviewers will be maintained in the system; this includes names, titles, institutional or organizational affiliations, professional contact information (including email addresses, addresses, and telephone numbers), employment histories, professional experiences, academic credentials, and demographic information (race, ethnicity) if provided by reviewers. All PII included within the system are drawn from information submitted by the peer reviewer through the PRIMO website or via paper forms submitted by secured fax. The information collected is not used to link or cross-reference multiple databases.

## 4. Why is the information collected?

*How is this information necessary to the mission of the program, or contributes to a necessary agency activity? Given the amount and any type of data collected, discuss the privacy risks (internally and/or externally) identified and how they were mitigated.*

The information that is included in the system is collected as part of the reports and research grant application and review process, and is necessary to support the Institute's program for funding education research. The use of PRIMO increases the efficiency of the scientific peer review process.

PRIMO has little effect on the privacy of individuals. Access to the information in the peer review system is strictly controlled. Individuals with access to the system include: authorized staff members of IES and its contractor who have responsibilities related to the review of research grant applications; peer



reviewers have access to the names and professional affiliations of other reviewers serving on the same panel(s) on which they are serving, but do not have access to any additional information.

## **5. Social Security Number (SSN).**

*If an SSN is collected and used, describe the purpose of the collection, the type of use, and any disclosures. Also specify any alternatives that you considered, and why the alternative was not selected. If system collects SSN, the PIA will require a signature by the Assistant Secretary or designee. If no SSN is collected, no signature is required.*

The PRIMO system does not collect, maintain, or store SSNs.

## **6. Uses of the Information.**

*What is the intended use of the information? How will the information be used? Describe all internal and/or external uses of the information. What types of methods are used to analyze the data? Explain how the information is used, if the system uses commercial information, publicly available information, or information from other Federal agency databases.*

There are two primary uses for the information that are collected and maintained in this system. 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 reports 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 grant applications submitted to IES.

Additionally, contracting staff use reviewer information (e.g., contact email, phone, address, etc.) to reimburse reviewers for their time and effort on the panel and travel expenses.

The collection of demographic information is used for informational purposes only; reviewers may opt out of providing this information.

## **7. Internal Sharing and Disclosure.**

*With which internal ED organizations will the information be shared? What information is shared? For what purpose is the information shared?*

Internal sharing and disclosure is limited only to authorized Institute staff members who have responsibilities related to the peer review of grant applications and reports. There are no plans for any additional sharing of information from the system internally within ED.

## **8. External Sharing and Disclosure.**

*With what external entity will the information be shared (e.g., another agency for a specified programmatic purpose)? What information is shared? For what purpose is the information shared? How is the information shared outside of the Department? Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding or other type of approved sharing agreement with another agency?*

External sharing and disclosure will be limited to individuals directly involved with the peer review of research grant applications and reports that have been submitted to IES. These include authorized staff



members of the Institute's contractor for the peer review of research grant applications and reports; and peer reviewers, who have access limited to information relevant to review activities on which they are currently working. There are no plans for any additional sharing of information from the system with any external entities, and there are no plans to engage in a computer matching program with the information in this system.

## 9. Notice.

*Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice)? What opportunities do individuals have to decline to provide information (where providing the information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent?*

Yes, a link to the website's privacy notice is posted on the PRIMO home page. The notice states that no PII is collected unless a user chooses to provide that information.

## 10. Web Addresses.

*List the web addresses (known or planned) that have a Privacy Notice.*

<https://iesreview.ed.gov/Home/PrivacyPolicy>.

## 11. Security.

*What administrative, technical, and physical security safeguards are in place to protect the PII? Examples include: monitoring, auditing, authentication, firewalls, etc. Has a C&A been completed? Is the system compliant with any federal security requirements?*

The computer system employed by IES' contractor for the peer review of research grant applications offers a high degree of resistance to tampering and circumvention. 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.

The system has share-level and file-level security utilizing New Technology File System (NTFS), which is built into the Windows 2008 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.

The system's servers are located at the Savvis DC3 data center and are protected by Savvis' procedures governing physical access to the servers. Access to sensitive areas is controlled by means of key cards, ID badges, security guards, biometric hand scanners, key-locked equipment cages, continuous video surveillance, and man traps equipped with key cards. Man traps are defined as "a physical security access control system comprising a small space with two sets of interlocking doors, such that the first set of doors must close before the second set opens."



## 12. Privacy Act System of Records.

*Is the information within the system retrieved by personal identifier? If so, is a system of records being created or altered under the Privacy Act, 5 U.S.C. 552a? Is this a Department-wide or Federal Government-wide SORN? If a SORN already exists, what is the SORN Number?*

PRIMO does not retrieve information by name or personal identifier, so a System of Records Notice is not required.

## 13. Records Retention and Disposition.

*Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected? If yes – provide records 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).