

Department of Energy
Privacy Impact Assessment (PIA)

Name of Project: Computerized Accident/Incident Reporting System

Bureau: Department of Energy

Project's Unique ID: 019-10-01-22-02-3015-00

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A. CONTACT INFORMATION

1) Who is the person completing this document?

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2) Who is the system owner?

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3) Who is the system manager for this system or application?

Raymond Holmer, Director, Office of Information Management, Office of Health, Safety and Security, US Department of Energy, HS-1.22, 1000 Independence Ave., S.W., Washington, D.C. 20585, 301-903-7325 will manage the application components of the system.

4) Who is the IT Security Manager who reviewed this document?

Vinh Le, Office of Information Management, Office of Health, Safety and Security, U.S. Department of Energy, HS-1.22, 1000 Independence Ave., S.W., Washington, D.C. 20585, 301-903-4648.

5) Who is the Privacy Act Officer who reviewed this document?

Kevin Hagerty, Director, Office of Information Resources, U.S. Department of Energy, MA-90, 1000 Independence Avenue, S.W., Washington, DC 20585, 202-586-8037.

B. SYSTEM APPLICATION/GENERAL INFORMATION

1) Does this system contain any information about individuals?

Yes, this Computerized Accident/Incident Reporting System (CAIRS) contains names, home addresses, and birth dates of DOE employees or DOE contractors who suffer an injury or illness on DOE facilities or DOE contractor facilities.

a. Is this information identifiable to the individual? ¹

Yes, this information may be identifiable to an individual.

b. Is this information about individual members of the public?

¹ Identifiable Form – According to the OMB Memo M 03-22, this means information in an IT system or online collection: (i) that directly identified an individual (e.g. name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect information (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

No, this information is not about individual members of the public.

c. Is the information about employees?

Yes, this information is about DOE and DOE contractor employees.

2) What is the purpose of the system/ application?

CAIRS is a database used to collect and analyze DOE and DOE contractor reports of injuries, illnesses, and other accidents that occur during DOE operations in accordance with DOE Order 231.1A, *Environment, Safety and Health Reporting*. CAIRS is certified and accredited under the security boundary of HSS Reporting Databases and Systems enclave.

3) What legal authority authorizes the purchase or development of this system/application?

The Department of Energy Organization Act, 42 U.S.C. 7101–7385o, the Energy Reorganization Act of 1974 (ERA), 42 U.S.C. 5801–5911, and the Atomic Energy Act of 1954, as amended, (AEA) 42 U.S.C. 2011, require DOE to protect the public safety and health, as well as the safety and health of workers at DOE facilities, in conducting its activities, and grant DOE broad authority to achieve this goal. Section 234C of the AEA makes DOE contractors (and their subcontractors and suppliers thereto) covered by the DOE Price-Anderson indemnification system, subject to civil penalties for violations of the worker safety and health requirements promulgated in this part. 42 U.S.C. 2282c. Title 10 CFR Part 820 sets forth the procedures DOE will use in exercising its enforcement authority. Compliance is based on regulations found in the following rules: 29 U.S.C 651 et seq. *Occupational Safety and Health Act*, 29 CFR 1904 *Recording and Reporting Occupational Injuries and Illnesses*, 29 CFR 1960 *Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters*, 10 CFR 851 *Worker Safety and Health*. Specifically, 10 CFR 851.26 *Record Keeping and Reporting* ensures that the work-related injuries and illnesses of its workers and subcontractor workers are recorded and reported accurately and consistent with DOE Manual 231.1–1A, *Environment, Safety and Health Reporting Manual*.

C. DATA IN THE SYSTEM

1) What categories of individuals are covered in the system? (e.g., agency employees, contractor employees, visitors, volunteers, etc.)

DOE and DOE contractor and subcontractor employees who have work related injuries or illnesses are the categories of individuals covered in the system.

2) What are the sources of the information in the system?

a. Is the source of the information from the individual or is it taken from another source?

The source of the information is from the site medical providers, human resource records, and the individual, recorded by a designated case investigator.

b. What Federal Agencies are providing data for use in the system?

None.

c. What Tribal, State and local agencies are providing data for use in the system?

None.

d. What other third party sources will data be collected from?

None.

e. What information will be collected from the employee?

The information collected from the employee will be from the “Information about the

Employee” section on DOE F 5484.3, namely; Full Name, ID Number or Badge Number, Home Address, Date of Birth, Date of Hire, Gender, Job Title, Occupation code, Experience on the Job, and Length of employment. Other information to help analysis of the particular injury or illness of the employee, such as a narrative description of the events that led to the case, causes of the case, and workdays loss because of the case are collected also. A hard copy of the form may be found at <http://management.energy.gov/documents/5484-3.pdf>.

3) Accuracy, Timeliness, and Reliability?

Information is provided by the individual to whom it pertains and the case investigator, therefore the information is accurate at the time it is provided.

a. How will data collected from sources other than DOE records and the subject be verified for accuracy?

N/A, data is not collected from sources other than DOE records.

b. How will data be checked for completeness?

The data is provided by the individual and the case investigator, therefore the information is complete at the time it is provided. The application performs a number of validation checks on input data before it may be submitted into production. Many values are selected from a predetermined list with no deviations allowed. Cases numbers are rolled up to an aggregate report for each organization that is checked for completeness on a quarterly basis.

c. Is the data current? How do you know?

Data collection is continuous and case modifications to previously reported cases are made on a quarterly basis. New case data must be reported at least twice a month. Some data fields are dynamic. Data must be marked current by the end of each quarterly reporting period as per DOE M 231.1-1A.

4) Are the data elements described in detail and documented? If yes, what is the name of the document?

Yes, data elements are described in DOE M 231.1-1A Appendix C.

D. ATTRIBUTES OF THE DATA

1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes, the data is relevant and necessary to the purpose for which the system was designed.

2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?

No, the system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

3) Will the new data be placed in the individual’s record?

N/A, the system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

4) **Can the system make determinations about the record subject that would not be possible without the new data?**

No, the system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

5) **How will the new data be verified for relevance and accuracy?**

N/A, the system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

6) **If data is being consolidated, what controls are in place to protect the data from unauthorized access or use**

N/A

7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

N/A. Processes are not being consolidated.

8) **How will the data be retrieved? Is it retrieved by personal identifier? If yes, explain.**

Information will be retrieved by assigned organization code, case identification number., date,

9) **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

Individual case reports are produced on individuals. The reports are used by management, analyst and accident investigators or inspectors who may review the reports to determine causes of accident or incident and ways that may prevent reoccurrence. Access to individual reports that contain privacy information is on a need-to-know basis

10) **What opportunities do individuals have to decline to provide information (e.g. where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?**

Information is voluntarily provided and required by law for OSHA reporting purposes. Information is not to be used for other than required or authorized uses.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS

1) **If the system is operated at more than one location, how will consistent use of the system and data be maintained?**

The data are only stored at one location.

2) **What are the retention periods of data in the system?**

The retention periods are in accordance with DOE Administrative Records Schedule 1-34 "Occupational Injury and Illness Files (N1-434-98-4). See http://cio.energy.gov/documents/ADM_1.pdf.

3) **What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

Disposition procedures for Occupation Injury and Illness files are found at DOE Administrative Records Schedule 1.34 (N1-434-98-4 item 34). Reports and logs (including Occupational Safety and

Health Administration (OSHA) Forms 300, 300A, and 301 or equivalents) maintained as prescribed in 29 CFR 1904, DOE M 231.1-1A, and 29 CFR 1960 to document all recordable occupational injuries and illnesses for each establishment. Records are kept for 75 years and then destroyed. See http://cio.energy.gov/documents/ADM_1.pdf.

- 4) **Is the system using technologies in ways that the DOE has not previously employed?**
No.
- 5) **How does the use of this technology affect public/employee privacy?**
N/A. The system is not using technologies in ways that the DOE has not previously employed.
- 6) **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**
No the system does not have the capability to identify, locate or monitor individuals.
- 7) **What kinds of information are collected as a function of the monitoring of individuals?**
The system will not be used for monitoring of individuals.
- 8) **What controls will be used to prevent unauthorized monitoring?**
The system will not be used for monitoring.
- 9) **Under which Privacy Act system of records notice does the system operate? Provide number and name.**
Accident and Occurrence Reports are operated under DOE-38 "Accident and Industrial Records."

The information maintained in the ORPS and P2 systems is retrieved by subject matter, therefore a Privacy Act system of records notice is not required.
- 10) **If the system is being modified, will the Privacy Act system of record require amendment or revision? Explain.**
No the system of records is not being modified or amended.

F. ACCESS TO DATA

- 1) **Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?**
System Administrators, Database Administrators, Users, and Developers. Individual users will not have access to personal information. Designated safety/case officers for each organization, that input the individual cases will be able to input and review information about each case they input for their particular organization.
- 2) **How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**
User profiles are established and roles are defined for those profiles. Roles determine which users see which data. Criteria, procedures, controls, and responsibilities are documented.

- 3) **Will users have access to all data on the system or will the user's access be restricted?**
User's access will be restricted.
- 4) **What controls are in place to prevent the misuse (e.g., browsing) of data by those having access?**
Profiles/role control will ensure that only the data that should be accessible to that individual will appear on the screen.

Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?

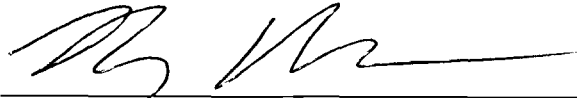
Yes. Contractors were involved with the design and development of the system and will be involved with the maintenance of the system. Information may be disclosed to contractors and their officers and employees in performance of their contract. Individuals provided this information are subject to the same limitation applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Pertinent contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need-to-know basis. Contractors are required to safeguard all information they may obtain in accordance with the provisions of the Privacy Act and the requirements of DOE. The contractor shall ensure that all documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.

- 5) **Do other systems share data or have access to data in this system? If yes, explain?**
No other systems share the data or have access to the data in the system.
- 6) **Who will be responsible for protecting the privacy rights of the employees affected by the interface?**
N/A, the system does not share data with another system. There is no interface to be responsible for.
- 7) **Will other agencies share data or have access to data in this system?**
No.
- 8) **How will the data be used by the other agency?**
N/A, data is not shared with other agencies.
- 9) **Who is responsible for assuring proper use of the data?**
N/A, data is not shared with other agencies.

The Following Officials Have Approved this Document

1) System Manager

 (Signature) 6/11/08 (Date)

Name: Raymond Holmer

Title: Director, Office of Information Management

2) Privacy Act Officer

 (Signature) 6/13/08 (Date)

Name: Kevin T. Hagerly

Title: Director, Office of Information Resources

3) Senior Official for Privacy Policy

 (Signature) 6-13-08 (Date)

Name: Ingrid Kolb

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