

Department of Energy
Privacy Impact Assessment (PIA)

Name of Project: Occupational Injury/Illness Database (OII) - RL-2007/Project Hanford Management Contract - PHMC (Fluor)

Bureau: U.S. Department of Energy (DOE)

Project's Unique ID: Occupational Injury/Illness Database (OII) as part of OMB Exhibit 53 Identification number: 019-10-01-15-02-0007-00 (RL PHMC Non-Major Mission Support IT Investments)

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A. CONTACT INFORMATION:

1. Who is the person completing this document?

Pamela R. Edwards
Information Services
Fluor Hanford
P.O. Box 1000 MSIN H7-22
Richland, WA 99352

2. Who is the system owner?

Doug Shoop
Office of Safety and Health
U.S. Department of Energy
Richland Operations Office
P.O. Box 550 MSIN A5-14
Richland, WA 99352

3. Who is the System Manager for this system or application?

Dana Kranz
Chief Information Officer
U.S. Department of Energy
Richland Operations Office
P.O. Box 550 MSIN A2-15
Richland, WA 99352

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

Harry Bell
U.S. Department of Energy
Richland Operations Office
P.O. Box 550 MSIN A6-35
Richland, WA 99352

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

Dorothy Riehle
Privacy Act Officer
U.S. Department of Energy
Richland Operations Office
825 Jadwin Avenue
Richland, WA 99352

Abel Lopez, Director
FOIA/Privacy Act Group
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585
202-586-5958

B. SYSTEM APPLICATION/GENERAL INFORMATION:

- 1) **Does this system contain any information about individuals?** Yes.
 - a. **Is this information identifiable to the individual?** ¹ Yes.
 - b. **Is the information about individual members of the public?** Yes.
 - c. **Is the information about DOE or contractor employees?** Yes
- 2) **What is the purpose of the system/application?** The OII application is used to record and track all occupational injury/illness, government vehicle accident and government property loss incidents for which Fluor Hanford is responsible.
- 3) **What legal authority authorizes the purchase or development of this system/application?** 5 United States Code (U.S.C.), Section 301; Department of Energy Organization Act, including authorities incorporated by reference in Title III of the Department of Energy Organization Act; Federal Tort Claims Act, 28 United States Code (U.S.C.) 2671-2680; Military Personnel and Civilian Employees Claims Act, 31, 31 United States Code (U.S.C.) 240-243; Executive Order 12009.

¹ "Identifiable Form" - According to the OMB Memo M-02-22, this means information in an IT system or online collection: (i) that directly identifies 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 identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptor).

C. DATA in the SYSTEM:

- 1) What categories of individuals are covered in the system?** Persons incurring an injury or illness or involved with a vehicle accident or property damage incident at the Hanford facility while performing work for Fluor Hanford. To include employees, prospective employees, subcontractor employees, visitors and vendors for which Fluor Hanford is responsible.
- 2) What are the sources of the information in the system?**
 - a. Is the source of information from the individual or is it taken from another source?** The source of data is from both the individual to whom it pertains and other sources (listed in 2.d).
 - b. What Federal agencies are providing data for use in the system?** DOE.
 - c. What tribal, state, and local agencies are providing data for use in the system?** None.
 - d. From what other third party sources will data be collected?** Data will be collected from AdvanceMed Hanford (Site Occupational Medical Provider), the DOE third party administrator for the Washington State Workers Compensation system (CCSI), witnesses, and the employee's line management.
 - e. What information will be collected from the employee and the public?** Name, address, social security number, date of birth, home or business telephone number, medical documentation relating to the involved injury or illness.
- 3) Accuracy, Timeliness, and Reliability**
 - a. How will data collected from sources other than DOE records be verified for accuracy?** Since the data is provided by the individual to whom it pertains, it is assumed that the information is accurate at the time it is provided. Some individual supplied information is validated through other sources such as medical records, witness statements, and line management investigations. Information provided by the identified third party sources is considered reliable.
 - b. How will data be checked for completeness?** Fluor Hanford employs a graded approach investigative process involving line management, safety professionals and case management specialists (CMS) to determine the facts surrounding injury and illness occurrences and the causes for such

occurrences. The assigned CMS is responsible for assuring the completeness and accuracy of data collected for the involved event.

- c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?** Data is maintained by the assigned CMS for a 5 year period following injury or illness occurrence as required by DOE Order, Fluor Hanford HNF-PRO-077, *Reporting, Investigating and Managing Health, Safety and Property/Vehicle Events*, and Fluor Hanford OSH-2, *Case Management Desk Instruction*.
- d. Are the data elements described in detail and documented?** Yes. The data elements are described in the data schema.

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.
- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?** No.
- 3) Will the new data be placed in the individual's record?** N/A
- 4) Can the system make determinations about employees/public that would not be possible without the new data?** N/A.
- 5) How will the new data be verified for relevance and accuracy?** N/A
- 6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?** No, data is not being consolidated.
- 7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?** N/A
- 8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.** Yes, data is retrieved by the Hanford Identification (HID), name, social security number or a combination of identifiers.
- 9) What kinds of reports can be produced on individuals?** The authorized user can generate a variety of reports that are used in the conduct of business to include the Occupational Safety and Health Administration (OSHA) 300 Form, *Log of Work-Related Injuries and Illnesses*, the DOE 5484.3 Form, *U*.

S. Department of Energy Individual Accident/Incident Report, and summary injury and illness summary reports by individual.

What will be the use of these reports? Reports will be used to meet DOE occupational injury and illness reporting requirements and Fluor Hanford business requirements.

Who will have access to them? Only authorized personnel have access to the reports. These reports contain official use only information and access to them is controlled by Fluor Hanford HNF-PRO-184, *Information Protection and Clearance* requirements.

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). N/A

E. Maintenance and Administrative Controls:

- 1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?** N/A. The system is not operated in more than one site.
- 2) What are the retention periods of data in this system?** Records retention and disposal authorities are contained in the National Archives and Records Administration (NARA) General Records Schedule and DOE record schedules that have been approved by NARA.
- 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?** Procedures are documented in the Records Schedule and established in accordance with NARA General Records Schedule.
- 4) Is the system using technologies in ways that the DOE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?** No.
- 5) How does the use of this technology affect public/employee privacy?** N/A
- 6) Will these systems provide the capability to identify, locate, and monitor individuals?** No.
- 7) What kinds of information are collected as a function of the monitoring of individuals?** N/A
- 8) What controls will be used to prevent unauthorized monitoring?** N/A

9) **Under which PA system of records notice does the system operate?** DOE-38 “Occupational and Industrial Accident Reports.”

10) **If the system is being modified, will the PA system of records notice require amendment or revision?** No.

F. Access to Data:

1) **Who will have access to the data in the system?** Only authorized personnel who have a need to know and are approved by management. Application and data access is controlled first via a network access logon id and complex password. The majority of software applications have secondary authentication and access controls implemented including role based security controls that require management approval prior to granting. Direct database access is controlled administratively through policy and through reviews of access control lists by management.

Routine uses of records are:

1. A record from this system may be disclosed as routine use to DOE contractors for performance of their contracts.
2. A record from this system may be disclosed as routine use to physicians, the Department of Labor, various state departments of labor and industry groups, and contractors who use information.
3. A record from this system may be disclosed as routine use for investigation, settlement of claims or preparation and conduct of litigation to relevant persons.
4. A record from this system may be disclosed as routine use for use in court or administrative proceedings.
5. A record from this system may be disclosed as allowed under 29 CFR 1904.35.

2) **How is access to the data by a user determined?** Access is governed on a need-to-know basis approved by management.

3) **Will users have access to all data on the system or will the user’s access be restricted?** Access is role dependent, as authorized by the job function and approved by management.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?** Administrative (procedure), authentication policy, and physical controls are implemented to prevent

misuse. Role based access control and management approvals assist in providing multiple layers of protection.

- 5) **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 PA contract clauses inserted in their contracts and other regulatory measures addressed?** Yes. 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 that they may obtain in accordance with the provisions of the Privacy and the requirements of the DOE Richland Office. The contractor shall ensure that all DOE Richland Office documents and software processed, and the information contained therein, are protect for unauthorized use and mishandling by assigned personnel.

- 6) **Do other systems share data or have access to the data in the system? If yes, explain.** Yes. The system interfaces are documented in interface agreements and specification documents. All interfaces are required to sign annual non-disclosure agreements. Interfaces include:

- Hanford PeopleCORE (HPC) for internal Hanford roster

- 7) **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

Gary Loiacono, Director
Security and Emergency Services Division
U.S. Department of Energy
Richland Operations Office
P.O. Box 550 MSIN A6-35
Richland, WA 99352

- 8) **Will other agencies share data or have access to the data in this system?**
No.

- 9) **How will the data be used by the other agency?** N/A

- 10) **Who is responsible for assuring proper use of the data?** N/A

The Following Officials Have Approved this Document

1. System Manager

Harry E. Bell (Signature) 8/28/07 (Date)
for Name: Dana Kranz
Title: RL Chief Information Officer

2. Privacy Act Officer (Field Office)

Dorothy Riehl (Signature) 9/28/07 (Date)
Name:
Title: Dorothy Riehl, RL and PA Officer

3. Privacy Act Officer (Headquarters)

Abel Lopez (Signature) 9/6/07 (Date)
Name: Abel Lopez
Title: Director, FOIA and Privacy Act Group

4. Senior Official for Privacy Policy

Ingrid A.C. Kolb (Signature) 9-7-07 (Date)
Name: Ingrid A.C. Kolb
Title: Director, Office of Management