



Department of Energy

Privacy Impact Assessment (PIA)

MODULE I – PRIVACY NEEDS ASSESSMENT		
Date	07/28/2022	
Departmental Element & Site	Environmental Management (EM) Fluor Idaho, LLC Idaho Cleanup Project (ICP) Idaho National Laboratory (INL) 1580 Sawtelle Street Idaho Falls, Idaho 83402	
Name of Information System or IT Project	INTEGRATED SAFETY EVALUATION DATABASE	
Exhibit Project UID	Contract No. DE-EM0004083	
New PIA Update x	Periodic update.	
	Name, Title	Contact Information Phone, Email
System Owner	Betty J. Warner Illness/Injury Coordinator Fluor Idaho, LLC P.O. Box 1625 Mailstop 9240 Idaho Falls, ID 83415	(208) 533-0824 <u>Betty.Warner@icp.doe.gov</u>
Local Privacy Act Officer	Amy Smith, DOE-ID Privacy Act Officer	(208) 526-4223 smithat@id.doe.gov





MODULE I – PRIVACY NEEDS ASSESSMENT			
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Tracy Anderson (ISSM) Fluor Idaho, LLC 1580 Sawtelle St. – MS 9107 Idaho Falls, Idaho 83415	(208) 533-3331 <u>Tracy.Anderson@icp.doe.gov</u>	
Person Completing this Document	Betty J. Warner Illness/Injury Coordinator Fluor Idaho, LLC P.O. Box 1625 Mailstop 9240 Idaho Falls, ID 83415	(208) 533-0824 <u>Betty.Warner@icp.doe.gov</u>	
Purpose of Information System or IT Project	The Integrated Safety Evaluation Database (ISED) is used for reporting and managing occupational injuries and illnesses. ISED provides instructions to injury coordinators and directs appropriate follow-up actions to prevent a recurrence. The system holds forms, reports, correspondence, and related medical and investigatory records relating to on-the-job injuries excluding copies filed in the Employee Medical Folder and copies submitted to the Department of Labor. ISED is used to collect and analyze DOE contractor, staff augmentation, and sub-contractor reports of injuries and illnesses. This information provides a centralized collection of injury/illness data for use to perform various analyses, including developing trends and identifying potential hazards. The results are used to evaluate safety and health performance, to analyze causes, and to define and prioritize means for improvement of safety and health of employees.		
	A series of physical, administrative, and technical controls are in place to protect data in the system. Access is restricted to safety personnel, ICP management, and the Illness/Injury Coordinator and the safety team chair of that group. Sensitive personally identifiable information (PII) is masked from view of general users pulling data for analysis. Injury/illness information is entered into the Computerized Accident/Incident Reporting System (CAIRS), which is a database used to collect and analyze DOE and DOE contractor reports of injuries, illnesses, and other accidents that occur during DOE operations.		
Type of Information Collected or Maintained by the System:	 □ SSN ☑ Medical & Health Information (Information relating to workplace injury or illness) □ Financial Information 		





MODULE I – PRIVACY NEEDS ASSESSMENT		
Clearance Information		
Biometric Information		
Mother's Maiden Name		
DoB, Place of Birth		
	Employment Information	
Criminal History		
	🛛 Name, Phone, Address	
	Other – Please Specify	
		The system contains PII.
Has there been any attempt to verify PII does not exist on the system?		
DOE Order 206.1, Department of Energy Privacy Program, defines PII as any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric data, and including any other personal information that is linked or linkable to a specific individual.		
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)		N/A
Threshold Questic		
	in (collect and/or maintain), or plan to ation about individuals?	YES
2. Is the information in identifiable form?		YES
3. Is the information about individual Members of the Public?		NO
4. Is the information about DOE or contractor employees?		 ☑ Federal Employees ☑ Contractor Employees





MODULE I – PRIVACY NEEDS ASSESSMENT

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS			
AUTHORITY, IMPACT & NOTICE	AUTHORITY, IMPACT & NOTICE		
1. AUTHORITY What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?	 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 Order 231.1B Admin Chg 1, Environment, Safety and Health Reporting. 		
2. CONSENT 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 relating to workplace injury or illness is required by DOE Order 231.1B. The information is secured and is used to protect workers and facilitate compensation or other remediation.		
3. CONTRACTS Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts?	No.		





MODULE II – PII SYSTEMS & PROJECTS		
4. IMPACT ANALYSIS: How does this project or information system impact privacy?	ISED contains PII relating to workers who have suffered workplace injury or illness. Should individuals' sensitive PII be compromised, it could cause serious professional, reputational, and social harm and could result in significant embarrassment. Individuals have a significant privacy interest in controlling access to their personal injury and illness data. Exposure of reported injuries or illnesses could cause significant privacy harm and damage the trust between individuals and the Federal Government. A series of physical, administrative, and technical controls are in place to protect data in the system. Access to and use of PII in ISED is limited to employees specifically tasked to collect and analyze injury	
	and illness data. Access is restricted to safety personnel, ICP management, and the Illness/Injury Coordinator and the safety team chair of that group. Sensitive PII is masked from view of general users pulling data for analysis.	
5. SORNs		
How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)? If yes, explain, and list the	PII in ISED can be retrieved by unique identifier.	
identifiers that will be used to retrieve information on the individual.		
6. SORNs		
Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal</i> <i>Register</i> ?	 DOE-10 Energy Employees Occupational Illness Compensation Program Act Files, 74 FR 1008, January 9, 2009 	
If "Yes," provide name of SORN and location in the <i>Federal Register</i> .	 DOE-38 Occupational and Industrial Accident Records, 74 FR 1039, January 9, 2009 	
7. SORNs		
If the information system is being modified, will the SORN(s) require amendment or revision?	N/A	
DATA SOURCES		





MODULE II – PII SYSTEMS & PROJECTS		
8. What are the sources of information about individuals in the information system or project?	Workplace injury/illness-related data is obtained from individual workers reporting their injury/illness. In addition, the system contains information obtained through investigation which may be sourced from witnesses to workplace injuries.	
9. Will the information system derive new or meta data about an individual from the information collected?	The system contains investigatory material relating to workplace injury/illness which may include witness accounts in addition to reported information from the affected individual.	
10. Are the data elements described in detail and documented?	Yes. See ISED System Security Plan.	
DATA USE		
11. How will the PII be used?	Injury/illness information is used for reporting requirements and to facilitate worker protection and claims. The information is entered into CAIRS to collect and analyze DOE and DOE contractor reports of injuries, illnesses, and other accidents that occur during DOE operations.	
12. If the system derives meta data, how will the new or meta data be used?Will the new or meta data be part of an individual's record?	N/A.	
13. With what other agencies or entities will an individual's information be shared?	Department of Labor.	
REPORTS		
14. What kinds of reports are produced about individuals or contain an individual's data?	ISED is used to collect and analyze DOE contractor, staff augmentation, and sub-contractor reports of injuries and illnesses. This information in ISED provides a centralized collection of injury/illness data for use to perform various analyses, including developing trends and identifying potential hazards.	
15. What will be the use of these reports?	Reports are used to evaluate safety and health performance, to analyze causes of injury/illness, and to define and prioritize means for improvement of safety and health of employees.	





MODULE II – PII SYSTEMS & PROJECTS			
16. Who will have access to these reports?	Safety Professional, Safety Management, Company Senior Management, safety team chairs, and illness/injury coordinators.		
MONITORING			
17. Will this information system provide the capability to identify, locate, and monitor individuals?	ISED does not provide monitoring capabilities beyond what is inherent to address data.		
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A		
19. Are controls implemented to prevent unauthorized monitoring of individuals?	A series of physical, administrative, and technical controls are in place to protect data in the system. Access is restricted to safety personnel, ICP management, and the Illness/Injury Coordinator and the safety team chair of that group. Sensitive PII is masked from view of general users pulling data for analysis.		
DATA MANAGEMENT & MAINTENANCE			
20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records.	Company management, safety personnel, and OMP are responsible for collecting injury/illness information by talking to the individual that had the incident as well as individuals who may have witnessed the incident. The illness/injury coordinator verifies information for accuracy.		
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A		
RECORDS MANAGEMENT			





MODULE II – PII SYSTEMS & PROJECTS		
	Forms, reports, correspondence, and related medical and investigatory records relating to on-the-job injuries, whether or not a claim for compensation was made, EXCLUDING copies filed in the Employee Medical Folder and copies submitted to the Department of Labor.	
22. Identify the record(s).	Computerized Accident/Incident Reporting System (CAIRS), CAIRS can produce the Occupational Safety and Health Administration (OSHA) 100, 101, 102 and 200 forms. CAIRS can also reproduce the original DOE 5484.3 form which is an individual accident/incident report that contains subject persons PII. These records have a retention period of 75 years, after which they will be deleted from the database	
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	 DOE 2.7, item 100 (DAA-GRS-2017-0010-0002) DAA-0434-2013-0001-0001 DAA-0434-2013-0001-0002 DAA-0434-2013-0001-0003 DAA-0434-2013-0001-0004 	
	Danelle Cummings	
24. Records Contact	Danelle.Cummings@icp.doe.gov	
	(208) 533-0032	
ACCESS, SAFEGUARDS & SECURITY		
25. What controls are in place to protect the data from unauthorized access, modification or use?	A series of physical, administrative, and technical controls are in place to protect data in the system. Access is restricted to safety personnel, ICP management, and the Illness/Injury Coordinator and the safety team chair of that group. Sensitive PII is masked from view of general users pulling data for analysis.	
26. Who will have access to PII data? Safety Professional, Safety Management, Company Senior Management, safety team chairs, illness/injury coordinator, an Information Technology (IT) personnel who administer and ma the database.		





27. How is access to PII data determined?	The Senior Safety and Health Manager determines access to PII.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	ISED information is entered manually into CAIRS, but CAIRS does not draw data from ISED directly or automatically.
29. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected?	N/A
30. Who is responsible for ensuring the authorized use of personal information?	The Senior Safety and Health Manager.
	END OF MODULE II





SIGNATURE PAGE		
	Signature	Date
System Owner	Betty Warner (Print Name) (Signature)	
Local Privacy Act Officer	Amy Smith (Print Name) (Signature)	
<i>Ken Hunt</i> Chief Privacy Officer	(Print Name) (Signature)	

