

**U.S. Consumer Product Safety Commission
PRIVACY IMPACT ASSESSMENT**

Name of Project:	ATV Death			
Office/Directorate:	EPHA			
A. CONTACT INFORMATION				
Person completing PIA: (Name, title, organization and ext.)	Youssef Takhssaiti, IT Specialist (INFOSEC), EXIT, x7852			
System Owner: (Name, title, organization and ext.)	Steve Hanway, Director, EPHA, x7256			
System Manager: (Name, title, organization and ext.)	Nidhu Nijhawan, Supervisory IT Specialist, EXIT, x6812			
B. APPROVING OFFICIALS	Signature	Approve	Disapprove	Date
System Owner Steve Hanway, Director	Steve Hanway, Director			
Privacy Advocate Bobby Sanderson, EXIT	Bobby Sanderson, ISSO			
Chief Information Security Officer Patrick Manley, EXIT	Patrick Manley, CISO	X		4/20/18
Senior Agency Official for Privacy James Rolfes, EXIT System of Record? _____ Yes <u>X</u> No	James Rolfes, CIO	X		4/30/18
Reviewing Official: James Rolfes, EXIT	James Rolfes, CIO	X		4/30/18
C. SYSTEM APPLICATION/GENERAL INFORMATION				
1. Does this system contain any personal information about individuals? (If there is NO information collected, maintained, or used that is identifiable to the individual, the remainder of PIA does not have to be completed.)	Yes			
2. Is this an electronic system?	Yes			
D. DATA IN THE SYSTEM				

1. What categories of individuals are covered in the system? (public, employees, contractors)	Public
2. Generally describe what data/information will be collected in the system.	Age of victim, state, sex, height, weight, and date of death
3. Is the source of the information from the individual or is it taken from another source? If not directly from individual, then what other source?	Another source. Medical Examiner Reports and Police Reports are the source of the vast majority of information collected. It is possible a CPSC investigator completing initial questionnaire could have sought out other information such as other news articles or even possibly communication with next of kin.
4. How will data be checked for completeness?	By EPI staff
5. Is the data current? (What steps or procedures are taken to ensure the data is current and not out-of-date?)	Follow-back investigations document incidents that have occurred in the past, the circumstances of which are not likely to change. Death certificates are not made available to CPSC until their coding is complete, which may sometimes be more than one year after the death occurred.
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	Yes. All-Terrain Vehicle Deaths Database (ATVD), It is updated annually and it is located
E. ATTRIBUTES OF THE DATA	
1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?	Reducing the number of ATV fatalities aligns with CPSC's mission. By understanding the circumstances that lead to fatalities, the Commission can be informed about the actions and policies that may reduce them.
2. For electronic systems, if the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? Explain.	Users must log into the CPSC network to access ATVD. Once users are logged into the application, they must enter a document identifier to retrieve data for viewing.
3. How will the data be retrieved? Can it be retrieved by a personal identifier? If yes, explain and list the identifiers that will be used to retrieve information on the individual.	Records can be retrieved by a variety of search techniques, but the unique identifier assigned to each record ("recordid") is sequentially suggested at time of entry and has no inherent correspondence to anything personally identifiable. Records are often retrieved by date of death and while date is not itself sufficient to be personally identifiable when combined with variables such as age, sex, location of death it may be reasonably possible to match up a record with a known incident of fatality.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	The individuals for whom each record is primarily concerned (the decedent) are already dead at the time of investigation by CPSC, so I'm not aware of any such opportunities or mechanisms to directly opt out to CPSC. In some cases police or medical examiners may decline to provide information requested by CPSC and so it's conceivable (I do not know, I'm just speculating that it's possible)that in some cases entities could be respecting any opt out of disclosure requests made by someone alive with the ability to do so on the decedents behalf, including possibly the victim while alive prior to death.
F. MAINTENANCE AND ADMINISTRATIVE CONTROLS	
1. What are the retention periods of data	Indefinite. It is expected that this information will always be of use.

in this system?	
2. 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 procedures documented?	N/A. There is no retention period.
3. For electronic systems, will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	No
4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?	No. The database is primarily focused on deceased persons. While there is relatively minimal data concerned with living persons, ATVD does attempt to classify ATV operator characteristics even if the decedent was a passenger, bystander or other party. To the extent that such information is provided this may include the surviving ATV operator's age/sex, height (in inches), weight range (in ranged categories) of the ATV. the and if you knew enough about a person to match identifies the date, age, and other characteristics of deceased persons involved in an ATV accident. While I can't imagine any practical utility for monitoring or tracking a living person. There are a few instances in which the database would collect information about a person who did not die for whom this database would not be directly concerned.
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	No Yes, CPSC-1
6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain	N/A Yes. CPSC-1 generally covers the scope and purpose of the files contained in this system however that SORN does not specifically reference the ATV deaths system or data.
G. ACCESS TO DATA	
1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	Only EPHA Staff, and system administrators.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	The internal database has password authentications and protections for both entry of data and analysis/queries. The external database includes only elements deemed safe to release to the public.
3. Who is responsible for assuring proper use of the data?	IT administrators and EPHA management
4. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? Are contractors involved in the collection of the data? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?	Yes – contractors were involved in the design and development of the system and they are involved in the maintenance of the system. Yes – contractors do enter data into the system. They are trained in information security policies.
5. Do other systems share data or have access to the data in the system? If	The data comes from reports in our other databases (DTHS, IPII, INDP) but include

<p>yes, explain. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?</p>	<p>some entry/validation by EPHA before being deemed final for a given year.</p>
<p>6. Will other agencies share data or have access to the data in this system? If yes, how will the data be used by the other agency?</p>	<p>No other agencies would be expected to get our internal use data, but we can't control which agencies access the public release data that we provide to any requesting member of the public.</p>
<p>7. Will any of the personally identifiable information be accessed remotely or physically removed?</p>	<p>N/a</p>