



U.S. Department of Transportation

Privacy Impact Assessment

Federal Railway Administration

(FRA)

Post-Accident Toxicological Testing System II (PATTS II)

Responsible Official

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Executive Summary

The Federal Railroad Administration (FRA) enables the safe, reliable, and efficient movement of people and goods throughout the Nation's railroad industry. To support our mission, the FRA utilizes Web Information Services (WIS), which is a collection of several internal facing web applications accessible only to FRA staff with government issued devices. Within WIS, the Post-Accident Toxicological Testing System II (PATTS II) is the only tool that collects, stores, or processes Personal Identifiable Information (PII). PATTS II supports FRA Office of Safety in the collection, processing, and storage of post-accident toxicological testing records, including program documentation and specimen lab results. PATTS II is used to support implementation of the requirements of Title 49 Code of Federal Regulations (CFR) Part 219 Subpart C, post-accident toxicological testing and to consider test results in relation to FRA accident/incident investigations.

This Privacy Impact Assessment (PIA) is conducted in accordance with the E-Government Act of 2002 because PATTS II collects and stores PII on members of the public.

What is a Privacy Impact Assessment?

The Privacy Act of 1974 articulates concepts for how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining, and disseminating information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.¹

Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we collect, store, retrieve, use, and share. It is a comprehensive analysis of how the DOT's electronic information systems and collections handle (PII). The goals accomplished in completing a PIA include:

¹Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo of M-03-22 dated September 26, 2003).



- *Making informed policy and system design or procurement decisions. These decisions must be based on an understanding of privacy risk, and of options available for mitigating that risk;*
- *Accountability for privacy issues;*
- *Analyzing both technical and legal compliance with applicable privacy law and regulations, as well as accepted privacy policy; and*
- *Providing documentation on the flow of personal information and information requirements within DOT systems.*

Upon reviewing the PIA, you should have a broad understanding of the risks and potential effects associated with the Department activities, processes, and systems described and approaches taken to mitigate any potential privacy risks.

Introduction & System Overview

Post-Accident Toxicological Testing System II (PATTS II)

PATTS II supports the FRA Office of Safety in the collection, processing, and storage of the PII listed below that relates to FRA post-accident toxicological testing. PATTS II is used to support the implementation of the requirements of Title 49 Code of Federal Regulations (CFR) Part 219 Subpart C—Post-accident toxicological testing. Subpart C does not apply to FRA employees. All information collected and maintained for post-accident testing is from railroad industry employees and/or contractors. Only four FRA employees have access to PATTS II. Memos contained in PATTS II (prepared by FRA alcohol and drug testing specialists) summarizing post-accident toxicological testing results and analyzing whether alcohol or drug use played a role in causing an accident/incident may also be added to FRA's Factual Accident Reporting System (FARS) for consideration when FRA investigates an accident/incident that qualified for Post-Accident Toxicological testing. These memos only refer to individuals by job title, not by name (or other PII).

PII Collection

After a railroad accident or incident that qualifies for post-accident toxicological testing (a "qualifying event"), Subpart C requires rail industry employers subject to Part 219 ("employers") to perform specimen collections, complete required paperwork, and ship the specimens to FRA's contract laboratory. The laboratory reports the results directly to FRA. With FRA's authorization, the laboratory also reports the results to the employer's Medical Review Officer (MRO), who then provides the results to the employee.

PATTS II enables all forms and paperwork to be stored and archived electronically and is the repository for new and legacy FRA post-accident toxicological testing program documentation, specimen lab results, and railroad accident data. Although the railroads may place a Social Security Number (SSN) or Employee Identification Number (EIN) on the 6180.74 form, any SSNs or EINs are redacted upon receipt by FRA Drug and Alcohol



Program Specialists, both on hard copy and .pdf, prior to uploading and archiving the form in the PATTS II application. The purpose of collecting this information is to allow FRA alcohol and drug program personnel access to query the accident files, archive each case, trend data, and develop reports to implement the requirements of subpart C. PATTS II is critical to effective management of this congressionally mandated program.

FRA F (6180.73) Post-Accident Toxicological Testing Form

FRA post-accident toxicological tests must be conducted after any event that involves one or more circumstances, including major train accident (with over \$1,500,000 damage, fatality, or HazMat release requiring evacuation), impact accident (with over \$150,000 damage or injury), fatal train incident, passenger train accident, or human-factor highway-rail grade crossing accident/incident, per 49 CFR Part 219, Subpart C.

FRA gathers information regarding railroad determinations to conduct post-accident toxicological testing on form FRA F 6180.73—Accident Information Required for Post-Accident Toxicological Testing (49 CFR Part 219). Information collected on this form includes the following:

- OMB 2130-0526
- Expires: 09/30/2028
- *Railroad Industry Employees and Contractors:*
 - Name of Employee(s) providing specimen
 - Employee(s) Job Title
 - Set Identification Number
 - FRA Toxicology Box Number (Predetermined number corresponds to each Toxicology Box; includes materials/forms for urine/blood sample)
 - Name of Medical Review Officer
 - Work Address of Medical Review Officer
 - Work Phone Number of Medical Review Officer
 - Name of Railroad Representative
 - Work Address of Railroad Representative
 - Work Phone Number of Railroad Representative

FRA F (6180.74) Post-Accident Testing Blood/Urine Custody and Control Form

The FRA post-accident testing blood/urine custody and control form is required for collection of basic information concerning the accident/incident and any treatment administered after the accident/incident. The custody and control form is an evidentiary chain of custody documenting the collection steps and is necessary to process specimens, analyze the significance of laboratory findings, and notify railroads/employees of test results, per 49 CFR Part 219 Subpart C.



- OMB 2130-0526
- Expires: 09/30/2028
- *Railroad Industry Employees and Contractors:*
 - Name of Employee providing specimen
 - Employee Identification Number (EIN) or Social Security Number (SSN) – any EINs or SSNs used are redacted by the Drug and Alcohol Program Specialists before uploading to the PATTS II system
 - Employee Home Address
 - Employee Telephone Number
 - Specimen Set Identification Number
 - Name of Collector (person collecting blood/urine specimen)
 - Name of Person taking possession of specimen for shipment

FRA F (6180.75) Collection of Post-Mortem Toxicology Samples

The FRA Collection of Post-Mortem Toxicology Samples form collects basic information concerning the accident/incident (the railroad involved and the date of the accident) and information after the accident/incident that is necessary to process specimens and ship them to FRA's contract laboratory. Specifically, the F 6180.75 documents the autopsy and harvesting of specimens as well as information regarding the medical personnel performing the autopsy. This form is specifically for documenting the specimen collection from fatally injured personnel in railroad accident/incidents.

- OMB 2130-0526
- Expires: 09/30/2028
- *Railroad Industry Employees and Contractors:*
 - Name of Deceased
 - Name of Collector (person collecting blood/urine specimen)
 - Name of person who received specimen at FRA Laboratory
 - Specimen Set Identification Number

DOT F (1380) Alcohol Testing Form

Railroads use this DOT form to collect information related to *optional* breath alcohol testing conducted after a qualifying event.

- OMB 2105-0529
- Expires: 02/28/2027
- Railroad Industry Employees and Contractors
 - Name of Employee Providing Specimen
 - EIN or SSN – any EINs or SSNs used are redacted by the Drug and Alcohol Program Specialists before uploading to the PATTS II system
 - Name and Address of Employer



- Name and Telephone Number of Employer's Designated Employer Representative (DER)
- Test Number
- Name and Address of the Alcohol Technician's Company
- Name of Alcohol Technician

Medical Review Officer (MRO) Results

The MRO reviews all positive laboratory results and interviews surviving personnel to ascertain if there was medical treatment or prescription medication that would account for any positive result(s). The MRO sends the documented results from the MRO to FRA's Alcohol/Drug (A/D) Program Manager, via dedicated email (only the employee identification number (EIN) or other identifier is collected—no SSN). The document includes a letter of the summary of the individual's results, the toxicology report, Form 6180.74, and (if the employee is deceased) Form 6180.75.

Railroad Industry Employees and Contractors:

- Name of Employee providing specimen
- Results from FRA's contract laboratory
- Form 6180.74 (post-accident testing)
- Form 6180.75 (if employee is deceased)
- MRO verification of the positive result or downgrade information regarding medical treatment/administration and/or the verified prescription medication(s).

National Transportation Safety Board (NTSB) Requests – Collects and maintains aggregated Sensitive PII (SPII). NTSB may investigate accidents/incidents. NTSB will request for release of information/subpoena to FRA's contract laboratory and/or FRA Alcohol/Drug (A/D) Program Manager requesting results of FRA's testing or remaining post-mortem specimen(s) of a fatally injured employee for use in expanded testing.

Railroad Industry Employees and Contractors:

- Name of Employee
- Date of Birth (DOB)

FRA's Contract Laboratory Results

Collects and maintains PII resulting in a Forensic Toxicology Report for FRA.

Railroad and/or Railroad Industry employee:

- Name of Employee providing specimen
- FRA Case Number Specimen
- Set Identification Number



- Drug and alcohol results from the laboratory analysis

FRA Analysis of Results

When an accident/incident is being investigated by FRA, FRA alcohol and drug testing specialists prepare memos summarizing post-accident testing results and analyzing whether alcohol or drug use played a role in causing an accident/incident. These memos summarize the test results for a particular qualifying event but refer to tested individuals by job title (e.g., Engineer or Conductor) instead of name (or any other PII).

Fair Information Practice Principles (FIPPs) Analysis

The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Privacy Act, are mirrored in the laws of many U.S. states, as well as many foreign nations and international organizations. The FIPPs provide a framework that will support DOT efforts to appropriately identify and mitigate privacy risk. The FIPPs-based analysis conducted by DOT is predicated on the privacy control families articulated in the Federal Enterprise Architecture Security and Privacy Profile (FEA-SPP) v3², sponsored by the National Institute of Standards and Technology (NIST), the Office of Management and Budget (OMB), and the Federal Chief Information Officers Council and the Privacy Controls articulated in Appendix J of the NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations³.

Transparency

Sections 522a(e)(3) and (e)(4) of the Privacy Act and Section 208 of the E-Government Act require public notice of an organization's information practices and the privacy impact of government programs and activities. Accordingly, DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their personally identifiable information (PII). Additionally, the Department should not maintain any system of records the existence of which is not known to the public.

FRA executes due care, and due diligence to ensure transparency. DOT System of Records Notices (SORNs) provide transparency about privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information about individuals covered under the Privacy Act of 1974, as amended. The information in PATTS II is covered under [DOT/FRA 133 - Post-Accident Toxicological Testing Records \(PATTR\) - 91 FR 22911](#) - April 28, 2026 because information in PATTS II is retrieved by a unique identifier.

Paperwork Reduction Act (PRA) statements exist on all forms, or on separate forms retained by individuals, to provide additional formal notice to individuals from whom any PII is

² <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

³ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



being collected. FRA has also specified in Title 49 CFR Part 219, Subpart C how information related to post-accident toxicological testing must be processed and reported, including how it will be shared. Furthermore, FRA public websites indicate what information is collected, why it is collected, how the information is used, how it is shared, with whom it is shared, choices the individual has regarding the collection of their PII, privacy information practices for children, the use of cookies and other tracking devices; how privacy information is secured, individual rights under the Privacy Act, and how to find out more or comment on FRA privacy practices.

The publication of this PIA further demonstrates FRA's commitment to providing appropriate transparency into the PATTS II system. The DOT Privacy Office publishes PIAs to the DOT Privacy Website.

Individual Participation and Redress

DOT provides a reasonable opportunity and capability for individuals to make informed decisions about the collection, use, and disclosure of their PII. As required by the Privacy Act, individuals should be active participants in the decision-making process regarding the collection and use of their PII and they are provided with reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.

After a railroad accident, the railroads are required by Title 49 CFR Part 219, Subpart C to have employee specimens collected at a medical facility, complete required paperwork, and ship the specimens to the contracted laboratory. FRA complies with the Privacy Act of 1974 and provides individual reasonable opportunities for informed decisions on PII collected, using approved OMB forms, pertaining to rail safety regulations.

Individuals may request access to their own records maintained in a records system under FRA control by writing a letter of request:

Federal Railroad Administration
Attn: FOIA/PA Team
1200 New Jersey Avenue SE
Washington, DC 20590
or email; frafoia@dot.gov or Fax: (202) 493-6068.

The request must include the following information:

- Full Name
 - Mailing address
 - Phone number and/or email address
 - A description of the records sought, and if possible, the location of the records.
- When requesting records related to post-accident toxicological testing, the individual should include the date of the accident, and the railroad involved for all qualifying



events they are requesting. Alternatively, the employee may provide the specimen ID numbers for all specimens they have provided.

- A statement under penalty of perjury that the requester is the individual who he or she claims to be.

Individuals may also submit a request online via the Department of Transportation Public Access Link (PAL) at <https://pal.dot.gov/>. Requests submitted through these electronic channels must include a digital certification of identity.

Purpose Specification

DOT should (i) identify the legal bases that authorize a particular PII collection, activity, or technology that impacts privacy; and (ii) specify the purpose(s) for which it collects, uses, maintains, or disseminates PII.

The Department's programs and information systems are restricted in the collection and use of PII, or activity impacting privacy, to that which is authorized by law. Under authority of the Federal railroad safety and hazardous materials transportation laws, the FRA Office of Safety collects, processes, and stores information related to post-accident toxicological testing to support implementation of the requirements of Title 49 Code of Federal Regulations (CFR) Part 219 Subpart C—Post-accident toxicological testing. Subpart C does not apply to FRA employees. All information collected and maintained for post-accident toxicological testing is from the Railroad Industry employees and/or contractors.

Post-accident toxicological testing information is authorized for data collection under OMB Control Number 2130-0526. Each post-accident toxicological testing form identified in the Introduction & System Overview section of this PIA clearly specifies this authority and purpose of collection and usage.

Post-accident toxicological testing data contained in PATTS II is used consistent with the purposes for which it was collected as described in the SORN [DOT/FRA 133 - Post-Accident Toxicological Testing Records \(PATTR\) - 91 FR 22911](#) - April 28, 2026.

Data Minimization & Retention

DOT should collect, use, and retain only PII that is relevant and necessary for the specified purpose for which it was originally collected.

FRA only collects the minimum PII necessary as listed in the Introduction & System Overview section of this PIA. Identified elements are relevant and necessary to accomplish the legally authorized purpose of collection. The FRA Privacy Officer evaluates PII holdings via annual privacy risk assessment and continuous monitoring assessments.



Retention of information is maintained according to NARA schedules. For PATTS II, the retention of information is identified in the schedules below:

1. **Schedule Identifier:**

[N1-399-08-09](#), PATTS II, 3/31/2008

2. **Schedule Summary:**

Item 1: Master File – Inputs: System data consists of drug and alcohol test results, accident and railroad information and scanned Images of key documents sent to the testing laboratory. Date range is 1987 to present.

Disposition: Temporary. Close files at end of the calendar year. Destroy when 7 years old.

Item 2: Master File – Attachments: File attachments consist of scanned inputs that are used to validate the data input or verify that the data was collected / tested properly.

Disposition: Temporary. Close files at end of the calendar year. Destroy when 10 years old.

Item 3: Master File – Case and Testing Information: Case details include date, location, individual(s) and railroad involved in the reportable incident. Testing information includes the results of the drug and alcohol testing.

Disposition: Permanent. Transfer immediately to NARA upon approval of this schedule data from 1987 to the present. Thereafter, cut off at end of each calendar year and transfer to NARA as specified in 36 CFR 1228270 or standards applicable at the time of transfer.

Use Limitation

DOT shall limit the scope of its PII use to ensure that the Department does not use PII in any manner that is not specified in notices, incompatible with the specified purposes for which the information was collected, or for any purpose not otherwise permitted by law.

DOT discloses PATTS II information outside of DOT in accordance with SORN [DOT/FRA 133 - Post-Accident Toxicological Testing Records \(PATTR\) - 91 FR 22911](#) - April 28, 2026. FRA shares PII only with appropriate DOT representatives, other federal government agencies, or other designated representatives as needed only for authorized purposes. Program and field personnel have completed initial and annual security and privacy awareness training to ensure protection of PII, pertaining to sharing PII with third parties. However, PATTS II does not share information with third parties, except when that sharing is requested and authorized as provided for in Subpart C, or when otherwise necessary to ensure compliance with applicable DOT provisions regarding alcohol and drug use. The FRA Office of Safety minimizes its data collection using PATTS II to that which is necessary to meet the authorized business purpose and mission of the Agency.



Data Quality and Integrity

In accordance with Section 552a(e)(2) of the Privacy Act of 1974, DOT should ensure that any PII collected and maintained by the organization is accurate, relevant, timely, and complete for the purpose for which it is to be used, as specified in the Department's public notice(s).

FRA complies with the Privacy Act of 1974, data quality and integrity requirements, by ensuring Program Offices confirm to the best of their knowledge that collection of PII is accurate, relevant, timely and complete. PII is collected directly from individuals whenever possible. The DOT Chief Privacy Officer and FRA Privacy Officer provide guidelines to the Program Offices for compliance with DOT standards and requirements.

The FRA Privacy Officer performs continuous privacy and security risk assessments, ensures integrity of data through the implementation and enforcement of appropriate security controls. Access to data and application is strictly limited to those who have a verified and authorized need to perform their duties in support of the FRA mission. FRA ensures PII is protected, collected, and retained in accordance with Federal privacy policies and laws.

Security

DOT shall implement administrative, technical, and physical measures to protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.

FRA has appropriate security safeguards in place to protect PII against risks such as loss, unauthorized access, use, destruction, modification or unintended or inappropriate disclosure. FRA protects all records against reasonably anticipated threats or hazards that may result in harm, embarrassment, inconvenience, or unfairness to any individual about whom information is maintained. At a minimum, all PII will be protected using controls consistent with the requirements at Federal Information Processing Standard Publication 199 (FIPS 199) moderate confidentiality standards where loss of confidentiality may result in serious adverse effects to agency's operations, assets, individuals and PII data not publicly available. PATTS II is hosted in Microsoft Azure cloud as Platform as a Service (PaaS) which is FedRAMP certified at the high security impact level.

DOT and Microsoft Azure implement and operate an extensive set of security configurations and controls to safeguard the confidentiality and integrity of the data in accordance with the NIST Standards. This includes documenting the management, operational, and technical processes used to secure the system and data.



The DOT CPO may, in accordance with OMB Memorandum 17-12 and FIPS 199, increase or decrease the accepted confidentiality risk of PII in a particular information system on a case-by-case basis, based on a determination about the risk of reasonably anticipated threats Privacy Risk Management DOT Order 1351.18, page 10 of 23, or hazards that could result in harm to the individual or the Department because of unauthorized access or use of the PII. The confidentiality protection requirements of Sensitive PII (SPII) may not be reduced.

Encryption of data in transit and at rest protections and phishing resistant multifactor authentication are implemented and enforced using National Institute of Standards and Technology (NIST)-certified cryptographic modules for PATTS II, unless authorized in writing, by DOT's Deputy Secretary or a Senior DOT Official. Since PATTS II is hosted in FedRAMP authorized Microsoft Azure cloud in a PaaS serverless computing environment data at rest is stored at datacenters physically located only in the United States. FRA established strict authentication and authorization controls to provide PATTS II availability to personnel who require need-to-know access.

FRA will not print records containing PII unless required to support the DOT mission. FRA follows DOT Incident Response Plan that provides an organized and effective response to all security and privacy incidents. FRA ensures all personnel are provided with a clear definition of what constitutes a breach involving PII and are aware of how, where, what information is needed to report the loss, inappropriate access, use or sharing of PII.

In the event of unauthorized PII access, use or disclosure, FRA takes immediate action to deter further damage or disclosure. FRA ensures appropriate and prompt notification of affected individuals in the event of a breach of SPII proportionate with the risk of harm to the individual(s) and consistent with Federal and DOT standards and requirements.

Accountability and Auditing

DOT shall implement effective governance controls, monitoring controls, risk management, and assessment controls to demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals.

Effective governance, monitoring, risk management, security safeguards and controls demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals. FRA is responsible for identifying, training, and holding Agency personnel accountable for adhering to DOT privacy and security policies and regulations. FRA follows the Fair Information Practice Principles as best practices for the protection of information associated with PATTS II.



In addition, these practices, policies, and procedures are consistently assessed, improved, and applied to ensure proper protection, retention, and destruction of records. Federal and contract employees are given clear guidance in their duties in accessing, collecting, using, processing, and securing data. Guidance is provided in the form of mandatory annual security and privacy awareness training as well as Acceptable Rules of Behavior.

Responsible Official

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Approval and Signature

Karyn Gorman
Chief Privacy Officer
Office of the Chief Information Officer

DOT Privacy Office - Approved - 05/06/2026