Procedure SSO-006

Data De-Identification Procedure

Current Version: 10/01/2021

Scope: This procedure explains the process and requirements for the RTA/RFGPTS safety event investigations, internal audits, and corrective action plans (CAPs) data and information to be de-identified, coded, and delivered to the FTA on an annual or as-needed/periodic basis in the State Safety Oversight Reporting (SSOR) system. The focus of this procedure is assuring that the data and information provided to the FTA is both responsive to FTA's requirements while at the same time not providing any sensitive or personally specific information that is not necessary to meet the FTA's requirements.

Data to be De-identified: The following are the data record types that need to be reviewed and de-identified:

(1) **Investigation information and data** – all personally identifiable information should be removed and only a summary of the investigation detail should be provided to FTA. Individual's names in the report should be redacted to only their title (e.g. Operator, Supervisor, Maintainer, Contractor, Passenger/Patron, Pedestrian, Bicycle Operator, or other), as appropriate. The shortened description of the investigation should not include names.

(2) **Corrective actions** – the SSO is required to provide the name of the responsible person and/or his/her department when submitting CAPs to the FTA Annual Report.

(3) **Triennial reviews/audits** – the new SSO rule now indicates that only a summary of the triennial report should be provided to FTA, not the entire report, as has been the requirement in the past.

(4) **Sensitive Security Information (SSI)** – all transmittals shall follow the established practices in "Sensitive Security Information (SSI): Designation, Markings and Control" published by the FTA in March 2009.

Update:

- March 5, 2018 – Initial release
- June 30, 2021 – minor word choice changes, added mention of the SSOR system
- October 1, 2021 – minor formatting