



OSHA DIRECTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: DIR 01-06 (ADM 1-1) | **EFFECTIVE DATE:** December 21, 2001
SUBJECT: OSHA EMPLOYEE IMIS IDENTIFICATION CHANGE

ABSTRACT

Purpose: This Direction provides revised policy for defining and creating OSHA employee IMIS identification codes.

Scope: This Direction applies OSHA-wide

Expiration: This Direction expires in one (1) year or upon revision of the directives referenced below, whichever is sooner.

References: OSHA Instruction ADM 1-1.29A, The IMIS Consultation Data Processing Manual; OSHA Instruction ADM 1-1.30, The System Administration and Maintenance Manual for use with the NCR; OSHA Instruction ADM 1-1.31, The IMIS Enforcement Data Processing Manual

Cancellations: None

State Impact: OSHA-approved State Plan Enforcement and Consultation Project offices must adhere to the requirements set out in this Direction.

Action Offices: National, Regional and Area Offices; State Plan Enforcement and Consultation Project Offices

Originating Office: Directorate of Information Technology (DIT), Office of Management Data Systems (OMDS)

Contact: Richard Steffe, Director (202-693-1724)
Office of Management Data Systems, N3510
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Significant Changes

The Direction provides revisions in the policy and procedures for creating employee IMIS identification codes and supersedes all references to using social security numbers in the paragraphs cited here.

- OSHA Instruction ADM 1-1.29A, The IMIS Consultation Data Processing Manual - **Chapter VII, *The Visit Form*, paragraph E, *Data Item Description*, subparagraph 2, *Consultant ID*.**
- OSHA Instruction ADM 1-1.30, The System Administration and Maintenance Manual for use with the NCR - **Chapter VII, *Menu and Database Table Maintenance*, paragraph E, *Database Tables Maintenance*, subparagraph 1, *CSHO/Consultant Table Update Screen*.**
- OSHA Instruction ADM 1-1.31, The IMIS Enforcement Data Processing Manual - **Chapter VIII, *Inspection Processing*, paragraph F, *Data Item Definitions/Instructions*, subparagraph 2a, *CSHO ID*.**

By and Under the Authority of
David C. Zeigler
Director, Administrative Programs

- I. Purpose. This Direction is to notify OSHA of 1) a change in defining and creating employee IMIS identification codes (i.e., CSHO IDs and Consultant IDs); and 2) the reassignment of ALL codes concurrent with the implementation of a NEW system not based on using social security numbers (SSNs).

This change results from potential problems with the use of SSNs within these codes. The change in defining employee IDs is to protect against the abuse of social security numbers and identity theft.

This new policy PROHIBITS OSHA employees from using their SSN when creating employee identification codes.

- II. Scope. OSHA-Wide.

- III. References.

A. OSHA Instruction ADM 1-1.29A, The IMIS Consultation Data Processing Manual - effective 12/06/1996.

B. OSHA Instruction ADM 1-1.30, The System Administration and Maintenance Manual for use with the NCR - effective 07/26/1993.

C. OSHA Instruction ADM 1-1.31, The IMIS Enforcement Data Processing Manual - effective 09/20/1993

- IV. Responsibilities. Regional Administrators (RAs) and Area Directors (ADs) will ensure that this Direction is forwarded to appropriate administrative and compliance staff to implement changes pertinent to their areas of responsibility and ensure its compliance. RAs will also ensure that this Direction is forwarded to each State Designee.

- V. Action Information.

A. Responsible Office. Directorate of Information Technology (DIT), Office of Management Data Systems (OMDS).

B. Action Offices. National, Regional and Area Offices; State Plan Enforcement and Consultation Project Offices

- VI. Action Required. Discontinue the use of social security numbers when defining and creating NEW employee IMIS identification codes (i.e., CSHO IDs and Consultant IDs). As NEW identification codes are needed for employees who will be reporting data to the IMIS for the first time, System Administrators shall call the *OSHA-ID Group* (202-693-2424) and request an interim code(s) to be used until a NEW system is in place. Please be sure to tell the person answering the phone that the call is in reference to a NEW CSHO/Consultant ID so that your call will be directed to the proper person.

Do NOT change or modify existing IMIS identification codes and continue to use existing codes until further notice.

- VII. Future Action by the Directorate of Information Technology. To eliminate employee dependence on SSNs for IMIS identification, DIT will convert employee IDs to a system not based on the SSN. ALL CSHOs and Consultants will be assigned NEW employee IDs and old data converted to the new IDs. As this will entail much planning, programming and data conversion strategies, the permanently assigned codes and data conversion will not be implemented for several months. All Federal OSHA offices, State Plan Enforcement and Consultation Project offices will be notified in advance as to when the change will take place, what to expect and what action, if any, is necessary by those offices at that time.