

U.S. Fish & Wildlife Service (USFWS) Injury & Mortality Reporting System

*Please note: The following information is subject to change. For questions or additional information, please contact Meghan Sadlowski at Meghan Sadlowski@fws.gov or (703) 358-2218.

I. System Purpose

The Injury and Mortality Reporting System is a repository for data on dead or injured birds and bats. It was created to inform the management of the USFWS trust resources in the face of an expanding human population, the infrastructure to support it, and the consequential impact on our nation's birds and bats. This database centralizes and standardizes the collection of information regarding sources and locations of mortality and injury. Over time, these data will become increasingly useful to assess relative levels of observed mortality from various sources. The Injury and Mortality Reporting System is located within the USFWS Environmental Conservation Online System (ECOS), which contains tools designed to assist both the public and private sectors in conserving our nation's natural heritage.

II. System Overview

1. Why collect this information?

The System is designed to facilitate the collection, reporting, and tracking of bird and bat mortality and injury information in a standardized format. The information gained will help inform and prioritize conservation and management decisions for species and its utility will grow with use. The System will also help industry track their own data within and across individual projects, improve and expedite eagle permitting in the future by centralizing and standardizing data essential for facilitating permitting, and help satisfy permit monitoring requirements.

2. When will the System be available for use?

After finalization of the policy for USFWS staff detailing protocols for the <u>Handling and Distribution of Bald and Golden Eagles and Parts (720 FW 6)</u> in September 2015, the System was made available for use by USFWS employees. Release to select users external to USFWS is expected to begin in late 2016. Potential external users will be notified in advance with specific information about how to set up an account and instructions about how to proceed if they currently utilize another system or method (e.g. Bird Fatality/Injury Reporting Program, SPUT Excel report form, own system) to submit reports to USFWS.

3. Who will be entering data into the System?

Initially, only USFWS staff, other federal agencies, state agencies, project proponents (any industry), tribes and NGOs will be able to enter data into the database. The USFWS is also coordinating with several laboratories and wildlife rehabilitators to enable direct incorporation of eagle necropsy reports into the System. As other useful data sets are identified, those will be added or linked into the System as well.

III. Basic System Information and Functionality

1. How can I get an account?

DOI Users will be able to request an account through the ECOS interface using their active directory login. Non-DOI users will request an account via an account creation website established for non-DOI users.

2. Can I designate other users who can view and edit information in my account?

Yes, the System is being designed so that you may add multiple e-mail accounts to each project profile as <u>Project Users</u> for individual projects established within project accounts. The Project User designation will allow those individuals to view, enter, and edit data within the project accounts for which they have been given the Project User designation. Designated users can be within or outside of your organization.

3. What will the form look like, and how will my data appear to me? *Please click on the highlighted text to view an example of the actual user interface (still in development) associated with the steps outlined below.

After you obtain an account, your logon page will allow you to create a profile for and enter <u>basic information</u> about each project within your account. Once you create your project profiles, you will be able to see a <u>list of your projects</u> and open a <u>summary view</u> of each project. Within that summary view, you will be able to click on a button to report any individual mortality/injury records associated with that project. As you add injury and mortality records, you will be able to see and export a <u>summary list of records you have entered</u>, and will be able to click on and edit the individual details of each incident within a <u>record summary view</u>, as well as upload any associated documents or photos.

4. Will I be able to download my data from the System?

Users are able to export a report of incidents associated with each of their projects. There are a couple of export options for report information (e.g. more detailed for analysis purposes, and less detailed for more secure data sharing purposes).

IV. Data Privacy & Security

1. Do I need to worry about data security issues?

All data are housed on a secure server in Ft. Collins, CO. The System resides behind the same firewall as the USFWS Environmental Conservation Online System (ECOS), and as such conforms to very high federal government security standards. The Injury and Mortality Reporting System will undergo regular security scans conducted by Security Specialists using the most current and best vulnerability testing. Any identified vulnerabilities will be immediately addressed.

2. What other individuals will have access to the data in private accounts?

Outside of the individuals you have designated as <u>Project Users</u>, there will be a subset of Federal employees who will have access to the data in the System to inform management decisions. These individuals will be fully trained and informed in the proper handling of that data to maintain data confidentiality.

3. If there is a FOIA on the database, could private company data be released to the public?

The Freedom of Information Act (FOIA) provides the public with access to agency records unless the records are protected from disclosure by a specific exemption. Exemption 4 protects trade secrets and commercial or financial information that is privileged or confidential. When USFWS has reason to believe that information that is responsive to a FOIA request may be protected from disclosure under Exemption 4, USFWS will follow the DOI FOIA regulations for handling confidential information, and, if required, inform the applicant/permittee of the request and provide an opportunity to object to release. The Department of the Interior's FOIA regulations for handling confidential information are located at: 43CFR 2.26 – 2.36. Nevertheless, when a company submits an application or report, it should clearly identify any information in its application or report that should be considered confidential business information. Since each dataset is considered and addressed on a case-by-case basis, the data USFWS deems proprietary may either be slightly more or less inclusive than this depending on the unique circumstances involved.

V. Data Reporting Requirements & Enforcement

1. Are the data entry requirements lengthy?

The System is designed to make data entry quick, easy, and sufficient for use in research and scientific analysis. The System will ask the User to fill out approximately 10 fields (required before 'saving' the record) for each injury or mortality record. For those who have a permit with the USFWS, permit conditions may require that they fill in more than the minimum required fields.

2. Do I need to adhere to certain data quality standards if I am using the System?

Whether or not you directly or <u>indirectly</u> submit records to the System, you will be asked to agree to a certification statement indicating that the information you are submitting is true and correct to the best of your knowledge, and be made aware that fraudulent claims may subject you to liability. Since the data may be used to address scientific questions, it is desired that the data be entered carefully, and that users always try to provide the greatest level of detail available for each incident within the form provided.

3. For Special Purpose Utility (SPUT) or Eagle permit holders, will entering information satisfy permit reporting requirements?

This will be specified in the section on reporting requirements under the permit conditions. The USFWS anticipates using this database increasingly with time as we work to streamline permitting and reporting requirements.

4. Can a company that does not have any permits with the USFWS use this System to enter data?

Yes. Companies and individuals who do not have permits with the USFWS may report bird mortality/injury incidents in this database. Companies that do not have permits may have an Avian Protection Plan (APP), a Bird and Bat Conservation Strategy (BBCS), or simply an agreement between a field office and a

project proponent as part of their responsibilities in avoiding and minimizing impacts. Those plans or agreements may have an associated monitoring or reporting component.

4. Will I still need to report federally threatened & endangered (T&E) species and eagle incidents to the USFWS, or will the System do this for me?

Currently, you must report any eagle or T&E injuries or mortalities you encounter to USFWS yourself directly. Clear instructions are provided in the "Help" on the System home page to assist with this process. The purpose for reporting these incidents immediately to USFWS personnel is to allow USFWS biologists and OLE to work with the responsible party to identify any potential necessary conservation measures to reduce further incidents and track the implementation and implementation results of these measures. It will also allow our biologists to keep track of eagle programmatic or T&E permit allocation status, and adjust these values as needed.

5. For unpermitted take, will this information be viewed as admission of guilt in violating MBTA or BGEPA and therefore constitute evidence that could be used against me or my company at a later date?

Any information has the potential for use by USFWS OLE during the investigative process. However, to promote MBTA and BGEPA compliance and protect migratory birds, the USFWS fosters relationships with and provides guidance to companies to minimize the need for enforcement actions. The USFWS focuses its enforcement efforts on those individuals or companies that fail to identify and implement reasonable and effective measures that avoid bird injury or mortality. The USFWS encourages companies to develop, in cooperation with USFWS personnel, an Avian Protection Plan (APP), Bird and Bat Conservation Strategy (BBCS), or other document that includes statements of responsibility, conservation measures, monitoring methods, data collection and reporting methods, and actions to be taken by the operator in coordination with USFWS. As examples of this approach, the Wind Energy Guidelines and Avian Power Line Interaction Committee (APLIC) recommendations outline how these documents can be written to serve the needs of wind power operators or electric utilities.

Glossary of Terms and Additional Details

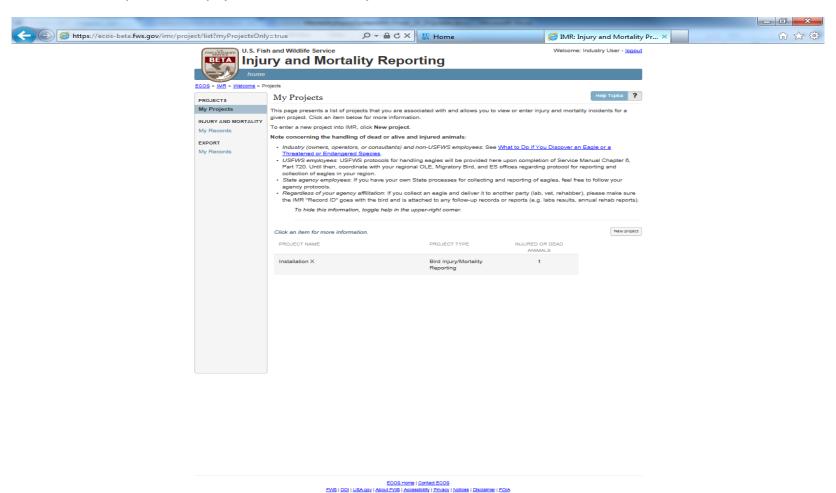
Indirect Submission of Data - Some users (those with their own systems or those who choose not to use the USFWS system directly) will be granted approval to periodically submit a spreadsheet of their mortality and injury information in a format that allows the information to be directly uploaded into the online system. All USFWS employees are strongly encouraged to submit data particularly regarding eagle injuries and mortalities directly into the System. If for some reason this is not possible, please contact Meghan Sadlowski to discuss data sharing options. RETURN TO QUESTION

Project Users – Individuals who are added by a System user to the user account as a "Project User" will be able to view and edit the details and records associated with each project account, as well as add new injury/mortality records for those projects. **RETURN TO QUESTION**

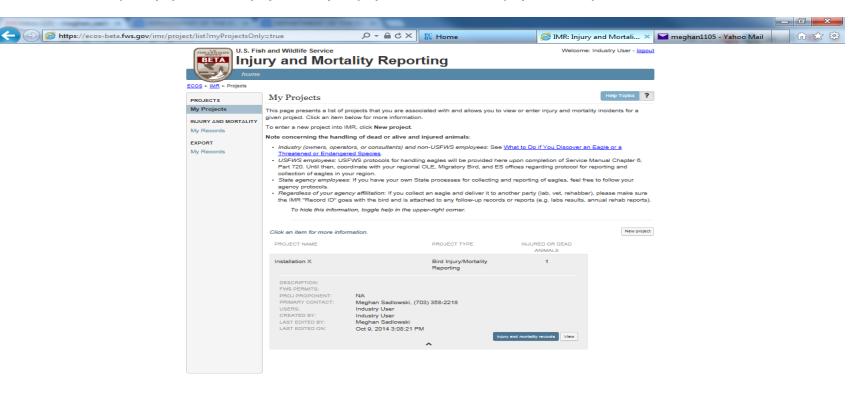
Basic information about the project such as project name, project type, project proponent, primary contact information, and designated project users will be required to create a project record. <u>RETURN TO QUESTION.</u>

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https://ecos-beta.fws.gov/imr/project/198/edit		P → A C X R Home		☆ 袋
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home	2			
ECOS > IMR > Welcome > I	Projects > Installation X > Edit project		Helip Topics ?	
PROJECTS My Projects	Edit Project: Install			
INJURY AND MORTALITY	Enter information about the project for which you will be reporting injury and mortality data. To hide this information, toggle help in the upper-right corner.			
My Records	* Required fields		Name	
EXPORT My Records	* Project Name:	Installation X 100 character maximum, \$6 remaining.	The unique name used to represent	
	* Project Type:	Other	the project.	
	* Other Project Type Description:	Bird Injury/Mortality Reporting 200 character maximum, 169 remaining.		
	Description:			
	Description.			
		500 character maximum, 500 remaining.		
	FWS Project Permits:	Type one or more FWS permit numbers		
	FWS Consultation Number:			
	* Project Proponent:	NA 200 character maximum, 198 remaining.		
	* Primary Contact Name:	Meghan Sadlowski 200 character maximum, 184 remaining.		
	Primary Contact Title:	200 character maximum, 200 remaining.		
	* Primary Contact Phone:	(703) 358-2218		
	* Project Users:	× meghan_sadlowski@fws.gov		
	[8	Save Cancel		
Form 3-202-17, Rev. 2/2014 OMB Control No.			OMB Control No. 1018-0022 Expires:5/31/2017	
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Users will be able to set up one or more project records within their System accounts. RETURN TO QUESTION.



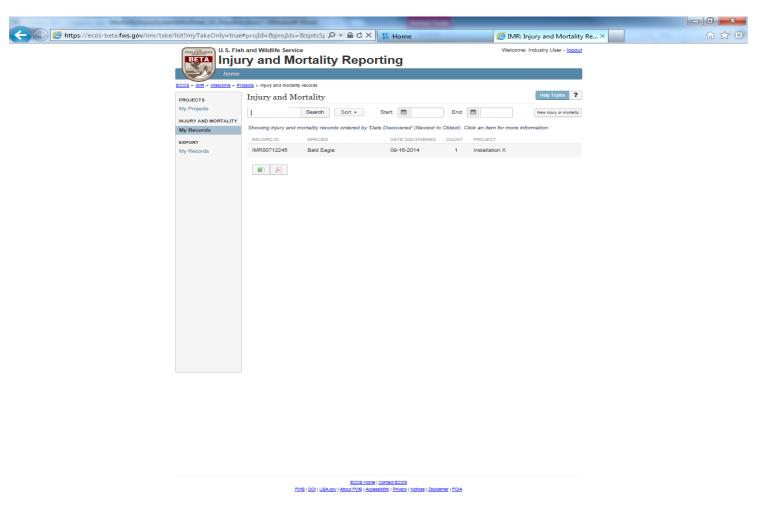
Users will be able to report injury and mortality information for a project via a button in the project summary view. RETURN TO QUESTION.



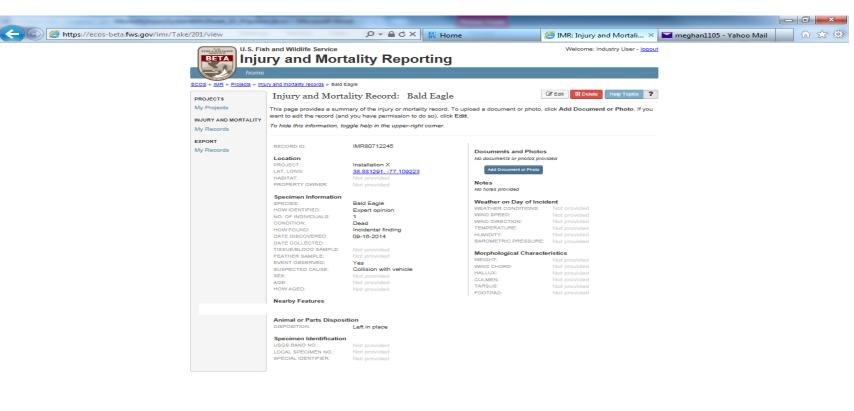
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Users and their project users will see a list of mortality records in their account, as well as search records, add new records, and export reports of their data from the system. <u>RETURN TO QUESTION.</u>



Users will be able to view a summary of the details of any species injury/mortality record by clicking on the record. They will also be able to edit the details through this page, as well as attach photos and documents to the record. <u>RETURN TO QUESTION.</u>



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Clear instructions are provided in the "Help" on the System home page to assist both USFWS and non-USFWS users in following proper protocols when they encounter eagle or T&E injuries or mortalities. <u>RETURN TO QUESTION.</u>

