U.S. Department of Transportation

Federal Aviation Administration (FAA) Office of Human Resource Management (AHR)

Privacy Impact Assessment

Air Traffic Skills Assessment (ATSA)

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Executive Summary

The Federal Aviation Administration (FAA) Air Traffic Control Specialists (ATCS) are responsible for the safe and efficient flow of air traffic in the National Airspace System (NAS). Given the safety-critical nature of this job, and the substantial investment in training required for ATCS certification, the FAA Office of Human Resources (AHR) Office of Aviation Careers uses a specialized process to select the best-qualified job candidates for employment. The ATCS pre-employment selection testing program represents a key step in the hiring process. The Air Traffic Skills Assessment (ATSA), a computer-based, entry-level employment-selection test battery, evaluates the required critical knowledge, skills, abilities, and other personal characteristics (KSAOs), to help the FAA determine the candidates best qualified for an ATCS position. The FAA conducted this Privacy Impact Assessment (PIA) in accordance with Section 208 of the E-Government Act of 2002 because the FAA collects, uses, and maintains the personally identifiable information (PII) of ATCS candidates in order to administer the ATSA, evaluate scores, and select candidates.

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 personally identifiable information (PII). The goals accomplished in completing a PIA include:

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[1]Office 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

The Federal Aviation Act of 1958[2] gives the FAA the responsibility to carry out safety programs to ensure the safest, most efficient aerospace system in the world. The FAA attracts and recruits high-quality applicants into the Air Traffic Controller workforce through a planned announcement process. In recent years, the FAA issued ATCS vacancy announcements on USAJOBS up to several times per year. Upon receiving all applications, the FAA reviews applications and selects candidates to move forward in the hiring process. This next step includes taking the ATSA. The ATSA is a computer-based, entry-level employment selection test battery, designed to assess the majority of the critical KSAOs required at entry to the ATCS position. The number of candidates invited to test depends on need, and aligns with the FAA's controller workforce plan, which FAA submits annually to Congress.

The FAA manages three contracts related to the ATSA. Two vendors provide the ATSA's commercial off-the-shelf testing content: Airways International Limited (AIL) and SHL. Additionally, the FAA contracted Pearson VUE (Pearson), using their systems, testing facilities, and trained proctor staff, to administer the ATSA. In order to create a seamless candidate experience, the FAA requested that Pearson develop a graphical user interface (GUI) to integrate the test content from AIL and SHL. Pearson sub-contracted with Personnel Decisions Research Institutes, LLC (PDRI), a subsidiary of SHL, to build the GUI. AIL's content is hosted on an Azure cloud-based platform. Since PDRI is a subsidiary of SHL, SHL's content was moved directly to PDRI's platform.

Candidate Registration and Scheduling

When candidates apply for the ATCS position through USAJOBS, their applications are loaded to the FAA's Automated Vacancy Information Access Tool for Online Referral (AVIATOR) system. At this time, AVIATOR assigns a unique identification number (an

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[2] 49 U.S.C. § 106.

"AVIATOR ID") to each candidate. To prepare for testing, AHR's Office of Aviation Careers evaluates applications and selects a subset of candidates to take the ATSA. During this process, the Office of Aviation Careers retrieves each selected candidate's contact information (candidate's full name, mailing address, email address, and phone number) and AVIATOR ID from FAA's AVIATOR System. The FAA uploads this set of candidate information to Pearson via Secure File Transfer Protocol (SFTP). Upon receipt of the referred candidate list, Pearson's system automatically generates an email to the candidates, notifying them that FAA selected them to take the ATSA. The email contains the candidate's full name and AVIATOR ID and instructs candidates to create an account on Pearson's website and register for the test.

Creating an Account

To create an account profile in Pearson's system, candidates navigate to the ATSA page on Pearson's website and enter their full name and AVIATOR ID. The candidate then creates a unique username and password and selects three security questions and answers. Pearson stores the candidate's full name, mailing address, phone number, email, and AVIATOR ID on its hub server.

Scheduling the ATSA

To schedule the ATSA, candidates log into their Pearson accounts, navigate to the scheduling page, and enter their zip code to display the nearest testing locations. The candidates then select the preferred testing location and chooses a test date and time. Prior to confirming their appointments, Pearson requests that the candidates review their contact information to ensure the information in Pearson's system matches their identification. Finally, the candidates must read and acknowledge Pearson's admission, rescheduling, and cancellation policies, as well as the Privacy Act Statement (PAS) notifying them that their exam results will be shared with the FAA to make decisions regarding their qualifications for an ATCS position. There are separate acknowledgements for the admission/rescheduling/cancellation policies and the PAS. The candidates will make their acknowledgements by checking the corresponding boxes. Candidates can finalize the registration process only after they complete these acknowledgements.

Upon successful registration, Pearson sends an email to the candidate confirming the test appointment. This email includes the candidates' name, order number, AVIATOR ID, registration ID, testing date, time, and testing location. The registration ID is created by Pearson to track the specific appointment. The order number tracks the purchase of the exam appointment, even when there is no price associated with the order. Both the candidate registration ID and the order number are internal to Pearson.

Taking the ATSA

To facilitate exam delivery, Pearson sends the candidate's information (full name, mailing address, phone number, email and AVIATOR ID) through its encrypted internal systems to the test center where the candidate will test. Test Center staff only access this information to validate the candidate's identity.

When candidates report to a Pearson test center to take the ATSA, they must present two valid, unexpired forms of identification (ID); including a government-approved photo ID (such as the driver's license or passport) and one additional form of ID that contains the candidate's name and signature. Pearson personnel check candidate IDs only to verify the candidate's identity, but this documentation is not recorded or maintained. Once the candidate's identity is verified, the Pearson staff takes the candidate's photograph, which Pearson's network delivers to the workstation where that candidate will take the test. This photograph, which then appears on the monitor at the designated workstation, enhances security by ensuring that the proctor seats the candidate at the proper workstation.

Scoring the ATSA

As the candidate takes the ATSA, responses are recorded on the AIL and SHL (content vendors) platforms. The content vendors de-identify the content, with the exception of maintaining the AVIATOR ID as the unique identifier to associate the responses to candidates. Each content vendor's test items and scoring mechanisms reside in their respective proprietary web-based applications; as a result, two separate websites supply data to support the ATSA Testing Program. Upon completion of the test, AIL transmits the exam results with the respective AVIATOR IDs to PDRI via the Application Program Interface (API). The API also pulls the scores for SHL's assessments, which are resident on PDRI's platform. PDRI transmits the scores from AIL and SHL's subtests to its online administrative console. All test results will be accessible to the FAA through this administrative console so that the FAA can log in, run and view reports, and download data in a CSV format.

The Office of Aviation Careers downloads and performs a quality review of the data, then sends it to the AVIATOR Liaison. The AVIATOR Liaison then forwards the test data to the developers to calibrate the data and run it through a proprietary algorithm that results in an ATSA score. After this step, the AVIATOR software developers/programmers upload the ATSA score to the appropriate applicants' records in AVIATOR. When the Human Resource office is ready to create a referral list, AVIATOR automatically assigns the eligible/qualified applicants to one of the following bands: Best Qualified, Well Qualified, Qualified, or, based on the ATSA score. Candidates who are no longer qualified/eligible are assigned to the "Not Referred" band. To obtain their placement on the referral list, the candidates must log into their USAJOBS account and click the "Track This Application" link.

The FAA maintains records for the ATSA in accordance with the following National Archives and Records Administration (NARA) General Records Schedules: GRS 2.1, *Employee Acquisition Records,* Items 50 (DAA-GRS-2017-0011-0001) and 51 (DAA-GRS-2017-0011-0002): Job vacancy case files; and Item 60 (DAA-GRS-2014-00020011): Job application packages; and GRS 5.2 *Transitory and Intermediary Records*, Item 20 (DAA-GRS-2017-0003-0002): Intermediary records.

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) v3[3], 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 Organizations[4].

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.

The FAA employs the following strategies to ensure that candidates are informed of the purpose for which the FAA collects, uses, disseminates and retains their PII.

Individuals voluntarily apply for ATCS positions and provide their own PII as required by the FAA's application process. As part of the ATCS selection process, the FAA evaluates applicants and selects a subset of these applicants to take the ATSA to further assess their skills and capabilities. Candidates who apply for ATCS positions may visit the FAA's website on Aviation Careers to review the minimum eligibility qualifications such as age, citizenship, language, security clearance, medical exam, education and work experience, as well as pre-employment testing requirements.

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[3] http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf
[4] http://csrc.nist.gov/publications/drafts/800-53-Appdendix-J/IPDraft_800-53-privacy-appendix-J.pdf

As part of the testing process, candidates must create an account with Pearson VUE. Pearson provides a PAS to candidates at https://home.pearsonvue.com/privacy, located at the point of candidate registration, provides notice to the candidates of their rights under the Privacy Act and the government's authorized uses of PII. The FAA maintains test results in accordance with OPM/GOVT-5 - Recruiting, Examining, and Placement Records, June 19, 2006 71 FR 35351. OPM/GOVT-5 contains an exemption for all such testing or examination material and information from certain provisions of the Act, when disclosure of the material would compromise the objectivity or fairness of the testing or examination process.

Additionally, Pearson asks each candidate to review and acknowledge its standard rules of agreement that covers the subject of audio and video recordings. Pearson records the testing room environment to discourage cheating and safeguard the integrity of test scores. For example, if a candidate disputes the testing environment or there is an incident such as alleged fraud, cheating, or disturbances in the testing environment, Pearson may use the footage to investigate. Additionally, the FAA may request the recording from Pearson for further investigation. When candidates electronically sign the document via an electronic key pay located at the check-in station, they grant consent to be recorded. In addition, Pearson has multiple signs posted in their testing rooms and waiting areas stating that candidates will be audio and video recorded. These recordings of the test environment are not linked to an individual.

ATSA maintains and shares candidate information in accordance with OPM/GOVT-5 - Recruiting, Examining, and Placement Records, June 19, 2006 71 FR 35351. In addition to other disclosures generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act, either all or a portion of the records or information contained in this system may be disclosed as a routine use as identified in OPM/GOVT-5, pursuant to 5 U.S.C. § 552a(b)(3).

Finally, the publication of this PIA also demonstrates DOT's commitment to provide transparency about its privacy practices to candidates who take the ATSA.

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 reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.

Application for ATCS positions is voluntary. Candidates furnish their own PII, including name, phone number, and address (street, city, state, zip code, and country), on the job application. Once the FAA approves the candidate for testing, AVIATOR uploads this information from the candidate's application into Pearson's SFTP site. This information is

used to verify the candidates and track their tests. On the day of the test, Pearson takes a photograph of the candidate used for identity verification at the testing terminal. Audio visual footage captured from candidates taking the test is available for three weeks in case the FAA needs to investigate issues or incidents that may have occurred during the testing process.

Candidates may contact Pearson at any time to update their name and contact information. The AVIATOR ID remains unchanged. Each candidate who wishes to update other information related to the application must access USAJOBS directly to do so.

The FAA maintains testing records in accordance with OPM/GOVT-5 - Recruiting, Examining, and Placement Records, June 19, 2006 71 FR 35351. OPM/GOVT-5 includes an exemption for disclosing testing or examination material and information from certain provisions of the Act, when disclosure of the material would compromise the objectivity or fairness of the testing or examination process.

In accordance with the Privacy Act, individuals may request searches of information related to their test to determine if the FAA has any records that may pertain to them. Individuals wishing to know if their records appear in this system may inquire in person or to:

> Federal Aviation Administration Privacy Office
> 800 Independence Avenue (Ave), SW
> Washington, DC 20591

The request must include the following information:

- Name
- Mailing address
- Phone number and/or email address
- A description of the records sought and, if possible, the location of the records

Individuals seeking to contest information about them that is contained in the Benefits Operations Center Case Management Module (BOC CMM) should make their request in writing, detailing the reasons their records must be corrected and addressing their letter to the FAA Privacy Office at the address above.

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.

Legal Authorities for Testing

Congress has authorized the FAA Administrator to develop a personnel management system that addresses the unique demands of the FAA's workforce.[5] Congress confirmed that the FAA's use of pre-employment testing for Air Traffic Control Specialists is consistent with that authorization.[6]

ATCS Candidate Application and Testing

As stated in the Overview above, when a candidate applies to become an ATCS, the FAA's Office of Aviation Careers retrieves the candidate's name, phone number, address, (street, city, state, zip code, country), and AVIATOR ID, from the candidate's ATCS employment application in AVIATOR system. The FAA maintains this PII as the candidate goes through the selection process, to include evaluation, referral for testing, the testing process itself, and test scoring. Photo IDs are used to verify the identity of the candidate at the time of testing but are not maintained in any system of records.

When the candidates take the ATSA, Pearson documents and retains all evidence of any disturbances or other issues that arise during the test sessions, and may provide documentation to the FAA in writing such as the location, time, applicant names, proctor names, computer number, a well-documented statement regarding the issues, and actions taken. Additionally, Pearson may provide the audio and/or video recording of the testing environment to the FAA if cheating or misconduct is suspected, or if an incident occurs which causes a candidate to dispute the testing environment.

Scoring of the ATSA

After each candidate takes the ATSA, the FAA receives and calibrates the scores, and applies FAA's proprietary scoring algorithm. Subsequently, the AVIATOR software developers/programmers upload the ATSA score to the appropriate applicants' records in AVIATOR. AVIATOR automatically assigns the eligible/qualified applicants to one of the following bands: Best Qualified, Well Qualified, or Qualified, based on the ATSA score. Applicants who are no longer eligible/qualified are assigned to the "Not Referred" band. During this process, the candidate's AVIATOR ID is associated with the scores.

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. DOT should retain PII for only as long as necessary to fulfill the specific purpose(s) and in accordance with a National Archives and Records Administration (NARA)-approved record disposition schedule.

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[5] 49 U.S.C. 40122(g)(1).

[6] 49 U.S.C. 44506.

FAA's ATSA employs data minimization techniques in addition to appropriate retention policies to reduce the privacy risks associated with the testing and maintains the records in accordance with appropriate legal and record retention requirements. The FAA collects a minimal amount of information from a candidate's application package (first name, middle name, last name, mailing address, email, phone number) and uploads this information to Pearson's SFTP to begin the testing cycle. This information is transmitted to the test center where a candidate is scheduled to test. Test Center staff may access this information only for identity verification. As candidates take the ATSA, the content vendors' platforms receive the test responses. However, the vendors, who only maintain the AVIATOR ID as a unique ID associated with the responses, otherwise de-identify the content.

The FAA maintains its position descriptions, job vacancy files, and test records under NARA GRS 2.1, *Employee Acquisition Records,* Items 50 and 51, *Job vacancy case files*; and candidacy application, resume', and relevant attachments pursuant to GRS 2.1, Item 60: *Job application packages*. Finally, the collection of audio-visual footage of the testing center serves as a deterrent to dishonesty during testing and helps to safeguard the integrity of test scores. Pearson does not share these recordings with any FAA system; nonetheless, in accordance with GRS 5.2 Transitory and Intermediary Records, Item 20: *Intermediary records*, the FAA-contracted vendor retains these records for up to three weeks after the test and may retain it longer as required by law.

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.

The FAA ensures that the collection, use, and maintenance of examinees' information is accurate, complete, up-to-date, and is used only for the purposes for which it was intended. To ensure the accuracy of candidates contact information and to verify that it matches the individual's identification, Pearson requests that the candidates review their contact information during the creation of their Pearson account profile.

When the examinee arrives at a Pearson test center to take the ATSA, he/she must present two valid forms of government-approved ID, such as the driver's license or passport, and one additional form of ID containing the candidate's name and signature. Pearson staff check IDs only to verify the candidate's identity, and do not record or maintain this documentation. Pearson also captures the candidate's photo, which Pearson's network delivers to the workstation to be displayed on the monitor where that candidate will take the test. This photograph is used only to enhance security by ensuring that each candidate is seated at the appropriate workstation. The audio and video footage captured at the test center not only discourages cheating but also safeguards the integrity of test scores. The footage

may be used to investigate if any incidents occur (such as suspected fraud or cheating) or if a candidate disputes the testing environment. However, unless otherwise required by law, Pearson retains the footage for only three weeks and does not use it for any other purpose.

The FAA uses the ATSA results only to inform its decision-making on candidate qualifications for ATCS positions. The FAA does not use the test results for any other purpose and takes steps to mitigate this risk, such as through a segregation of duties between FAA and its contractor. Pearson registers candidates and administers the test, while the FAA operates the program and maintains the data for only two years after termination of the register of eligible candidates, in accordance with NARA GRS 2.1, *Employee Acquisition Records,* Items 50/51: Job vacancy case files.

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).

The FAA employs a number of procedures to ensure the quality and integrity of the date in ATSA. In order to protect the quality of the data and ensure its accuracy, when a candidate creates a Pearson account profile, the individual only enters the full name and AVIATOR ID before verifying the contact information. PII collected voluntarily and directly from the individual candidate as part of the FAA's application process. Following the exam, the FAA's Office of Aviation Careers downloads candidates' test results through PDRI's administrative console. Upon conducting a quality review of the data, the Office of Aviation Careers sends the scores to the AVIATOR Liaison, who forwards the test data to the AVIATOR developers. The developers calibrate the data and run it through FAA's proprietary algorithm, resulting in a final ATSA score. Each content vendor's test items and scoring mechanisms reside in separate proprietary web-based applications. These processes help to ensure the accuracy of the data.

Pearson is responsible for administering the ATSA; however, Pearson contracted PDRI, a subsidiary of SHL, to build a GUI on its testing platform that ensures all test content runs seamlessly. It is through this platform that PDRI pulls the test scores from each content vendor. This segregation of duties and limited access to the test data by a small number of people reduces the risk of unauthorized data manipulation or alteration. These measures reduce the risk of unauthorized alteration of the test data. Pearson uses encrypted internal IT systems for submission of candidate information to the specified test center. Pearson collects and sends minimal information on each candidate to the testing center. This data includes the full name, AVIATOR ID, mailing address, phone number, email address. Test Center staff may only access this information to validate the identities of the candidates. Finally, the two content vendors receive candidate test responses with only AVIATOR IDs. The vendors

maintain test responses for two years but anonymize the data 90 days after the conclusion of a testing cycle.

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.

The FAA protects PII with reasonable security safeguards against loss or unauthorized access, destruction, usage, modification, or disclosure. These safeguards incorporate standards and practices required for federal information systems under the Federal Information Security Management Act (FISMA) and are detailed in Federal Information Processing Standards Publication 200, dated March 2006, and the National Institute of Standards and Technology Special Publication (NIST) 800-53, Revision 4, *Security and Privacy Controls for Federal Information Systems and Organizations,* dated April 2013.

The FAA and Pearson testing centers undertake a number of security measures to allow the proctor to verify that the correct candidates are seated at their corresponding workstation, and to prevent cheating. Pearson testing centers require each candidate to provide two forms of identification, including a government-approved photo ID such as the driver's license or passport, and one additional form of ID which contains the candidate's name and signature. This information is used to verify the identity of the candidate in order to match the appropriate individuals with the PII they provided on their application, and to ensure that test results are assigned to the correct candidate. Once the candidate's identity is verified, the Pearson staff takes the candidate's photograph at the check-in desk with a camera linked to Pearson's test center server. The photograph is delivered via Pearson's test center network and appears on the workstation where that candidate will test. This process helps the test administrator to verify that the candidate is at the correct terminal. The exchange of testing results occurs via encrypted secure file transfer protocol. In addition, Pearson records (audio and video) two different views of the testing room. These recordings capture all candidates while testing, as well as proctors who enter the testing room.

In order to facilitate delivery of the test candidate information to the test centers, Pearson sends the candidate's PII such as full name, mailing address, phone number, email and AVIATOR ID through FAA's encrypted internal systems to the test centers. Test Center staff is permitted to access this information only for the purpose of identity verification of the candidates. Limited access to a small and select number of individuals reduces the security risk that the data may be altered or manipulated.

Once a candidate completes the ATSA, the GUI accesses the test scores from AIL's server and combines them with SHL's test scores from PDRI's platform. All test results are

accessible to the FAA via PDRI's administrative console so that the FAA can log in, view and run reports, and download data in a CSV format. For security purposes, the administrative console requires two-factor authentication, and all communication regarding test scores is encrypted, both in transit and at rest. Finally, individual candidates are not permitted to update or change their scores at any time.

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.

FAA Order 1370.121A, FAA Information Security and Privacy Program & Policy, implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), DOT privacy regulations, Office of Management and Budget (OMB) mandates, and other applicable DOT and FAA information and information technology management procedures and guidance. In addition to these practices, the FAA consistently implements additional policies and procedures that are consistently applied, especially as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors who work with ATSA are given clear guidance about their duties as related to collecting, using, and processing privacy data. Guidance is provided in mandatory annual security and privacy awareness training, as well as FAA Order 1370.121A. The FAA will conduct periodic privacy compliance reviews of the ATSA as related to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

Responsible Official

David Hamill
Director, Human Capital Programs
Office of Human Resource Services
Federal Aviation Administration

Approval and Signature

Karyn Gorman
Acting Chief Privacy Officer
Office of the Chief Information Officer