



U.S. Department of Transportation

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

**Privacy Impact Assessment
Automated Vacancy Information Access
Tool for Online Referral (AVIATOR)**

Responsible Official

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Executive Summary

The Federal Aviation Administration (FAA) Automated Vacancy Information Access Tool for Online Referral (AVIATOR) is operated and maintained by the FAA Office of Human Resource Management (AHR) and the FAA Office of Information & Technology Services (AIT). AVIATOR is a web-based application used by current FAA employees to develop and post FAA job announcements through a system interface with the Office of Personnel Management (OPM) USAJOBS.gov¹ web-based system, and by members of the general public to apply for FAA job openings. AVIATOR shares information with OPM's USAJOBS to simplify and streamline the FAA application process. The FAA is conducting this Privacy Impact Assessment (PIA) in accordance with the E-Government Act of 2002, because AVIATOR collects, disseminates, and uses the personally identifiable information (PII) of members of the public who apply for FAA jobs. This PIA also addresses the privacy risks for FAA employees who access the system in their official capacity.

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.²

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

¹ USAJOBS.gov is the Federal Government's website for posting civil service job opportunities with Federal agencies. The site is operated by the OPM. For additional information, please see the USAJOBS PIA at: <http://www.opm.gov/privacy/PIAs/USAJOBS.pdf>.

² 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).



electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:

- *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 1958³ gives the FAA the responsibility to carry out safety programs to ensure the safest, most efficient aerospace system in the world. The FAA's central mission is to promote safety in civil aeronautics. FAA's Associate Administrator for Administration is responsible for setting the broad agency human resources policies and operating principles. These policies and principles provide the agency framework for the lines of business and staff organizations to establish the human resources programs necessary to accomplish their organizations' missions. Under the Associate Administrator's direction, the Director of Human Resources Management issues these policies and other guidance following appropriate coordination. To fulfill these responsibilities and automate its hiring process, the FAA developed AVIATOR, a web-based application.

Current FAA AHR employees use the application to create and publish FAA job announcements through a system interface with AVIATOR and USAJOBS. Members of the public, who may have interest in FAA positions, use AVIATOR to apply to FAA job announcements. AVIATOR interfaces with [USAJOBS](#) to facilitate the hiring process with instant certification of qualified candidates for employment.

AVIATOR allows for simultaneous online application submittal, screening and testing, scoring and notification, eligibility list placement, and referral for interview. The FAA's use of AVIATOR reduces the time and effort associated with announcing vacancies and expedites the screening and selection process.

³ 49 U.S.C. § 106.



Typical Transaction for Job Applicants

Through USAJOBS, applicants (job seekers) create a profile by voluntarily entering personal information such as the full name, mailing address, telephone numbers (home, work, cell, and other), email address, citizenship status, military status, along with resume data such as educational records, military records, and employment status and records. Applicants may also elect to provide their race, national origin, and disability information, which USAJOBS uses for statistical purposes only. Depending on the position, the FAA may also require an applicant to provide an FAA or an OPM form to provide supplemental information, which would include information beyond the general profile.⁴

In a typical transaction, job seekers navigate to USAJOBS online, enter their credentials, and review FAA job announcements within USAJOBS. When job seekers elect to apply to an FAA job, USAJOBS redirects them to AVIATOR to apply. AVIATOR verifies the job seeker via USAJOBS Single Sign-On (SSO) and downloads the USAJOBS job seeker profile data into AVIATOR, in addition to any documents attached to the application. An identifier is also created in the AVIATOR database the first time an USAJOBS candidate applies to a FAA job announcement. This identifier is uniquely linked to the USAJOBS' candidate User ID and becomes a shared data field for AVIATOR. Once transferred into AVIATOR, this data field is known as an applicant's "record number."

The job seeker completes the FAA job specific questionnaire and submits it, along with any supplementary documents for hiring consideration. Often, applicants also enter non-requested PII, as found on their resumes, such as salary information and place of birth. This information remains as submitted electronically and is encrypted by the FAA.

All applicants have access to their personal information in USAJOBS and can change their profile information, including contact information. If the FAA job announcement is still open at that time, they can reapply with the updated personal information.

AHR Users

A limited number of AHR employees and their designees require access to AVIATOR to create and update the job announcements, screen applicants, process testing, scoring, and notification of applicants, and to generate eligibility lists and interview referrals. An authorized AHR user creates a list of applicants within AVIATOR for each job announcement, and AVIATOR functionality allows the FAA selection official to access the "Referral List." The selection official electronically annotates appointments on the Referral

⁴ In September 2020, FAA AHR made the decision to refrain from collecting or displaying SSNs within the AVIATOR system. Previously collected SSN data, which is encrypted, continues to be stored in AVIATOR according to the National Archives and Records Administration General Records Schedule 2.1: Employee Acquisition Records, Approved July 2017, as discussed in the Data Minimization and Retention Section below.



List and notifies the AHR user of the selection. Finally, the AHR user or selecting official enters an Appointment Code on the Referral List to annotate that the individual is selected.

AHR administrative users login to the internal AVIATOR system using their Personal Identify Verification (PIV) card. AVIATOR authenticates the AHR administrative user via MyAccess. AHR administrative users include human resource specialists, who create job vacancies, perform qualification reviews, and create referral lists.

Data Exchanges

AVIATOR has six active data exchanges, including one external exchange with OPM (USAJOBS) and five internal exchanges with other FAA systems and programs:

- **USAJOBS.gov⁵ (as previously noted):** is OPM's web-based application for hiring federal employees. AVIATOR and USAJOBS.gov share information real-time through a bi-directional SSL HTTP data transfer. AVIATOR does not share PII with the [USAJOBS.gov](https://www.usajobs.gov) application but does receive PII from USAJOBS.gov. This includes profile and demographic data and documents that contain educational and employment history, and other PII that a user deems pertinent to applying for consideration for a federal job vacancy. Current agreements between OPM and the FAA outline roles and responsibilities and service agreements terms (Memorandum of Agreement) and define the interconnection system security compliances (Interconnection System Agreement).
- **Tableau:** AVIATOR interfaces with FAA AIT Cloud Tableau server for the purposes of data analytics and presentation via the Denodo Platform, a data virtualization and analytics tool that assists with addressing access controls, availability, data integrity, and direct access to the Tableau server itself. Denodo enables the FAA to more effectively secure, cache, and prepare the data for prompt consumption. Tableau, which resides in a Virtual Privacy Cloud (VPC) within the FAA Amazon Web Services (AWS) Cloud Services GovCloud West production environment, provides encryption of its data at rest as well as in transit.
- **MyAccess:** AVIATOR is PIV-enabled, leveraging FAA's MyAccess to authenticate FAA users who access the AVIATOR application internally via their username and personal identification number (PIN).
- **Covered Positions Decision Support System (CPDSS):** AVIATOR exchanges data with FAA's CPDSS to facilitate FAA tracking of onboarding Air Traffic Controller Specialists (ATCS). CPDSS is used only for a specific position description related to the ATCS role. AHR requires the following data elements from CPDSS: full name,

⁵ USAJOBS is the Federal Government's official employment site that connects job seekers with federal employment opportunities across the United States and around the world.



suffix, applicant ID (unique to the Office of Aerospace Medicine), date of birth, gender, city, state, zip, tentative offer letter (TOL) authored date (also known as clearance instruction letter, or CIL authored date), first contact with region, schedule date for exam, final medical determination (values of pending, cleared, not cleared), date of final disposition, clearance expiration date, and actual date of drug test.

- **Investigations Tracking System (ITS):** AVIATOR's interconnection with FAA ITS is to properly oversee the ATCS background investigation process. Data sharing views include: ITS ID, full name, suffix, city, state, zip, date of birth, gender, create date, electronic questionnaires for investigations (e-QIP) initiated date, individual identification (IndID), number of days as an applicant in e-QIP, number of days as an applicant with the agency, fingerprint submission date, cleared for hire date, waiver status, effective date of waiver, current status (will always be an applicant).
- **Air Traffic Skills Assessment (ATSA):** AVIATOR exchanges data manually with the ATSA. The ATSA test is operated by a vendor and is not integrated with FAA systems. The ATSA consists of a computer-based, entry-level employment selection test battery designed to assess the critical knowledge, skills, abilities, and other personal characteristics (KSAOs) that are required at entry to the FAA Air Traffic Control Specialist position. The FAA sends applicants who meet the basic ATCS position qualifications to an external, non-FAA testing center to take the ATSA. AHR shares the AVIATOR PII data with the external testing vendor. AVIATOR makes the following data views available for ATSA: first name/last name/middle name/suffix, AVIATOR Applicant ID, street address of applicant, city/state/zip code of applicant's address, day/evening/mobile phone, and email address.

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) v3⁶, 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 Organizations⁷.

⁶ <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

⁷ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



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 multiple strategies to ensure that FAA job candidates are informed of the purpose for which the FAA collects, uses, disseminates, and retains their PII. Individuals voluntarily apply for FAA positions and provide their own PII as required by the FAA's application process. Candidates who apply for FAA positions may visit USAJOBS.gov to review the minimum eligibility job qualifications such as age, citizenship, language, security clearance, education and work experience, as well as any additional pre-employment requirements.

Before AVIATOR can store an individual's PII, he or she must create a profile and apply for employment with the FAA by entering personal information into USAJOBS and AVIATOR and attesting to its accuracy. The USAJOBS Website provides notice to the public regarding information handling practices, authority to collect the information, the uses of the information provided, consequences for not providing the information, and access and amendment processes. Additionally, once a candidate is transferred over to AVIATOR from USAJOBS, the FAA provides a Privacy Act Statement (PAS). Finally, both USAJOBS and AVIATOR provide notice to applicants of their respective Privacy Policies through the posted website links.

Job postings on USAJOBS often include either FAA or OPM Form(s) (paper or electronic) that must be completed. For instance, OPM may request a [Standard Form \(SF\) 15, Application for 10-Point Veteran Preference](#), [FAA Form 3330 – 43, Rating of Air Traffic Experience](#), [FAA Form 3330-43-1, Rating for Air Traffic Experience at Movement](#), and/or [Optional Form \(OF\) 306, Declaration of Employment](#). The required FAA forms provide the appropriate notice to candidates through a PAS.

The FAA maintains applicant records in AVIATOR in accordance with the following OPM-published System of Records Notices (SORN): [OPM/GOVT-5 - Recruiting, Examining, and Placement Records](#), 71 FR 35351, June 19, 2006, and [OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records](#), 71 FR 35356, June 19, 2006. OPM/GOV 5 claims exemptions as detailed in the published SORN. AVIATOR also maintains account profile and authentication records on FAA employees and contractors in accordance with [DOT/ALL 13, Internet/Intranet Activity and Access Records](#), 67 FR 30758, May 7, 2002. The



publication of this PIA further demonstrates the U.S. Department of Transportation's commitment to providing transparency into FAA's AVIATOR program.

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.

Individuals who wish to voluntarily apply for an FAA position must create and complete a profile on OPM's USAJOBS, which shares specified PII with FAA's AVIATOR system. USAJOBS collects the candidate's full name, mailing address, telephone numbers, email address, citizenship and military status, and resume information such as education, employment, and military records, as well as supplemental forms and information as requested for particular positions. USAJOBS also collects demographic data, which is optional and is used for statistical purposes only. USAJOBS shares specified candidate PII with AVIATOR such as profile and demographic data as well as documents that contain employment history, work history, and other PII as the candidate believes is useful for consideration.

Candidates may login to USAJOBS at any time to update their information such as name, contact information, educational background, or employment history. The USAJOBS candidate's ID known as the AVIATOR Record Number remains unchanged. Each candidate who wishes to update other information related to the application must access [USAJOBS](#) directly to do so.

The FAA maintains candidate records in AVIATOR in accordance with [OPM/GOVT-5 - Recruiting, Examining, and Placement Records](#), 71 FR 35351 (June 19, 2006), and [OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records](#), 71 FR 35356 (June 19, 2006). Subject to the limitations of the Privacy Act, individuals may request access to information about themselves contained in an FAA system of records through the FAA's Privacy Act procedures. The FAA reviews all Privacy Act requests on an individual basis and may, as appropriate, waive applicable exemptions, if the release of information to the individual would not detrimentally impact the law enforcement or national security purposes for which the information was originally collected or is subsequently being used. Under the Privacy Act, job candidates may request searches of the AVIATOR file to determine if any records have been added that may pertain to them. These individuals may mail this request in writing to the system manager at the following address:

Federal Aviation Administration



Director for Office of Information Security and Privacy
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Individuals should include the following information in their request: name; date of birth; identification number (if known); approximate date of record; title of examination or announcement with which he or she is concerned; and geographic area in which consideration was requested.

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 PII contained in PTB is utilized for transit subsidy usage reconciliation, reporting for the agency, monitoring, and tracking participant usage.

Under Sections 1302, 3301, and 3304 of Title 5 of the U.S. Code, OPM is authorized to rate applicants for Federal jobs. Section 1104 of Title 5 enables OPM to authorize other Federal Agencies to rate applicants for Federal jobs. Additionally, the FAA has the authority to collect and maintain personally identifiable information within the AVIATOR system under 5 U.S.C. §§ 1302, 3109, 3301, 3302, 3304, 3305, 3307, 3309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, 5532, 5533; and 5 U.S.C. 7201.

AVIATOR is used by FAA AHR to automate the FAA hiring process. AVIATOR reduces the time and effort associated with announcing vacancies and expedites the screening and selection process. AVIATOR facilitates the hiring process with instant certification of qualified candidates for employment. It allows simultaneous online application submittal; screening and testing; scoring and notification; eligibility list placement; and referral for interview. Current FAA employees use AVIATOR to develop FAA job announcements, and the members of the public use the system to respond and/or apply to the job announcements.

Job seekers voluntarily create profiles in USAJOBS for the purpose of applying for federal jobs. The applicants enter PII such as name, mailing address, telephone numbers, email address, citizenship and military status, resume' and supplemental information, as well as additional as requested for particular jobs. Additionally, USAJOBS also collects optional demographic data but only for statistical purposes. If the job seeker chooses to apply for jobs at the FAA, USAJOBS shares specified candidate PII with AVIATOR, such as the profile, demographic data, education, work history, and other PII offered voluntarily by the candidate.



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.

The AVIATOR system collects the minimum information necessary to consider FAA applicants for employment, transfer, reassignment, reinstatement, or promotion and to evaluate personnel/organizational measurement and selection methods.

Records in AVIATOR are maintained in accordance with the National Archives and Records Administration (NARA) General Records Schedule, NARA [GRS 2.1: Employee Acquisition Records, Approved July 2017](#). Position Descriptions (Item 22) are temporary and must be destroyed when the position descriptions are final, but longer retention is authorized if required for business use (DAA-GRS-2014-0002-0003). Accordingly, for Job Vacancy Case Files (Item 50), records of one-time competitive and Senior Executive Service announcements/selections are temporary and should be destroyed two years after the selection certificate is closed or the final settlement of any associated litigation, whichever is later (DAA-GRS-2017-0011-0001). Job Vacancy records of standing register competitive files for multiple positions (Item 51) filled over a period of time are retained temporarily and must be destroyed two years after termination of the register (DAA-GRS-2017-0011-0002). Finally, Job Application Packages (Item 60) are also temporary and should be purged one year after the date of submission (DAA-GRS-2014-0002-0011).

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 PII collected and processed by AVIATOR is used to provide the FAA and its voluntary job applicants with an effective, efficient hiring process. The FAA does not use PII that is stored within AVIATOR for any purposes other than for the hiring process. The AVIATOR system collects PII only with the express permission (obtained electronically) of applicants, and only for activities associated with the hiring process. The uses of PII in AVIATOR are specified in the PAS at the time of collection, whether on USAJOBS or on the FAA AVIATOR website. In addition, some job vacancies require completion of FAA and/or OPM forms (either paper or electronic), each of which contains the required PAS specifying the uses of the information.

FAA HR Administrative Users and Selection Officials responsible for making hiring decisions may have access to all or some of the PII contained in AVIATOR. During the hiring selection process, these personnel may share data from AVIATOR with personnel



staffing specialists and other authorized employees of the FAA who have a need to know the information for FAA business purposes.⁸ The records or information contained in AVIATOR and USAJOBS may be disclosed as a routine use as prescribed in [OPM/GOVT-5 - Recruiting, Examining, and Placement Records](#), 71 FR 35351, (June 19, 2006), and [OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records](#), 71 FR 35356, (June 19, 2006), pursuant to 5 U.S.C. § 552a(b)(3). These routine uses include sharing AVIATOR data with other Federal Agencies and organizations, employers, schools, and law enforcement agencies for the purpose of verifying application information and obtaining necessary clearances, prior to the final hiring selection. Finally, the FAA maintains AVIATOR account profile records in accordance with [DOT/ALL 13. Internet/Intranet Activity and Access Records](#), 67 FR 30758, (May 7, 2002).

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 supports the accuracy, relevance, timeliness, and completeness of job seeker information. The FAA assumes the accuracy of the information in AVIATOR that it receives from OPM's USAJOBS because the PII is collected voluntarily and directly from the individual job candidate. The FAA also assumes the data quality within AVIATOR with an attestation of accuracy from the individual. The USAJOBS and AVIATOR systems provide opportunities for applicants to view their PII and update this information at any time before a job announcement closes. Applicants access and modify their own PII through the OPM USAJOBS Website, which authenticates applicants using [Login.gov](#) credentials. As a final step in completing an application for employment with the FAA, the applicant is required to assert that all information with the application, including PII, is correct and complete.

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

⁸ This internal sharing within FAA is in accordance with the Privacy Act's "need to know" exception. 5 U.S.C. § 552a(b)(1).



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 AVIATOR system meets all requirements and has been certified with an Authority to Operate (ATO) by DOT/FAA. AVIATOR received its first ATO on September 18, 2013, and was granted its latest ATO on February 28, 2019, after undergoing the National Institute of Standards and Technology (NIST) security assessment and authorization (SA&A). The AVIATOR system is audited by FAA Security Personnel to ensure FISMA compliance through an annual assessment according to NIST standards and guidance.

The FAA has implemented security and privacy controls that fully incorporate administrative, technical, and physical measures to protect candidate PII against loss, unauthorized access, and disclosure. Specifically, AVIATOR takes the following steps to safeguard PII: identification and authentication, physical security, user roles and permissions, and encryption. Physical security includes physical access and environmental controls in the controlled server center within a secure facility which houses AVIATOR. Physical access to the AVIATOR system is limited to designated personnel through photo badges, building key cards, and room-access keypads.

AVIATOR's security measures also include encryption to safeguard PII and other sensitive data both at rest and in transit between AVIATOR and USAJOBS as well as other systems with which it connects. The FAA employs intrusion devices centrally monitored by the FAA's Cyber Security Management Center. AVIATOR limits access to the data it maintains through user roles and permissions, based on the need to know, according to job function. This practice prohibits the unauthorized access to job seeker information. All FAA government and contract personnel must complete privacy and security training and must agree to the Rules of Behavior (ROBs), which emphasize privacy protective practices.

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's Office of the Chief Information Officer, Office of Information Systems Security, Privacy Division is responsible for governance and administration of FAA Order 1370.121A, FAA Information Security and Privacy Program, 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, OMB mandates, and other applicable DOT and FAA Records Management procedures and guidance. In addition to these



practices, the FAA consistently implements policies and procedures, especially as they relate to the access, protection, retention, and destruction of PII. Federal and contract employees who work with AVIATOR are given clear guidance in their duties as they relate to the collection, use, processing, and security of privacy data. Guidance is provided in the form of FAA 1370.121A, mandatory annual security and privacy awareness training including ROB Acknowledgement. The FAA Office of the Chief Privacy Officer will conduct periodic privacy compliance assessments of AVIATOR in accordance with the requirements of the OMB Circular A-130, Managing Information as a Strategic Resource.

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Approval and Signature

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