

**U.S. Department of Transportation** 

**Privacy Impact Assessment** Federal Aviation Administration FAA

# National Airspace System Data Warehouse System/ Aircraft Noise Complaint and Inquiry System NAS-DW / ANCIS

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#### **Responsible Official**

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## **Reviewing Official**

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

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#### **Executive Summary**

The Federal Aviation Administration (FAA) Aircraft Noise Complaint and Inquiry System (ANCIS) is an automated portal which serves as the agency-wide tracking system to automate the aircraft noise complaint and inquiry processes for members of the public. ANCIS is a subsystem hosted on and authorized under the FAA National Airspace System Data Warehouse (NAS-DW) system, which serves as the FAA's central repository for aeronautical movement information. This Privacy Impact Assessment (PIA) pertains to ANCIS and will not address other application and data sets within the NAS-DW system. The ANCIS assists FAA employees in responding to members of the public when a noise complaint is made in ANCIS to help facilitate a more efficient and consistent response for various complaint types. ANCIS records include files, correspondence, supporting documentation, and other related records accumulated for the purpose of processing aircraft noise complaints and inquiries. These attachments include Personally Identifiable Information (PII), such as name, event location (cross street or home address), phone number, and e-mail address. This PIA was developed pursuant to Section 208 of the E-Government Act of 2002 because the FAA collects, uses, and maintains PII from members of the public who submit noise complaints via ANCIS. Freedom of Information Act (FOIA) requests are not addressed within ANCIS.

## 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.<sup>1</sup>

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

<sup>&</sup>lt;sup>1</sup>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).



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:

- 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 gives the Federal Aviation Administration (FAA) the responsibility to carry out safety programs to ensure the safest, most efficient aerospace system in the world. The FAA is responsible for:

- Regulating civil aviation to promote safety;
- Encouraging and developing civil aeronautics, including new aviation technology;
- Developing and operating a system of air traffic control and navigation for both civil and military aircraft;
- Developing and carrying out programs to control aircraft noise and other environmental effects of civil aviation; and
- Regulating U.S. commercial space transportation.

One of the ways the FAA supports this mission is by responding to members of the public about their noise complaint inquiries, as required under Public Law 104-264, Section 1210 Federal Aviation Reauthorization Act of 1996; 49 U.S.C. § 40101 Public Law 112-95, Section 510; and Public Law 115-254 Section 180 FAA Reauthorization Act of 2018.

#### USER ACCOUNTS

#### COMPLAINANTS:



Complainants are not required to create a user account. No username or password is needed. The ANCIS web portal (noise.faa.gov) serves to collect the required information that is unique to each Complainant who enters a complaint. A complaint record is automatically generated upon submittal and can be retrieved (internally by FAA employees only) by the record number or by identifiers, such as the Complainant's PII. Other than the required PII (name, email address, event location, and home address), no other Complainant PII is required to submit a complaint. Before the Complainant can proceed to submit a complaint, the Complainant must agree that they have reviewed the ANCIS Privacy Act Statement to proceed with complaint submittals. They are advised not to provide any additional information beyond what is required. The Privacy Act Statement can be viewed at <a href="https://noise.faa.gov/noise">https://noise.faa.gov/noise.</a>

#### FAA USERS WHO ADDRESS COMPLAINTS

ANCIS uses Active Directory and the FAA Personal Identity Verification (PIV) solution for system authentication for FAA employee users who address noise complaints in the system. ANCIS does not create user accounts. The Lead Contributor manages the Staff Office or Line of Business (LOB) to coordinate the responses to the Regional Administrators Office, and Contributors provide support to develop a response to the Complainant.

**<u>Regional Office Users</u>**: The ANCIS Regional Office staff member receives an email from the Complainant's email address, enters the complaint into ANCIS, and assigns it to a Staff LOB to assist in closing out the complaint.

The Regional Administrator's office responds only to unique complaints. One type of ANCIS user is an Aircraft Noise Ombudsman. There is an Aircraft Noise Ombudsman in every FAA region who serves as a liaison with the public on issues regarding aircraft noise. The Ombudsman helps to bring about change in aircraft routes to minimize any increases in aircraft noise over populated areas. For more information about the role of the Aircraft Noise Ombudsman, please visit the following websites:

https://www.faa.gov/about/office\_org/headquarters\_offices/apl/noise\_emissions/airport\_airc raft\_noise\_issues/noise\_ombudsman/

and

https://www.faa.gov/about/office\_org/headquarters\_offices/apl/noise\_emissions/airport\_airc raft\_noise\_issues/noise/.

• **Regional Administrator's Office**: The Regional Administrator's Office provides for a direct line of communication with the public regarding aircraft noise. This office facilitates providing a solution to the complaints; but if not acceptable, the public may contact the Aviation Noise Ombudsman for further assistance. The



Regional Office staff reviews and approves the final responses to the complaints. The Regional Office staff members are assigned based on the geographic location of the complaints.

- Staff Office/LOB Lead Contributor: The LOB Lead Contributor is assigned by the Regional Office based on the geographical region of the complaint. The LOB Lead may be the Noise Ombudsman, who may also serve as an advocate for the public's interest. The LOB Lead manages the Staff Office and ensures that a draft response to a noise complaint is being processed. Access to ANCIS must be approved by the Regional Office; and once granted, it requires the LOB Lead to use their PIV card for access. The LOB Lead sends the draft responses back to the Regional Office for approval.
- LOB Contributor: The LOB Contributor is assigned by the LOB Lead. The LOB Contributor may be the office staff assigned to work the noise complaint response or another individual internal to FAA who may have pertinent contributions that can help close out the complaint. Access to ANCIS must approved by the Regional Office; and once granted, it requires the LOB Contributor to use their PIV card for access. This work is reviewed by the LOB Lead, and then is submitted to the Regional Office for final disposition of the response to the Complainant. All Contributor access to ANCIS is restricted to internal FAA use only.

### ANCIS APPLICATIONS

#### External Website:

Reporting through ANCIS is voluntary and is one method used if members of the public want to submit a noise complaint or inquiry to the FAA. A Complainant is directed to the Aircraft Noise Complaint and Inquiry System (ANCIS) external website application (noise.faa.gov) to submit a complaint or inquiry. A Complainant does not need a Username and password. The Complainant must enter their name, email address, event location (Cross Street) or home address, a description of the complaint; complete the Completely Automated Public Turing test (CAPTCA) to verify the user is a human; and finally, they must submit the complaint. After the complaint is submitted, the Complainant is sent an email to confirm the email address is valid; that email contains a hyperlink on which the Complainant must click to confirm their email address is valid. Once the email is confirmed, the Complainant can add attachments, if they desire. Attachments could include pictures of the aircraft, images, or maps from publicly available flight-tracking applications which depict the



location of where the noise is coming from. This could include pictures of homes in the area or radar track data, which shows latitude/longitude.

#### Internal Website:

An internal website application is used by the FAA to address noise complaints and inquiries. This website is not accessible to the public. This site requires the user of the FAA PIV solution to gain access. The user goes to the ANCIS internal website where they are redirected to the FAA PIV site solution to verify their credentials. Once confirmed, the user is redirected back to the ANCIS application.

Once the complaint is confirmed, the Regional Office assigns it to staff member who will respond. If the complaint was previously addressed, the response goes back to the Regional Office for approval. The Regional Office then sends responses to the Complainant's email address to adjudicate the complaint.

ANCIS provides reports to the Regional Office Director's offices to determine if additional resources are required. Reports are not generated for individual complaints. The reports contain summary information only and do not contain PII. The summary status reports that are generated within ANCIS can include, but are not limited to, the following types of information:

- Average response times for complaints
- Number of responses due within a specified window of time
- Complaints that are overdue
- Staff Office or Line of Business total number of annual complaints
- Airports with a high level of complaints or inquiries

## WAYS TO SUBMIT A COMPLAINT:

There are four ways for a member of the public to submit a noise complaint or inquiry:

• Via email to the FAA Ombudsman at 9-awa-noiseombudsman@faa.gov – If the Complainant emails the complaint, the Regional Administrator Office staff manually enters the complaint into ANCIS. Then the Regional Administrator Office staff assigns the complaint to the LOB Lead Contributor within ANCIS. The Lead Contributor drafts a response to the noise complaint and sends the response back to Regional Office. The Regional Administrator Office approves, and then sends the response back to the Complainant. Contributors may help develop the response. The



Regional Administrator Office can approve or return the response back to the Staff Office for more edits.

- Via phone: (202) 267-3521 The same Regional Office Staff takes the voice mail and follows the same process as for complaints received by email.
- Via regular mail: Federal Aviation Administration, Aviation Noise Ombudsman, AEE-2, 800 Independence Ave. S.W., Washington, DC 20591. The FAA Headquarters Staff takes the mail and follows the same process as for email.
- Via the ANCIS website at the following Uniform Resource Locator (URL): https://noise.faa.gov/noise/pages/noise.html

Once a complaint is entered into ANCIS on the website, it goes directly to the Regional Office Staff.

Members of the public may submit their noise complaint or inquiry via the ANCIS. Once the complaint or inquiry is investigated and a resolution determined, the Complainant can contact the Regional Noise Ombudsman or the Regional Administrative Office if they feel the resolution is not acceptable. The FAA Regional Administrators' Offices and the FAA Noise Ombudsman uses the information voluntarily reported by the Complainant to prepare responses to their noise complaints or inquiries. If the Complainant felt the response was not adequate, the Headquarters Ombudsman assists to better respond to the complaint. A new complaint will be entered into ANCIS, with a new unique identifier (Complaint Record Number); it may be linked to the original complaint in ANCIS.

#### **COMPLAINT PROCESS:**

Complainants who wish to submit a noise complaint can use the ANCIS URL to enter their complaint so that the FAA can respond to the Complainant. The ANCIS web portal collects the following data from the Complainant: name, email address, event location (cross-street) or home address, and a description of the complaint. Once submitted, a Complaint Record Number is automatically generated by the ANCIS application. The data is stored in the ANCIS database. The required fields in ANCIS represent the minimum amount of information the FAA needs to address the public's noise complaint or inquiry. It is important to have the person's name and email address to respond to and track the complaint. The FAA will not respond to the same complaint from the same person more than once. The address or cross street is needed by the FAA to determine potential sources of the aircraft noise issues, as most people complain about aircraft in the vicinity of their residence. The description is used to provide additional details for the FAA to better address the complaint or question. Required information also includes the event start/stop dates and times, and any other questions the Complainant may have. Additional optional information may be included, such as aircraft type/description, supporting documents, and any contact the Complainant had with the airport or other officials. The supporting documents can vary and



may include emails, images of radar track data or other information, or any attachments the Complainant includes in their complaint. The attachments may contain PII at the Complainant's discretion, such as photos of individuals; photos of aircraft, which include the aircraft registration number; photos of their home captured in supporting documents, documents with addresses, etc.

The FAA's Regional Administrator's Offices and the Aviation Noise Ombudsman serve as liaisons with the public on issues regarding aircraft noise. If an individual has a specific question, comment, concern or complaint that cannot be answered or addressed by any of the methods above, complainants can contact the Aviation Noise Ombudsman at: <a href="https://www.faa.gov/about/office\_org/headquarters\_offices/apl/noise\_emissions/airport\_aircraft\_noise\_issues/noise\_ombudsman/">https://www.faa.gov/about/office\_org/headquarters\_offices/apl/noise\_emissions/airport\_aircraft\_noise\_issues/noise\_ombudsman/</a>, and as can be seen on the Ombudsman website here: <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a>, which details the information the Complainant is to provide by email, telephone, or regular mail:

- Your First and Last Name Required (PII)
- Your Email Address Required (PII)
- Street Address or Cross Streets Please provide the street address or cross streets where the event(s) occurred. The FAA can more accurately research and determine a cause of an event(s) if more accurate details are provided. This information is important not only in determining the initial cause of an event(s), but also to track continual occurrences that can point to a systemic issue. This address may be the Complainant's home address. Required (PII)
- **State** Please provide the state name in which the event(s) occurred. This may be the Complainant's State location. Required (PII)
- **Zip code** Please provide the zip code in which the event(s) occurred. This may be the Complainant's Zip code. Required (PII)
- Approximate Start Date and Time of Event The times and dates you are experiencing the noise disturbance. Approximate Start Time/Date of the event is required. This information is not considered PII.
- Approximate End Date and Time of Event The times and dates you are experiencing the noise disturbance. Approximate Start Time/Date is Optional for the event and not considered PII.
- **Description/Questions** Please describe the event and the location of the event(s) as best you can. Required to provide details or ask questions about the event and not considered PII.



- The type of aircraft causing the complaint (i.e., jet, helicopters, propeller, unknown). Optional, and not considered PII.
- Aircraft Description Please provide any additional details to help describe the aircraft, including color, number and placement of large wings (top, middle, bottom of aircraft), and number and placement of engines (tail, body, wing). This may include the aircraft N-Number or Aircraft Registration Number ID. ANCIS does not connect to the Aircraft Registry. Optional, and not considered PII.
- Airport Source Please provide the airport name that the aircraft departed from or was heading to (if known). This is the airport that you believe the inquiry is associated with. Required, and not considered PII.
- **Repeat Occurrence (optional)** Please indicate if this is a repeat occurrence (Yes/No). Optional, and not considered PII.
- Did you contact the local airport (Yes/No) Required for correspondence on the event.
- Officials Contacted to Date Please indicate whether any additional government officials were contacted and include their name, office title, and how they were contacted (such as email, letter, or phone). Optional, and not considered PII. Once the complaint is submitted, ANCIS confirms the Complainant would like to file a complaint via email. The ANCIS system auto-emails a reply to the Complainant, who must confirm they wish to file a complaint by confirming the email. If so, ANCIS sends confirmations back to the Complainant via email.
- The ANCIS uses the FAA Mail Relays to provide email notifications to individuals who have submitted a noise complaint. Only the Complainant Contact Name, Contact Email, Event Location and the Complaint Description pass through the FAA Mail Relay. The data is not shared with or retained by the FAA Email Relay. The Email Relay is a process of transferring an email from one server to another for delivery.
- 2. After the noise complaint or inquiry is confirmed, the FAA Regional Administrator Office assigns actions to FAA Staff Offices and FAA Lines of Business to develop a response.
- 3. The Regional Administrator's Office staff then determines if the complaint or inquiry has an appropriate resolution.
- 4. An email resolution is provider to the Complainant, as well as with other appropriate participants within the FAA.



5. The data remains in the ANCIS application database until the resolution is complete or until the data retention period has expired. In either case, the information will then be destroyed. During this process a Complaint Record Number is generated, but the complaint can also be looked up internally, by FAA employees only, by other identifiers, such as the Complainant's contact PII.

## 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<sup>2</sup>, 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<sup>3</sup>.

#### 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 ANCIS site includes a Privacy Act Statement

(https://noise.faa.gov/noise/pages/noise.html) which the member of the public (also known as Complainant) must acknowledge to proceed with filing a complaint or inquiry. Also, currently there is information relative to Aircraft Noise on the <u>FAA Headquarters Noise</u> <u>Ombudsman</u> for members of the public who want to address aircraft-related noise issues with the FAA.

The ANCIS complaint and inquiry process includes information about individuals that can be retrieved or accessed by a Unique Identifier assigned to the complaint, not the individual. There is an existing Privacy Act System of Records Notice (SORN) for the records retrieved or accessed by a Unique Identifier:

<sup>&</sup>lt;sup>2</sup> http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf

<sup>&</sup>lt;sup>3</sup> http://csrc.nist.gov/publications/drafts/800-53-Appdendix-J/IPDraft\_800-53-privacy-appendix-J.pdf



DOT/FAA 845 - Administrators Correspondence Control and Hotline Information System, ACCIS, Administrator's Hotline Information System, AHIS, and Consumer Hotline Information System, CHIS - 65 FR 19526 - April 11, 2000

Also, as required by the Privacy Act of 1974, a Privacy Act Statement informing applicants of the Department's privacy practices regarding collection, use, sharing, safeguarding, maintenance, and disposal of PII is included on all applicable paper and web-based forms. Information on the Department's privacy program may be found at <a href="http://www.transportation.gov/privacy">www.transportation.gov/privacy</a>.

The ANCIS site includes a Privacy Act Statement which the Complainant must acknowledge before proceeding to file a complaint or inquiry. The FAA protects records subject to the Privacy Act in accordance with the Department's Published System of SORN. The publication of this PIA demonstrates DOT's commitment to provide appropriate transparency into the ANCIS. The Privacy Act Statement can be seen at <a href="https://noise.faa.gov/noise/pages/noise.html">https://noise.faa.gov/noise/pages/noise.html</a>.

## **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.

Records in ANCIS are collected directly from the Complainant. Once a Complainant enters their PII, but before they hit "submit", the information can be edited in ANCIS. Under the Privacy Act, individuals may request searches to review any records which pertain to them. Individuals inquiring whether their records appear in the ANCIS can inquire in person or in writing to:

Federal Aviation Administration Privacy Office 800 Independence Avenue SW Washington, DC 20591

The following must be included in all requests:

- Name
- Mailing address
- Phone number and/or email address



- A description of the records sought, and if possible, the location of the records

Contesting records procedures:

Individuals contesting information contained in this system should make their requests in writing detailing the reasons why the records should be corrected, to the following address:

Federal Aviation Administration Privacy Office 800 Independence Avenue SW Washington, DC 20591

## **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 ANCIS records and information collected and maintained in this system are used to document, monitor, and track the processing of aircraft noise complaints and inquiries to more efficiently and effectively respond to noise complaints and inquiries in a clear, consistent, and repeatable manner that is responsive to the public. ANCIS records include files, correspondence, supporting documentation, and other related records accumulated for the purpose of processing aircraft noise complaints and inquiries. These attachments include PII, such as name, event location (cross street or home address), phone number, and e-mail address. This PIA was developed pursuant to Section 208 of the E-Government Act of 2002 because the FAA will collect, use, and maintain PII from members of the public who submit noise complaints via ANCIS. In some instances, aircraft noise complaints and inquiries have the potential to impact aviation safety. The records collected and maintained assist in the investigative efforts of any reported safety-related allegations. The data collection for the ANCIS is used only for the ANCIS submittals. The purposes of collection are consistent with the purposes discussed in this SORN:

• <u>DOT/FAA 845</u> - Administrators Correspondence Control and Hotline Information System, ACCIS, Administrator's Hotline Information System, AHIS, and Consumer Hotline Information System, CHIS - 65 FR 19526 - April 11, 2000

SORN DOT/FAA 845, as well as the complete list of DOT SORNS, are located at this link: https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices



#### **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 FAA manages risk by minimizing the amount of PII collected by ANCIS through the creation of standardized forms. These forms were created to provide a standardized way for members of the public to submit information that is otherwise submitted to the FAA in an ad hoc manner. Using these forms limits the chance that a Complainant will submit unnecessary or irrelevant PII to the FAA. The paper forms are maintained until it has been confirmed that the digital image meets quality standards, and in accordance with retention, paper forms are destroyed upon completion of a quality review.

The ANCIS is updating National Archives and Records Administration (NARA) RECORDS DISPOSITION schedule DAA-0237-2019-0012 to add ANCIS. The retention period to destroy records will be ten (10) years after the complaint is closed. The FAA will retain the records until DAA-0237-2019-0012-0003 for ANCIS is approved.

### **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.

ANCIS is used by members of the public to submit documentation for a noise complaint inquiry. As part of the complaint process, the FAA collects PII as discussed in the PIA overview for the purpose of ANCIS records, and the information collected and maintained in this system is used to document, monitor, and track the processing of aircraft noise complaints and inquiries to more efficiently and effectively address noise complaints and inquiries in a clear, consistent, and repeatable manner that is responsive to the public. In some instances, aircraft noise complaints expose a potential safety issue that needs to be investigated. The records collected and maintained will assist in the investigative efforts of any reported safety-related allegations. The complaint information is not transmitted or shared with any other subsystems within NAS-DW.

In the event of a security or safety or aviation threat or as required by law, the FAA shares the first and last name, email, and event address, which may be the Complainant's address, with law enforcement. Law enforcement may use the information to perform security vetting. Law enforcement returns this information and the results of the security vetting to the FAA. The FAA may share information with law enforcement when a criminal law is



violated or a threat exists. In these cases, the FAA enters into or applies a Memorandum of Agreement.

The <u>SORN DOT/FAA 845</u>, Administrators Correspondence Control and Hotline Information System, ACCIS, Administrator's Hotline Information System, AHIS, and Consumer Hotline Information System, includes the following specific routine uses located at <u>https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices</u>, which permits the sharing of Privacy Act records per

- Referral to the appropriate action office within or outside the Department or agency for preparation of a response.
- Referral, to the appropriate agency for actions involving matters or law, of regulations beyond the responsibility of the agency or Department, such as the Department of Justice in matters of law enforcement.
- As a data source for management information, such as briefing material on hearings, trend analysis, responsiveness, etc.

## 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).

ANCIS collects information directly from the individual during the noise complaint process. The Complainants are strongly encouraged to completely review their application prior to submission. ANCIS displays a copy of the complaint or inquiry that the Complainant can review to ensure the correct information was entered. If corrections are required, the Complainant can make the appropriate changes prior to submission.

ANCIS records may also be checked against existing records or supporting documents submitted in the ANCIS web portal to determine whether the complaint is a repeat complaint.

Reporting through ANCIS is voluntary and only used if a member of the public wants to submit a noise complaint or inquiry to the FAA via ANCIS. FAA takes the necessary steps to ensure that the Complainant's PII information collected by ANCIS for these complaints and inquiries remain accurate, relevant, timely and complete; and therefore, data integrity is maintained, including but not limited to the following: 1) The Complainant and ANCIS users enter data via an encrypted Transport Layer Security protocol link to the websites, both internal and external; 2) All data and actions remain within the ANCIS Application



Server and are stored in the ANCIS database through the data lifecycle; and 3) Routine security scans are conducted, and actionable tasks are completed as required.

## Security

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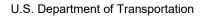
DOT shall implement administrative, technical, and physical measures to protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB 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 (FIPS) 200, Minimum Security Requirements for Federal Information and Information Systems, dated March 2006; and National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Revision 4, Security and Privacy Controls for Federal Systems and Organizations, dated April 2013. The ANCIS received Authority to Operate on August 21, 2018. The Authority to Operate is granted to the NAS-DW system; ANCIS is not authorized separately. The ANCIS feeds data from the Complainant into the NAS-DW system. All noise complaint data is housed within the NAS-DW's secure encrypted databases, and the data is used by the FAA for review and response.

FAA personnel adhere to Agency-wide procedures for handling and safeguarding PII and receive annual privacy and security training. The system manages access to information through user roles. Users receive the least privileges possible to perform their job duties through the user roles for development, support, and maintenance.

There are three classes of users with access to ANCIS. All FAA employees and contractors access the ANCIS using the FAA PIV authentication solution.

ANCIS Users	Function
Regional Administrator Office	FAA users who assign actions to Staff Offices and Lines of Business to develop a response to a noise complaint/inquiry. Also the individuals responsible for sending the email response to the public.





Lead Contributors	FAA users who lead the Staff Office or Line of Business in coordinating a response to the Regional FAA Administrators Office.
Contributors	The Ombudsman is considered a Contributor, who is an advocate for the Complainant. Also includes FAA employees and contractors who access ANCIS in response to complaints.

## **Accountability and Auditing**

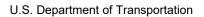
DOT shall implement effective governance controls, monitoring controls, risk management, and assessment controls to demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals.

For the ANCIS, current governance, monitoring and risk and assessment management controls are in-place. FAA Order 1370.121 implements the various privacy requirements based on the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the FISMA, 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, additional policies and procedures related to the access, protection, retention, and destruction of PII are consistently applied. Federal employees and contractors are given clear guidance in their duties related to collecting, using, and processing privacy data in the form of an annual security and privacy awareness training, and as mentioned in the implementation of FAA Order 1370.121. The FAA conducts periodic privacy compliance reviews of the NAS-DW ANCIS, as related to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

## **Responsible Official**

Greg Schaefer System Owner IT Program Manager/Air Traffic Organization





Prepared by: Essie Bell, FAA Privacy Officer

#### **Approval and Signature**

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

Reinadoffice Approved ALL