



U.S. Department of Transportation
Privacy Impact Assessment
Federal Aviation Administration (FAA)

**Survey of Airman Satisfaction with Aeromedical
Certification Services**

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Executive Summary

The Federal Aviation Administration’s (FAA) Civil Aerospace Medical Institute (CAMI) sponsors the *Survey of Airmen Satisfaction with Aerospace Medical Certification Services*. The survey collects feedback from airmen on their experiences with Office of Aerospace Medicine (OAM) services. This is accomplished through a biennial survey designed to meet the requirement to survey stakeholder satisfaction under [Executive Order No. 12862](#), “Setting Customer Service Standards,” and the [Government Performance and Results Act of 1993](#) (GPRA; Public Law 103-62).

The FAA is publishing this Privacy Impact Assessment (PIA) for the *Survey of Airmen Satisfaction with Aerospace Medical Certification Services* in accordance with Section 208 of the [E-Government Act of 2002](#) because the survey processes personally identifiable information (PII) from members of the public, specifically airmen who receive OAM services.

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:

- *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;*

¹Office 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).



- *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

FAA's Civil Aerospace Medical Institute (CAMI) sponsors the *Survey of Airman Satisfaction with Aeromedical Certification Services*. This is a biennial survey designed to meet the requirement to survey stakeholder satisfaction under Executive Order No. 12862, *Setting Customer Service Standards*, and the *Government Performance and Results Act of 1993* (GPRA). The survey assesses airmen's opinions of key dimensions of service quality. These dimensions, identified by the Office of Management and Budget (OMB) Statistical Policy Office in the 1993 *Resource Manual for Customer Surveys*, are courtesy, competence, reliability, and communication. The survey also provides airmen with the opportunity to provide feedback on the services and a medical certificate application tool they use, called MedXPress². This information informs FAA of potential improvements in Aeromedical Certification Services.

CAMI conducts this survey in accordance with the standards and protocols common to research involving human subjects defined in 45 CFR 46 and is overseen by CAMI's Institutional Review Board (IRB). A consent notice informs participants of their rights under 45 CFR 46.

CAMI draws its pool of participants for the survey from *Aeromedical Certification Services' Airman Medical Certification Subsystem* (AMCS).

FAA leverages Cherokee Nation 3S LLC (Cherokee) contractors to submit the survey instrument to FAA/CAMI's IRB for approval, administer the survey, and process the survey response records. Cherokee processes PII from AMCS to select and contact the sample pool of survey recipients. The survey business processes are described below.

The Sample Pool of Survey Participants

The sample pool consists of applicants from AMCS using the non-PII and PII criteria below:

- Domestic, non-military airmen only.

² [MedXPress has a PIA](https://www.transportation.gov/individuals/privacy/privacy-impact-assessments) published January 22, 2007 available at <https://www.transportation.gov/individuals/privacy/privacy-impact-assessments>.



- Applied for medical certification recently:
 - First class medical - applied within past 7 months.
 - Second class medical - applied within past 13 months.
 - Third class medical - applied within past 25 months.
- Application Status (issued, denied, or deferred).
- No duplicates based on airman's unique FAA Tracking Number (FTN).³

The FAA receives the contact information for the survey participants in a one-time data pull from FAA's AMCS database, which is the system used by Aviation Medical Examiners (AMEs) to transmit FAA flight physical information from airmen applicants to the FAA. To ensure proper statistical sampling, the data pull delivers the following elements of PII:

- Applicant FTN
- Applicant Name (First, Middle, Last)
- Street Address
- City
- State
- Zip Code
- Email Address
- FAA AME ID Number
- Class Applied For (i.e., Airman Medical Certificate I, II, or III)
- Certification Issued (i.e., issued, denied, or deferred)
- Certificate Type Held (e.g., Air Transport Airman, Commercial Airman, Private Airman)
- Class Issued (i.e., Airman Medical Certificate I, II, or III)

Cherokee then takes this information and stratifies the data to ensure that airmen of all medical classes and all types of certifications issued are surveyed. Cherokee then selects airmen from the various stratifications to contact for participation in the survey. Cherokee stores all the PII listed above about the list of potential respondents securely with access limited to Cherokee staff.

Survey Administration

The survey remains active for 90 days and is no longer accessible by participants after the survey closes. The survey includes questions with open text boxes, but the questions do not

³ https://www.faa.gov/training_testing/testing/acts/media/ftn_faqs.pdf



solicit the participant to respond with PII⁴. If a respondent inadvertently provides PII in an open text box, Cherokee contractor staff delete the PII before providing results to the FAA. The survey also includes questions with specific responses the participant must choose (e.g., yes or no responses), which will not solicit any PII.

The FAA's *Survey of Airman Satisfaction with Aeromedical Certification Services* program uses online survey development software Qualtrics⁵ to administer the survey. Survey administration activities include creating the survey, collecting data from respondents, and creating survey item reports. To create a Qualtrics account, Cherokee staff provide their FAA email address, which allows them to log in with a username and password.

Cherokee staff both mails (via Postal Service) and emails those to be surveyed an invitation to participate in the survey. The invitation includes the Uniform Resource Locator (URL) for the survey and a system-generated password unique to each airman in the sample pool. Members of the sample pool who receive the survey may elect to take the survey or not. Recipients in the sample pool may also opt out of further communication by sending an email to that effect to the address listed in the email invitation to participate in the survey. Unless the recipient opts-out, they receive a reminder email from Cherokee approximately halfway through the data collection period.

If the recipient elects to participate in the survey, they must access the link. Once the respondent accesses the link, they receive an informed consent notice.⁶ The notice contains information about the purpose of the survey, the voluntary nature of participation, the right to opt-out at any time without adverse consequences, participant compensation, and how FAA will use the survey results. All participants receive the informed consent prior to taking the survey, and if they wish to participate, must provide consent before continuing with the survey.

When a participant takes the [survey](#), Qualtrics automatically assigns a unique ID, which identifies each survey response record. The survey response records in Qualtrics additionally include the airman's name and address (which originally came from the AMCS system and was used to address the survey invitations). At the conclusion of the survey, Cherokee staff log into Qualtrics with their username and password and download the survey response records to an FAA Personal Identity Verification (PIV)-protected drive with access limited



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⁵ In April 2018, Qualtrics achieved International Standards Organization (ISO) 27001 certification and is Federal Risk and Authorization Management Program (FedRAMP) authorized.

⁶ An Informed Consent notice is a legal and ethical requirement for research involving human participants. See 45 CFR Part 46.



to Cherokee contractors. Cherokee de-identifies the survey response records by removing the name and email address from them, along with any unsolicited PII that respondents may have provided, unprompted, in open text boxes. Cherokee then aggregates the survey responses for reporting.

The final dataset consisting of de-identified demographic information and aggregated survey results will be made available to the public in perpetuity pursuant to the *Moving Ahead for Progress in the 21st Century Act* (MAP-21; P.L. 112-141, July 6, 2012; 49 U.S.C. 6304).⁷ The FAA will use the results in briefings and published technical reports.

After the survey is closed, Cherokee destroys all files containing the link between names, addresses, and unique identifiers. Cherokee also downloads informed consent documents to FAA-owned servers with access limited to certain Cherokee contractor staff and FAA Management (but not Primary Investigators), as required per IRB approval and per IRB compliance requirements.

FAA does not compensate survey respondents for their participation.

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, 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.

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.

⁷ See the *U.S. DOT Public Access Plan* at: <https://doi.org/10.21949/1503646>



As explained above, the survey participants include those identified through the FAA's AMCS database of airmen who have used OAM services within the past 7 to 25 months. The FAA uses this PIA to provide transparency to all individuals who may be included in the sample pool.

FAA also provides transparency through its informed consent notice to those individuals who choose to take the survey. As explained above, the informed consent advises the survey participant of FAA's PII processing activities, such as the de-identification of survey responses, designed to reduce the project's privacy risks. Each participant must accept the informed consent notice by agreeing to the statement, "By clicking 'Next' you are consenting to participate."

The survey response records are not retrievable by an identifier linked to an individual and are not subject to the Privacy Act. Additionally, the survey response records are stripped of all PII once those records are downloaded from Qualtrics.

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

There are two components to the survey project: the sample pool, all of whom FAA contacts to participate in the survey, and the subset of actual survey respondents.

For the sample pool subset of survey participants, the individual about whom the data pertains is not the source of the information. The individuals who receive the survey have the right and the opportunity to choose not to participate in the survey. They can click on the opt-out link to decline participation included in the email used to distribute the URL to the survey, delete the email, or ignore the email. In addition, recipients in the sample pool can opt out of further communication by sending an email to that effect to the address listed in the email invitation to participate in the survey.

Should the participant choose to begin the survey, they will be presented with the informed consent notice, which advises them of the voluntary nature of the survey and of their right and ability to opt out at any time without penalty. The participants will determine whether they will accept the informed consent and start the survey.

Regarding redress, the informed consent notice that each participant accepts advises respondents that they can withdraw at any time. The informed consent notice provides



contact information for the FAA employees who can assist with any questions. It also provides information for a person affiliated with the IRB who can address any questions regarding a respondent's rights as a research participant. To change responses, participants can contact survey support via email or phone call, provided in the informed consent, to request a retake link.

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.

FAA is undertaking this survey under the authority of Executive Order No. 12862, *Setting Customer Service Standards*, and the *Government Performance and Results Act of 1993* (GPRA; Public Law 103-62).

The *Survey of Airmen Satisfaction with Aerospace Medical Certification Services* receives and generates information for different purposes related to the project. CAMI receives contact information from the ACMS database in a regulated data pull once every two years to facilitate the sending of the survey, including: the individual's name, mailing address, and email address. Other information received from ACMS in the data pull is used to assure the representativeness of the sample, support analysis of participant response data, and eliminate duplicates, including:

- Applicant's FAA Tracking Number (FTN)⁸
- FAA AME ID Number (i.e., if AME has seen the individual)
- Class Applied For (i.e., Airman Medical Certificate I, II, or III)
- Certification Issued (i.e., issued, denied, or deferred)
- Certificate Type Held (e.g., Air Transport Airman, Commercial Airman, Private Airman)
- Class Issued (i.e., Airman Medical Certificate I, II, or III)

The Qualtrics software generates a unique ID for each survey record to aid in the processing of responses, such as creating survey item reports. Cherokee de-identifies the survey

⁸ The use of the FTN resolves potential duplicates, such as "corner cases". These are unlikely, but possible, when using only information like name and address to establish uniqueness. For instance, John Smith and John Smith Jr. may live at the same address, but show up as simply "John Smith, Oklahoma City" in the records (the "Jr." sometimes doesn't show up on driver's licenses). Therefore, the use of the FTN (unique to each individual) would differentiate between Smith and Smith Jr.



responses upon downloading the data from Qualtrics, so the unique ID is not linked to an individual.

After the survey is closed, Qualtrics collates the survey response records to generate an item-level (i.e., per-question) report containing descriptive statistics (e.g., averages, bar charts) of responses to question items.

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.

CAMI employs data minimization techniques in addition to appropriate retention policies to reduce the privacy risks associated with the *Survey of Airmen Satisfaction with Aerospace Medical Certification Services* project. FAA receives a minimal amount of information from FAA's AMCS database needed to create the survey's representative sample pool (i.e., the targeted audience for the survey questionnaire). Cherokee removes PII from participant response data once it downloads the batched response file, thus de-identifying the survey responses and minimizing the PII it processes.

FAA retains the survey project data in accordance with appropriate legal and record retention requirements. First, FAA maintains its network access records pursuant to National Archives and Records Administration, [General Records Schedule 3.2, Information System Security Records, item 30: System access records](#), which are temporary, to be destroyed when business use ceases, under DAA-GRS-2013-0006-0003. Secondly, the record retention schedules for the survey-related data are as follows:

- Survey or questionnaire response forms, direct respondent or participant names and identifiers, and other textual or electronic records used in data collection and not relevant for further review and analysis are covered under DAA-0237-2019-0004-0001, with a disposition of: Temporary, to be cutoff when survey study is completed, and destroyed 3 year(s) after cutoff.
- Technical data required to reproduce study findings, detailed statistical tables, data analyses, and related records; and electronic copies of the technical reports produced, including the text of the final report and all other electronic records related to the report such as detailed tables, charts, statistical data analyses, and spreadsheets are covered under DAA-0237-2019-0004-0002, with a disposition of: Cutoff when survey study is completed. Destroy 25 year(s) after cutoff.
- Correspondence and related documents generated subsequent to survey completion and used in creation of rules as a result of the survey are covered under DAA-0237-2019-0004-0003, with a disposition of: Cutoff upon creation of final rule. Destroy 25 year(s) after cutoff.



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 undertakes the survey to collect data from a population with knowledge regarding OAM services. FAA uses the survey results to inform improvements in Aeromedical Certification Services. To that end, FAA receives a limited amount of PII to create the sample pool and to facilitate the survey and limits the use of the information consistent with the various notices CAMI provides about the survey project.

First, to create the sample pool, Cherokee receives information from FAA's AMCS database of recent applicants for airman medical certificates. Although the FAA holds and provides this data to parties internal to the FAA, the FAA researchers do not have access to this information and Cherokee does not share this information, which limits the risks of its use for purposes beyond the scope of the survey.

Secondly, Cherokee collects the informed consents required for research involving human subjects. To participate in the survey respondents must accept the informed consent notice by agreeing to the statement, "By clicking 'Next' you are consenting to participate." Cherokee maintains this PII separately to satisfy IRB requirements, and this PII is not associated with the survey responses. This information may be shared with FAA's CAMI IRB upon request.

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).

FAA's CAMI employs a combination of processes to ensure the quality and integrity of the survey project data. As mentioned previously, the source from which the survey receives its data, AMCS, is the system used by AMEs to transmit FAA flight physical information from airmen applicants to the FAA. As such, AMCS data quality and integrity is critical as corrupted or inaccurate data could result in loss of airmen employment or loss of public confidence in the FAA's ability to regulate air safety through the medical certification process. Prior to the physical exam, airmen applicants use a medical certification application tool (MedXPress) to input answers to questions concerning their identify (FTN, name and address) and the types of medical certificates sought and certificate types held, along with their health information. Because individuals directly input this information, it is



presumed accurate. Furthermore, MedXPress employs numerous field-level controls, such as radio buttons, drop down menus, and pre-population of associated fields, to encourage the accuracy of inputted data. Airmen applicants can change their answers up to the point of submission. AMCS imports the MedXPress record for individual airmen applicants once they arrive for the physical exam with the AME. Before the start of the exam, AME's must first positively identify the airman applicant using a government-issued ID (ex. driver's license) allowing AMEs to verify the name and address contained in AMCS. Secondly, the AME reviews, with the applicant, the types of medical certificates sought and certificate types held as reflected in AMCS. If changes are required, the AME can make changes in AMCS with the knowledge and approval of the airman applicant. Upon completion of the medical exam, airmen applicants and AME's mutually review and sign the medical exam questionnaire to attest to its veracity, allowing both to verify the certification and class issued, as reflected in AMCS.

In addition, the Qualtrics survey preserves data quality through internal controls that limit the information that can be input into the survey. For example, fields that require numerical entries do not include alpha characters.

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.

Secured network drives, access-controlled folders, and contract clauses re: data security.

FAA and its contractors utilize a variety of controls to ensure the security of the information collected and processed during the survey project. FAA employees do not have access to the sample pool list, or the survey data processed and stored by its contractor, Cherokee. Access to all project data is limited on a "need-to-know" basis. FAA secures the information, providing Cherokee an access-controlled, PIV-protected network drive to store the survey data.

Regarding its data integrity controls, FAA employs a segregation of duties and limited access to the survey data to reduce the risk of unauthorized processing or changing of the data by limiting the number of people with access to the information. Cherokee administers the survey and processes the survey data, independent of FAA employees.



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 1370.121B, 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 will implement additional policies and procedures as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors who work with the Survey of Airmen Satisfaction with Aerospace Medical Certification Services 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 1370.121B. The FAA will conduct periodic privacy compliance reviews of the Survey of Airmen Satisfaction with Aerospace Medical Certification Services as related to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

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