



**U.S. Department of Transportation**

## **Privacy Impact Assessment**

**Federal Aviation Administration**

**FAA**

**Electronic Medical Record System**

**EMRS**

### **Responsible Official**

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## Executive Summary

[5 U.S.C. Section 7901](#) and [Executive Order 12196](#) allow the Federal Aviation Administration's (FAA) Office of Aerospace Medicine (AAM) to implement a health service and occupational safety program to promote and maintain the physical and mental fitness of employees<sup>1</sup> under their jurisdiction. The Electronic Medical Records System (EMRS) is used to check-in patients and document the purpose of the patient's visit. In most instances, EMRS collects and maintains medical information on FAA employees or applicants seeking an FAA position requiring a medical clearance. EMRS, in rare instances, may collect information from FAA contractors and members of the public due to a medical emergency or need for first aid. EMRS is used at the clinics in the Civil Aerospace Medical Institute in Oklahoma City (CAMI Occupational Health Clinic) and FAA Health Unit at Headquarters in Washington D.C. (HQ Health Unit).

The FAA developed this Privacy Impact Assessment (PIA) pursuant to the [E-Government Act of 2002](#), because EMRS collects and maintains Personally Identifiable Information (PII) on FAA employees, applicants for FAA positions requiring a medical clearance, FAA contractors, and members of the public.

## 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>2</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*

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<sup>1</sup> 5 U.S.C 2105 defines "Employees," which for this purpose includes FAA employees, other government agency employees (such as Department of Defense, Department of Transportation, Customs and Border Patrol), government Interns, and individuals applying for a federal job.

<sup>2</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**

[5 U.S.C. Section 7901](#) and [Executive Order 12196](#) allow the FAA to implement health service and occupational safety programs. The EMRS is used by the clinic staff, who are FAA employees, to check-in patients for visits under those programs and document the purpose of the patient's visit. FAA employees only have access to the "My Records" and "Wellness Records" components of EMRS allowing them to view, download, and print certain parts of their own patient records<sup>3</sup>.

For patients that previously visited an FAA clinic, their historical records were integrated into EMRS via a one-time migration from the Clinic Health Awareness Program Subsystem (CHAPS<sup>4</sup>) and an ingestion of supporting medical documentation<sup>5</sup>. The following PII was migrated or is contained in the supporting medical documentation: name, suffix, date of birth (DOB), Social Security Number (SSN), the Federal Employee Number, an ID Number, home address, personal telephone number, medical/family history, gender, employee information including: employee type, region, facility, organization, routing symbol, occupation, company, work phone, class ending, allergies, medications, medical alerts, immunizations, visit purpose, whether the visit pertained to a job related illness or injury (Yes or No), comments, treatments, results of screening programs, including lab tests, x-

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<sup>3</sup> FAA employees can see abbreviated records concerning their allergies, clinic visits, immunizations, lab results, medications, and respirator requirements. From the "Wellness Records", FAA employees can also select and view trend records of their Body Mass Index (BMI), blood pressure, height, and weight.

<sup>4</sup> CHAPS is a component of the Medical Support System (MSS) and EMRS is its replacement system.

<sup>5</sup> Supporting medical documentation are scanned records which could include completed FAA forms as outlined in Appendix A and outside medical records such as immunization records or workman compensation records.



rays, and medications. For patients whose records were not migrated from CHAPS, their information is manually entered by the clinic staff during their initial visit.

*System Access:*

Clinic staff access EMRS at the Uniform Resource Locator (URL) <https://faa.coritygov.com> using their Personal Identity Verification (PIV) card. FAA employees access EMRS at the URL <https://faa.my.coritygov.com> using their PIV card. Both sets of EMRS users are authenticated via their PIV card and FAA's MyAccess process before they can access EMRS.

Patients come to the CAMI Occupational Health Clinic and the HQ Health Unit for a variety of reasons. These clinics are used mainly by FAA employees for both non-occupational and occupational reasons as described below; however, FAA contractors and visitors can seek treatment for non-occupational reasons in a limited set of circumstances. Below are the four situations in which medical attention may be rendered, the procedures related to each visit type, and the type of PII and related information (demographic information) possibly collected during each visit:

- 1) FAA employees can seek medical attention for an illness or injury not related to work. Employees are checked in for appointments through EMRS using their name and DOB. Their demographic information may be updated if necessary. Employees complete a "Report of Medical History" form, SF-93, in addition to other forms listed for non-occupational visits as applicable (see Appendix A). Clinic staff documents the visit in EMRS.
- 2) FAA employees may also seek medical attention for work-related visits such as Workman's Comp injury or illness, occupational medical surveillance, occupational preventive needs, and flying class physicals. All employees are presented with a Privacy Act Statement. Employees are checked in for appointments through EMRS using their name and DOB. Their demographic information may be updated if necessary. Employees complete a Report of Medical History form, SF-93. Employees also complete occupational screening forms as applicable to the visit type (See Appendix A forms for occupational visits). Clinic staff documents the visit in EMRS.

The demographic information for these two types of visits described above, where the patients are FAA employees, is: full name, "goes by" name, maiden name, gender assigned at birth, preferred gender, DOB, work building address, building name, cell phone, work email, other email, work phone, FAA organizational/code, FAA job series/title, mail stop, line of business (LOB), LOB Unit, routing code, date of hire, date of separation, supervisor's name/phone/email, physician name/address/phone, emergency contact and nature of relation, emergency home phone, and emergency work phone. In addition to the demographic information, EMRS could also collect and maintain the following health



information on patients, which may include: reason for visit, vital signs, clinical testing, x-ray information and results, immunizations given, allergies, current and prescribed medications.

- 3) FAA contractors and members of the public may possibly seek medical attention for emergency situations. If necessary, a new patient record is established with limited demographic information. These patients are checked into EMRS using their name and DOB. Clinic staff uses EMRS to document limited clinical information as necessary.
- 4) Members of the public may possibly seek medical attention for first aid in certain situations. If necessary, a new patient record is established with limited demographic information. These patients are checked into EMRS using their name and DOB. Clinic staff uses EMRS to document limited clinical information as necessary.

The limited demographic information collected for visit types three and four above where the patients are FAA contractors or members of the public could include: full name, “goes by” name, maiden name, gender assigned at birth, preferred gender, DOB, work building address, building name, cell phone, work email, other email, work phone, supervisor’s name/phone/email, physician name/address/phone, emergency contact and nature of relation, emergency home phone, and emergency work phone. For FAA contractors only the company name, company representative’s name/mail/phone, contract officer representative (COR) name/email/phone might also be collected. In addition to the demographic information, EMRS could also collect and maintain the following health information on patients, which may include reason for visit, vital signs, clinical testing, x-ray information and results, allergies, current and prescribed medications.

### **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.*

The FAA employs multiple techniques informing patients of the purposes for which FAA collects, uses, and retains their PII in EMRS. FAA retrieves patient's records in EMRS by an individual's name and DOB. Therefore, FAA has determined the records in EMRS are Privacy Act records, and the FAA protects these records in accordance with the following DOT and Office of Personnel Management (OPM) published System of Records Notices (SORN):

- [DOT/FAA 811, "FAA Health Information Record Systems", 87 FR 54751 \(September 7, 2022\)](#), which covers FAA employees who visit the clinic for non-occupational reasons, and contractors and members of the public who visit the CAMI Occupational Health Clinic and the FAA Health Unit at Headquarters in Washington D.C.
- [OPM/GOVT-10, "Employee Medical File System Records", 75 FR 35099 \(June 21, 2010\)](#), which covers FAA employees undergoing occupational visits to the CAMI Occupational Health Clinic or the FAA Health Unit at Headquarters in Washington D.C.
- [OPM/GOVT-5, "Recruiting, Examining, and Placement Records", 79 FR 16834 \(March 26, 2014\)](#), which covers FAA job applicants undergoing required medical tests.

For the purposes of user authentication, system access records are retrieved by username and therefore FAA protects these records in accordance with the DOT published SORN:

- [DOT/ALL 13, "Internet/Intranet Activity and Access Records," 67 FR 30758 \(May 7, 2002\)](#).

Each patient is presented with a *Privacy Act Statement* for EMRS when visiting the clinic which gives them notice that these SORNs are applicable to records generated from their visit as appropriate.

The publication of this PIA further demonstrates DOT's commitment to provide appropriate transparency regarding EMRS.

### **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.*

All patients provide PII when visiting the CAMI clinic or HQ Health Unit. Patients at both medical clinics participate in the collection of their PII by voluntarily submitting their PII to schedule appointments, fill out forms, verbally providing demographic information and collaborating with their treatment and evaluation by medical personnel during the visit. Medical staff at the clinics transcribe this PII into EMRS. Additionally, for patients that previously visited an FAA clinic, their historical records were integrated into EMRS via a one-time migration as discussed in the Introduction and System Overview section. The clinic staff can update any field that needs correction or updating, based on discussion with the patient during the visit. FAA employees can view selected elements of their own EMRS data using a specialized portal. If they note corrections to their PII which should be made, they can alert clinic staff to make those corrections. Additionally, by filling out the “Consent for Release of Employee Medical Information or Employee Medical Treatment Records” form (listed in Appendix A), patients can consent to have their medical information or records released or discussed either with/to others or themselves.

**Notification Procedure (for access to records):**

Under the provisions of the Privacy Act, individuals may request searches to determine if any records in EMRS pertain to them. Individuals wishing to know if their records appear may inquire in person or to:

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

The request must include the following information:

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

**Contesting Record Procedures:**

Individuals wanting to contest information about themselves that is contained in EMRS should provide their request in writing, detailing the reasons for why the records should be corrected and addressing their letter to the following address:

Federal Aviation Administration



Privacy Office  
800 Independence Ave. 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 FAA uses EMRS, and the information it uses and stores therein, pursuant to the following legal authorities:

5 U.S.C. Section 7901 - which allows the FAA to implement a health service program to promote and maintain the physical and mental fitness of employees under their jurisdiction.

Executive Order 12196 – which allows all agencies of the executive branch to maintain occupational safety and health programs for Federal employees.

Patients are asked to provide their name and DOB when checking into an FAA clinic for the purpose of patient identification. During their visit, additional information discussed in the Introduction and System Overview section is manually entered by physicians and clinic staff. This information is collected for the purpose of providing medical care.

EMRS has also received a one-time migration of records from CHAPS and supporting medical documentation as discussed in the Introduction and System Overview section. Certain of the ingested documents may capture a patient's SSN. For those records, the SSN was collected under [Executive Order 9397](#), as amended by [Executive Order 13478](#).

For user authentication purposes, MyAccess validates the following information from the PIV card of the user wishing to access EMRS: PIV card users' full name, government-issued email address, certificate serial number, and PIV card serial number.

## 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 privacy risk by minimizing the amount of PII EMRS collects to the information that is relevant and necessary to check-in patients and to document the purpose of the patient's visit.





EMRs maintains records for FAA health clinics supporting FAA personnel in accordance with the following National Archives and Records Administration (NARA) schedules:

[NARA GRS 2.7, \*Employee Health and Safety Records\*, March 7, 2022:](#)

- Item 60, Occupational Individual Case Files - These records can be destroyed 30 years after employee separation or when the employee's Official Personnel Folder (OPF) is destroyed, whichever period is longer.
- Item 10, Clinic Scheduling Records – These records can be destroyed after three years or longer if authorized as necessary for business use.
- Item 70, Non-Occupational Individual Medical Case Files – These records can be destroyed 10 years after the most recent encounter; however, a longer retention is authorized if needed for business.

[NARA GRS 3.1, \*General Management & Technology Records\*, November 1, 2019:](#)

- Item 20, IT Operations & Maintenance Records – These records can be destroyed three years after agreement control measures, procedures, project activity, or transaction is obsolete, completed, terminated, or superseded; but longer retention is authorized if required for business use.

[NARA GRS 3.2, \*Information Systems Security Records\*, January, 2023:](#)

- Item 30, System Access Records – These records can be destroyed when business use ceases.

## **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 maintains information in EMRS in accordance with the following Department and OPM published System of Records Notices:

The sharing of EMRS patient visits records is conducted in accordance with [DOT/FAA 811, "FAA Health Information Record Systems", 87 FR 54751 \(September 7, 2022\)](#). Specifically, this SORN applies to records of FAA employees visiting FAA clinics for non-occupational health reasons, and records of FAA contractors and members of the public who visit FAA clinics. In addition to other disclosures generally permitted under 5 U.S.C. §552(a)(b) of the



Privacy Act, all or a portion of the records or information contained in the system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C § 552a(b)(3) as follows:

- To external medical professionals and independent entities, any patient records required to support their reviews for purposes of determining medical quality assurance and safety of FAA health facilities.
- To private or other government health care providers, portions of patient records required for consultation, referral, and continuity of care or medical contingency support.
- To disclose information to a Federal, state, or local agency to the extent necessary to comply with laws governing reporting of communicable diseases.
- To disclose to a requesting agency, organization, or individual minimal personal and health information concerning those individuals who are reasonably believed to have contracted an illness or been exposed to or suffered from a health hazard while visiting FAA facilities.
- Additional routine uses are listed in the “Routine Use” section of SORN DOT/FAA 811. Please visit the SORN to review the full list of circumstances where the FAA may release information covered by the SORN without explicit consent.

The sharing of EMRS visits of FAA employees visiting FAA clinics for occupational health reasons is conducted in accordance with [OPM/GOVT-10, “Employee Medical File System Records”, 75 FR 35099 \(June 21, 2010\)](#).

- To disclose information to the Department of Labor, Department of Veterans Affairs, Social Security Administration, Federal Retirement Thrift Investment Board, or a national, State, or local social security type agency, when necessary to adjudicate a claim (filed by or on behalf of the individual) under a retirement, insurance, or health benefit program.
- To disclose information to a Federal, State, or local agency to the extent necessary to comply with laws governing reporting of communicable disease.
- To disclose information to another Federal agency, to a court, or a party in litigation before a court or in an administrative proceeding being conducted by a federal agency when the Government is a party to the judicial or administrative proceeding.
- Additional routine uses are listed in the “Routine Use” section of SORN OPM/GOVT-10. Please visit the SORN to review the full list of circumstances where the FAA may release information covered by the SORN without explicit consent.

The sharing of EMRS visits concerning medical testing for FAA job applicants is conducted in accordance with [OPM/GOVT-5, “Recruiting, Examining, and Placement Records”, 79](#)



[FR 16834 \(March 26, 2014\)](#)). In addition to other disclosures generally permitted under 5 U.S.C. §552(a)(b) of the Privacy Act, all or a portion of the records or information contained in the system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C § 552a(b)(3) as follows:

- To refer applicants, including current and former Federal employees to Federal agencies for consideration for employment, transfer, reassignment, reinstatement, or promotion.
- With the permission of the applicant, to refer applicants to State and local governments, congressional offices, international organizations, and other public offices for employment consideration.
- To disclose pertinent information to the appropriate Federal, State, or local agency responsible for investigating, prosecuting, enforcing, or implementing a statute, rule, regulation, or order, when the disclosing agency becomes aware of an indication of a violation or potential violation of civil or criminal law or regulation.
- Additional routine uses are listed in the “Routine Use” section of OPM/GOVT-5. Please visit the SORN to review the full list of circumstances where the FAA may release information covered by the SORN without explicit consent.

The authentication of EMRS users access is conducted in accordance with [SORN DOT/ALL 13, “Internet/Intranet Activity and Access Records”, 67 FR 30758 \( May 7, 2002\)](#)). In addition to other disclosures generally permitted under 5 U.S.C. §552(a)(b) of the Privacy Act, all or a portion of the records or information contained in the system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C § 552a(b)(3) as follows:

- To provide information to any person(s) authorized to assist in an approved investigation of improper access or usage of DOT computer systems.
- To an actual or potential party or his or her authorized representative for the purpose of negotiation or discussion of such matters as settlement of the case or matter, or informal discovery proceedings.
- To contractors, grantees, experts, consultants, detailees, and other non-DOT employees performing or working on a contract, service, grant cooperative agreement, or other assignment from the Federal government, when necessary to accomplish an agency function related to this system of records.
- To other government agencies where required by law.
- Additional routine uses are listed in the “Routine Use” section of SORN DOT/ALL 13. Please visit the SORN to review the full list of circumstances where the FAA may release information covered by the SORN without explicit consent.



- The Department has also published 15 additional routine uses applicable to all DOT Privacy Act system of records. These routine uses are incorporated by reference into DOT/ALL 13, and are published in the Federal Register at 75 FR 82132 - December 29, 2010, 77 FR 42796 - July 20, 2012, and 84 FR 55222 - October 15, 2019, under “DOT General Routine Uses” (available at <http://www.transportation.gov/privacy/privacyactnotices>).

## 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 takes reasonable steps to confirm the accuracy and relevance of PII in EMRS by verbally collecting and verifying information directly from patients, by transcribing information from forms filled out by patients (this step is completed by medical staff), or from a one-time migration of historical patient’s records into EMRS. FAA employees can view selected elements of their own EMRS data using a specialized portal. If they note inaccurate information, they can alert clinic staff to correct that inaccurate information. The clinic staff can also update any field that needs correction or updating, based on discussion with the patient during the visit. Additionally, EMRS relies upon a combination of technical, database integrity checking functions and authentication services to ensure the overall accuracy of the data in the system. For instance, completeness and accuracy validation in EMRS is enabled via the EMRS application fields, using such techniques as drop-down menus or character limitation in open text fields, where applicable, and field validations.

## 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.*

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) Publication 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 Information Systems and Organizations, dated April 2013.



EMRS employs specific administrative, technical, and physical measures to protect PII against loss, unauthorized access, or disclosure. Personnel can only access the internal interfaces via FAA's network using their PIV card. All PII is encrypted in transit and at rest. Personnel receive guidance on their duties as they relate to collecting, using, processing, and securing PII. This includes mandatory annual security and privacy awareness training, as well as a review of the FAA Rules of Behavior. The DOT and FAA Privacy Office conduct periodic privacy compliance reviews of EMRS, as related to the requirements of OMB Circular A-130, *Managing Information as a Strategic Resource*.

FAA has in place a privacy/security incident response plan which includes procedures for detection of a privacy/security incident, remediation and response if one occurs, and notification where appropriate to protect and inform impacted individuals. In addition, the FAA administrators, privacy personnel, and security personnel have conducted a privacy/security incident response exercise to evaluate the effectiveness of this plan.

EMRS has a system security plan in place. The system has received its Authority to Operate on the EMRS activation date of February 12, 2024, after completing the authorization and accreditation process that reviews security controls and procedures and that validates that EMRS is compliant with appropriate information security processes and policies.

### **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 implements additional policies and procedures as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors who work with EMRS 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. As previously stated, the FAA conducts periodic privacy compliance reviews of EMRS as related to the requirements of OMB Circular A-130, *Managing Information as a Strategic Resource*.



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### **Approval and Signature**

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Office of the Chief Information Officer

DOT Privacy Office - Approved - 02 06 2024



**Appendix A:**

The table below indicates the various forms that could be used during a medical visit according to type of visit. Completed forms are scanned and uploaded into the patient's EMRS record.

**Clinic Forms Used**

<b>Form Name</b>	<b>PII Contained</b>	<b>Type Clinic Visit</b>
Request Medical Records (external facility)	Full Name & Address	Occupational / Non-Occupational
Leaving Clinic Against Medical Advice (AMA)	Full Name & DOB	Non-Occupational
Consent for Release of Employee Medical Information or Employee Medical Treatment Records	Full Name	Occupational / Non-Occupational
Authorization for Disclosure of Protected Health Information (FOH-AUD)	Full Name & DOB	Occupational / Non-Occupational
Procedure Consent Form	Full Name & DOB	Occupational / Non-Occupational
Questionnaires (3) : Obstructive Sleep Apnea (OSA) , Manganese, Noise	Full Name, DOB, Sex, job title,	Occupational
SF-600s (12 Each): Blank, ENT, Cardiac, GU, GI, Neuro, Muscle, Skin, Eye, Respiratory, Patient History, BBP	Full Name, DOB, phone number	Non-Occupational
<a href="#">Medical Record Chronological Record, SF600 2018 version</a>	Full Name, DOB, phone number **	Non-Occupational
HCP Audio History (SF600-OP)	Full Name & DOB	Non-Occupational



Student History	Full Name, phone number, emergency contact	Occupational / Non-Occupational
<a href="#">OSHA Respirator Medical Evaluation Questionnaire (Mandatory) Appendix C to Sec. 1910.134</a>	Full Name, DOB, Sex, Age	Occupational
<a href="#">CDC-Screening Checklist for Contraindications to Vaccines for Adults</a>	Full Name & DOB	Occupational / Non-Occupational
Medical Services Request, AC3900-6	Full Name, DOB, phone number	Occupational / Non-Occupational
<a href="#">Certificate or Medical Exam, OF178</a>	Full Name, DOB, Sex, phone number, email **	Occupational / Non-Occupational
<a href="#">Report of Medical History, SF93</a>	Full Name, Address, Grade, Occupation **	Occupational / Non-Occupational

\*\* These forms also request the collection of additional personal identifiers such as the Social Security Number (SSN), the Federal Employee Number, or an ID Number. EMRS does not collect these personal identifiers so clinic staff will either direct patients not to fill out those fields, or the fields will be blanked out on the form before being provided to the patients. If the patient inadvertently adds any of these additional personal identifiers, then EMRS staff will redact those identifiers before scanning and uploading of the completed forms occurs. Historical forms that are scanned and uploaded/ingested into EMRS may include the SSN, the Federal Employee Number or an ID Number.