



U.S. Department of Transportation

Privacy Impact Assessment

Federal Aviation Administration (FAA)

**Office of Airports (ARP) Airport Compliance
and Management Analysis Division (ACO)**

Airport Compliance Application Suite (ACAS)

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Executive Summary

The Federal Aviation Administration's (FAA) Airport Compliance Activity Suite (ACAS) consists of three sub-system enterprise-level applications used by Federal employees, contractors, and external airport entities to gather airport financial data using the Certification Activity Tracking System (CATS), address compliance issues at U.S. Airports using the Airport Compliance Division Compliance Database (ACODB) and provides a publicly accessible archive of the outcome of complaints filed against airports using Part 16 Decision Database (Part 16). The ACAS system is authorized under 44 United States Code (U.S.C.) Sections 106(t), 3101, 40101, 42121, and 44701.

The FAA has published this Privacy Impact Assessment (PIA) for the ACAS suite in accordance with Section 208 of the [E-Government Act of 2002](#) because the system processes Personally Identifiable Information (PII) from members of the public, including public and private airports owners/airport employees, authorized airport representatives, sponsors, legal counsel, and complainants.

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:

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).



- *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 PLA, 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

Office of Airports Compliance and Management Analysis (ACO) within the Office of Airports (ARP) operates all subsystems within ACAS to allow the ACO to track informal compliance issues, archive Part 16 decisions, and administer the Airport Financial Reporting Program.

ACAS is a web-based application, and different components are accessible to members of the public and FAA employees/contractors. ACAS is comprised of the following three (3) components, all supporting the ACO mission:

1. Certification Activity Tracking System (CATS) - Central location for the gathering and disseminating of congressionally mandated airport financial information that offers publicly available read-only information. The information available to the public contains information such as airport name, location ID, state, FAA region, and year filed within the “View and Airport Financial Report” section in CATS.
2. Airport Compliance Division Compliance Database (ACODB) - Airport sponsor filing and complaint system.
3. Part 16 Decision Database (Part 16) - Publicly accessible, read-only archive of the outcome of complaints filed alleging non-compliance of a federally funded airport.

The three subsystems are fully described below:

1. CATS Subsystem



CATS is a web-based module serving as a central location for the gathering and disseminating congressionally mandated airport financial information. United States (U.S.) private and public airports owners are required to submit annual financial reports using FAA Form 5100-126, *Financial Government Payment Report* and FAA Form 5100-127, *Operating and Financial Summary Report* through the Airport Financial Reporting Program Website at Uniform Resource Locator (URL) <https://cats.airports.faa.gov>.

If an airport fails to submit its reports, the FAA issues a letter notifying the airport of the overdue report. If the reports are not received within 30 days of the letter, the FAA takes action under Code of Federal Regulations (C.F.R.) Part 16 to withhold future entitlement and discretionary Airport Improvement Program (AIP) grant awards. The FAA may also suspend payments on existing grants.

2. ACODB Subsystem

ACODB is only available within the FAA network and accessible only by FAA employees and contractors. It is designed for FAA ARP employees to research, record, and report information related primarily to potential compliance issues at U.S. airports. These records track possible violations of federal obligations by airport sponsors. FAA employees and contractors may use ACODB to track compliance issues before a Part 16 complaint is filed. ACODB is used to record the correspondence, documentation, and findings related to informal complaints. The Office of Airports regional and district offices typically intake these informal complaints when a complainant has an issue with the airport sponsor and files with the ARP regional offices by email, mail, or telephone. The substance of the complaint is based on an airport and not an individual. There is no specific set of required information that must be included in the complaint when it is filed. The type of PII contained in complaints generally includes the complainant's name, business address, business telephone number, business email address, and airport authorized representative's name and contact information.

In this capacity, ACODB is a mechanism for FAA Airports Compliance Division to resolve compliance issues before they become subject to a legal enforcement action. ACODB is also used as a historical archive to record the decision rendered on informal complaints. Records contain the airport point of contact (POC) name and sponsor name.

The ARP regional and district offices typically record issues reported by airport users and questions about the airport, especially those related to the grant assurances. If an informal complaint is filed, the FAA employee handling the issue sends an electronic letter to the airport describing the alleged complaint and uploads a copy of the letter into ACODB. The FAA ACO employee, or appropriate FAA employee within the region, investigates the issue.



The regional FAA employee may also conduct a site visit and manually record details of the airport visit that they later manually input into ACODB.

3. Part 16 Decision Database (Part 16) Subsystem

The Part 16 subsystem is a publicly accessible, read-only archive at URL <https://part16.airports.faa.gov>. This database contains summaries of the outcome of complaints filed from individuals (complainants) who are directly and substantially affected by an alleged non-compliance of a federally funded airport. The Part 16 database also includes FAA administrative decisions, Part 16 Director's Determinations, Final Agency Decisions, and appeals court rulings. All documents are saved as Adobe Acrobat Portable Document Format (PDFs) and accessible to any member of the public. The PII contained in Part 16 includes complainant and/or respondent name and case docket number.

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 Organizations².

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.

ACAS is a privacy-sensitive system because it maintains, collects, uses, and disseminates PII from public and private airports owners/airport employees/authorized airport representatives/sponsors, complainants/respondents, and legal counsel for legal communication and airport grant obligation enforcement purposes. Policies, procedures and practices for information storage, data use, access, notification, retention, and disposal are

² http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



described in this PIA. The program has a Privacy Act Statement (PAS) posted at the point of PII collection that details how the individual's PII will be used.

The FAA protects records subject to the Privacy Act, for each subsystem in accordance with the following Department's Published System of Records Notices (SORNs):

- ACODB: Records contain PII from individuals alleging civil rights violations and/or individuals that are the subject of an alleged civil rights violation and include airport POC/sponsor name, email address, and docket number. These records are handled in accordance with Department of Transportation ([DOT/FAA 852, *Complaint Investigations System*, 87 FR 61137 \(October 7, 2022\)](#)) and ([DOT/FAA 845, *Complaint Intake System*, 87 FR 61649 \(October 12, 2022\)](#)).
- Part 16: Records contain PII from individuals alleging civil rights violations and/or individuals that are the subject of an alleged civil rights violation and include complainant and/or respondent name and case docket number and are handled in accordance with ([DOT/FAA 852, *Complaint Investigations System*, 87 FR 61137 \(October 7, 2022\)](#)) and ([DOT/FAA 845, *Complaint Intake System*, 87 FR 61649 \(October 12, 2022\)](#)).
- Login credentials, audit trails, and security monitoring for FAA employees and contractors who are part of the airport compliance program and/or manage the system are handled in accordance with ([DOT/ALL 13, *Internet/Intranet Activity and Access Records*, 67 FR 30757 \(May 7, 2002\)](#)).

For ACODB and Part 16, these systems of records are exempted from certain provisions of the Privacy Act. The purpose of the exemptions is to protect investigatory materials compiled for non-criminal law enforcement purposes. The exemptions claimed for this system are pursuant to 5 U.S.C. 552a(k)(2).

The records in the CATS subsystem are not about an individual, but about an airport. The records are not covered under the Privacy Act and thus no SORN is required.

The publication of this PIA demonstrates FAA's commitment to providing appropriate transparency into the ACAS system.

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.



CATS: Airport sponsors/representatives may contact the FAA through the CATS *User Support by Email* selection at URL <https://cats.airports.faa.gov/contactus.cfm> on the CATS opening page for helpdesk requests to include, but not limited to user deletions, registration, data entry difficulties, and other general financial questions. CATS administrators are FAA personnel and contractors who perform deletions and confirmations of airport users within the system. FAA ACO ensures accountability and data integrity by strictly limiting administrator data input or amendments into the airport's reports unless granted express permission.

ACODB: This subsystem is only available within the FAA network and is not publicly accessible. Specifically, the FAA ACO (employees and contractors) use ACODB to research, record, and report information related primarily to potential compliance issues at U.S. airports.

Part 16: This subsystem is a publicly accessible, read-only archive of complaint outcomes, which is available at URL <https://part16.airports.faa.gov/>. Individuals (complainants) who are directly and substantially affected by an alleged non-compliance of a federally funded airport can submit a complaint to the FAA (in a different system) against public and private federally assisted airports. All documents are saved within the archive as PDFs and accessible to the public.

If changes to an individual record are required in any of the ACAS subsystems the individual must contact the FAA compliance administrator by using the contact feature listed on the application's website.

Under the provisions of the Privacy Act, individuals may request searches of ACAS and its subsystems to determine if any records have been added that may pertain to them and if such records are accurate.

For all inquiries related to the information contained in ACAS, the individual may appear in person or send a request either via email (privacy@faa.gov) or in writing to:

Privacy Office
800 Independence Avenue, 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



- A signed attestation of identity

If you have comments, concerns, or need more information on FAA privacy practices, please contact the Privacy Division at privacy@faa.gov or 1 (888) PRI-VAC1.

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.

Congress authorized the FAA Administrator to develop systems and/or tools to support the filing of airport financial records, tracking of airport compliance issues, and the retention of Part 16 complaints. ACAS addresses the unique demands of the FAA's workforce and operates under the following authorities:

- [49 U.S.C. 106\(t\)](#) establishes in the Federal Aviation Administration the Office of Whistleblower Protection and Aviation Safety Investigations to receive complaints and information submitted by employees of persons holding certificates issued under *Title 14, Code of Federal Regulations* and employees of the Agency concerning the possible existence of an activity relating to a violation of an order, a regulation, or any other provision of Federal law relating to aviation safety.
- [49 U.S.C. 3101](#) authorizes the head of each Federal agency to establish and maintain an active, continuing program for the economical and efficient management of the records of the agency.
- [49 U.S.C. 40101](#) (*Economic Regulation*) establishes the Secretary of Transportation shall consider the following matters, among others, as being in the public interest and consistent with public convenience and necessity: assigning and maintaining safety as the highest priority in air commerce; preventing deterioration in established safety procedures, recognizing the clear intent, encouragement, and dedication of Congress to further the highest degree of safety in air transportation and air commerce, and to maintain the safety vigilance that has evolved in air transportation and air commerce and has come to be expected by the traveling and shipping public.



- [49 U.S.C. 42121](#) (*Protection of Employees Providing Air Safety Information*) - A holder of a certificate under section 44704 or 44705 of this title, or a contractor, subcontractor, or supplier of such holder, may not discharge an employee or otherwise discriminate against an employee with respect to compensation, terms, conditions, or privileges of employment because the employee (or any person acting pursuant to a request of the employee) ... provided information relating to any violation or alleged violation of any order, regulation, or standard of the Federal Aviation Administration or any other provision of Federal law relating to aviation safety under this subtitle or any other law of the United States...
- [49 U.S.C. 44701](#) (*Promoting Safety*) - the Administrator of the Federal Aviation Administration shall promote safe flight of civil aircraft in air commerce by prescribing— minimum standards required in the interest of safety for appliances and for the design, material, construction, quality of work, and performance of aircraft, aircraft engines...and to examine and report on the inspecting, servicing, and overhauling; regulations required in the interest of safety... and regulations and minimum standards for other practices, methods, and procedure the Administrator finds necessary for safety in air commerce and national security.

ACAS, and its subsystems, use the following information in accordance with the purposes for which it is collected under the following SORNs:

[DOT/FAA 852, Complaint Investigations System, 87 FR 61137 \(October 7, 2022\):](#)

- Purpose: To file/process Part 16 complaints:
 - From members of the public who are complainants: Name, business email, business phone number, business address, subject of the complaint.³
- Purpose: To file/process required FAA annual airport financial reports:
 - From public and private airports owners/airport employees and/or authorized airport representatives: Name and business email.

³ These complainants are individuals directly and substantially affected by anything allegedly done or omitted to be done by a person in contravention of Title 14, Chapter 1, Subchapter B, Part 16 or any person under 49 C.F.R. 26.105(c) against a recipient of FAA funds alleged to have violated a provision of 49 C.F.R. parts 23 and/or 26. Effectively, complaints allege violations of one or more of the FAA's thirty-nine Airport Compliance Grant Assurances.



[DOT/FAA 845, *Complaint Intake System*, 87 FR 61649 \(October 12, 2022\):](#)

- Purpose: To cover reports of unsafe or unauthorized aviation activities concerning the perceived or actual violations of FAA regulation, order, or other provision of Federal law related to aviation safety or practices, including whistleblower, SUP, and noise complaints.
 - From complainants, including members of the public and FAA employees and contractors, and individuals who are the subject of such violations; and members of Congress and the public who call in or correspond with the FAA personnel: name of complainants, contact information (phone number, address, email address), geolocation of noise, aircraft registration number, certificate number, aircraft tail number, and report/case tracking number (to include, but not limited to, reference number, case number, record number, and control number).

[DOT/ALL 13, *Internet/Intranet Activity and Access Records*, 67 FR 30757 \(May 7, 2002\)](#)

- Purpose: ACAS account creation/system access and program management:
 - From FAA employees and contractors: Name, FAA email address, FAA telephone number, username, and password.
 - From public and private airports owners/airport employees, authorized airport representatives, and complainants: Name, email, username, and password.

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.

FAA personnel collects the minimum amount of information from individuals to support FAA's airport compliance programs. Records for the system are handled according to the following National Archives and Record Administration (NARA) General Retention Schedules (GRS).⁴

- *Operational and financial summary and financial government payment records* are covered under [NI-237-10-007, *Compliance Activity Tracking*](#)

⁴ General retention schedules are used by the FAA to determine how long to maintain an individual's records and when to delete the individual's records and in order to promote consistent retention practices.



[System, approved October 22, 2009](#). These records are cutoff at end of fiscal year (FY) information received and verified and all review or trend analysis activity is completed; Destroy 10 years after cutoff.

- *System access records* are covered under [GRS 3.2, Information Systems Security Records, item 030, approved September 2016](#). These records are temporary and are destroyed when business use ceases.
- [NC1-237-77-03](#) Request for Authority to Dispose of Records, Item #39, *General Correspondence File Records*. Transfer to the Federal Records Center (FRC) when four years old. Destroy after 20 years and Item #50, *Compliance Enforcement File Records*. Transfer to FRC when volume warrants. Destroy when there is no longer any Federal obligation under programs administered by the DOT or FAA. March 2, 1977. [ACODB, Part 16]. These records are to be maintained as permanent until the proposed schedule is approved by NARA.

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 uses and discloses information in accordance with applicable notices, or in accordance with statutory Privacy Act exceptions, if applicable, as detailed below.

ACODB:

Some of the PII maintained in ACODB is from individuals alleging civil rights violations and/or individuals that are the subject of an alleged civil rights violation and is used for investigative purposes. PII is used for FAA ARP employees to research, record, and report information related primarily to potential compliance issues at U.S. airports. ACODB is a mechanism for FAA Airports Compliance Division to resolve compliance issues before they become subject to a legal enforcement action. FAA does not use this information for any other purpose. The records are retrieved using LOC ID, airport name, POC name, sponsor name, issue topic, keyword or any combination of these fields may be used to tailor specific searches. These records are covered by System of Records notice (SORN) [Department of Transportation \(DOT\)/FAA 852, Complaint Investigations System 87 FR 61137 \(October 7, 2022\)](#).

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



- To the Federal Bureau of Investigation, U.S. Customs Service, and the Department of Defense for their use in any civil/criminal investigations when an FAA suspected unapproved parts case is initiated.
- To airport sponsors, federal agencies and departments operating manned and unmanned aircraft outside FAA's regulatory jurisdiction, and other operators of aerial landing and takeoff sites, records relating to noise complaints stemming from their operations to ensure consistency between the FAA and these entities on noise complaints.
- To manned and unmanned aircraft operators when necessary to resolve a complaint pertaining to the operator, or when necessary to ensure consistency between the FAA and the operator in responding to noise complaints.
- To officials of labor organizations

Part 16:

Some of the PII maintained in Part 16 is from individuals alleging civil rights violations and/or individuals that are the subject of an alleged civil rights violation. Part 16 PII also includes reports of unsafe or unauthorized aviation activities concerning the perceived or actual violations of FAA regulation, order, or other provision of Federal law related to aviation safety or practices, including whistleblower, Suspected Unapproved Parts (SUP) and noise complaints. The purpose of PII data contained in Part 16 is to provide read-only access to Part 16 complaints via the website. The FAA does not use this information for any other purpose. Records are retrieved by complainant and/or respondent name and case docket number. These records are covered by SORN [DOT/FAA 845, Complaint Intake System, 87 FR 61649 \(October 12, 2022\)](#).

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

- To the Federal Bureau of Investigation, U.S. Customs Service, and the Department of Defense, the initial SUP complaints received by FAA, for their use in any civil/criminal investigations when an FAA suspected unapproved parts case is initiated.
- To airport sponsors, federal agencies and departments operating manned and unmanned aircraft outside FAA's regulatory jurisdiction, and other operators of aerial landing and takeoff sites, records relating to noise complaints stemming from their operations to ensure consistency between the FAA and these entities on noise complaints.
- To manned and unmanned aircraft operators when necessary to resolve a complaint pertaining to the operator, or when necessary to ensure consistency



between the FAA and the operator in responding to noise complaints.

Records disclosed pursuant to this routine use are limited to the following information: geolocation only to the extent necessary to identify the general location of the noise complaint; time and date of complaint; and description of the complaint or inquiry. Complainant names and contact information will not be disclosed pursuant to this routine use.

- To officials of labor organizations

CATS:

Records in CATS are not about an individual, and not retrieved by PII but retrieved by airport name, and thus no SORN is required.

Access, authentication, and audit log records within ACAS are handled in accordance with SORN [DOT/ALL 13- *Internet/Intranet Activity and Access Records*, 67 FR 30757 \(May 7, 2002\).](#)

The Department has also published 17 additional routine uses that apply to all DOT Privacy Act systems of records, including this system. These routine uses 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 "Prefatory Statement of General Routine Uses."

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).

ACAS collects, uses, and retains data that is relevant and necessary for the purpose for which it was collected. Members of the public (public and private airports owners/airport employees, authorized airport representatives and complainants) who have PII in the system are responsible for ensuring the accuracy of the information that they provide. When they create the report/file a complaint, they have the opportunity at that time to validate or edit the information they have entered prior to submitting to ACAS. Because these individuals directly enter the information into ACAS, it is assumed to be accurate.

ACAS is a web-based system and different components are accessible to members of the public and FAA employees/contractors.⁵ Specifically, Airport sponsors/representatives may contact the CATS *User Support by Email* selection at URL <https://cats.airports.faa.gov/contactus.cfm> on the opening page for helpdesk requests to

⁵ CATS and Part 16 (Decision Database) are available to the public and FAA employees/contractors; ACODB and the Part 16 (Case Management Database) are restricted to FAA employees/contractors only.



include, but not limited to user deletions, registration, data entry difficulties, and other general financial questions. For ACODB and Part 16, the websites are frequently used by FAA Office of Airports employees, aviation attorneys, and any member of the public and can be used to provide information and/or make general requests.

Security

DOT shall implement administrative, technical, and physical measures to protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.

The FAA protects PII with reasonable security safeguards against loss or unauthorized access, destruction, usage, modification, or disclosure. These safeguards incorporate standards and practices required for federal information systems under the Federal Information Security Management Act (FISMA) and are detailed in Federal Information Processing Standards (FIPS) Publication 200, *Minimum Security Requirements for Federal Information and Information Systems*, dated March 2006, and the National Institute of Standards and Technology Special Publication (NIST) 800-53, Revision 5, *Security and Privacy Controls for Federal Information Systems and Organizations*, dated September 2020 (includes updates as of Dec. 10, 2020).

These safeguards include an annual independent risk assessment of the ACAS system to test security processes, procedures, and practices. The system operates on security guidelines and standards established by NIST and only FAA personnel with a *need to know* are authorized to access the records in ACAS. All data in-transit and at-rest is encrypted. Access to records in the system is controlled by use of a Personal Identity Verification (PIV) card, use of a Personal Identification Number (PIN), and limited according to job function. Additionally, FAA conducts annual cybersecurity assessment to test and validate security process, procedures, and posture of the system. Based on the security testing and evaluation in accordance with the FISMA, the FAA issues ACAS an on-going authorization to operate (ATO).

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.

The DOT/FAA implements 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 needed as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors who work with ACAS 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 conducts periodic privacy compliance reviews of ACAS as related to the requirements of OMB Circular A-130, *Managing Information as a Strategic Resource*.

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