U.S. Department of Transportation

Privacy Impact Assessment

Federal Railroad Administration (FRA)
Railroad Safety Information System (RSIS)

Responsible Official

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Executive Summary

The Railroad Safety Information System (RSIS) is a self-contained, government-owned and operated information technology (IT) system that houses the Federal Railroad Administration's (FRA) principal monitoring system for railroad safety. Information includes records and statistics on railroad operational data, railroad injuries and illnesses, reportable railroad accidents such as derailments, collisions, highway-rail crossing impacts, inspection activities, and railroad defects and violations. It also serves as a repository of safety data on the nation's highway rail intersections. RSIS fulfills the requirements of Section 552 of the Consolidated Appropriations Act of 2005 (codified at 42 U.S.C. 2000ee-2).

This Privacy Impact Assessment (PIA) is conducted in accordance with the E-Government Act of 2002 because RSIS collects and stores Personally Identifiable Information (PII) on 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.[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 PII. The goals accomplished in completing a PIA include:

[1]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).

- *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

RSIS is a self-contained, government-owned and operated IT system that houses FRA's principal data collection and monitoring system for railroad safety. It is accessed by both internal and external users and includes the collection and processing of railroad safety data dating back to 1975 (FRA is mandated to collect and maintain this information). This data is used by FRA inspectors and other safety staff to focus on specific inspection functions and activities across the nation's rail system to reduce accidents and injuries.

Information includes statistics on railroad operational data, railroad injuries and illnesses, reportable railroad accidents such as derailments and collisions, as well as highway-rail crossing impacts, inspection activities, and railroad defects and violations and is a repository of safety data on the nation's highway rail intersections. This collection of information is mandatory under 49 CFR 225 and is used, maintained, or disseminated by RSIS to monitor national rail safety.

RSIS is comprised of the following seven primary subsystems and one secondary subsystem (Part 243 Portal). These integrated primary subsystems are used extensively in reporting on the agency's performance to comply with the Government Performance and Results Act of 1993 (GPRA). Multifactor Authentication (MFA) has been implemented and enable for all RSIS applications/portals for both DOT users and the

non-DOT user community. DOT users authenticate using MyAccess whereas non-DOT users authenticate using Login.gov.

Internal link: https://sirportal.fra.dot.gov/default.aspx

External link: https://railroads.dot.gov/safety-data

1. **Grade Crossing Inventory System (GCIS) – Collects, stores, and processes PII.** GCIS is a file repository for Form FRA F 6180.71, U.S. DOT Crossing Inventory Form, which collects data on the description of the grade crossings used for planning and promoting safety at railroad crossings. Information collected on each GCIS form has been approved by OMB and assigned control number OMB 2130-0017. The data includes the types of crossing warning devices, speed of trains, and type of grade crossing path. The forms are processed in near-real time, validated, and uploaded by the railroads. The forms can be submitted to GCIS three ways:
    - Railroads and/or States upload electronic Excel spreadsheets, which contain all the data for each crossing being updated or submitted, to the GCIS Dashboard
    - Using the RSIS Web Services API to submit the form data to the GCIS Dashboard (railroads submit batches of records)
    - Logging in with a validated username and password and populating the required fields for individual crossing forms in the GCIS Dashboard
2. **Asset Inventory of Railroads and Shippers (AIRS) - (Internal FRA users only) – Does not collect or store PII.**
   AIRS is used to collect and analyze all railroad and shipper assets. The application data collected is unique to each Office of Railroad Safety discipline and is maintained by each individual inspector on an annual basis for their respective territory. The AIRS is accessed on the FRA Secure site by way Login.gov or MyAccess when logged into the DOT Network and can produce detailed and summary reports.
   https://safetydata.fra.dot.gov/AIRS/
3. **Electronic One Time Movement Approval (eOTMA) portal - Does not collect or store PII.**
   eOTMA is both a repository of Hazardous Material One Time Movement Approval requests and the resulting investigations and approval documents from the FRA. FRA has the authority to issue one-time movement approvals (OTMAs) for bulk packages that no longer conform to the hazardous materials regulations contained in 49 CFR § 174.50. OTMAs are required for movement of nonconforming tank cars, or any other bulk nonconforming packages designed, marked, or otherwise

represented for the transportation of hazardous material. Each entity submitting a OTMA request is assigned unique login credentials and will choose between three levels of severity- OTMA-1, OTMA-2, and OTMA-3. The requests are handled and assigned in real-time by the FRA staff. OTMA forms are submitted through the portal. The resulting data can be queried by FRA staff for data analysis. Anyone that is not a Federal DOT employee or contractor must access the eOTMA portal using Login.gov. Federal DOT employees or contractors must authenticate using MyAccess.

https://safetydata.fra.dot.gov/eOTMA

4. **Quiet Zone Calculator (QZC)** - The QZ Calculator - **Does not collect or store PII**.
QZC is used to determine the characteristics/needs to set up a quiet zone for various municipalities within the U.S. The accident history data from GCIS is transmitted to (QZ) using a two-way exchange. The calculator provides a Quiet Zone Risk Index (QZRI) value which measures the amount of risk associated with a crossing in a quiet zone. Its calculated value must meet one of the following requirements for a quiet zone to be established:

    - QZRI is less than or equal to the risk with train horns sounding (RIWH).
    - QZRI is less than the National Significant Risk Threshold (NSRT), the average risk of a gated crossing where train horns are sounding.

    The NSRT is an annually calculated value. A Quiet Zone established by being less than the NSRT may be cancelled if its QZRI is not low enough to maintain qualification. Anyone that is not a Federal DOT employee or contractor must access the eOTMA portal using Login.gov. Federal DOT employees or contractors must authenticate using MyAccess.

    https://safetydata.fra.dot.gov/quiet/login.aspx

5. **Railroad Accident Incident Reporting System (RAIRS) - Collects, stores, and processes PII.**
RAIRS is a repository for the below forms, which are uploaded by the railroad. The Accident/Incident Report Generator (AIRG) is a client-based computer program that allows users to record and maintain their accident/incident data and submit their FRA-required monthly reports electronically. The AIRG application provides validation of the data prior to submission in a format that can be easily used by the FRA data processing contractors. The data collected on the forms is compiled statistics on railroad operational data, railroad injuries and illnesses, reportable

railroad accidents such as derailments and collisions, as well as highway rail-crossing impacts. RAIRS is the agency's safety scorecard. Information collected on each AIRS form has been approved by OMB and assigned control number OMB 2130-0500.

a. Rail Equipment Accident/Incident Report
b. FRA F(6180.55) Railroad Injury and Illness Summary
c. FRA F(6180.55a) Railroad Injury and Illness Summary (Continuation Sheet of 6180.55)
d. FRA F(6180.56) Annual Railroad Report of Employee Hours and Casualties by State
e. FRA F(6180.57) Highway Rail Grade Crossing Accident/Incident Report
f. FRA F (6180.78) Notice to Railroad Employee Involved in Rail Equipment Accident/Incident (Human Factor)
g. FRA F(6180.81) Employee Human Factor Attachment
h. FRA F(6180.97) Initial Rail Equipment Accident/Incident Record
i. FRA F(6180.98) Railroad Employee Injury and/or Illness Record
j. FRA F(6180.107) Alternative Records for Illness Claimed to Be Work-Related
k. FRA F(6180.150) Highway User Injury Inquiry Form

6. **Railroad Inspection Reporting System (RIRS) - Collects, stores, and processes PII.**

RIRS collects information from FRA and State inspectors on inspection activities, railroad defects, and violations. It serves as FRA's compliance monitor for the industry. Information collected on each RIRS form has been approved by OMB and assigned control numbers OMB 2130-0509 and OMB 2130-0539. Inspectors use the web base/client server application called Railroad Inspection System for PC (RISPC) under RIRS on a continuous basis to upload and generate the below forms:

a. FRA F(6180.33) Violation of Hours of Service Law
b. FRA F(6180.61) Accident/Incident Reporting Rules Violation Report Form, FRA Internal Form
c. FRA F(6180.67) Operating Practices Violation Report Form
d. FRA F(6180.96) Inspection Report
e. FRA F(6180.96a) Inspection Report (Continuation Sheet of 6180.96)
f. FRA F(6160.109) Motive Power and Equipment Violation Report Form
g. FRA F (6180.110) Hazardous Materials Violation Report Form
h. FRA F(6180.111) Track Violation Report Form
i. FRA F(6180.112) Signal and Train Control Violation Report Form
j. FRA F(6180.119) Part 214 Railroad Workplace Safety Violation Form, OMB 2130-0539

Form 6180.96 and the associated violation reports listed above are put into a violation packet by the inspector once uploaded in RISPC. The RISPC violation packet data is then transmitted to a tool called the Violation Generation Tracking System (VGTS), which is also under RIRS. The VGTS application is used to create and validate the

Transmittal From Regions (TFR) that are created to correspond with each violation packet, which is transmitted with the supporting evidence to Office of Chief Counsel's Railroad Compliance System (RCS). VGTS information is transferred to RCS on a real-time basis using two-way exchange.

7. **Positive Train Control (PTC) System – Does not collect or store PII.**
   The PTC System collects operational data including down-time issues related to the functionality of the PTC systems used by the railroads. PTC uses communication-based and processor-based train control technology to prevent train-to-train collisions reliably and functionally, overspeed derailments, incursions into established work zones, and movements of trains through switches left in the wrong position.

8. **Part 243 Railroad Portal - Collects, stores, and processes PII.**
   The Part 243 Railroad Portal is a secondary component used to collect training programs form railroads and training organizations or learning institutions (TO/LI) for review and approval by FRA. Per regulation, any person employed by a railroad, or a contractor of a railroad must be trained and qualified to comply with relevant Federal safety laws, regulations, and orders. Railroads and TO/LI submit their training programs through a real-time web portal and FRA determines if they have met the requirements. The portal allows railroads to see the TO/LI that can provide the necessary training, while also providing the TO/LI some idea of the training that should be developed and offered to the railroads. FRA may also use this information to ensure compliance with the Part 243 regulation. Access to the Portal is limited to those with login ID and password.

URL: https://safetydata.fra.dot.gov/Part243/login

Collection of PII

The Grade Crossing Inventory System (GCIS)

FRA F (6180.71) – U.S. DOT Crossing Inventory Form: FRA requires operating railroads to submit this form or the initial reporting of new and previously unreported highway-rail and pathway grade crossings. URL to GCIS: Crossing Inventory Dashboards & Data Downloads | FRA (dot.gov)

- OMB 2130-0017
- Expires 01/31/2026.
- Railroad Reporting Officer's:
  - First Name
  - Middle Initial
  - Last Name
  - Official Title
  - Work Telephone Number

The Railroad Accident Incident Reporting System (RAIRS)

FRA F (6180.55) – Railroad Injury and Illness Summary: Railroads use this form monthly to report their total number of operating miles, railroad working hours, and accident counts to FRA. The operating information on the form is disseminated to the public.

- OMB 2130-0500
- Expires 12/31/2026.
- Railroad Reporting Officer's:
  - First Name
  - Middle Initial
  - Last Name
  - Official Title
  - Work Telephone Number
  - Work Mailing Address

FRA F (6180.55a) Railroad Injury and Illness Summary (Continuation Sheet of 6180.55): Railroads use this form to collect PII and report each event or exposure arising from the operation of a railroad.

- OMB 2130-0500
- Expires 12/31/2026
- Railroad Industry Employee's/Member of the General Public's
  - Age - "Age" is not linked to a person and just used for statistical purposes only. Railroads use this form only to develop statistical reports on events or exposures arising from the operation of a railroad.
  - Health Information: HAZMAT Exposure
  - Accident/Injury Identification Number

The Railroad Inspection Reporting System (RIRS)

RIRS collects PII from FRA and State inspectors on inspection activities, railroad defects, and violations. It serves as FRA's compliance monitor for the industry. Inspectors use the web base/client server application called Railroad Inspection System for PC (RISPC) under RIRS on a continuous basis to upload and generate forms below:

FRA F(6180.33) Violation of Hours of Service Law: FRA Field Inspectors input hours of service infractions into the electronically generated inspection/violation report in Real-time Inspection System Processing (RISPC).

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Industry Employee's:

- First Name
- Middle Initial
- Last Name
- Occupation Title
- Personal Mailing Address
- Employee ID Number
- GPS coordinates for accidents

FRA F (6180.61) Accident/Incident Reporting Rules Violation Report Form (FRA Internal Form): Field Inspectors use this standard violation report form to collect PII on Employee's/Member of the General Public for Railroad Accident/Incident Reporting/failure to report accidents/incidents:

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Industry Employee's/Member of the General Public's:
  - Injury, or type of occupational illness
  - First, Last Name; Occupation Title
  - Description of Injured Employee or Member of the General Public's Restriction of Work or Motion
  - Name, Title, and Location of Physician
  - Registered Professional who provided medical treatment

FRA F (6180.67) Operating Practices Violation Report Form: This form collects PII used by Field Inspectors to report violations of all regulations within the FRA Operating Practices.

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Industry Inspector's:
  - First Name
  - First Name
  - Last Name
  - Inspector's ID
  - Details of Violation

FRA F (6180.96) Inspection Report, OMB 2130-0509: Field Inspectors use this report to record both compliance and noncompliance with 49 CFR Parts 171-180 and 200-272 observed during their inspections. The form collects PII used to track investigations of accidents to support his or her accident observations of train accident evidence,

complaints, waiver requests, and specialized investigations such as audits. DOT Railroad Field.

- OMB 2130-0509
- Expires 11/30/2025
- Inspector's/Railroad Industry Employee's
  - First Name
  - Middle Name
  - Last Name
  - Inspector's Employee Identification Number

FRA F (6180.96a) Inspection Report (Continuation Sheet of 6180.96), OMB 2130-0509: DOT (Federal and State) collects this information to supplement F (6180.96).

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Field Inspector's:
  - Home Address
  - Employee Identification Number (EIN)

FRA F (6180.109) Motive Power and Equipment Violation Report Form, OMB 2130-0509. Motive Power and Equipment (MPE) inspectors collect PII for their discipline-specific reports recommending civil penalties (Parts 215, 218, 221, 223, 229, 230, 231, 232, 238, 239, and USC).

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Industry Employee's:
  - First Name
  - Middle Initial
  - Last Name
  - Inspector's Employee Identification Number

FRA F (6180.110) Hazardous Materials Violation Report Form, OMB 2130-0509. Field Inspectors use this form to collect PII for discipline-specific reports

recommending civil penalties. When generated in RISPC, several of the fields are automatically filled in with PII data from the F (6180.96) Inspector Report.

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Industry Employee's:
  - First Name
  - Middle Initial
  - Last Name
  - Railroad Industry Employee Identification Number
  - Business Address of Respondent

FRA F (6180.111) Track Violation Report Form, OMB 2130-0509
Track inspectors collect PII on this form for discipline-specific reports recommending civil penalties (Parts 213 and 214).

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Industry Employee's:
  - First Name
  - Middle Initial
  - Last Name
  - Occupation Title

FRA F (6180.112) Signal and Train Control Violation Report Form, OMB 2130-0509.
Signal and Train Control (S&TC) Inspectors collect PII for discipline-specific reports recommending civil penalties (Parts 233, 234, 235, 236, etc.).

- OMB 2130-0509
- Expires: 11/30/2025
- Railroad Industry Employee's:
  - First Name
  - Middle Initial
  - Last Name
  - Railroad Industry Employee Identification Number

FRA F (6180.119) Part 214 Railroad Workplace Safety Violation Report Form, OMB 2130-0539. Track inspectors collect PII for discipline-specific reports recommending civil penalties (Part 214).

- OMB 2130-0539
- Expires: 5/31/2025
- Railroad Industry Employee's:
  - First Name
  - Middle Initial
  - Last Name

The Part 243 Railroad Portal

49 CFR Part 243 requires railroads and training organizations/learning institutions (TO/LI) to submit their respective training programs to the FRA for review. Railroads or contractors for a railroad are required to provide a program to ensure their employees are trained and qualified to comply with Federal laws, regulations, and orders. While the TO/LI provides the training programs they offer for the railroad employees, access to the Portal is limited to users with login ID credentials and password; but TO/LI may post documents that include a resume with their course descriptions and syllabus. The following PII is collected:

URL: https://safetydata.fra.dot.gov/Part243/login

Railroad Training Officer:

- First Name
- Last Name
- Official Title
- Work Mailing Address
- Work Email Address
- Work Telephone

Training Organization/Learning Institution Point of Contact:

- First Name
- Last Name
- Official Title
- Mailing Address (may be Home Address)
- Telephone Number (may be Home Number)
- Email Address (may be Personal Email Address)

Fair Information Practice Principles (FIPPs) Analysis

The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Paperwork Reduction 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[2], 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[3].

Transparency

Sections 522a(e)(3) and (e)(4) of the Paperwork Reduction 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 FRA executes due care and diligence to ensure transparency. The PII data elements are collected through FRA forms approved by OMB. Paperwork Reduction Act (PRA) statements exist on all forms, or on separate forms retained by individuals, to provide additional formal notice to individuals from whom any PII is being collected. Furthermore, FRA and RSIS public websites indicate what information is collected, why it is collected, how the information is used, how it is shared, with whom it is shared, choices the individual has regarding the collection of their PII, privacy information practices for children, the use of cookies and other tracking devices; how privacy information is secured, individual rights under the Privacy Act, and how to find out more or comment on FRA privacy practices. To further bolster FRA's attempts at transparency, the DOT Privacy Office publishes PIAs to the DOT Privacy Website.

Since RSIS PII is not routinely retrieved by a unique identifier associated with an individual, a system of records notice (SORN) is not required for this 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

[2] http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf
[3] http://csrc.nist.gov/publications/drafts/800-53-Appdendix-J/IPDraft_800-53-privacy-appendix-J.pdf

Paperwork Reduction 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.

a. FRA provides individual reasonable opportunities for informed decisions on PII collected, using approved OMB forms, pertaining to rail safety regulations.
b. All RSIS forms that collect PII provide a means for individuals to authorize the collection, use, maintenance, and sharing of PII prior to its collection. Each form is approved by OMB and not open to public discussion or removal of information, as agreed upon by OMB. An example of OMB language is below:

> The collection of information is set forth under 49 CFR part 212 and requires qualified state inspectors to provide various reports to FRA for monitoring and enforcement purposes concerning state investigative, inspection, and surveillance activities regarding railroad compliance with Federal railroad safety laws and regulations. Additionally, railroads are required to report to FRA actions taken to remedy certain alleged violations of law.
>
> Public reporting burden for this information collection is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information.

c. FRA obtains consent, where feasible and appropriate, from individuals prior to any new uses or disclosure of previously collected PII.
d. FRA ensures that individuals are aware of and, where feasible, consent to all uses of PII not initially described in the public notice, that was in effect at the time the organization collected the PII.

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.

This collection of information is mandatory under 49 CFR 225 and is used, maintained, or disseminated by RSIS to monitor national rail safety. FRA's programs and information systems are restricted in the collection and use of PII, or activity impacting privacy, to that which is authorized by law. The information is collected for this reason and is only used for this reason.

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.

FRA only collects the minimum PII necessary, identified elements are relevant and necessary to accomplish the legally authorized purpose of collection. RSIS collects, uses, or retains the following PII:

- Inspector name
- Inspector ID number
- Violation recipient (railroad work contact)
- Mailing address (personal and work)
- Telephone number (personal and work)
- Date of birth
- Gender

Collection is limited to the minimum elements. Retention of information that may contain PII; and is maintained according to NARA standards. For RSIS, the retention of information is identified in the schedules below:

1. Record Schedule N1-399-08-04, Railroad Information System (RSIS) https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/department-of-transportation/rg-0399/n1-399-08-004_sf115.pdf

2. General Records Schedule 5.2: Intermediary Records, Item #020. Records of an intermediary nature, meaning that they are created or used in the process of creating a subsequent record. https://www.archives.gov/files/records-mgmt/grs/grs05-2.pdf

3. DAA-GRS-2013-0005-0002, General Record Schedule 3.1, Item #050. Data Administration Records. Permanent administrative files. https://www.archives.gov/files/records-mgmt/grs/grs03-1.pdf

The FRA Privacy Officer evaluates PII holdings via annual security assessments and use of network monitoring tools to ensure PII is appropriately collected and retained according to DOT standards and requirements.

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.

FRA uses PII collected by RSIS by DOT representatives, only for authorized FRA official business purposes. PII is only used for the purpose for which it was originally collected. RSIS does not share information with third parties. RSIS minimizes its data collection necessary to meet the authorized business purpose and mission of the Agency. In addition, all FRA federal and contract employees must complete annual Cybersecurity and Privacy Awareness Training, which covers authorized uses of PII, and sign the DOT Rules of Behavior.

Data Quality and Integrity

In accordance with Section 552a(e)(2) of the Paperwork Reduction Act Paperwork Reduction Act, 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).

FRA ensures any PII collected and maintained by the organization is accurate, relevant, timely, and complete for the purpose for which it is to be used. PII is collected directly from individuals whenever possible.

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 Paperwork Reduction Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.

FRA protects PII through appropriate security safeguards against risks such as loss; unauthorized access, use, destruction, or modification; or unintended or inappropriate disclosure. protect all records against reasonably anticipated threats or hazards that could result in harm, embarrassment, inconvenience, or unfairness to any individual about whom information is maintained. At a minimum, all PII is protected using controls consistent with Federal Information Processing Standard Publication 199 (FIPS 199) moderate confidentially standards.

Multifactor Authentication (MFA) has been implemented and enabled for all RSIS applications/portals for both FRA users and the non-FRA user community. FRA users authenticate using MyAccess whereas non-organizational users authenticate using Login.gov. Data is stored in the cloud and on-prem servers and are encrypted. PII is only be stored on federally owned or approved computers or mobile computing devices. FRA will require all personnel requesting to maintain Sensitive PII (SPII) on mobile computing devices or who work off site at any time to obtain documented authorization and conditions for any removal of SPII from FRA premises prior to any activity.

FRA requires all personnel who maintain SPII on mobile computing, devices or who work off site at any time to ensure information is properly safeguarded against loss or compromise. FRA will not print records containing PII unless required to support the DOT mission. FRA will implement a Privacy Incident Response Plan that provides an organized and effective response to privacy incidents. FRA ensures all personnel are provided with a clear definition of what constitutes a breach involving PII and are aware of how, where, what information is needed to report the loss, inappropriate access, use or sharing of PII.

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.

Effective governance, monitoring, risk management and assessment controls demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals. FRA is responsible for identifying, training, and holding Agency personnel accountable for adhering to DOT privacy and security policies and regulations. FRA follows the Fair Information Principles as best practices for the protection of information associated with the RSIS system.

In addition to these practices, policies and procedures are consistently applied, especially as they relate to protection, retention, and destruction of records. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing, and securing data. Guidance is provided in the form of mandatory annual Security and privacy awareness training as well as Acceptable Rules of Behavior.

The FRA Information Security Team and Privacy Officer conducts regular periodic security and privacy compliance reviews of information systems consistent with the requirements of the Office of Management and Budget (OMB) Circular A-130, Section 8b (3), Securing Agency Information Systems.

Audit provisions are also included via electronic privacy auditing tools to ensure that information systems are used appropriately by authorized users and monitored for unauthorized usage.

All FRA information systems are governed by the FRA Rules of Behavior (ROB) for IT Systems. The FRA ROB for IT Systems must be read, understood, and signed by each user prior to being authorized to access FRA information systems, including RSIS. FRA contractors involved in data analysis and research are also required to sign the FRA Non-Disclosure Agreement prior to being authorized to access information systems.

Responsible Official

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Prepared by: Elizabeth Varghese, Information System Security Manager (ISSM)

Approval and Signature

Karyn Gorman
Chief Privacy Officer
Office of the Chief Information Officer

KARYN MARIE GORMAN
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Date: 2025.02.21 15:30:50 -05'00'