



**U.S. Department of Transportation**

## **Privacy Impact Assessment**

**Federal Aviation Administration  
(FAA)**

### **Obstruction Evaluation/Airport Airspace Analysis (OE/AAA)**

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## Executive Summary

The Federal Aviation Administration (FAA) has established comprehensive policies and procedures to evaluate potential hazards to air navigation posed by construction or alteration projects. These assessments are critical to maintaining the safety and efficiency of the National Airspace System (NAS). To support this effort, the FAA's Air Traffic Organization (ATO) developed the Obstruction Evaluation and Airport Airspace Analysis (OE/AAA) System, a web-based platform that enables public submission and FAA processing of proposed construction or alteration notices. The collection and processing of this information are authorized under 49 U.S.C. § 44718 and 14 CFR Part 77, which pertains to the notice and study of proposed construction or alteration near navigable airspace.

This Privacy Impact Assessment (PIA) for the OE/AAA System was developed pursuant to Section 208 of the E-Government Act of 2002 because the FAA is utilizing a web-based capability in which a sponsor/representative's Personally Identifiable Information (PII) is collected to process their notice.

## What is a Privacy Impact Assessment?

*The Privacy Act of 1974 articulates concepts for how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.<sup>1</sup>*

*Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we 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:*

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<sup>1</sup>Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo of M-03-22 dated September 26, 2003).



- *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**

The OE/AAA System is a web-based tool developed by the Federal Aviation Administration (FAA) to support rules that help protect aircraft and airspace. It allows people (called “proponents” or “sponsors”) to notify the FAA when they plan to build or change a structure that might affect flight safety such as tall buildings, antennas, or wind turbines.

When someone submits a notice, FAA experts use the OE/AAA System to conduct an aeronautical study. This means they review the proposed construction to see if it could be a hazard to aircraft or interfere with things like air traffic control or navigation systems. These studies help ensure the construction won’t negatively impact air travel or flight safety.

The FAA also works with the Department of Defense (DoD) and the Department of Homeland Security (DHS) to evaluate if a project could pose a risk to national security. After reviewing all necessary information, the FAA sends a determination letter to the sponsor. This letter explains whether the project is a hazard to air navigation. Sometimes the FAA includes requirements or conditions that must be followed to keep the project safe for the airspace.

The OE/AAA System helps manage this entire process, from start to finish, including submission, review, tracking, and communication. It helps keep everything organized and helps ensure that everyone follows the rules.

Anyone can register online at <https://oeaaa.faa.gov> to file a notice. A member of the public creates an account by providing basic contact information, including name, mailing address, phone number, and email address. Once registered, users can:

- Submit new construction or alteration notices
- Track the status of existing notices
- Get notifications and updates from the FAA
- Respond to FAA requests for additional information
- Report progress or changes related to their construction project



Government users such as DoD or DHS personnel, access OE/AAA through a separate secure portal. Their permissions are assigned based on specific roles in the aeronautical study process. These users must create an account by providing their name, mailing address, phone number and email address.

For those who prefer or are unable to use the online system, the FAA also accepts manual submissions. Proponents can request an aeronautical study by filling out [FAA Form 7460-1, Notice of Proposed Construction or Alteration](#). This form can be downloaded, completed, and mailed to the FAA. The FAA uses this form to evaluate whether a proposed structure may be a hazard to air navigation. Once received, FAA staff manually enter the data into the OE/AAA system to begin the study process. While this option is available, electronic filing through OE/AAA is encouraged for faster processing and real-time status updates.

When submitting a notice, either online or manually, proponents provide key project details, including:

- The type, location (latitude/longitude), and height of the proposed structure
- Contact information for the proponent and/or their representative
- Any additional details relevant to the construction or alteration

Online users must confirm the information is accurate before submission. Once entered into OE/AAA, FAA staff verify the data for completeness before beginning the aeronautical study.

### Typical Transaction

By using the FAA Search feature, contact information can identify the individual that owns the structure or airport being studied by the FAA. Each set of latitude/longitude coordinates provided with a notice submitted to the agency on FAA Forms 7460-1, Notice of Proposed Construction or 7480-1, Notice for Construction, Alteration and Deactivation of Airports, is assigned an Aeronautical Study Number (ASN). Contained within the ASN case file is the contact information (as described in 2.2) given to the agency via the FAA Form. All the information collected on FAA Forms 7460-1/7480-1 is used to administer the Aeronautical Study Process and the information may be disclosed to officials within the Federal government and the public in general. Additionally, contact mailing lists are maintained that include all known interested aviation community members or groups so they may be contacted to provide input on an aeronautical study when a Public Notice and a comment period are offered in accordance with federal regulation. Interested individuals voluntarily provide their contact information to participate in this public process. Searches to identify interested individuals from which comments/input will be solicited for a specific aeronautical study are performed only by authorized DOT/FAA users of the system. Distribution lists are for FAA use only and are compiled using the ASN case file number or by manually entering latitude/longitude coordinates and a search radius. Lastly, the system requires unique accounts for individuals to access and/or track (creates audit record) of an



individual's use of the system. OE/AAA Records are stored and retrieved by file/ASN case numbers.

After a notice is submitted and verified, the FAA assigns it a unique ASN and begins the review. If any details are missing or unclear, the FAA contacts the proponent to provide corrections or clarification.

The notice is then evaluated by FAA experts and, if applicable, reviewed by DoD and DHS. If changes are needed to ensure safety, the FAA works with the proponent to negotiate modifications. If risks are fully addressed, the FAA issues a "Determination of No Hazard." If risks cannot be resolved, a "Determination of Hazard" is issued.

In certain cases, the FAA may open a public comment period, giving individuals or organizations the opportunity to provide feedback before a final decision is made.

Once the study is complete, the FAA issues a determination letter that outlines:

- Whether the proposed structure poses a risk to the safe and efficient use of airspace
- Whether the project creates national security concerns, based on input from DoD and DHS

Proponents are responsible for keeping the FAA informed about construction progress. This includes notifying the FAA:

- When construction begins
- When the structure reaches its full height
- If the project is cancelled, abandoned, or dismantled

This follow-up helps the FAA maintain accurate records and ensure continued airspace safety.

All this information is tracked and stored securely in the OE/AAA System.

### **Fair Information Practice Principles (FIPPs) Analysis**

*The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Privacy Act, are mirrored in the laws of many U.S. states, as well as many foreign nations and international organizations. The FIPPs provide a framework that will support DOT efforts to appropriately identify and mitigate privacy risk. The FIPPs-based analysis conducted by DOT is predicated on the privacy control families articulated in the Federal Enterprise Architecture Security and Privacy Profile (FEA-SPP) v3<sup>2</sup>, sponsored by the National Institute of Standards and Technology (NIST), the Office of Management and Budget (OMB), and the Federal Chief Information Officers Council and*

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



*the Privacy Controls articulated in Appendix J of the NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations.*<sup>3</sup>

## Transparency

*Sections 522a(e)(3) and (e)(4) of the Privacy Act and Section 208 of the E-Government Act require public notice of an organization's information practices and the privacy impact of government programs and activities. Accordingly, DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their personally identifiable information (PII). Additionally, the Department should not maintain any system of records the existence of which is not known to the public.*

The FAA is committed to ensuring transparency so that individuals, especially project sponsors (proponents), clearly understand how their personal information is used, why it is collected, and the procedures for submitting notices of proposed construction or alteration through the OE/AAA System.

To raise awareness of these requirements, the FAA uses multiple communication methods, including FAA forms, approved information collections (such as OMB Control Number 2120-0001), notices in the Federal Register, websites, informational videos, email, phone calls, and online forums. The primary public resource for this information is the OE/AAA website (<https://oeaaa.faa.gov>), which serves as a central hub for submitting notices and learning about the rules, policies, and procedures that govern the aeronautical study process.

The OE/AAA website includes frequently asked questions, regulatory guidance, and resources that explain the roles and responsibilities of both proponents and the FAA. The FAA also publicly shares FAA Order JO 7400.2, which outlines the procedures for handling airspace matters, including how the FAA reviews notices, conducts studies and issues determinations of hazard or no hazard to air navigation.

The information collected is maintained in accordance with the following Privacy Act System of Records Notices (SORNs):<sup>4</sup>

- DOT/ALL 13 – *Internet/Intranet Activity and Access Records* (67 FR 30757): Covers names and email addresses of DOT users.
- DOT/ALL 16 – *Mailing Management System* (71 FR 35319): Covers names, contact details (mailing address and organizational information of public and government personnel receiving DOT communications).
- DOT/FAA 826 – *Petitions for Exemption (Other than Medical)* (65 FR 19475): Covers individuals petitioning for exemptions under Federal Aviation Regulations.

<sup>3</sup> [http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft\\_800-53-privacy-appendix-J.pdf](http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf).

<sup>4</sup> For a list of all DOT SORNs, see <https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices/DOT-ALL>.





A Privacy Act Statement is displayed on the OE/AAA home page to inform users of the FAA's privacy practices related to the collection, use, and protection of PII.

Finally, the publication of this Privacy Impact Assessment (PIA) reflects the FAA's and Department of Transportation's (DOT) ongoing commitment to transparency, accountability, and safeguarding individual privacy within the OE/AAA Program.

### 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.*

OE/AAA collects data directly from the individual for processing of notices submitted to the FAA for aeronautical study of construction or alteration proposals and/or for those individuals that have requested to receive one-time or periodic mailings about aeronautical studies. If the proponent determines that the source information for the notice is inaccurate, the proponent may correct their information directly in their registered OE/AAA account or by submitting a correction request. The FAA will then determine the accuracy of the information and, if a correction to the data is appropriate, the necessary correction is made to the record in OE/AAA.

In addition, under the provisions of the Privacy Act, individuals may submit a Privacy Act request to determine if any records have been added that may pertain to them. Individuals wishing to know if their records appear in this system may inquire in writing to:

Federal Aviation Administration  
Privacy Office  
800 Independence Ave, S.W.  
Washington, DC 20591

The following information must be included in the request:

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



Individuals wanting to contest information about them that is contained in this system should make their requests in writing, detailing the reasons for why the records should be corrected, to the following address:

Federal Aviation Administration  
Privacy Office  
800 Independence Ave, S.W.  
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 the Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) System to carry out its responsibilities under 49 U.S.C. § 44718 and 14 CFR Part 77, which require the FAA to evaluate how proposed structures such as towers, buildings, and antennas may affect air navigation and the safe use of navigable airspace.

To support this mission, the OE/AAA System collects PII from individuals (known as proponents) who submit construction or alteration proposals. This information is used for the following key purposes:

1. System Access: To create and manage user accounts, OE/AAA collects the user's name, email address, and phone number.
2. Point of Contact Information on FAA Forms: As part of FAA Form 7460, proponents provide their name, company name, mailing address, phone, and fax number (business or personal) to serve as the point of contact for the notice.

The FAA also uses OE/AAA to facilitate public awareness and participation in the aeronautical study process. When a project may pose a risk to airspace safety, the FAA uses OE/AAA to “circularize” the study—that is, to notify and invite comments from interested individuals and organizations who have subscribed to receive updates about such projects. This process helps the FAA gather valuable feedback that may influence the final determination.

After the study, the FAA issues a determination letter that concludes whether the proposed structure is a hazard or not. If the determination follows a public comment period or exceeds regulatory standards, the public may have the right to petition the FAA for discretionary





review. The FAA uses contact lists from the OE/AAA System to send final determination letters to all those who participated in or subscribed to the public comment process.

The PII collected for circularization and public notification is protected under the Privacy Act SORN DOT/FAA-826 – Petitions for Exemption, Other Than Medical Exemption– Public Dockets (65 FR 19475) (April 11, 2000).

### **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 collects only the minimum amount of personal information necessary to carry out its responsibilities under 14 CFR Part 77, which governs the safe and efficient use of navigable airspace. The information collected supports the FAA’s review of proposed construction or alteration projects that may affect air navigation.

The OE/AAA System uses FAA Forms [7460-1](#) and [7460-2](#) to both gather this information from proponents (also known as sponsors or their representatives) and limit what is collected. These forms and the associated data collection process are reviewed and renewed every three years by the Office of Management and Budget (OMB) as an approved federal information collection (OMB No. 2120-0001).

For each notice, OE/AAA collects and stores the following sponsor/representative information:

- Name
- Organization
- Mailing Address
- Phone and Fax Numbers
- Email Address

The name and email address are used to process the notice and communicate throughout the study. The address is used to mail the final determination letter, and phone/fax numbers are used as needed for follow-up or clarification during the study process.

Each notice submitted through OE/AAA is assigned a unique tracking number. Once officially submitted, the system generates an ASN to identify and track the notice throughout the aeronautical study lifecycle.

The FAA follows Record Retention Schedule No. N1-237-77-03 (Item 64) for obstruction evaluation case files, which are documents relating to aeronautical studies of the effect of



proposed construction or alteration on the use of navigable airspace. Obstruction evaluation case files that do not exceed the obstruction standards of 14 CFR 77 are destroyed when they become 3 years old, while case files that do exceed the obstruction standards of 14 CFR 77 and which were circularized for comment, or are of a controversial nature, are transferred to the Federal Records Center (FRC) when they become 3 years old where they are destroyed once the structure is dismantled.

The FAA follows Record Retention Schedule No. N1-237-75-04 (Item 7) for airport airspace analysis case files, which are records relating to aeronautical studies of the effect of proposed construction, alteration, activation, and deactivation of airports on the use of airspace. These records are PERMANENT and are transferred to the FRC when they become 5 years old, and to the National Archives and Records Administration (NARA) when they become 10 years old.

The FAA follows General Records Schedule 3.1 (Item 20) for information technology operations and maintenance records. These are records that relate to the activities associated with the operations and maintenance of the basic systems and services used to supply the agency and its staff with access to computers and data telecommunications. This includes the activities associated with IT equipment, IT systems, storage media, IT system performance testing, asset and configuration management, change management, and maintenance on network infrastructure. These records are destroyed 3 years after the system activity or transaction is obsolete, completed, terminated, or superseded, but may be retained for a longer period if required for business use under disposition authority DAA-GRS-2013-0005-0004.

Lastly, the FAA follows General Records Schedule 3.2 (Item 30) for system access records, which are records created as part of the user identification and authorization process to gain access to systems. This includes records such as user profiles log-in files, password files, audit trail files and extracts, system usage files, and cost-back files used to assess charges for system use. These records are destroyed when business ceases under disposition authority DAA-GRS-2013-0006-0003.

### 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 ensures that the personally identifiable information (PII) collected through the Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) System is used only for the purposes authorized by law—primarily to evaluate proposed construction or alteration



projects that may affect air navigation, in accordance with 14 CFR Part 77 and 49 U.S.C. § 44718.

To protect privacy and promote responsible data use, the FAA provides clear guidance and training on how OE/AAA information should be used. This includes:

- Guidance materials (FAA Orders, regulations, user manuals, reference guides, and system-generated emails),
- Formal training through the FAA Academy's Basic Obstruction Evaluation Course, and
- Virtual training sessions for FAA and authorized government users through tools like Microsoft Teams and Zoom.

As part of the FAA's approved Information Collection (OMB No. 2120-0001), proponents (also called sponsors) are required to provide:

- Name
- Organization
- Phone and fax number
- Email address
- Mailing address

This contact information is essential to file a notice, conduct the aeronautical study, issue a determination letter, and follow up as needed. If this required information is not submitted, the notice is considered incomplete and will not be processed.

Proponents are notified that the contact information provided may be shared with:

- Federal government officials involved in the review process, and
- Members of the public, in accordance with transparency requirements and FAA procedures.

The FAA does not use this information for any unrelated purpose. Information in OE/AAA may be disclosed under routine use provisions in accordance with the SORN DOT/ALL 13 – Internet/Intranet Activity and Access Records, 67 FR 30757 (May7, 2002), including:

- To any person(s) authorized to assist in an approved investigation of improper access or misuse of DOT systems.
- To an actual or potential party (or their representative) for purposes of negotiation, discussion, or informal discovery related to a case or matter.
- To contractors, grantees, consultants, detailees, and other non-DOT personnel working under a government agreement when necessary to perform agency functions related to the system of records.
- To other government agencies when required by law.



These disclosures are made in compliance with 5 U.S.C. § 552a(b)(3) of the Privacy Act of 1974 and only to the extent needed to support the FAA's authorized responsibilities.

The verification, printing, and mailing of contact information collected through the OE/AAA System is conducted in accordance with the Department of Transportation SORN DOT/ALL 16 – Mailing Management System (71 FR 35319) June 19, 2006). 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 the system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows:

- To verify addresses provided by proponents by comparing them against the master address list maintained by the United States Postal Service (USPS), to ensure the accuracy of mailing information.
- To DOT-contracted printing and mailing services for the purpose of printing and distributing FAA determination letters and related publications to proponents or members of the public in accordance with FAA regulations and public notification requirements.

The sharing of contact information to support the FAA's public transparency efforts is conducted in accordance with Department of Transportation SORN DOT/FAA 826 – Petitions for Exemption (Other Than Medical) (65 FR 19475) (April 11, 2000). 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 the system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows:

- To support the FAA's public notice and comment process by notifying interested persons and groups about aeronautical studies and determinations, and by making documents related to these studies available for public access and review, in accordance with FAA policies governing transparency and exemption procedures.

These routine uses are aligned with the General Routine Uses described in the Department of Transportation's 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).*

The FAA takes several steps to ensure the accuracy and reliability of information collected and maintained in the OE/AAA System.

All information entered into OE/AAA is submitted directly by the individual (known as the proponent) who is requesting an aeronautical study. The FAA relies on the proponent to provide complete and accurate details about their proposed construction or alteration, and therefore, the information is assumed to be accurate. Once submitted, an FAA Processor reviews the notice for completeness and works directly with the proponent to resolve any missing or inconsistent information. If necessary, the FAA Processor may return the notice to the proponent for updates or corrections before moving it forward in the review process.

After initial validation, the notice is reviewed by other authorized parties, including FAA Division Specialists, DoD, and DHS. Each party provides input on potential impacts to air navigation or national security. If any issues are identified, the FAA works with the proponent to find ways to mitigate those impacts. If no significant risks remain, the FAA issues a Determination of No Hazard, which includes the findings and any conditions the proponent must meet. If risks cannot be mitigated, the FAA may issue a Determination of Hazard explaining why the project poses an unacceptable impact to the National Airspace System.

To protect the integrity of the information, OE/AAA uses a role-based access system and follows the principle of least privilege. This means that each authorized user can only access the data and functions necessary for their job. FAA personnel with specific roles and responsibilities are granted access only to the areas they need to perform their duties. OE/AAA also employs separation of duties to reduce the risk of unauthorized edits or misuse of data. Access permissions are carefully managed and monitored.

In addition, account sharing is not allowed in OE/AAA. Each user must maintain their own account, ensuring accountability and traceability for all actions taken within the system.

These combined technical and procedural safeguards help ensure the data in OE/AAA remains accurate, secure, and trustworthy throughout the aeronautical study process.

## 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. Additionally, OE/AAA incorporates standards and practices for federal information systems as directed under the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Revision 5, [\*Security and Privacy Controls for Information Systems and Organizations\*](#), dated September 2020.

OE/AAA is a General Support System and is deployed within an FAA maintained/operated production environment located at the Mike Monroney Aeronautical Center (MMAC) in Oklahoma City, Oklahoma. The MMAC is responsible for providing physical access control to the campus and maintains physical access control for the buildings and select rooms, including the Enterprise Data Center. OE/AAA routinely undergoes a security review process under the FAA National Air Space Security Office. This process ensures the OE/AAA application and program meet the necessary security standards and controls to operate in a production operation.

### **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 FAA's Office of the Chief Information Officer, Office of Information Systems Security, Privacy Division is responsible for governance and administration of FAA Order 1370.121B, Information Security and Privacy Program & Policy. FAA Order 1370.121B implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the Federal Information Security Management Act (FISMA), Department of Transportation (DOT) privacy regulations, Office of Management and Budget (OMB) mandates, and other applicable DOT and FAA information and information technology management procedures and guidance.

In addition to these practices, additional policies and procedures are consistently applied, especially as they relate to the access, protection, retention, and destruction of personally identifiable information. Federal and contract employees are given clear guidance in their





duties as they relate to collecting, using, processing, and securing privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, as well as FAA Privacy Rules of Behavior. The DOT and FAA Privacy Offices will conduct periodic privacy compliance reviews of the OE/AAA web application relative to the requirements of OMB Circular A-130, “Managing Information as a Strategic Resource.”

#### **Responsible Official**

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Prepared by: Michael Bjorkman, FAA Privacy Officer

#### **Approval and Signature**

Karyn Gorman  
Chief Privacy Officer  
Office of the Chief Information Officer

DOT Privacy Office - Approved - 06/30/2025