



U.S. Department of Transportation
Privacy Impact Assessment
Federal Aviation Administration (FAA)
Office of Civil Rights (ACR)
FAA Civil Rights Connect (FAA Civil Rights Connect)

Responsible Official

Jonathan Klein
Email: jonathan.klein@faa.gov
Phone Number: 424-405-7202

Reviewing Official

Karyn Gorman
Chief Privacy Officer
Office of the Chief Information Officer
privacy@dot.gov





Executive Summary

The Federal Aviation Administration (FAA) Office of Civil Rights (OCR) leverages the FAA Civil Rights Connect system to meet its regulatory reporting requirements for the Disadvantaged Business Enterprise (DBE) Program (49 Code of Federal Regulations (C.F.R.)), the Airport Concession DBE Program ((ACDBE) 49 C.F.R. Part 23), the Title VI Program (49 C.F.R. Part 21), and the Americans with Disabilities Act and Sec. 504 of the Rehabilitation Act (ADA) Program (29 C.F.R. Part 27). The FAA Civil Rights Connect system is used by airport grant recipients to maintain compliance, individuals who file civil rights complaints against airport grant recipients, and FAA employees who process submissions and create reports.

Under the E-Government Act of 2002, the FAA developed this Privacy Impact Assessment (PIA) because the FAA Civil Rights Connect system collects Personally Identifiable Information (PII) on members of the public, including business contact information on representatives for airport grant recipients, and personal contact information for individuals who have filed civil rights complaints against airport grant recipients for discrimination.

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

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).



electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:

- *Making informed policy and system design or procurement decisions. These decisions must be based on an understanding of privacy risk, and of options available for mitigating that risk;*
- *Accountability for privacy issues;*
- *Analyzing both technical and legal compliance with applicable privacy law and regulations, as well as accepted privacy policy; and*
- *Providing documentation on the flow of personal information and information requirements within DOT systems.*

Upon reviewing the PIA, you should have a broad understanding of the risks and potential effects associated with the Department activities, processes, and systems described and approaches taken to mitigate any potential privacy risks.

Introduction & System Overview

The FAA Civil Rights Connect system is used to facilitate required federal regulatory reporting for the Disadvantaged Business Enterprise (DBE) Program (49 Code of Federal Regulations (C.F.R.) Part 26), the Airport Concession DBE (ACDBE) Program (49 C.F.R. Part 23), Title VI Program (49 C.F.R. Part 21), and the Americans with Disabilities Act and Sec. 504 of the Rehabilitation Act (ADA) Program (29 C.F.R. Part 27).

Pursuant to Civil Rights regulations 49 C.F.R. Parts 21, 23, 26 and 27, and related authorities, airport grant recipients and/or their representatives (consultants) including city, state, county, as well as public and private airport owners and employees (collectively called “airport grant recipients”) use the system to submit required regulatory information including reports, programs, goals, contractor prompt payment complaints, Title VI complaints filed against airport grant recipients and investigations at the airport, compliance reviews, and compliance assessments and long term exclusive agreements. Furthermore, the system is used to ensure that airports are in compliance with the Civil Rights regulations and the Civil Rights Program (Grant Assurances numbers 30 and 37) prior to awarding grants. Records are retrieved by airport names and not by unique identifiers linked to individuals.

User Access:

Airport grant recipients obtain access by visiting the Uniform Resource Locator (URL) <https://faa.civilrightsconnect.com/FAA/login.asp> and submitting a request for a user account. To submit a request, the new user must provide their name, organization, email address/username, telephone number, physical business mailing address, and indicate which program areas they are requesting access to (e.g., DBE, ACDBE, Title VI, or ADA). At the time of the collection of this PII, the user is presented with an FAA Privacy Act Statement.

The FAA Regional Compliance Specialist (RCS) for the airport grant recipient’s state or regional area reviews the request. If approved, an automated email message is sent to the



new airport grant recipient user with a temporary password to login. The new airport grant recipient user will log in and then request the airport or airports assignments (i.e., request all the airports they are submitting program information for). This request is also reviewed and approved by the FAA. When the airport assignments are approved, the new airport grant recipient user receives an automated email confirming the approval.

FAA and DOT employee users must have an FAA.GOV or DOT.GOV email address to obtain access to the FAA Civil Rights Connect user module. Users can request a user account from the system home screen at faa.civilrightsconnect.com, or by contacting their FAA RCS. If requested from the home screen, the system provides the RCS contact list. The RCS reviews the request and verifies the user to approve their account request. If the request is approved, the RCS creates the FAA user account and generates an automated email message containing the user's username/email address and a temporary password. The only information entered for the FAA or DOT user account is the employee's name and faa.gov or dot.gov email address. The user then logs into the system with the temporary password at URL <https://faa.civilrightsconnect.com/FAA/login.asp> (or faa.civilrightsconnect.com) and is prompted to create a new password. Once a user logs in, the FAA Civil Rights Connect website is branded with the appropriate FAA branding.

Users are allowed access only to specific data sets that they have been authorized to view or edit by the System Administrator.

System Functionality:

A. Non-Airport Grant Recipient Individuals Filing Complaints

Federal civil rights regulations authorize individuals and/or firms to file a complaint against a United States airport alleging discrimination. These individuals do not have direct access to FAA Civil Rights Connect. These complaints are submitted to the FAA Civil Rights Office via mail, or through email via the [FAA External Programs Civil Rights Complaint Form](#). These individuals or firms provide the following information: full name, mailing address, phone number, email address, and information about the claimed discrimination, including airport information. Similar information is collected if sent via regular mail or phone. There is no technical connection between this web form and the FAA Civil Rights Connection system.

Once a complaint is received, the FAA ACR office analyzes the allegations for possible non-compliance² by the airport grant recipient. If the complaint merits investigation, an

² Examples of airport non-compliance are: 1) ADA Program – airport restrooms do not meet ADA accessibility requirements; 2) Title VI Program – Airport, airport employee, or airport lessee/contractor discriminated against an individual based on the person's race, color, sex, creed, age, or national origin; 3) DBE and ACDBE Programs – airport failed to implement or enforce DBE or ACDBE requirements during award or performance of a contract, subcontract, concession or purchase agreement.



investigation process is initiated and reported to the DOT tracking system, ENTELLITRACK. The airport grant recipient and complainant are also notified by email. The complainant information is extracted from the complaint correspondence and is manually entered into the FAA Civil Rights Connect system by an RCS. Complaints are retrieved by airport name from the system. If non-compliance is found, the non-compliance issues are presented to the airport grant recipient with recommendations to bring the issues into compliance. This letter would include PII from the FAA employee who drafted it, including their name and business contact information. The goal of the FAA ACR investigatory process is for informal resolution and voluntary compliance between the airport sponsor and the FAA. Records are searchable by airport name or complaint number, and not by unique PII.

B. Airport Grant Recipient Use of FAA Civil Rights Connect – Filing Required Reports

To start the process of entering and submitting the required DBE, ACDBE, or Title VI reports, goals, programs, compliance assessments or ADA information, the airport grant recipient user navigates to the above URL and enters their username and password. The airport grant recipient user then selects the airport and the program or subject they are working with, for example, Chicago O’Hare, DBE/ACDBE Programs. Depending on what is being submitted, the airport grant recipient user enters the required information (name, email address, mailing address, and phone number), uploads the required documents, and submits them to the FAA. An assigned RCS reviews the information and either returns the form(s), program, plan or goal submittal to the airport grant recipient for more information, if needed, or approves the submission. The airport grant recipient user receives an email message indicating the status; the status is also indicated on the Dashboards.

Everything submitted by an airport grant recipient that is in the system can be viewed, downloaded, saved and printed from the system and may contain the airport grant recipient’s name, name of airport address of airport contacts, dates received and approved, goals and achievement data, and comments. Some reports also contain names of FAA employees, who are part of the FAA ACR. FAA RCS’s can make documents “visible to airport” (for example, important documents contained in the Document Vaults) so that the airport grant recipient user can access, view, save or print the document. Documents containing confidential information are not made “visible to airports.” Under the DBE/ACDBE uniform form reporting section, FAA Civil Rights Connect contains templates for airports to complete and upload to the system. The completed letter contains the names and work addresses of the FAA RCS assigned to that airport or region, and the names and addresses of the POCs from each airport completing and submitting the letters.



C. Airport Grant Recipient Use of FAA Civil Rights Connect – Filing Received Complaints Regarding Discrimination and Prompt Payment

Airport grant recipients are required to submit to the FAA any Title VI complaints received by the airport grant recipient alleging discrimination based on race, color, national origin, sex, creed, or age consistent with 49 C.F.R. Part 21, Appendix C and related requirements. For airport grant recipients to submit a report to the FAA that a Title VI complaint has been filed against the airport, they must login to FAA Civil Rights Connect, upload documents related to the complaint and submit the record to the FAA. The complaint record contains the names of the primary and secondary assigned FAA ACR employees, and the primary and secondary airport investigators. It also contains the name, business address, business email and business phone number of the complainant, the name of the airport sponsor or owner, and the airport's three-digit identifier number. Airport grant recipient users can return to FAA Civil Rights Connect to update the record as their complaint investigation proceeds. If anything is missing, the system automatically displays an on-screen alert. The FAA RCS logs into FAA Civil Rights Connect to review the Title VI complaints submitted, return the submission, request more information, or accept the submission. The airport grant recipient will receive an email indicating the status. The status email sent to the airport after submission contains the name of the airport and the name of the complainant, and indicates it was received by the FAA.

Airport grant recipients must report DBE prompt payment complaints³ as required by the FAA Reauthorization Act of 2018. Prompt payment complaints must only be reported after they are resolved at the airport. For airport grant recipients to report a prompt payment complaint to the FAA, they must log into FAA Civil Rights Connect, fill in all required fields in the complaint record, upload documents related to the complaint, and submit the record. The complaint record contains the Complainant's name, business mailing address, business email address, and business phone number. It also contains a description of the complaint and information regarding how the airport managed and resolved the complaint. It may also contain FAA project information for the project the firm is working on or has worked on but did not receive payment as required. If anything is missing, the system will display an on-screen alert. The FAA RCS will review the submission and may either return it requesting more information or accept it. The airport grant recipient will receive an email indicating the status. The status email contains the names of the airport and the complainant. The complaint and correspondence are retrievable by the airport file name from FAA Civil Rights Connect.

³ Refers to DBE regulation requirements that all subcontractors are paid within 30 days of the completion of work. Prompt payment complaints are complaints made by subcontractors that an airport contractor did not pay them in a timely manner.



Reports:

Airports DBE and ACDBE uniform form aggregate data reports are available in the Reports module of FAA Civil Rights Connect and are uploaded to a DOT SharePoint page. Also, aggregate reports are downloaded to respond to requests for information such as Freedom of Information Act Requests (FOIA), and requests from the DOT Department of Civil Rights (DOCR), the DOT DOCR General Support System (GSS), and the Office of Inspector General (OIG). The data types in the reports include business mailing addresses, business email addresses, and business phone numbers.

The FAA ACR can access unique reports in the Reports module; this module is only accessible to FAA employees. Airport grant recipients do not have access to the Reports module. FAA RCSs may need to download a report to respond to a Freedom of Information Act (FOIA) request or other requests. FAA RCSs sometimes must download and share the program's airport contact list. In the Complaints modules, airport grant recipients only have access to what they uploaded and submitted, or to documents that the FAA has made “visible to airport.” Reports and correspondence are retrievable by the airport name from FAA Civil Rights Connect.

Logging:

As this is a contractor-owned system, audit logs are maintained by B2Gnow. The FAA, however, can receive a spreadsheet report that contains a record of all users that have logged into FAA Civil Rights Connect and includes the date and time, name, title, and organization of the individual who logged in.

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) v3⁴, 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.⁵

⁴ <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

⁵ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



Transparency

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

The FAA employs multiple techniques to ensure that individuals are informed of the purpose for which the FAA collects, uses, disseminates, and retains PII within the FAA Civil Rights Connect system. The FAA's ACR has an external [web page](#) that provides explanations of policies, complaint resolution processes, training and the DBE/ACDBE programs to members of the public. On the web form, there is a check box querying "Do you waive anonymity (Is it okay to release your name to the airport sponsor)?" This web page also contains a link to the FAA's Privacy Policy. The FAA Civil Rights Connect website itself contains a link to the FAA's Privacy Policy on its landing page, and a Privacy Act Statement is presented to external user airport grant recipients requesting to create an account.

The FAA Civil Rights Connect system is not a Privacy Act System of Records for the substantive records, reports and data analytics in the system. Records within the system are retrieved by airport name and not by PII.

FAA Civil Rights Connect access-related records about users are maintained in accordance with the Department's Privacy Act System of Records Notice (SORN), [DOT/ALL 13, Internet/Intranet Activity and Access Records, 67 FR 30758 \(May 7, 2002\)](#), which covers computer access records.

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.

Airport grant recipients and complainants are active participants in the decision-making process regarding the collection and use of their PII. To participate in the DBE and ACDBE programs, airport grant recipients are required to provide information to process those requests. Airport grant recipients who have user profiles within FAA Civil Rights Connect



can use their login credentials and update their PII as needed. Upon request, a profile can be deactivated or completely deleted by the FAA Civil Rights Connect system administrators.

For external (non-airport grant recipient) complainants, at the point of initial intake, the ACR process requires the complainant to manually input their own PII. That PII is relied upon to be accurate and up to date. However, the ACR process also allows for complainant anonymity at initial stages.⁶ If anonymity is not waived, the individual may be contacted by an RCS with further questions or clarifications. The individual may request that the RCS manually update their PII at that time.

The FAA Civil Rights Connect system is not a Privacy Act System of Records for the substantive records, reports and data analytics in the system. Records within the system are retrieved by airport name and not by 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.

The PII collected is used to monitor airport grant recipient compliance with civil rights regulations, process and track discrimination complaints, and ensure equitable participation in DBE and ACDBE programs.

The FAA uses the FAA Civil Rights Connect system and the information stored therein under the following legal authorities:

- [Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d](#), which provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.
- [49 C.F.R. Part 21, Nondiscrimination in federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964](#), which provides that no person in the United States shall be denied the benefits of or otherwise be subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.
- [49 C.F.R. Part 23, Participation of Disadvantaged Business Enterprise in Airport Concessions](#), which provides a level playing field for ACDBEs to fairly compete for concession activities.

⁶ Consistent with DOT policies and DOT Order 1000.18, ACR will not open a complaint investigation for full investigation when anonymity is not waived.



- [49 C.F.R. Part 26, Participation by Disadvantaged Business Enterprise in Department of Transportation Financial Assistance Programs](#), which provides a level playing field for DBEs to fairly compete for DOT assisted contracts and remove barriers.
- [49 C.F.R. Part 27, Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance](#), which carries out section 504 of the Rehabilitation Act of 1973, providing that no otherwise qualified individual, shall solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

As described in the overview, the FAA Civil Rights Connect system receives PII; specifically, business contact information from airport grant recipients, as well as personal contact information from complainants to resolve complaints and process required reports pursuant to these authorities.

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 minimizes its data maintenance, use, and retention in the FAA Civil Rights Connect system to only the relevant and necessary information needed to meet its authorized purposes. The FAA Civil Rights Connect system collects personal information to contact and respond to complainants, business contact information and profile information to process complaints against airport grant recipients, and other information related to ACDBEs and DBEs.

Records are maintained in accordance with different retention schedules for each record type. Small and Disadvantaged Business Utilization records are maintained temporarily, and are destroyed after 3 years, although longer retention is authorized if required for business use. Mandatory reporting to external federal entities regarding administrative activities is maintained temporarily and is destroyed 6 years after report submission or oversight entity notice of approval, but longer retention is authorized if required for business use. Civil rights compliance review files are maintained for 5 years. General IT maintenance and records within the system are also maintained temporarily, and are destroyed after three years, but longer retention is authorized if required for business use. System access records are maintained temporarily and are destroyed when business use ceases.



Use Limitation

DOT shall limit the scope of its PII use to ensure that the Department does not use PII in any manner that is not specified in notices, incompatible with the specified purposes for which the information was collected, or for any purpose not otherwise permitted by law.

The FAA Civil Rights Connect system is not a Privacy Act system of records for the substantive records, reports, or data within the system.

FAA Civil Rights Connect shares a select subset of data with US DOT OCR. The FAA Civil Rights Connect System Lead Specialist downloads aggregate data reports from FAA Civil Rights Connect and uploads the same aggregate reports to US DOT SharePoint, as required by US DOT DOCR. The data reports contain non-PII data (e.g. aggregate FAA funded contracts awarded, paid and completed subject to the DBE program, and gross receipts and expenditures generated by all airport concessions subject to the ACDBE program). The reports are provided to the US DOT to fulfill the statutory requirements. OCR also may request specific reports which may contain PII data (e.g., names, email addresses and telephone numbers of airport grant recipient POCs) where the FAA Specialist manually emails the OCR the requested reports. These requested reports also contain the airport name and airport identifier number of each recipient. There is a Memorandum of Understanding (MOU) in place for the data exchange with no expiration date and the MOU is reviewed periodically.

Additionally, Title VI, DBE, ACDBE and ADA complaints and information received by the FAA are manually entered in DOT's ENTELLITRACK for tracking purposes only, and into FAA Civil Rights Connect simultaneously. The complaints contain the name and email address of the complainants. In addition, the complaint information and investigation correspondence are manually entered into FAA Civil Rights Connect. To add any additional information to the complaints, the complaints are retrieved in FAA Civil Rights Connect by airport name. There is no data exchange between ENTELLITRACK and FAA Civil Rights Connect for these complaints. The complaint information is not copied from FAA Civil Rights Connect to ENTELLITRACK or vice versa. The complaint information is extracted from the complaint correspondence and entered into each system manually.

Profile and logging PII collected by the FAA is used as specified by the DOT's system of records notice, DOT/ALL 13, Internet/Intranet Activity and Access Records. 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 provide information to any person(s) authorized to assist in approved investigations of improper access or usage of DOT computer systems.



- To an actual or potential party or his or her authorized representative for the purpose of negotiation or discussion of such matters as settlement of the case or matter, or informal discovery proceedings.
- To contractors, grantees, experts, consultants, detailees, and other non-DOT employees performing or working on a contract, service, grant cooperative agreement, or other assignment from the Federal government, when necessary to accomplish an agency function related to this system of records; and
- To other government agencies where required by law.

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).

Data that is ingested into FAA Civil Rights Connect is relied on to be accurate, as it is provided by the individual who is providing their own PII, whether an airport grant recipient or an external disability complainant. It is the responsibility of the airport grant recipient employer to request deletion of profile PII that was provided by their employees who entered airport information into the FAA Civil Rights Connect system.

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 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 NIST Special Publication (SP) 800-53, Revision 5, Security and Privacy Controls for Federal Information Systems and Organizations, dated August 4, 2022. FAA Civil Rights Connect implements administrative, technical, and physical measures to protect against loss, unauthorized access, or disclosure. The principle of least privilege is used to grant access to FAA employees and contractors, and user actions are tracked in the FAA Civil Rights Connect audit logs.



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 Information Security and Privacy Service (AIS), Security Governance Division is responsible for the administration of FAA Order 1370.121B, "FAA Information Security and Privacy Program & Policy." FAA Order 1370.121B defines the various privacy requirements of the Privacy Act of 1974, as amended (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the Federal Information Security Management Act (FISMA), DOT privacy regulations, OMB mandates, and other applicable DOT and FAA information technology management policies and procedures. In addition to these, other policies and procedures will be consistently applied, especially as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors are given clear guidance on 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. The DOT and FAA Privacy Offices will conduct periodic privacy compliance reviews of FAA Civil Rights Connect in accordance with the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

Responsible Official

Jonathan Klein
System Owner

Approval and Signature

Karyn Gorman
Chief Privacy Officer
Office of the Chief Information Officer