



U.S. Department of Transportation

Privacy Impact Assessment

Federal Aviation Administration

FAA

Pilot Medical Disclosure Decision Making Survey

Responsible Official

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Executive Summary

The Federal Aviation Administration (FAA) Civil Aerospace Medical Institute (CAMI) is conducting the Pilot Medical Disclosure Decision Making Survey. The survey is used to conduct a research study about how pilots make decisions regarding the disclosure of health conditions to the FAA. This study aims to gain a deeper understanding of pilot experiences, concerns, and thought processes regarding medical disclosure. The goal is to inform efforts aimed at reducing unnecessary barriers and burdens in the reporting process. The survey is being conducted under the authority of [Federal Aviation Act of 1958 \(49 U.S.C. § 44507\)](#) and [Aviation Safety Research Act of 1988 \(Public Law 100-591\)](#). The FAA is publishing this Privacy Impact Assessment (PIA) for the Pilot Medical Disclosure Decision Making Survey in accordance with Section 208 of the E-Government Act of 2002 because the FAA contractor and sub-contractor conducting the survey collects Personally Identifiable Information (PII) from pilots that includes name, email, and home addresses.

What is a Privacy Impact Assessment?

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

Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we collect, store, retrieve, use and share. It is a comprehensive analysis of how the DOT's electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:

- *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;*

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).



- *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 Civil Aerospace Medical Institute (CAMI) National Airspace System Safety Research Laboratory (AAM-520) is administering this survey on behalf of the Office of Aerospace Medicine (AAM) with the assistance of Cherokee Federal, a third-party contractor. Cherokee uses Qualtrics software to administer the survey, which includes designing the survey, collecting responses, and generating survey item reports.

FAA estimates that they will conduct the survey from March 1, 2026, through March 24, 2027. The universe of potential respondents includes 148,306 Air Transport pilots represented within the aerospace medical certification database. The minimum sample required to detect an effect from the current collection is 1,950 responses. Given prior response rates of 35% for previous surveys conducted by the FAA, the FAA will sample 51,907 of the total number of Air Transport pilots.

The survey participants include pilots who have previously participated in CAMI's research and have expressed interest in future research/surveys. In addition, researchers for this study work closely with the Air Line Pilots Association, International (ALPA), the world's largest pilot union. ALPA provides the FAA with the names, email addresses, and mailing addresses of interested pilots within the union who would like to participate in the survey.

To initiate the survey, Cherokee mails invitations to survey participants by the U.S. Postal Service or email. The correspondence includes a unique Uniform Resource Locator (URL) and a QR code that provide participants with access to the online survey. The correspondence also includes a system-generated password unique to the participant.

The participant accesses the survey and is presented with an informed consent notice, which provides an overview of the study, its voluntary nature, and the option to opt out, informs them about the purposes of the study, and how the FAA will use the results. The informed consent notice also advises the survey participant of FAA's PII processing activities, such as the de-identification of survey responses, which is designed to reduce the project's privacy risks. Each survey participant must accept the informed consent notice prior to participating in the survey by agreeing to the following statement: ***“By clicking ‘Next’, you are***



consenting to participate.” The survey participants must provide their consent before continuing with the survey. If consent is not provided, the survey participant cannot proceed.

The survey is designed with plans to obtain a response rate of approximately 1,950 participants. If, after a period of time, not enough responses are received, Cherokee sends another offer to all nonresponding survey participants. The survey will be closed once a response rate of 1,950 has been met.

The survey questions are not written in a way that requires PII to be provided when responding. The survey has internal controls that limit the information that can be input into the survey. For example, fields that require numerical entries do not include alpha characters. However, there are two questions that require a written response where a survey participant could enter PII. The questions are accompanied by reminders to participants not to include PII in their responses.

Cherokee contractors enter their FAA email address and password to log in to their Qualtrics account. After the survey is closed, the Cherokee contractor accesses their account and downloads the survey responses to FAA-owned servers, with access limited to Cherokee contractors and FAA Management. The Cherokee contractor reviews the response and removes all PII. The final survey records will contain only aggregated responses and no PII. Results will be provided to CAMI managers, sponsors, and stakeholders in the form of briefings and technical reports that contain only group-level, aggregated, and de-identified data.

Survey participants are compensated for their participation. The survey includes a direct link to a secure website for a third-party contractor, Lemasters Group, to directly collect PII from the survey participant to facilitate payment. The survey participants provide their name, mailing address, and email address. Cherokee sends Lemasters Group an encrypted email that includes the survey participant’s name to verify their participation. Lemasters Group facilitates payment by mailing a check to the survey participants.

The information Lemasters Group Personnel collects will not be shared. Lemasters Group Personnel will maintain this information for three years to comply with the requirements set forth by the Fair Labor Standards Act (FLSA). Lemasters Group Personnel stores any hard copy documents in locked, access-controlled cabinets. Electronic data is stored in password and firewall-protected systems. At the end of the three-year retention period, any hard copy documents are shredded, and electronic files are deleted.

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) v3², 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 Organizations³.

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 names, email addresses, and mailing addresses are not collected from the survey participants. As discussed in the Overview, the participants include pilots who have previously participated in CAMI's research and have indicated interest in future surveys/research. Additionally, ALPA provides the names, email addresses, and mailing addresses of interested pilots within the union who wish to participate in the survey. The FAA does not receive any of this information, as it is sent by ALPA directly to the FAA contractor or subcontractor.

The survey participant is presented with an informed consent notice, which provides an overview of the study, its voluntary nature, and the option to opt out. It informs them about the purposes of the study and how the FAA will use the results when accessing Qualtrics. Survey participants are compensated for their participation, and Lemasters Group collect their names, mailing addresses, and email addresses to facilitate payment. No PII about survey respondents is provided to the FAA.

The survey participant also presents applicants with a Paperwork Reduction Act (PRA) Statement that includes the Office of Management (OMB) collection number 2120-0835.

Records containing the survey responses are not retrieved by information pertaining to individuals. Because they are not, the records containing the substantive survey responses are not subject to the Privacy Act. The FAA retrieves system access records by the name of FAA employees and contractors and protects Privacy Act records in accordance with

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

³ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



Department published System of Records Notice (SORN) [DOT/ALL 13, Internet/Intranet Activity and Access Records](#), May 7, 2002 67 FR 30757.

The FAA also uses this PIA to provide transparency to survey participants.

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.

The survey response records are stripped of all PII once they are downloaded from Qualtrics and the FAA does not receive any information from members of the public that is retrievable by an identifier linked to an individual. Thus, the survey does not generate any records pertaining to members of the public that are subject to the Privacy Act. The FAA does retrieve system access records by name and protects Privacy Act records in accordance with Department published System of Records Notice (SORN) DOT/ALL 13, Internet/Intranet Activity and Access Records, May 7, 2002, 67 FR 30757. These records are only those of FAA employees. When the participant accesses the survey, they are presented with an informed consent notice that provides an overview of the study, its voluntary nature, and the option to opt out. The notice also informs them about the purposes of the study and how the FAA will use the results. The informed consent notice also advises the survey participant of FAA's PII processing activities, such as the de-identification of survey responses, which is designed to reduce the project's privacy risks. The survey participants must provide their consent before continuing with the survey. If consent is not provided, the survey participant cannot proceed.

Survey participants are compensated for their participation, and Lemasters Group contractors collect their names, mailing addresses, and email addresses to facilitate payment. The FAA is not provided this information.

Under the provisions of the Privacy Act of 1974, individuals may request searches to determine if any records pertain to them, or contest information about themselves. Individuals wishing to know if their records appear in this system may inquire in person or in writing to:

Federal Aviation Administration
Privacy Office
800 Independence Ave. SW



Washington DC, 20591

Included in the request must be the following:

- Name
- Mailing Address
- Phone number or email address
- A description of the records
- Location of the records (if applicable)

Contesting record procedures:

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

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

Additional information about the Department's privacy program may be found at <https://www.transportation.gov/privacy>. Individuals may also contact the DOT Chief Privacy Officer at privacy@dot.gov

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 contained in PTB is utilized for transit subsidy usage reconciliation, reporting for the agency, monitoring, and tracking participant usage.

The FAA is conducting the survey in accordance with [Federal Aviation Act of 1958 \(49 U.S.C. § 44507\)](#) and [Aviation Safety Research Act of 1988 \(Public Law 100-591\)](#). The names, email addresses, and mailing addresses are used to disseminate surveys for a research study on how pilots make decisions regarding the disclosure of health conditions to the FAA. This study aims to gain a deeper understanding of pilot experiences, concerns, and thought processes regarding medical disclosure. The goal is to inform efforts aimed at reducing unnecessary barriers and burdens in the reporting process. This de-identified information will be provided to CAMI managers in the form of briefings and technical reports that contain only group-level, aggregated, and de-identified data.



Survey participants are compensated for their participation, and Lemasters Group collect their names, mailing addresses, and email addresses to facilitate payment. The information Lemasters Group collects is not shared.

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 does not receive any personally identifiable information about members of the public. All PII is removed from participants' responses, thus de-identifying the survey responses and minimizing the PII. The survey-related records are maintained in accordance with the [*Federal Aviation Administration, Survey Study Record Schedule*](#) as follows:

- The survey questionnaire and the responses are destroyed three years after the cutoff
- The completed survey study is destroyed 25 years after cutoff
- Survey reports are cutoff off when the survey study is completed and destroyed 25 years after cutoff.

System access records are maintained in accordance with National Archives and Records Administration, [General Records Schedule 3.2, Information System Security Records item 30](#) 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 names, email addresses, and mailing addresses are used to disseminate surveys for a research study on how pilots make decisions regarding the disclosure of health conditions to the FAA. The Cherokee contractor reviews the response and removes all PII. The final survey records will contain only aggregated responses and no PII that are sent to CAMI researchers for analysis to evaluate customer satisfaction and determine whether any changes are suggested from the results. The aggregated responses are provided to CAMI managers in the form of briefings and technical reports.

Survey participants are compensated for their participation, and Lemasters Group collect their names, mailing addresses, and email addresses to facilitate payment. The information Lemasters Group collects is not shared. Cherokee sends Lemasters Group an encrypted email that includes the survey participant's name to verify their participation.



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 questions in the survey are designed not to collect PII. The Qualtrics survey has internal controls that limit the information that can be input into the survey. For example, fields that require numerical entries do not include alpha characters. However, there are two questions that require a written response where a survey participant could enter PII. The questions are accompanied by reminders to participants not to include PII in their responses. All survey responses are reviewed and redacted of PII if present.

Survey participants are compensated for their participation, and Lemasters Group collect their names, mailing addresses, and email addresses to facilitate payment. The participants are responsible for ensuring the accuracy of the information they enter.

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.

Cherokee contractors enter their FAA email address and password to log in to their Qualtrics account. After the survey is closed, the Cherokee contractor accesses their account and downloads the survey responses to FAA-owned servers, with access limited to Cherokee contractors and FAA Management. The Cherokee contractor reviews the response and removes all PII. The final survey records will contain only aggregated responses and no PII that are sent to CAMI researchers for analysis to evaluate customer satisfaction and determine whether any changes are suggested from the results. This information will be provided to CAMI managers in the form of briefings and technical reports that contain only group-level, aggregated, and de-identified data.

CAMI, including Cherokee, strictly adheres to ethical standards, public law, and federal policies for safeguarding the confidentiality of all participants in this survey. All data provided will be kept private in accordance with legal and regulatory requirements.



Accountability and Auditing

DOT shall implement effective governance controls, monitoring controls, risk management, and assessment controls to demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals.

FAA Order 1370.121B, FAA Information Security and Privacy Program & Policy, implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), DOT privacy regulations, Office of Management and Budget (OMB) mandates, and other applicable DOT and FAA information and information technology management procedures and guidance.

In addition to these practices, the FAA will implement additional policies and procedures as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors who work with the Survey of Airmen Satisfaction with Aerospace Medical Certification Services are given clear guidance about their duties as related to collecting, using, and processing privacy data. Guidance is provided in mandatory annual security and privacy awareness training, as well as FAA Order 1370.121B. The FAA will conduct periodic privacy compliance reviews of the Survey of Airmen Satisfaction with Aerospace Medical Certification Services as related to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

Responsible Official

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