



# U.S. Department of Transportation Privacy Impact Assessment

**Federal Aviation Administration (FAA)  
Office of Audit & Evaluation (AAE)**

## FAA Hotline Information System (FHIS)

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## Executive Summary

Federal Aviation Administration (FAA) Hotline Information System (FHIS) is a web-based application used for tracking voluntary reports of unsafe or unauthorized aviation activities violating Federal law or FAA regulation related to aviation safety or practices. FHIS is also used to capture complaints about fraud, waste, abuse, or mismanagement of FAA programs, personnel, organizations or facilities. Safety concerns reported to the FHIS include, but are not limited to, aircraft maintenance, suspected unapproved parts, crew flight and duty-time issues, and other matters related to aviation safety. Complaints may involve FAA employees or organizations, the aviation industry or its oversight and aviation safety. The FHIS allows for the reporting of these incidents anonymously.

The FHIS collects personally identifiable information (PII) from individuals named in complaints and reporting parties. Therefore, FAA is developing this a Privacy Impact Assessment (PIA) pursuant to the E-Government Act of 2002.

## 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:*

- 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.*

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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).

## Introduction & System Overview

The Office of Audit and Evaluation (AAE) manages the Federal Aviation Administration (FAA) Hotline and its FAA Hotline Information System (FHIS). FHIS was created as a result of past recommendations from the U.S. Department of Transportation (DOT), Office of the Inspector General, and the passage of the FAA Modernization and Reform Act of 2012 ([Public Law 112-95](#)) requiring FAA to operate a complaint hotline. FHIS was developed to consolidate the multiple FAA hotline applications, specifically Aviation Safety Hotline Information System (ASHIS) and Administrators Hotline Information System (AHIS).<sup>2</sup> The consolidation was needed to streamline the complaint intake processes, as well as update old technology and include new business processes. As a result of this consolidation, FAA migrated open and closed cases from ASHIS and AHIS into FHIS on February 15, 2018. The only complaint information for ASHIS and AHIS cases that FAA migrated into FHIS were those that were within the 5-year record retention period. FAA will continue to maintain supplemental documentation on the network and on shared drives, and will not be migrated into FHIS.

The FHIS is a web-based application, used by AAE, that supports the FAA's mission to promote safety and regulate civil aviation as defined in [FAA Order 1070-Hotline Order](#). Concerns reported to FHIS can include alleged aviation safety issues, such as code violations, concerns involving FAA employees or facilities, aircraft maintenance issues, aircraft incidents and/or accidents and suspected unapproved parts, crew flight and duty-time issues, unauthorized drone/Unmanned Aircraft Systems use, or fraud, waste, abuse, or misconduct related to FAA programs or personnel. Complaints can be about issues involving FAA employees or organizations, the aviation industry and/or aviation safety.

### Submitting a Complaint

The general public, aviation industry, and FAA employees/contractors may submit a complaint to the FAA Hotline in three ways: 1) the electronic FAA Hotline Reporting Form; 2) by mail; and 3) by email.

#### **I. Submitting a Hotline Complaint by the FAA Hotline Reporting Form**

A person initiating a complaint, via the online web form, navigates to the Uniform Resource Locator (URL) <https://hotline.faa.gov/>. The reporting party does not need to authenticate to the website, although they must acknowledge a pop up Privacy Act Statement (PAS) before accessing the FAA Hotline Reporting Form. The FAA Hotline Reporting Form specifically advises reporting parties not to include PII such as date of birth and Social Security Number. The reporting party then manually enters data into mandatory and optional fields into the FHIS Web form.

Mandatory Fields include Reporter Type; Issue reported; Report Narrative; Other Reports on the Same Subject Matter; and whether the reporter wished to remain anonymous, cooperate with AAE, or be confidential. The Report Narrative is an open-text field in which reporter may include PII if needed to clarify the report, such as names of potential witnesses.

Other Reports on the Same Subject Matter: Here the reporting party indicates whether they know of any other related complaints pertaining to the same issue that was made in a different forum. The reporting party

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<sup>2</sup> ASHIS and AHIS were previously documented in system of records notice Department of Transportation (DOT) /FAA 845 - Administrators Correspondence Control and Hotline Information System, ACCIS, Administrator's Hotline Information System, AHIS, and Consumer Hotline Information System, CHIS - 65 FR 19526 - April 11, 2000 located at <https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices>.

has to identify any other division of FAA, or external federal or state agency to which this was reported. Submissions to the FAA Hotline that are identified as being investigated under a different agency forum will be closed upon confirmation by the AAE Hotline Analyst. The reporting party will also be notified that his/her submission to the Hotline is not being referred for further investigation because a related investigation is already in process.

Selection to Cooperate, Anonymity or Confidentiality: If a reporting party chooses to “cooperate” with any inquiry or investigation, only their full name and email address are required, and this contact information may be made available to FAA or other government personnel, as deemed appropriate. Any such disclosure would only be made in accordance with the applicable system of records notice (SORN).<sup>3</sup> In addition, the form itself states: “Please note, if your report is outside the jurisdiction of the FAA Hotline, we may provide your contact information to the appropriate agency so they may respond or take appropriate action.” If the reporting party chooses to remain anonymous”, the FAA Hotline is accepted, but no response will be provided. The reporting party has the option to remain anonymous by checking a box on the web form, and no contact information is required. If a reporting party chooses to remain “confidential”, only their full name and email address are required, and their contact information will only be provided to the personnel involved in the inquiry or investigation.

Reporting Parties who are submitting complaints to FAA through the electronic web form can also provide additional, optional information related to their report including the event date and time, event location, the name of the related airline or aviation company, or information about their flight, including the flight number, departure and arrival location or an aircraft registration number. Completing these fields is not required in order to submit a complaint. However, these fields do allow a reporting party to provide relevant details about their complaint.

The reporting party can also include additional information about the person, company, or organization involved in the activity being reported. This can include the person’s or organization’s name, address, and contact phone number. Completing these fields within the FAA Hotline web form are also optional and are not required to submit a complaint.

Upon completion and submission, the data from the FAA Hotline Reporting Form is automatically transferred into the FHIS through a secure firewall. Upon submission a unique reference number is generated and displayed to the reporting party along with instructions on submitting supplemental information by emailing the FAA Hotline at [FHIS@FAA.gov](mailto:FHIS@FAA.gov). Such email should include the reference number provided for this complaint. Supplemental information can include attachments, such as photos, videos or other digital media which could have PII such as alleged violator’s name, address, and other contact information. The email and its attachments are saved in FHIS as journal entries to the systems’ complaint files and are associated by the reference number.

The electronic form is reset to blank after being submitted. Information is not cached by FHIS; the only cache that will occur is in the web browser. If the reporting party decides to print the information from their

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<sup>3</sup> The SORN that applies to this FHIS is FAA 845, Administrators Correspondence Control and Hotline Information System, ACCIS, Administrator’s Hotline Information System, AHIS, and Consumer Hotline Information System, CHIS. This SORN includes the permitted routine use: “Referral, to the appropriate agency for actions involving matters or law, of regulations beyond the responsibility of the agency or Department, such as the Department of Justice in matters of law enforcement.”

submission, it will be handled through the print capabilities of the browser and local printer they are using, not by FAA technology.

## II. Submitting a Hotline Complaint by Mail

The reporting party can also report a complaint by mail by sending their correspondence directly to:

*Federal Aviation Administration  
Office of Audit and Evaluation  
800 Independence Avenue, S.W.  
Washington, D.C. 20591  
Attn: AAE-300, Room 911*

Upon receipt, the AAE Hotline Analyst enters name and contact information of reporting party into the FHIS. Any other pertinent information from the correspondence will also be entered into the appropriate field, such as Report Narrative. This process will cause FHIS to generate a reference number. All hardcopies are scanned and saved as a portable document file (PDF) and saved as journal entries associated with this reference number. All hardcopies of the correspondence are destroyed after being scanned into the system. Information included in the mailed copy may contain the reporting party's name, contact information, information about the complaint and information about the alleged violator. If provided with a mailing address by the reporting party, the FAA mails an acknowledgement of the complaint to the reporting party that includes the reference number.

## III. Submitting a Hotline Complaint by Email

Individuals have the option to submit a complaint by email to [FHIS@faa.gov](mailto:FHIS@faa.gov) to report a concern. Once AAE receives the emailed complaint, the AAE Hotline Analyst follows the same procedures as when receiving complaints by correspondence. All emails are saved in FHIS as journal entries to the system's complaint files. Information included in the email may contain the reporting party's name, contact information, information about the complaint and/or the alleged violator, and anything else they feel comfortable providing about their concern, including digital media, videos and photos. Again, FAA sends a response acknowledging receipt of their email that includes the reference number.

## IV. Processing a Complaint

An AAE Hotline Analyst reviews the complaint to determine appropriate follow up action based on the subject matter of the complaint. The AAE Hotline Analyst also considers various factors including whether there is sufficient information to investigate, has it been previously reported, or what is the proper investigative authority. In any case the reporting party receives an acknowledgement of receipt of the complaint and the final disposition. If information to develop a complaint is lacking, the AAE Hotline Analyst can reach out to the reporting party to follow up.

If an AAE Hotline Analyst accepts the complaint for further action, FHIS converts it into an investigative case and assigns it to the appropriate office for investigation. The investigative office is notified via email with a password protected copy of the Hotline Report. The reporting party will be notified (if they provided their contact information) that the issue has been referred to another office.

Hotline reports accepted by other forums (e.g., ASH, Appeals Board, Equal Employment Office, Bargaining Unit, OIG, etc.) will be closed out in the FHIS upon notification of acceptance or confirmation that the issues

submitted are already being investigated. If the reporting individual provides contact information she or he will be notified by FHIS that the issue has been referred to another venue and is being closed out in the FHIS.

#### V. Investigating a Hotline Report

When an investigation is warranted, FAA handles the investigative process outside of the FHIS. The investigative file and related records will reside within the investigative office, not in FHIS. Once the investigation is completed, the investigative office provides an Investigative Results Report (IRR) to AAE via email. The IRR details a summary of the allegations, the reference number, the investigative steps taken, the outcome of the investigation, as well as any remediation recommendations. It may also include some or all of the PII included in the original complaint such as violator name, witnesses interviewed, and reporting party's name and contact information. Once AAE receives the IRR, the case is closed. If the complaint was not submitted anonymously, AAE sends a general summary of the findings to the reporting party via the medium used to submit the complaint. The summary explains the final outcome of the case as either substantiated or not. The summary letter also provides the reporting party with information about how to submit a Freedom of Information Act (FOIA) request if they are interested in getting additional details about the case. AAE does not provide any investigative details or PII to the reporting party.

#### VI. Reconsideration of Investigative Findings

When a reporting party does not believe their concerns have been adequately addressed in the hotline response, such as disagreeing with the final decision, the individual may submit a written request for reconsideration of their report to the FAA Hotline Office. Appeal requests must include the specific allegations(s) that were not addressed in the original response, the hotline reference number, and the reason(s) why the reporting party feels that their allegations were not addressed, including evidence to support their claim. AAE reviews the request to determine if further action is warranted. If accepted, the matter will be re-actioned to the original investigating office under the same hotline reference number for response to the issues outlined in the appeal. Confidential reporters may maintain confidentiality during the appeals process.

### Fair Information Practice Principles (FIPPs) Analysis

*The DOT PIA template 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>4</sup>, sponsored by the National Institute of Standards and Technology (NIST), the Office of Management and Budget (OMB), and the Federal Chief Information Officer's 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<sup>5</sup>.*

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

<sup>5</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)

## 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 deploys multiple techniques to ensure individuals are aware of the FHIS and the purposes for which the Department collects and maintains PII in support of the FHIS. The FAA hotline complaint process is well known throughout the aviation industry. Previously the FAA ran an ad campaign including posters in airports and public places publicizing the ways in which an individual could submit a complaint. FAA also notifies the public of the FHIS through FAA's public website available at

[https://www.faa.gov/about/office\\_org/headquarters\\_offices/aae/programs\\_services/faq\\_hotlines](https://www.faa.gov/about/office_org/headquarters_offices/aae/programs_services/faq_hotlines). The FHIS Hotline Reporting Form displays a PAS that informs individuals of their rights afforded under the Privacy Act and applicable laws and regulations. As required, the PAS discusses the Department's privacy practices regarding the collection, use, sharing, maintenance, and disposal of PII. If any changes to law or policy occur which require modification of the PAS, it is modified accordingly.

Additionally, all FHIS records are maintained in accordance with the Department's System of Records Notice (SORN) -Department of Transportation, Federal Aviation Administration (FAA), DOT/FAA 845,

Administrators Correspondence Control and Hotline Information System, ACCIS, Administrator's Hotline Information System, AHIS, and Consumer Hotline Information System, CHIS, which provides notice to the public of its privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information within the FHIS. This SORN may be found at <https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices>.

The public can learn more about the DOT privacy policies at <https://www.transportation.gov/privacy>, and about the FAA privacy policies at <https://www.faa.gov/privacy/>.

The publication of this PIA demonstrates DOT's commitment to provide appropriate transparency into the FHIS.

## Individual Participation and Redress

*DOT should provide 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 be provided reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.*

Individuals voluntarily submit a complaint by web form, mail or email. An individual who is submitting a complaint using the web form FHIS hotline voluntarily elects to enter information into the FHIS. During that process, the reporting party can review and make changes to the information before submitting. Once that information is submitted, they cannot directly change the FHIS information because it has been migrated to the application itself, which is only accessible to FAA workforce members assigned to it. However, they would have the option of filing a new complaint with revised information. Another means for updating or correcting information regardless of method compliant was submitted would be to contact AAE personnel and discuss the desired change, which could be taken into account during analysis of the complaint.

In addition to the above, individuals may request searches to determine if their own records appear in Privacy Act systems of records. Individuals wishing to know if their records appear in this system may inquire in person or in writing to:

Federal Aviation Administration  
Office of Audit and Evaluation  
800 Independence Avenue, S.W.  
Washington, D.C. 20591  
Attn: AAE-300, Room 911

Included in the request must be the following:

- Name
- Mailing address
- Phone number or email address
- A description of the records sought, and if possible, the location of the records and system(s) acronym(s).

Individuals wanting to contest information about themselves that is contained in this system must 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, SW  
Washington, DC 20591

Individuals may also use the above address to register a complaint or question regarding FAA's privacy practices.

For questions relating to privacy matters of the DOT, go to the DOT Privacy Program at

<https://www.transportation.gov/individuals/privacy/>.

## 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 its collects, uses, maintains, or disseminates PII.*

The FHIS information will be used by the FAA consistent with the purposes for which it was collected, as described in the SORN DOT/FAA 845, Aviation Safety Matters Management System. As discussed in the Overview, FHIS records are used to document and process allegations of violations of any order, regulation, or standard of the FAA or any other Federal law relating to air carrier safety; to document and process allegations of fraud, waste, abuse, or misconduct related to FAA programs, personnel, organizations, or facilities related to FAA programs or personnel; and to monitor and track case assignments, disposition, status, and investigative results, and create and report statistical information.

The PII maintained in FHIS is authorized under:

- Title 14 Code of Federal Regulations (CFR), Aeronautics and Space Parts 1 -199 are the Federal Aviation Administration, Department of Transportation (DOT) current regulations codified under this title of the CFR.



The CFR is the Federal Aviation Regulations (FARs) which are prescribed by the FAA and governs all aviation activities in the United States.

- 49 U.S.C. subtitle VII and 49 U.S.C. § 40113, The FAA Administrator has broad authority to take action the Administrator considers necessary to carry out his or her statutory responsibilities and powers relating to safety in air commerce, including conducting investigations; prescribing regulations, standards, and procedures; and issuing orders.

## 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. DOT should retain PII for only as long as necessary to fulfill the specified purpose(s) and in accordance with a National Archives and Records Administration (NARA)-approved record disposition schedule.*

The FAA collects the minimum necessary amount of PII and other information to be able to analyze and process complaints made by reporting parties into the FHIS. The system allows the reporting party to choose to remain anonymous. If they choose not to remain anonymous, the only mandatory fields collecting PII are the reporter's first and last name and email address. The complainant voluntarily provides all other information to the system if they feel that the information is germane to their complaint. AAE scans hardcopies, saves them as PDFs, and then shreds the original.

Additionally, the system has a warning message below the open-text field on the FAA Hotline Reporting Form to help minimize the collection of extraneous data. A reporting party may include a description of the allegation, concern, or complaint in this open-text field. The FAA Hotline Reporting Form specifically advises reporting parties not to include PII such as birthdate and Social Security Number.

Records in FHIS are maintained in accordance with the National Archives and Records Administration (NARA) Schedule <https://www.faa.gov/documentLibrary/media/order/finance/1350-15C/media/chapter4.pdf>.

Hotline paper and electronic files and records will be destroyed after 5 years; hotline system documentation records will be disposed of on an as needed basis; and all other related cutoff records, such as investigative records, will be destroyed after 2 years.

## 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.*

FAA shares Privacy Act records collected, used and maintained as part of FHIS in accordance with the applicable SORN, which can be found at [DOT/FAA 845 - Administrators Correspondence Control and Hotline Information System, ACCIS, Administrator's Hotline Information System, AHIS, and Consumer Hotline Information System, CHIS](#), 65 FR 19526, 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 this system may be disclosed outside of DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows:

- Referral to the appropriate action office within or outside the Department or agency for preparation of a response.

- Referral, to the appropriate agency for actions involving matters or law, of regulations beyond the responsibility of the agency or Department, such as the Department of Justice in matters of law enforcement. As a data source for management information, such as briefing material on hearings, trend analysis, responsiveness, etc.

Further, the Department has published 14 additional routine uses applicable to all DOT Privacy Act SORNs, including this system. The routine uses are published in the Federal Register at [75 FR 82132, December 29, 2010](#) and [77 FR 42796, July 20, 2012](#).

## 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 collects, uses, and retains data that is relevant and necessary for the purpose for which it was collected. The FHIS receives complaint information directly from the reporting party. To ensure data completeness, AAE Hotline Analysts review the hotline data to ensure all required data that is needed to initiate a complaint is obtained. As noted in the Overview, if information is incomplete and follow up warranted, the AAE Hotline Analyst can contact the reporting party for more complete information. If the reporting party believes the FHIS contains inaccurate information, the reporting party may contact the AAE office using the reference number requesting to correct the information. Additionally, the investigative process helps verify the accuracy and integrity of a complaint and the data and information contained. During the case investigation, all data, allegations, and information is checked for accuracy and completeness.

Alleged violators cannot make corrections to any of their information within the system that was a part of the complaint by a reporting party. They can only provide details and updated information as a part of an investigation, if one is initiated.

Data quality is also ensured through functionality in the FHIS using DENODO technology, which automatically fetches a familiar name or email address that was previously entered in the system. This functionality allows an FHIS administrative user to see if a reporting party has previously submitted a correspondence and makes it easy to identify (or remove) duplicate entries in the system.

FHIS actions are routinely audited, and resulting audit logs reviewed to assure proper use of the system. These activities and audit records are time stamped.

## Security

*DOT shall implement administrative, technical, and physical measures 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 has a comprehensive information security program that contains management, operational, and technical safeguards that are appropriate for the protection of PII. These safeguards are designed to achieve the following objectives:

- Ensure the security, integrity, and confidentiality of PII
- Protect against any reasonable anticipated threats or hazards to the security or integrity of PII

- Protect against unauthorized access to or use of PII

FAA protects PII with reasonable security safeguards against loss or unauthorized access, destruction, usage, modification, or disclosure. These safeguards incorporate standards and practices required for federal information systems under the Federal Information Security Management Act (FISMA) and are detailed in Federal Information Processing Standards (FIPS) Publication 200, Minimum Security Requirements for Federal Information and Information Systems, dated March 2006, and National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations, dated April 2013. FHIS was issued a three-year authority to operate on January 31, 2017.

Hotline documents are kept in, locked storage areas when unattended, and are only accessible to those needing the specific materials to process the investigation. In addition, all DOT workforce members are required to take security awareness and privacy training.

FHIS takes appropriate security measures to safeguard PII against loss or unauthorized access, destruction, usage, modification, or disclosure using the following means:

- The FHIS website uses encryption in transit and at rest to ensure the security of the information. Appropriate firewalls and enterprise architecture further protect that data.
- FAA users are authenticated through PIV-card so they must have a valid FAA Domain ID, password and be a member of the active directory group granted access to the application.
- Except for the ability of the reporting party to enter a complaint, the system is otherwise only available on the internal network and limited to designated AAE full-time authorized users, on an as-needed-basis. Field representatives (points-of-contact) from FAA Lines of Business and Staff Offices have view and print capability only. Further, these Field representatives can only view case information that is assigned to them.
- Appropriate physical and administrative controls are used such as locked doors, guards, and appropriate training, supervision, and management of the use of FHIS.
- The FHIS application has an incident response plan which includes procedures for detection of an incident, remediation and response if an incident occurs, and notification where appropriate to protect and inform affected individuals. In addition, the FHIS administrators, privacy and security personnel have conducted an incident response exercise to evaluate the effectiveness of this plan.

## 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 1370-121, FAA Information Security and Privacy Program and Policy. FAA Order 1370-121 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, OMB mandates, and other applicable DOT and FAA information and information technology management procedures and guidance. The FAA Privacy personnel and Records officials routinely perform inspections of physical office space to ensure that the security of documents is strictly maintained.

In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to the access, protection, retention, and destruction of PII. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing, and security 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 FHIS relative to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

## Responsible Official

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## Approval

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