



## U.S. Department of Transportation

### Privacy Impact Assessment

Maritime Administration  
Mariner Survey

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## Executive Summary

The Mariner Survey (Survey) will be used by the Maritime Administration (MARAD) to collect voluntary information from mariners to develop a statistically valid estimate of the number of qualified merchant mariners who would be willing to serve on short notice during a period of National Need (i.e., war, armed conflict, national emergency, or maritime mobilization). MARAD has the authority, delegated from the Secretary of Transportation, to survey mariners. Title 46, United States Code (USC), Section 50102(a) states: “(a)In General -The Secretary of Transportation shall survey the merchant marine of the United States to determine whether replacements and additions are required to carry out the objectives and policy of section 50101 of this title.” 46 USC sections 50104, 51103, and 51104 are also applicable.

The Maritime Workforce Working Group (MWWG) Report, in response to FY 2017 National Defense Authorization Act (NDAA) Section 3517, 2017, recommended that “A periodic survey of the U.S. citizen mariner pool qualified to crew U.S. government reserve vessels should be undertaken to measure mariner availability – Since merchant mariner employment is voluntary, the number of people willing to sail in times of national need is unknown. A survey would allow MARAD to determine, with reasonable certainty, how many qualified mariners would be available and willing to sail on U.S. government reserve vessels if called upon to do so. The survey should be conducted at a minimum biennially to adequately keep track of changes in the mariner workforce’s availability and willingness to sail.”

The biennial Mariner Survey will serve to provide a reliable estimate of the number of qualified merchant mariners available and willing to serve during times of National Need.

MARAD developed this Privacy Impact Assessment (PIA) to document the steps taken to protect Mariner Survey participants’ privacy when providing personally identifiable information for inclusion in the Survey.

## 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*

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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).

*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.*

## **Introduction & System Overview**

The Department of Transportation's Maritime Administration (MARAD) is responsible for improving and strengthening the U.S. marine transportation system. MARAD programs promote the development and maintenance of an adequate, well-balanced United States merchant marine, sufficient to carry the Nation's domestic waterborne commerce and a substantial portion of its waterborne foreign commerce, and capable of service as a naval and military auxiliary in time of war or other time of national need.

The ability of the U.S. to respond to major military contingencies worldwide is dependent on adequate U.S. flag active/reserve sealift resources and skilled U.S. maritime labor. MARAD's National Security Objective, is to assure that sufficient sealift capability and intermodal transportation infrastructure exist to support vital homeland and national security interests. Additionally, DOT is responsible for determining whether adequate manpower is available to support the operation of sealift ships during a crisis, as set forth in the National Security Sealift Policy - National Security Directive #28 (October 5, 1989).<sup>2</sup>

U.S. mariners actively sailing in the commercial shipping industry under the U.S. flag are the primary pool of mariners to crew sealift ships. The sufficiency (availability, commitment, and skills) of this mariner pool to support a large-scale activation of the sealift fleet depends upon the health and size of the commercial U.S.-flag merchant fleet. A fleet that is sufficiently sized will result in a pool of sufficient qualified merchant mariners to meet the crewing requirements of both the commercial and sealift fleet during national emergencies.

The Mariner Survey provides a systematic way to assess the adequacy of the nation's merchant mariner pool to crew sealift vessels in support of military operations during a period of national need. The Mariner Survey is an invaluable tool for MARAD and its partners to make valid vessel crewing projections and identify potential mariner shortfalls. MARAD has engaged a Contractor to deploy and analyze the results of the Mariner Survey.

Currently, the only comprehensive source of information on these Mariners is the USCG's Merchant Mariner Licensing and Documentation (MMLD) system, which was developed and is maintained by the United States Coast Guard. However, the MMLD has duplicative records that inhibit MARAD's ability to currently provide exact numbers for the potential respondent universe. Therefore, the records from the MMLD system will be used only as a starting

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<sup>2</sup> See <https://www.maritime.dot.gov/national-security>.

point for conducting the Mariner Survey. A Memorandum of Understanding (MOU) between MARAD and USCG establishes the procedures for transferring this data from USCG to MARAD “to track consenting mariners, allow mariners to provide updated contact information, analyze trends, and aid in the analysis of mariner qualifications and service during the activation of ships.” MARAD provides its Contractor only the data elements from the MMLD needed to conduct the Mariner Survey. These data elements include the USCG Mariner Reference Number, the mariner’s capacity and propulsion type notation for Engineer officers (used to ensure adequate responses are received from each of the mariner subgroups); mariner’s name, home address, phone number(s), and e-mail address (used to contact mariners for the Survey); and the mariner’s date of birth (to help ensure the proper identification of mariners and to remove duplicate records).

Once the Contractor has received the information, the Contractor will use disproportionate random sampling to select a sample of mariners to complete the Mariner Survey. The sampling approach will take into consideration requirements regarding margins of error for different subgroups of interest and estimated response rates. Once the sample is drawn, the Contractor will clean the sample contact database which includes screening for strange characters, incorrect formatting, and obvious errors. The Contractor will also screen the contact database for duplicate entries; i.e., multiple instances of the same individual. In addition to this data cleaning, the Contractor will use a third-party service to conduct a National Change of Address (NCOA) check, and append telephone numbers and e-mail addresses whenever possible. This information will be used to contact the mariner for participation in the Mariner Survey.

The Contractor will use this information to contact individual mariners to solicit their participation in the Survey, and assign each mariner a randomly-generated alpha-numeric passcode that each mariner will use to access the Survey. Only this passcode will be associated with the mariner’s responses.

As a strategy to maximize response rates, prior to sending out the survey invitations, efforts will be made to reach out to entities that have regular contact with mariners, such as associations, credentialing agencies, and labor unions; these efforts can help promote awareness of the survey, the legitimacy of the survey effort, and the importance of participating. A one-page announcement will be developed that can be sent to entities for them to use on websites, paper newsletters, and other media typically consumed by mariners.

Personalized email invitations to participate in the Survey will be sent all mariners for whom the Contractor has an e-mail addresses. The invitation will include a letter from the MARAD administrator introducing the survey explaining the importance of the survey and states that the contractor will be collecting survey responses on behalf of MARAD. This emailed package will also provide contact information if the mariner has any questions. The email will also include a link to the survey website and the individual mariner’s randomly-generated passcode. The passcode is required to complete the survey.

For those mariners who do not have an e-mail address or whose e-mail invitation is returned as undeliverable, no additional attempts will be made to reach them electronically. These mariners will be sent a prenotification invitation via regular mail. The packet will include a personalized cover letter (which, again, will provide the survey website and their passcode), the survey questionnaire, and a business reply envelope. Each paper survey will have the individual mariner’s randomly-generated passcode pre-printed on it.

One month after the first survey packet is sent, a second packet will be mailed to mariners who have not yet returned the mail survey, completed the survey online, or called the survey contractor to opt out of the survey. Two

weeks after these letters are sent, the Contractor will mail a survey packet to all mariners who have not already completed the online Survey and whose mail Survey invitation was not returned by the Post Office as undeliverable. The packet will include a personalized cover letter, the Survey questionnaire, and a business reply envelope. The survey responses will not be associated with individual mariners' names; instead, the mariners' passcode will appear in the header on each page of the survey.

All non-responding mariners who have a valid e-mail address (as determined from the initial e-mail survey invitation) will be sent a reminder e-mail on a weekly basis until either they complete the survey or the survey window closes. There will be multiple versions of the follow-up reminder e-mails, so there is some variation in phrasing as the data collection phase progresses. In addition to sending e-mail reminders to non-responders, e-mail reminders will be sent to mariners who have started but not yet completed the survey. These reminders would convey appreciation to the mariner for having started the survey and encourage them to finish it.

Approximately eight weeks after the initial survey invitations have been sent, telephone prompting will begin for nonresponses. Responses will be closely monitored for the 22 subpopulations to ensure that nonresponse efforts will be focused on those groups that have not achieved sufficient response. This will be done to ensure the required MOE. Nonresponse prompting also will be conducted in cases for which there is a telephone number for a mariner, but no valid e-mail or mail address.

The Contractor will compile and analyze all responses for the Mariner Survey and develop a final report for MARAD. The final report and the supporting data, which has been disassociated from mariner contact information, will be provided to MARAD at the completion of the Contract.

## 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>3</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 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>4</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, the DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their personally identifiable information (PII). Additionally, the DOT should not maintain any system of records the existence of which is not known to the public.*

<sup>3</sup> <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

<sup>4</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)

MARAD published a 60-day notice and request for comments on this information collection in the Federal Register on December 17, 2018 (83 FR 64633), indicating comments should be submitted on or before February 15, 2019. No comments were received in response to this notice. Additionally, MARAD published a 30-day notice informing the public of the collection on March 21, 2019 (84 FR 10570).

Through the publication of [DHS/USCG-030 - Merchant Seamen's Records](#) June 25, 2009 74 FR 30308, USCG notifies merchant mariners that their information may be provided to MARAD “for the purpose of merchant mariner call-ups related to national security”.

The United States Coast Guard (USCG) Merchant Seamen’s Records system is the source of the contact data that is used by the Contractor to solicit participation in the Mariner Survey. This data is a subset of the Merchant Mariner Licensing and Documentation (MMLD) system, developed and maintained by the United States Coast Guard (USCG). Through the publication of [DHS/USCG-030 - Merchant Seamen's Records](#)<sup>5</sup> the USCG notified merchant mariners that their information will be shared with MARAD, “for the purpose of merchant mariner call-ups related to national security.”

USCG has a published PIA for the Merchant Mariner Licensing Documentation (MMLD) System, which states: “Some MMLD information is shared with the Maritime Administration (MARAD) for use in the Mariner Outreach System and national security mariner recalls.<sup>3</sup> Information shared includes: Mariner name, address, phone number, last 4 digits of SSN, date of birth, sea service record information, and credentials issued. MARAD presently requires the last 4 of the SSN to differentiate between mariners with the same first and last names. Presently, the MMLD number is not used because it is an internal number to MMLD that the data recipient (MARAD) is unaware of, and hence could not use. The PIA for MMLD also states: “The USCG has a Memorandum of Understanding (MOU) with MARAD regarding the sharing of MMLD data. The agreement identifies the information to be shared, requirements for protecting the information and restrictions on further transmission of the information.”

As discussed in the PIA for MMLD, the Memorandum of Understanding (MOU) between MARAD and USCG establishes the procedures for transferring this data from USCG to MARAD. The MOU states that the information from these records will be used “to track consenting mariners, allow mariners to provide updated contact information, analyze trends, and aid in the analysis of mariner qualifications and service during the activation of ships.”

An introductory letter from the MARAD Administrator accompanies all email and postal mail survey packages that are sent to mariners. This letter informs mariners that the survey is being conducted by the contractor on behalf of MARAD. Both the web form and paper form of the survey contain Privacy Act Statements that inform mariners of the authority for collecting their information, the purpose of the collection, a statement that participation in the survey is voluntary, and information about routine sharing of the data provided in the survey.

MARAD provides its Contractor only the data elements from the MMLD that are needed to conduct the Mariner Survey. These data elements include reference number, capacity, propulsion type notation for Engineer officers, name, date of birth, home address, phone number(s), and e-mail address. The information collected is maintained in accordance with a Privacy Act System of Records Notice (SORN) entitled [DOT/ MARAD 031, Mariner Outreach](#)

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<sup>5</sup> See 74 FR 30308, June 25, 2009

[System \(MOS\)](#), published at 74 FR 47852, September 17, 2009. The collected information will also be subject to the purposes and routine uses published in the SORN.

## 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.*

MARAD ensures that individuals have the right to: (a) obtain confirmation of whether MARAD has records containing PII relating to him or her; (b) access the record related to him or her within a reasonable time, at little if any cost, and in a form, that is easily understood; (c) obtain an explanation if a request is denied, and challenge such denial; and (d) challenge records relating to him or her and, if the challenge is successful, have the record amended. Individuals may request access to their records that are maintained in a system of records in the possession and under the control of DOT by complying with DOT Privacy Act regulations, 49 CFR Part 10. Privacy Act requests for access to an individual's record must be in writing either handwritten or typed, may be mailed, faxed or emailed. DOT regulations require that the request include; a description of the records sought, the requester's full name, current address, and date and place of birth. The request must be signed and either notarized or include statement that the information submitted is accurate. The statement must be attested to under penalty of perjury. Additional information and guidance regarding DOT's Privacy program is located on the DOT website, [www.transportation.gov/privacy](http://www.transportation.gov/privacy).

Initial contact information is obtained from the USCG MMLD system. The contact information that is obtained from the USCG MMLD is provided by mariners for, among other things, allowing MARAD to assess readiness of the mariner community and to contact mariners in a time of national need. MARAD obtains consent for records created by the Mariner Survey through individual mariner' participation in the survey. Any updated personal data maintained by the Mariner Survey is collected directly from the mariner who has been made aware of the purpose for which the information will be used through the Privacy Act Statement and this PIA. At any point prior to submission of their responses, the mariner can cancel the process if concerns arise. In addition, all information provided by the mariner is accessible and modifiable. Errors in the information may be corrected by the user at any time. Mariners are notified that they may contact the Contractor by telephone at 800-341-3660 to request that information be corrected or updated.

Under the provisions of the Privacy Act, individuals may request searches of the Mariner Survey system to determine if any records in the system pertain to them. This is accomplished by sending a written request directly to:

Maritime Administration  
Attn: Privacy Officer  
1200 New Jersey Avenue SE  
Washington, DC 20590

## 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.*

DOT is responsible for determining whether adequate manpower is available to support the operation of sealift ships during a crisis, as set forth in the National Security Sealift Policy - National Security Directive #28, October 5, 1989.

The Mariner Survey will capture mariner responses to the Survey questionnaire related to mariner's willingness and availability to sail on sealift vessels during a time of national need. The Mariner Survey may be completed by mariners via a secure website, currently located at <https://marinersurvey.websrg.com>. Each mariner invited to participate in the Mariner Survey is furnished a unique passcode to enable them to access and complete the website based Survey. The website includes an introduction, a privacy notice and a Paperwork Reduction Act Information Collection notice.

Mariners who agree to participate may volunteer to provide updated contact information. The forms used to collect contact information provide notice to mariners that the updated contact information they provide will be used only to contact them for participation in future Mariner Surveys or to contact them during a period of national need.

The Mariner Survey provides a systematic way to conduct a statistically valid assessment of the willingness of our nation's merchant mariner pool to crew sealift vessels during a period of National Need. The Mariner Survey will allow MARAD and its partners to make valid vessel crewing projections during a time of national need.

## 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 data collected by the Mariner Survey is limited to that necessary to assess the ability and willingness of our nation's merchant mariner pool to crew sealift vessels during a period of national need. For example, in order to assess willingness to volunteer, the survey will ask questions such as:

- If reemployment rights would influence a mariner's decision to volunteer
- The type(s) of vessel on which mariners would be willing to serve
- How long a tour mariners would be willing to serve
- How long mariners would desire between tours
- The number of tours mariners would be willing to serve
- The time it would take mariner to report to their service designation
- The lowest billet they would accept
- Reasons mariners would not be willing to serve, for those who indicated they would not be willing to serve
- Potential incentives that might change mariners' decision to not serve, for those who indicated they would not be willing to serve



In order to assess available skills, the survey will ask questions such as:

- Current Mariner Status and History
  - Mariners' current employment as a merchant mariner
  - Mariners' sailing history
  - Mariners' future plans for their career as a merchant mariner
- Merchant Mariner Credentials
- Standards of Training, Certification and Watch-keeping

MARAD provides the initial contact data for mariners to MARAD's contractor, based on its MOA with the USCG's MMLD system. As discussed above, MARAD only provides the data the Contractor needs to contact mariners for participation in the Survey. These data include USCG Mariner Reference Number, the mariner's capacity and propulsion type notation for Engineer officers, name, date of birth, home address, phone number(s), and e-mail address (if available).

At the conclusion of the study, the Contractor will provide both the anonymized dataset and updated contact information to MARAD. The Contractor will not retain any information from either dataset. The anonymized responses will be transmitted to MARAD for future use in research. The updated contact information will be sent as a separate file and will be used to contact mariners for participation in future biennial readiness surveys, or in the event of a national emergency, to notify mariners of volunteer opportunities. MARAD will not attempt to re-associate contact information with the Survey responses. The Survey response data will remain anonymous. The records submitted by the Contractor to MARAD will comprise Mariner Survey Contact List (a cleaned-up list of the data originally provided by MARAD to the contractor), Survey Status List based on categories of respondents (anonymized), Survey Results Compilation (anonymized), Survey Comments Compilation (anonymized), completed Survey questionnaires (anonymized) and Final Project Report (anonymized).

Although the system is currently unscheduled, MARAD will retain and dispose the records in accordance with the NARA approved records schedule. MARAD is proposing a retention period of NARA 5 years for the anonymized data set. A longer retention will be authorized, if required for business use. The Mariner survey contact list dataset will be retained for a year from the initiation of the next biennial Mariner's Survey.

### 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.*

Information collected during the Mariner Survey will be used to assess mariner availability and willingness to volunteer during a period of national need. Although individual responses will not be identified using mariner name or contact information, an updated contact list will be provided by the contractor to MARAD. This contact list may be used to contact mariners for future Mariner Surveys, and only if necessary, to contact mariners during a period of national need. The survey responses collected during this Mariner Survey will be used by the Contractor to provide MARAD with a statistically valid assessment of the willingness of our nation's merchant mariner pool to crew sealift

vessels during a period of national need. Mariners can choose whether to complete the Mariner Survey and whether to provide updated contact information.

## 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 data extracted from MMLD are verified by screening e-mail addresses, mail addresses, and telephone numbers for strange characters, incorrect formatting, obvious errors and duplicate entries, (i.e., multiple instances of the same individual). In addition to this data cleaning, MARAD's Contractor will use the services of a third-party service provider to do a National Change of Address (NCOA) check, as well as to append telephone numbers and e-mail addresses whenever possible. During the administration of the Survey, any corrected contact information provided by mariners (via a mailed response or email) or through other means, such as updated addresses provided on returned Survey invitation, will be entered into this database by the Contractor. Rather than overwrite the original information, the Contractor will input the information into new fields until further verification.

The sampling methodology used to conduct the Mariner Survey will be a disproportionate stratified sampling design that would ensure a 5% margin of error (MOE) for each of the 22 Mariner subpopulations, assuming a 40% response rate. Under this approach, a sample of Mariners from within each subpopulation will be selected such that a 40% response rate will provide enough respondents within each subpopulation to achieve a MOE of 5%. Within each of the 22 subpopulations, simple random sampling will be conducted to choose the sample. Once sampling is complete, the distribution of sample cases across the 22 subpopulations will match the distribution of the mariner population from the cleaned and de-duplicated data that was extracted from the MMLD.

Mariners are responsible for ensuring that the information they provide in response to the Survey is accurate, relevant, timely, and complete. The quality of the data is the sole responsibility of the information providers. For Surveys completed by mail, the Contractor uses a double-entry software program whereby Survey responses are entered twice by different staff, and the program flags any discrepancies, which are then corrected by reviewing the response from the Survey. This process helps to ensure accurate data. Additionally, the double-blind software is integrated with the web survey software, which eliminates the possibility of duplicate response.

## 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.*

PII collected about study participants is safeguarded in accordance with applicable rules and policies, including all applicable DOT automated systems security and access policies. For information collected, stored, or transmitted electronically, MARAD ensures that contractors provide detailed information about the technology environments, data management systems, or web-hosted data collection systems used during the study. These systems are expected to meet or surpass best practices for information security and data protection of PII. Contractors are encouraged to reference the NIST Special Publication 800-53 Revision 4, "Security and Privacy Controls for Federal Information Systems and Organizations," to obtain information about the preferred level of security controls. For

example, a contractor's technology environment may be protected by a firewall with malware and intrusion prevention services, as well as anti-virus and spyware tools. In all studies, participants' PII is stored on contractors' computers in encrypted form. Whenever possible, data is collected via automated means, such as electronic entry of PII by participants themselves. The data exchanges between MARAD and the contractor are also electronic in order to ensure accuracy.

Additionally, during the data collection period, the research team completes periodic "spot checks" to ensure that privacy protocols are being observed.

Data is transmitted using password-protected and encrypted data transmission protocols. MARAD and its contractor also ensures that information collected or stored electronically is protected by administrative controls. Names and passwords are required to access contractors' secure networks and computers, and access is limited to personnel directly involved in a study. PII is also protected using physical safeguards. Computers are stored in locked rooms to which only study personnel have access. Importantly, electronically-stored PII about participants is kept in a separate file or database from the files or databases that store study responses. Unique identifier codes are created and assigned to each participant. One electronic database contains PII about participants (e.g., name, address, date of birth) and their unique identifier code, and a separate database contains information collected from or about participants for the study purposes (i.e., survey responses,) in which participants are identified only by the unique identifier code.

### 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.*

MARAD is responsible for identifying, training, and holding personnel accountable for adhering to MARAD privacy and security policies and regulations. MARAD follows the Fair Information Practice Principles as best practices for the protection of information associated with the Mariner Survey. In addition to these practices, policies and procedures will be consistently applied, especially as they relate to the protection, retention, and destruction of records. Moreover, the Mariner Survey underwent a Privacy Threshold Assessment (PTA). The PTA is an analytical tool used by DOT to determine the scope of privacy risk management activities that must be executed to ensure that DOT initiatives do not create undue privacy risks for individuals. The PTA determines whether the initiative creates privacy risk for individuals that must be further analyzed, documented, or mitigated, and determines the need for additional privacy compliance documentation.

MARAD staff also complete mandatory annual security and privacy awareness training, as well as acknowledgement of system rules of behavior. The MARAD Security and Privacy Officer conducts regular periodic security and privacy reviews of the system consistent with the Office of Management and Budget Circular A-130, Managing Information as a Strategic Resource.

Research team personnel receive clear guidance in their duties as they relate to the handling of PII, and only the minimum number of personnel have access to participants' PII. Finally, oversight from the MARAD Contracting Officer's Representative (COR) throughout the process ensures that privacy controls are being implemented correctly by the Contractor.

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