



**Privacy Impact Assessment Update
for the
Crew Member Self Defense Training
(CMSDT) Program
DHS/TSA/PIA-014(a)
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Abstract

The Department of Homeland Security (DHS) Transportation Security Administration (TSA) Crew Member Self-Defense Training (CMSDT) Program is a voluntary self-defense training course for U.S. commercial and cargo air carrier crew members. The CMSDT Program trains crew members on how to defend the flight deck against acts of criminal violence or air piracy. TSA previously published a Privacy Impact Assessment (PIA) on this program on February 6, 2008. TSA has collected CMSDT Program information principally through completion of an electronic registration form hosted on the TSA.gov web site. At times, information was collected through paper forms. TSA is updating the PIA to reflect that it plans to: (1) collect information from crew members solely through electronic means; and (2) conduct personnel security suitability checks on American Association of Community College (AACC) Site Coordinators so that they may be granted access to an existing secure TSA web-based system in order to process registrations on behalf of crew members.

Introduction

TSA implemented the CMSDT Program in order to comply with Section 603 of the Vision 100 – Century of Aviation Reauthorization Act (Pub. L. 108-176), which requires TSA to provide a voluntary program of self-defense training for crew members of air carriers providing scheduled passenger air transportation. TSA’s Office of Law Enforcement/Federal Air Marshal Service (OLE/FAMS) is responsible for administering the CMSDT Program and has developed a training approach that combines distributed learning technology with hands-on instruction in self-defense techniques. Crew members interested in the training are able to obtain information from the TSA CMSDT web page¹ to identify a classroom training location and to register online or directly with the point of contact listed for the training site (via telephone). TSA collects the crew member’s name, last four numerals of the Social Security Number (SSN), contact information, employer information including the employer-issued employee identification number, and course location preferences to verify a crew member’s eligibility for the CMSDT Program and to provide the self-defense training. Upon completion of self-paced instruction, an eligible crew member can attend a one-day, hands-on training session in self-defense techniques applicable to the aircraft environment. In order to maintain proficiency, eligible crew members may repeat the training as many times as they would like. These one-day courses are conducted at select community colleges located throughout the United States, under a Cooperative Agreement with the AACC.

¹ <http://www.tsa.gov/stakeholders/crew-member-self-defense-training-program-0>



Reason for the PIA Update

TSA is updating the CMSDT Program PIA to reflect that it now permits crew members to register electronically using the CMSDT Module, which is a subsystem of the TSA Federal Flight Deck Officer (FFDO) Information Dashboard and Distribution System (FIDDS). FIDDS is a secure web-based information/collaboration system that provides messaging and dashboard capabilities for the FFDO Program.² TSA leverages FIDDS to replace the process of obtaining CMSDT Program training and enrollment data via Internet links on the TSA.gov web site. The CMSDT Module within FIDDS provides a web-based interface that allows TSA CMSDT Program Administrators to verify crew members' employment and determine eligibility to participate in the CMSDT Program. It also alleviates the need for third-party contractors to provide employment verification services on behalf of TSA. Once TSA verifies the crew member's position and employment status with his or her respective airline, TSA sends a confirmation email to the AACC Site Coordinator containing links to the CMSDT Module and authorizes the crew member's participation in the requested class. The CMSDT Module allows AACC Site Coordinators to complete online crew member registration, schedule classes, and assign specific AACC training locations and times.

Once the AACC Site Coordinators have completed the online crew member registration, the CMSDT Module allows crew members to receive necessary instructional materials; confirm and record their attendance at a training class; submit voluntary feedback regarding the quality of the instruction, instructors, and facilities used to deliver the training; receive information about recurring and/or advanced self-defense training opportunities; and check training schedules, course dates, and view AACC training locations.

TSA is also updating the CMSDT Program PIA to reflect that it is conducting personnel security suitability checks on AACC Site Coordinators. Because AACC Site Coordinators now receive access to the CMSDT Module to record scheduled training dates, times, locations, and note training completion, they must successfully complete a suitability check prior to gaining access to the CMSDT Module per the DHS Sensitive Systems Policy Directive 4300A and the DHS Homeland Security Acquisition Regulation (HSAR).³ The suitability check consists of a fingerprint-based criminal history records check, a credit check, and local law enforcement agency checks. AACC Site Coordinators submit fingerprints to TSA and use the Office of Personnel Management (OPM) web-based e-QIP System to submit a Standard Form 86 (SF-86)⁴ to complete the suitability check.

² For more information about the FFDO Program, see DHS/TSA/PIA-013 FFDO Program PIA at www.dhs.gov/privacy.

³ <http://www.dhs.gov/homeland-security-acquisition-regulations#0>

⁴ <http://www.opm.gov/investigations/e-qip-application/completingsf86.pdf>



Privacy Impact Analysis

The System and the Information Collected and Stored within the System

Previously, no interface existed between the CMSDT Program and the FIDDS System. TSA stored CMSDT Program Administrator and trainee information on individual forms within data files. The CMSDT Program now interfaces with the FIDDS System via the CMSDT Module and stores information in a centralized database. Although the data maintained by the CMSDT Program (previously detailed in the February 6, 2008 PIA⁵) has not changed, TSA will now collect fingerprints and the SF-86 from AACC Site Coordinators in order to verify suitability for access to the CMSDT Module. This process provides CMSDT Program Administrators direct access to CMSDT Program data through the CMSDT Module. The SF-86 collects biographic and biometric information including, but not limited to, the following:

- Full Name and other names used;
- SSN (voluntary);
- Current and Previous Residences;
- Date of Birth;
- Place of Birth;
- Citizenship information;
- Gender;
- Weight;
- Height;
- Eye and hair color;
- Fingerprints;
- Marital status and date of marriage;
- Name, date and place of birth, address, and citizenship of spouse, children, and relatives;
- Passport information and number;
- Current and previous employers, applicable dates, and contact information (including federal or military service);

⁵ DHS/TSA/PIA-014 Crew Member Self Defense Training (CMSDT) Program PIA:
http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_tsa_cmsdt.pdf



- Selective Service Registration Number (if applicable);
- Educational information;
- Financial record information;
- Known acquaintances and contact information (including foreign nationals abroad);
- Criminal history information (if applicable); and
- Suitability determination, for example, the date and the fact that the security checks have been completed.

Uses of the System and the Information

With the exception of requesting biographic and biometric information associated with the suitability checks and allowing AACC Site Coordinators access to the CMSDT Module, there are no additional changes to the uses of the system and the information obtained.

Retention

There are no changes to the retention schedule for CMSDT Program-related information with the exception of data pertaining to the suitability check and the SF-86. TSA retains this information in accordance with National Archives Records Administration (NARA) General Record Schedule NC1-GRS-80-1 item 23a. TSA will destroy the information no later than 5 years after the individual ceases to participate in the program.

Internal Sharing and Disclosure

FIDDS System IT Administrators now have access to information contained in the CMSDT Module. TSA now shares information pertaining to the suitability check and the SF-86 with the Office of Personnel Security for use in the Department of Homeland Security Integrated Security Management System (ISMS)⁶.

External Sharing and Disclosure

TSA now shares SF-86 information with the Office of Personnel Management (OPM) and fingerprints with the Federal Bureau of Investigations (FBI) as permitted by the Privacy Act

⁶ http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_dhs_psams_isms.pdf and http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_psams.pdf



and in accordance with the routine uses identified in the DHS/ALL-023 DHS Personnel Security Management System of Records Notice (SORN), February 23, 2010, 75 FR 8088-8092.

In addition to the entities listed in Section 5.1 of the February 6, 2008 CMSDT Program PIA, TSA may share individual information with others as permitted by the Privacy Act and in accordance with the routine uses identified in the applicable SORN, including the DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) SORN, November 27, 2012, 77 FR 70792-70795.

Notice

In addition to the notice provided in Section 6.1 of the February 6, 2008 CMSDT Program PIA, the AACC Site Coordinators receive notice on OPM Standard Forms associated with the suitability vetting process via web links contained in the CMSDT Module.

Individual Access, Redress, and Correction

DHS/ALL/PIA-001 Personnel Security Activities Management System PIA dated September 12, 2007,⁷ addresses the individual access, redress, and correction parameters associated with the suitability check and submission of the SF-86.

Technical Access and Security

Previously, the CMSDT Program did not operate and maintain a consolidated, automated system for processing and storing Personally Identifiable Information (PII). The CMSDT Module provides single sign-on authentication and authorization capabilities to users and CMSDT Program Administrators that establish strict access controls for CMSDT Program data.

Although an interface exists between the CMSDT Module and the FIDDS System, the security features of the FIDDS System prevents CMSDT Program users from accessing data maintained on FFDO Program participants, and vice versa. Additional access and security parameters are defined below:

- **AACC Site Coordinators (one or more at each training site):** Site Coordinators are employed by AACC member institutions. They view and modify training class schedule and training location information details; submit class cancellation requests; modify instructor user information; modify site inventory lists; submit site inventory reports; send bulk email to students registered for a particular class; close-out a particular

⁷ http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_psams.pdf



class, which includes specifying attendance and adding incident reports; and receive various automated notifications such as inventory report past due notices, new registrations, and registration cancellations.

- **FIDDS System IT Administrators:** FIDDS Administrators are government employees that manage the FIDDS System and administer approved changes, daily system reviews, and all required maintenance during the operations and maintenance phase of the FIDDS System.
- **CMSDT Program Administrators:** CMSDT Program Administrators are government employees tasked with managing the CMSDT Program. They view and modify training class schedule and site details; view a variety of reports on the number of crew members trained, number of classes offered, and projected cost of the CMSDT Program; view pending and previous registration suitability reviews and their results; modify documents; access control lists in the on-line training document library; modify user profile information; send bulk email to students registered for a particular class; modify automated notification email templates and other various configuration settings such as lookup list values; and modify the list of Frequently Asked Questions (FAQs) and CMSDT Program information available to public.

The role-based access parameters, auditing measures, federal IT security requirements, and training requirements listed in Section 8.0 of the February 6, 2008 CMSDT Program PIA remain in effect.

Technology

The FIDDS sub-system allows the CMSDT Program to leverage an existing secure TSA web-based system in order to automate paper-based processes associated with the registration process.

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Approval Signature

Original signed copy on file with the DHS Privacy Office

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