

From: [Iddrisu, Yasmine CTR \(FAA\)](#)
To: [Robino, Graciela S \(FAA\)](#)
Cc: [Bell, Essie \(FAA\)](#); [Evans, Abraham M \(FAA\)](#)
Subject: RE: SDRS User Account Form PAS
Date: Monday, September 28, 2020 11:08:37 AM

Hi Graciela,

In light of the information you just provided, the forms do not require privacy act statements. A PAS is only required if the information will be retrieved by an individual's personal unique identifier and if the information retrieved is about an individual and not a company. If the individual's PII is not maintained and retrieved by their unique identifier, then the collection is not covered by the Privacy Act.

Please let me know if you have any additional questions.

Thank you.

Yasmine.

From: Robino, Graciela S (FAA) <Graciela.S.Robino@faa.gov>
Sent: Monday, September 28, 2020 8:48 AM
To: Iddrisu, Yasmine CTR (FAA) <Yasmine.CTR.Iddrisu@faa.gov>
Cc: Bell, Essie (FAA) <Essie.Bell@faa.gov>; Evans, Abraham M (FAA) <Abraham.M.Evans@faa.gov>
Subject: RE: SDRS User Account Form PAS

Hello Yasmine:

Sorry about that, I totally missed your email.

Here is my response to your questions:

- Firstly, how are retrieved from this system? **We have a search screen. The search screen criteria only reflects the designator.**
- Are they retrieved by an individual's unique identifier? **The designator is the unique identifier for a company not for an individual.**
- When a report is ran what individual's PII is retrieved (if any)? **No individual's name is displayed when a report is retrieved. For FAA Form 8010-4, the individual's information is not saved to the database. It is for reference only in case we need to get hold of the individual.**

Thanks

Graciela S. Robino
Aviation Safety
Office of Safety Standards
Aviation Data, AFS-620
APT, eForms, FSAS/TAP/Logbook, SDRS Information Systems Program Manager
(336) 369-3915

To provide any **Feedback, Suggestions, Comments** or **Complaints** ... Please Visit:
<http://av-info.faa.gov/Feedback/>

From: Iddrisu, Yasmine CTR (FAA) <Yasmine.CTR.Iddrisu@faa.gov>
Sent: Monday, September 28, 2020 8:19 AM
To: Robino, Graciela S (FAA) <Graciela.S.Robino@faa.gov>
Cc: Bell, Essie (FAA) <Essie.Bell@faa.gov>; Evans, Abraham M (FAA) <Abraham.M.Evans@faa.gov>
Subject: FW: SDRS User Account Form PAS

Hi Graciela,

I sent you an email on 9/2/2020 (see email below) with additional questions as FAA CPO passed the PASs back with comments, however I did not hear back from you yet. I will make updates once the questions are answered.

Please let me know if you have any questions.
Thank you.
Yasmine.

From: Iddrisu, Yasmine CTR (FAA)
Sent: Wednesday, September 2, 2020 1:21 PM
To: Robino, Graciela S (FAA) <Graciela.S.Robino@faa.gov>
Subject: FW: SDRS User Account Form PAS

Hi Graciela,

I received some feedback on the draft PAS and I would like to ask some additional questions before I move forward.

- Firstly, how are retrieved from this system?
- Are they retrieved by an individual's unique identifier?
- When a report is ran what individual's PII is retrieved (if any)?

Please see email trail for some more context.

I am asking this because the adjudication statement in the recently adjudicated PTA states that "It is unclear if records are both retrieved by identifier linked to an individual and about the individual. Referenced records schedule indicates that records are not about an individual and therefore not protected under the Privacy Act."

Please contact me if you have any questions.

Sincerely,

Yasmine Iddrisu

FAA Chief Privacy Office

Work: **202-558-0492**

Cell: **240-486-9366**

Information Security & Privacy

DOT Privacy Program

From: Bell, Essie (FAA) <Essie.Bell@faa.gov>
Sent: Wednesday, September 2, 2020 10:20 AM
To: Iddrisu, Yasmine CTR (FAA) <Yasmine.CTR.Iddrisu@faa.gov>
Cc: Evans, Abraham M (FAA) <Abraham.M.Evans@faa.gov>; Gordon, Bud (FAA) <bud.gordon@faa.gov>
Subject: RE: SDRS User Account Form PAS

Yasmine,

It is not about what they provide. It is about how the records is retrieved and what comes back. Is the record about the aircraft or the individual.

Essie L. Bell

Acting, Chief Privacy Officer

Work 202-267-6034

Cell 202-379-6826

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From: Iddrisu, Yasmine CTR (FAA) <Yasmine.CTR.Iddrisu@faa.gov>
Sent: Wednesday, September 02, 2020 10:17 AM
To: Bell, Essie (FAA) <Essie.Bell@faa.gov>
Cc: Evans, Abraham M (FAA) <Abraham.M.Evans@faa.gov>; Gordon, Bud (FAA) <bud.gordon@faa.gov>
Subject: RE: SDRS User Account Form PAS

Essie,

Yes, I had a conversation with POC about that in particular and she stated that individuals who owned private aircrafts could also submit a malfunction report and submit their personal information for contact purposes.

From: Bell, Essie (FAA) <Essie.Bell@faa.gov>
Sent: Wednesday, September 2, 2020 10:05 AM
To: Iddrisu, Yasmine CTR (FAA) <Yasmine.CTR.Iddrisu@faa.gov>
Cc: Evans, Abraham M (FAA) <Abraham.M.Evans@faa.gov>; Gordon, Bud (FAA)

<bud.gordon@faa.gov>

Subject: FW: SDRS User Account Form PAS

Yasmine,

Please look at the Dot Privacy analyst for the SDRS PTA. It questions if the records are about an individual. Was this questioned asked or brought to the Programs attention.

Essie L. Bell

Acting, Chief Privacy Officer

Work 202-267-6034

Cell 202-379-6826

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From: Iddrisu, Yasmine CTR (FAA) <Yasmine.CTR.Iddrisu@faa.gov>

Sent: Monday, August 31, 2020 12:24 PM

To: Bell, Essie (FAA) <Essie.Bell@faa.gov>

Subject: SDRS User Account Form PAS

Good afternoon Essie,

Please see the attached for your review. Here is the associated URL (<https://av-info.faa.gov/sdrx/Secured/NewAccount.aspx>)

Please let me know if you have any questions. Thank you.

Sincerely,

Yasmine Iddrisu

FAA Chief Privacy Office

Work: **202-558-0492**

Cell: **240-486-9366**

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