



U.S. Department of Transportation

## **Office of the Chief Information Officer (OCIO)**

### **Privacy Threshold Assessment (PTA)**

Federal Aviation Administration (FAA)  
Office of Aviation Safety (AVS)  
Unmanned Aircraft System (UAS) Market Survey





## Privacy Threshold Assessment (PTA)

*The Privacy Threshold Assessment (PTA) is an analytical tool used to determine the scope of privacy risk management activities that must be executed to ensure that the Department's initiatives do not create undue privacy risks for individuals.*

The Privacy Threat Assessment (PTA) is a privacy risk management tool used by the Department of Transportation (DOT) Chief Privacy Officer (CPO). The PTA determines whether a Department system<sup>1</sup> creates privacy risk for individuals that must be further analyzed, documented, or mitigated, and determines the need for additional privacy compliance documentation. Additional documentation can include Privacy Impact Assessments (PIAs), System of Records notices (SORNs), and Privacy Act Exemption Rules (Exemption Rules).

The majority of the Department's privacy risk emanates from its direct collection, use, storage, and sharing of Personally Identifiable Information (PII),<sup>2</sup> and the IT systems used to support those processes. However, privacy risk can also be created in the Department's use of paper records or other technologies. The Department may also create privacy risk for individuals through its rulemakings and information collection requirements that require other entities to collect, use, store or share PII, or deploy technologies that create privacy risk for members of the public.

To ensure that the Department appropriately identifies those activities that may create privacy risk, a PTA is required for all IT systems, technologies, proposed rulemakings, and information collections at the Department. Additionally, the PTA is used to alert other information management stakeholders of potential risks, including information security, records management and information collection management programs. It is also used by the Department's Chief Information Officer (CIO) and Associate CIO for IT Policy and Governance (Associate CIO) to support efforts to ensure compliance with other information asset requirements including, but not limited to, the Federal Records Act (FRA), the Paperwork Reduction Act (PRA), the Federal Information Security Management Act (FISMA), the Federal Information Technology Acquisition Reform Act (FITARA) and applicable Office of Management and Budget (OMB) guidance.

Each Component establishes and follows its own processes for developing, reviewing, and verifying the PTA prior to its submission to the DOT CPO. At a minimum, the PTA must be reviewed by the Component business owner, information system security

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<sup>1</sup> For the purposes of the PTA the term "system" is used throughout document but is not limited to traditional IT systems. It can and does refer to business activity and processes, IT systems, information collection, a project, program and/or technology, and proposed rulemaking as appropriate for the context of the assessment.

<sup>2</sup> The term "personally identifiable information" refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.



manager, general counsel, records officers, and privacy officer. After the Component review is completed, the Component Privacy Office will forward the PTA to the DOT Privacy Office for final adjudication. Only PTAs watermarked “adjudicated” and electronically signed by the DOT CPO are considered final. Do NOT send the PTA directly to the DOT PO; PTAs received by the DOT CPO directly from program/business owners will not be reviewed.

If you have questions or require assistance to complete the PTA please contact your [Component Privacy Officer](#) or the DOT Privacy Office at [privacy@dot.gov](mailto:privacy@dot.gov). Explanatory guidance for completing the PTA can be found in the PTA Development Guide found on the DOT Privacy Program website, [www.dot.gov/privacy](http://www.dot.gov/privacy).

DOT CPO Adjudicated 03/01/2021



## PROGRAM MANAGEMENT

**SYSTEM name:** Unmanned Aircraft Systems (UAS) Market Survey

**Cyber Security Assessment and Management (CSAM) ID:** Not applicable

**SYSTEM MANAGER CONTACT Information:**

**Name:** Ashley Awwad

**Email:** [Ashley.awwad@faa.gov](mailto:Ashley.awwad@faa.gov)

**Phone Number:** 1-816-786-5716

**Is this a NEW system?**

- Yes** (Proceed to Section 1)
- No**
  - Renewal**
  - Modification**

**Is there a PREVIOUSLY ADJUDICATED PTA for this system?**

- Yes:**
  - Date:**
- No**

## 1 SUMMARY INFORMATION

### 1.1 System TYPE

- Information Technology and/or Information System**
  - Unique Investment Identifier (UII):**
  - Cyber Security Assessment and Management (CSAM) ID:**
- Paper Based:**
- Rulemaking**
  - Rulemaking Identification Number (RIN):**
  - Rulemaking Stage:**
    - Notice of Proposed Rulemaking (NPRM)**
    - Supplemental NPRM (SNPRM):**
    - Final Rule:**
  - Federal Register (FR) Notice:**



- Information Collection Request (ICR)<sup>3</sup>**
  - New Collection** In progress. The 60-day public comment period for the ICR ends January 19, 2021.
  - Approved Collection or Collection Renewal**
    - OMB Control Number:**
    - Control Number Expiration Date:**
  - Other:** Survey

## 1.2 **System OVERVIEW:**

The Unmanned Aircraft System (UAS) Market survey has been constructed by a team of researchers at the Federal Aviation Administration's (FAA's) Civil Aerospace Medical Institute (CAMI). The purpose of the survey is to receive feedback from experts in industry and academia on UAS, such as common fatigue-related practices; minimum knowledge, skills, abilities (KSAs) to operate UAS; testing; and staffing procedures required for operating UAS. The survey will gain insight from those involved or plan to be involved in UAS air carrier operations, in particular UAS engineers, operators, instructors, and managers. The industry leaders will be able to provide insight to current and future policies from their companies to conduct UAS air carrier operations. The results from this survey will be used to inform rulemaking activities, and a new PTA for the rulemaking process will be conducted at that time. The FAA Office of Aviation Safety (AVS) Office of Aerospace Medicine (AAM) oversees the UAS Market Survey Program at the Mike Monroney Aeronautical Center (MMAC) in Oklahoma City, Oklahoma.

### **The Sample Pool of Survey Participants**

The sample pool consists of UAS engineers, operators, instructors, and managers who have submitted Part 107 Waivers relating to rules governing UAS, or been identified in academia as a UAS instructor<sup>4</sup>. The initial distribution list contains 381 individuals, but should increase because the FAA routinely updates the publicly accessible Part 107 Waivers database, and because academic institutions are continually developing new UAS programs. The survey will collect responses from 180 participants. To ensure the representativeness of the sample, the 180 respondents will be distributed across quotas that are set based on occupational duties as reported by the respondent (pilot/operator = 40, cargo/sensor operator = 40, supervisor = 40, instructors = 40, engineers = 10, other = 10).

<sup>3</sup>See 44 USC 3201-3521; 5 CFR Part 1320

<sup>4</sup> The information for members of academia is collected from Centers of Excellence. FAA has relationships with academics who offer UAS training.



The information from survey participants processed to create the sample pool comes from publicly available dockets in the Federal Register identifying corporations who received blanket waivers from Part 107; the FAA's publicly available [Part 107 Waivers website](#) (which identifies individuals who have been granted waivers from Part 107 relating to rules for operating UAS); Google searches<sup>5</sup>; and names provided by the research sponsors and contractors, and it includes: the individual's name, company name, and email address (business and/or personal, depending on the email the user submitted with the FAA during the waiver submission process). FAA's in-house contractor, Cherokee Nation 3S LLC (CN3S), creates the sample pool by pulling this information together from the above mentioned sources. FAA uses this variety of sources to help ensure the representativeness of the drawn sample.

The sample pool list of potential respondents is stored on an FAA Network shared drive that requires PIV card credentials via MyAccess<sup>6</sup> and is only accessible by CN3S staff with a need to know.

### **Survey Administration**

The survey will be active for 90 days or completion of the 180-respondent limit, whichever comes first, and will no longer be accessible by participants after the survey closes. The survey includes questions with open text boxes, however, the questions do not lead the participant to respond with PII. If a respondent inadvertently provides PII in a text box, CN3S contractor staff will delete the PII before providing results to the FAA.

The FAA's UAS Market Survey Program has a contract in place with online survey development software Qualtrics<sup>7</sup> to administer the survey. CN3S uses Qualtrics to create the survey, collect data and create survey item reports. CN3S staff will use their FAA email address to create a Qualtrics user account to login with username and password.

CN3S staff sends an email to the sample pool it compiled (noted above) containing the [URL](#) for the survey.<sup>8</sup> Members of the sample pool receiving the survey may choose to take the survey or not, and they have the ability to forward the survey to a

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<sup>5</sup> CN3S uses Google searches in an effort to ensure the contact information drawn from the Part 107 Waivers website is current, since the individual's contact information may have changed between the submission of the Waiver and FAA's sending of the survey.

<sup>6</sup> MyAccess (CSAM ID: 2009) and has an adjudicated PTA dated December 20, 2016. A new PTA is under development.

<sup>7</sup> In April 2018, Qualtrics achieved International Standards Organization (ISO) 27001 certification and is Federal Risk and Authorization Management Program (FedRAMP) authorized.

<sup>8</sup> The URL for the survey will be active once the ICR is approved and the OMB Control Number granted.



colleague for their participation.<sup>9</sup> Recipients in the original sample pool are also able to opt out of further communication. Unless the recipient opts-out, the recipients will receive a reminder email approximately halfway through the data collection period.

Once the respondent accesses the link, they receive the informed consent notice<sup>10</sup>, which provides an overview of the study, its voluntary nature and ability to opt-out, informs them about the purposes of the study, and how FAA will use the results. All participants receive the informed consent prior to taking the survey. Participants must provide their consent before continuing with the survey. As part of providing their consent, participants provide their name (first and last) and email address. The Informed Consent states that this PII will not be associated with the individual's survey responses.

When a respondent clicks the link to access the [survey](#), Qualtrics automatically assigns a unique ID to each survey response record. The survey records in Qualtrics also include the PII collected via the informed consent – name and email address. At the conclusion of the survey, CN3S staff logs into Qualtrics with their username and password and downloads the survey responses to an FAA PIV-protected drive with access limited to CN3S contractors. CN3S de-identifies the survey responses by removing the name and email address from the response record. CN3S does not share this PII with FAA. Likewise, although the individual survey responses are located on an FAA server, access to these individual responses is restricted to CN3S only. In addition, CN3S removes any unsolicited PII that respondents may have provided, unprompted, in open text boxes. CN3S then aggregates the survey responses for reporting.

Lastly, survey respondents are compensated for their participation. The survey includes a direct link to a secure website for a third-party FAA contractor, Neese Personnel, to directly collect personally identifiable information to facilitate payment, including the respondent's name, mailing address, phone, and email address. CN3S verifies the participant's names with Neese via email, and Neese facilitates payment by mailing a check to the respondent. The information Neese Personnel collects will not be shared with FAA.

Neese Personnel will maintain the information associated with payments for three years to meet requirements set forth by the Fair Labor Standards Act (FLSA). Neese Personnel stores hard copy documents in locked, access-controlled cabinets, and electronic data is stored in password- and firewall-protected systems. At the end of

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<sup>9</sup> The survey contains a question to exclude individuals that are outside of the targeted population noted above.

<sup>10</sup> An Informed Consent notice is a legal and ethical requirement for research involving human participants.



the three-year retention period, any hard copy documents are shredded and electronic files are deleted.

Neither the survey data nor the analysis will be made available to companies or organizations outside of the FAA. After the survey is closed, CN3S will destroy all files containing the link between names, addresses, and unique identifiers. After the survey is closed, CN3S will download Informed Consent documents to FAA-owned servers with access limited to certain CN3S contractor staff and FAA Management (but not Primary Investigators<sup>11</sup>), as required per Institutional Review Board (IRB) approval and per IRB compliance requirements<sup>12</sup>. CN3S will provide the Informed Consent information to the FAA IRB upon its request.

The record schedule for survey records in is progress, as such, all survey records will be maintained as permanent records until the NARA approves the record schedule. FAA will maintain on servers the respondent information, but access will be limited to CN3S personnel.

## 2 INFORMATION MANGEMENT

### 2.1 *SUBJECTS of Collection*

Identify the subject population(s) for whom the system collects, maintains, or disseminates PII. (Check all that apply)

**Members of the public:**

**Citizens or Legal Permanent Residents (LPR)**

**Visitors**

**Members of the DOT Federal workforce**

**Members of the DOT Contract workforce**

**System Does Not Collect PII.** If the system does not collect PII, proceed directly to question 2.3.

### 2.2 *What INFORMATION ABOUT INDIVIDUALS will be collected, used, retained, or generated?*

PII collected to administer the survey: PII collected directly from survey respondents

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<sup>11</sup> The Primary Investigators are the FAA employees sponsoring the research.

<sup>12</sup> See the attached PDF for details on the IRB.



for consent purposes: name (first and last) and email address. PII about individuals in the sample pool includes: name, company name, and email address. In addition, Qualtrics automatically generates a unique identifier for each survey response when the participant clicks on the survey link.

PII collected for payment purposes: Neese Personnel collects the following directly from survey participants: name (first and last), mailing address, phone number, and email address. No bank information is collected, as Neese Personnel will mail physical checks to the participants.

**2.3 Does the system *RELATE* to or provide information about individuals?**

**Yes:** First, FAA contractors (CN3S) use their FAA email addresses to establish user accounts for the Qualtrics software used to facilitate the surveys. Secondly, CN3S creates a sample pool for the survey by gathering publically available PII about UAS operators (names, company name, and email addresses) from the Federal Register, the FAA’s [Part 107 Waivers website](#), and other sources as described above. Lastly, an FAA contractor, Neese Personnel, collects name, mailing address, phone number, and email address from survey participants to facilitate their compensation.

**No**



**If the answer to 2.1 is “System Does Not Collect PII” and the answer to 2.3 is “No”, you may proceed to question 2.10.**

**If the system collects PII or relate to individual in any way, proceed to question 2.4.**

**2.4 Does the system use or collect SOCIAL SECURITY NUMBERS (SSNs)? (This includes truncated SSNs)**

**Yes:**

**Authority:**

**Purpose:**

**No:** The system does not use or collect SSNs, including truncated SSNs. Proceed to 2.6.



**2.5 Has an SSN REDUCTION plan been established for the system?**

Yes:

No:

**2.6 Does the system collect PSEUDO-SSNs?**

Yes:

No: The system does not collect pseudo-SSNs, including truncated SSNs.

**2.7 Will information about individuals be retrieved or accessed by a UNIQUE IDENTIFIER associated with or assigned to an individual?**

Yes

*Is there an existing Privacy Act System of Records notice (SORN) for the records retrieved or accessed by a unique identifier?*

Yes:

**SORN:** [DOT/ALL 13, Internet/Intranet Activity and Access Records, 67 FR 30757 \(May 7, 2002\).](#)

No:

**Explanation:**

**Expected Publication:**

**Not Applicable:** Proceed to question 2.9

**2.8 Has a Privacy Act EXEMPTION RULE been published in support of any Exemptions claimed in the SORN?**

Yes

**Exemption Rule:**

No

**Explanation:**

**Expected Publication:**

**Not Applicable:** SORN does not claim Privacy Act exemptions.

**2.9 Has a PRIVACY IMPACT ASSESSMENT (PIA) been published for this system?**

Yes:

No: This is a new survey project.

**Not Applicable:** The most recently adjudicated PTA indicated no PIA was required for this system.



**2.10 Does the system EXCHANGE (receive and/or send) DATA from another INTERNAL (DOT) or EXTERNAL (non-DOT) system or business activity?**

**Yes:**

Internal Exchange(s):

There are no internal data exchanges.

External Exchange(s):

Qualtrics: CN3S sends its FAA email address (as username) and password to Qualtrics for system access. In addition CN3S receives survey responses and respondent name and email (captured from the informed consent) from Qualtrics. There is a contract in place to govern this exchange.

Neese Personnel: CN3S sends to Neese Personnel names of survey participants collected via informed consent to allow Neese to verify their participation and facilitate payment to them. CN3S sends participant names via encrypted emails. There is a contract in place to govern this exchange.

**No**

**2.11 Does the system have a National Archives and Records Administration (NARA)-approved RECORDS DISPOSITION schedule for system records?**

**Yes:**

**Schedule Identifier:** [National Archives and Records Administration, General Records Schedule 3.2, approved January 2017, Information System Security Records, item 30 System access records.](#)

**Schedule Summary:** Temporary. Destroy when business use ceases. (DAA-GRS-2013-0006-0003).

**In Progress:** The FAA Records Officer is engaged with NARA to create a retention schedule for its survey records.

**No:**



### 3 SYSTEM LIFECYCLE

The systems development life cycle (SDLC) is a process for planning, creating, testing, and deploying an information system. Privacy risk can change depending on where a system is in its lifecycle.

**3.1 Was this system *IN PLACE* in an *ELECTRONIC FORMAT* prior to 2002?**

[The E-Government Act of 2002](#) (EGov) establishes criteria for the types of systems that require additional privacy considerations. It applies to systems established in 2002 or later, or existing systems that were modified after 2002.

- Yes:**
  - Not Applicable:** System is not currently an electronic system. Proceed to Section 4.
  - No:**

**3.2 Has the system been *MODIFIED* in any way since 2002?**

- Yes:** The system has been modified since 2002.
  - Maintenance.**
  - Security.**
  - Changes Creating Privacy Risk:**
  - Other:**
- No:** The system has not been modified in any way since 2002.

**3.3 Is the system a *CONTRACTOR-owned* or *-managed* system?**

- Yes:** The system is owned or managed under contract.
  - Contract Number:**
  - Contractor:**
- No:** The system is owned and managed by Federal employees.

**3.4 Has a system *Security Risk CATEGORIZATION* been completed?**

The DOT Privacy Risk Management policy requires that all PII be protected using controls consistent with Federal Information Processing Standard Publication 199 (FIPS 199) moderate confidentiality standards. The OA Privacy Officer should be engaged in the risk determination process and take data types into account.

- Yes:** A risk categorization has been completed.

Based on the risk level definitions and classifications provided above, indicate the information categorization determinations for each of the following:



**Confidentiality:**     Low     Moderate     High     Undefined

**Integrity:**         Low     Moderate     High     Undefined

**Availability:**     Low     Moderate     High     Undefined

Based on the risk level definitions and classifications provided above, indicate the information system categorization determinations for each of the following:

**Confidentiality:**     Low     Moderate     High     Undefined

**Integrity:**          Low     Moderate     High     Undefined

**Availability:**     Low     Moderate     High     Undefined

**No:** A risk categorization has not been completed. Provide date of anticipated completion.

**3.5 Has the system been issued an AUTHORITY TO OPERATE?**

**Yes:**

**Date of Initial Authority to Operate (ATO):**

**Anticipated Date of Updated ATO:**

**No:**

**Not Applicable:** System is not covered by the Federal Information Security Act (FISMA).

## 4 COMPONENT PRIVACY OFFICER ANALYSIS

The Component Privacy Officer (PO) is responsible for ensuring that the PTA is as complete and accurate as possible before submitting to the DOT Privacy Office for review and adjudication.

### COMPONENT PRIVACY OFFICER CONTACT Information

**Name:** *Essie L. Bell*

**Email:** *essie.bell@faa.gov*

**Phone Number:** *202-267-6034*

### COMPONENT PRIVACY OFFICER Analysis

This is the initial PTA for FAA’s Unmanned Aircraft Systems (UAS) Market Survey. The purpose of the survey is to receive feedback from experts in industry and academia on aspects of operating UAS. Respondents are selected because they are employees of organizations that operate UAS or academic institutions that provide UAS training.

The survey will gain insight from those involved or plan to be involved in UAS air carrier operations, in particular UAS engineers, operators, instructors, and managers. The results



from this survey will be used to inform rulemaking activities, and a new PTA for the rulemaking process will be conducted at that time.

The UAS Market Survey is privacy-sensitive as FAA contractor CN3S processes PII from members of the public, such as the individual’s name, company name, and business or personal email address to create a sample pool of survey recipients, while a second FAA contractor, Neese Personnel, collects name, mailing address, phone number, and email address to facilitate payments to respondents for their participation in the survey.

SORN coverage is not required for the survey, because the responses are not retrieved by PII. Once CN3S downloads the survey responses, it de-identifies the data, removing the name and email addresses from the survey responses. The survey responses are then aggregated for reporting. SORN coverage for the FAA network access records is under DOT/ALL 13, Internet/Intranet Activity and Access Records, 67 FR 30757 (May 7, 2002).

The RMO has determined that a new retention schedule is required to cover the survey responses. This retention schedule is in progress. Additionally, the IT access records are covered under National Archives and Records Administration, General Records Schedule 3.2, approved January 2017, Information System Security Records, item 30 System access records, which are temporary records that may be destroyed when business use ceases under DAA-GRS-2013-0006-0003.

Lastly, the following Plan of Action & Milestones (POAMs) are recommending to remediate the following privacy risks:

- DM-2 Data Retention & Disposal
  - **Issue:** A new retention schedule for the substantive survey records is in progress.
  - **Requirement:** Maintain all survey records as permanent until schedule is approved by NARA.
  - **Issue:** An FAA contractor, Neese Personnel, maintains the PII of survey participants for 3 years to meet legal requirements. No corresponding record schedule was identified for these records.
  - **Requirement:** Identify or create a record schedule for the compensation records associated with the survey, and establish a process to verify the destruction of these records.

## 5 COMPONENT REVIEW

Prior to submitting the PTA for adjudication, it is critical that the oversight offices within the Component have reviewed the PTA for completeness, comprehension and accuracy.

Component Reviewer	Name	Review Date
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Business Owner	Ashley Awwad	1/13/2021
General Counsel	Sarah Leavitt	2/19/2021
Information System Security Manager (ISSM)	None	None
Privacy Officer	Essie L. Bell	2/11/2021
Records Officer	Kelly Batherwich	1/5/2021

*Table 1 - Individuals who have reviewed the PTA and attest to its completeness, comprehension and accuracy.*

DOT CPO Adjudicated 03/01/2021



Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
AP-1	Authority to Collect	1.2 - Overview		X		<p><b>POA&amp;M:</b> PRA Package must be approved before collection.</p> <p><b>Note:</b> recommend updating DOT/FAA 847 to include participation in research.</p> <p>Recommend updating DroneZone portal to have explicit opt in to participate in surveys/research.</p> <p>Survey responses will be de-identified and not retrieved by a unique identifier associated with a respondent. Substantive records do not require SORN coverage.</p> <p>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p>
AP-2	Purpose Specification	1.2 - Overview	X			Purpose defined.
AR-1	Governance and Privacy Program	Common Control	X			Addressed by DOT CPO.
AR-2	Privacy Impact and Risk Assessment	Program Management		X		<p><b>POA&amp;M</b></p> <p><b>Issue:</b> Information collection involves members of the public. <b>Requirement:</b> submit and receive approval of Privacy Impact Assessment (PIA) from DOT CPO. PIA should cover all phases of the study and tools to collect and analyze data. <b>Timeline:</b></p>



Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
						Prior to study activities involving members of the public.
AR-3	Privacy Requirements for Contractors and Service Providers	3.3 - Contractor System		X		<b>POA&amp;M Issue:</b> unclear whether contract includes standard language and procedures for data retention timelines. <b>Requirement:</b> review contracts and update accordingly. <b>Timeline:</b> prior to collection. See DM-2.
AR-4	Privacy Monitoring and Auditing	Common Control	X			Addressed by DOT CPO.
AR-5	Privacy Awareness and Training	Common Control	X			Addressed by DOT CPO.
AR-6	Privacy Reporting	Common Control	X			Addressed by DOT CPO.
AR-7	Privacy-Enhanced System Design and Development	2.5 - SSN Reduction			X	SSN not collected.  Business owner is responsible for ensuring DOT Privacy Risk Management Policy and the FIPPs are applied to all data holdings and systems.
AR-8	Accounting of Disclosures	2.7 - SORN			X	Not maintained in SOR.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.



Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
DI-1	Data Quality	1.2 - System Overview			X	Not maintained in SOR.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
DI-2	Data Integrity and Data Integrity Board	3.4 - Security Risk Categorization			X	Activity does not constitute sharing covered by the CMA.
DM-1	Minimization of PII	2.2 – Information About Individuals	X			Data collection consistent with purpose.
DM-2	Data Retention and Disposal	2.11 - Records Disposition Schedule	X			Cross reference with AR-3.  <b>POA&amp;M Issue:</b> it is unclear if there are established protocols/timelines for data retention timelines. <b>Requirement:</b> establish protocols and data retention timelines, and if already established, include in PIA. <b>Timeline:</b> prior to collection.
DM-3	Minimization of PII Used in Testing, Training, and Research	2.2 – Information About Individuals			X	System not used for testing, training, research.
IP-1	Consent	2.7 - SORN	X			Participants receive informed consent notice. Participation is voluntary.



Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
IP-2	Individual Access	2.8 – Exemption Rule			X	Not maintained in SOR.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
IP-3	Redress	2.7 - SORN			X	Not maintained in SOR. Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
IP-4	Complaint Management	Common Control	X			Addressed by DOT CPO.
SE-1	Inventory of PII	Common Control	X			Not IT system under FISMA.
SE-2	Privacy Incident Response	Common Control	X			Addressed by DOT CPO.
TR-1	Privacy Notice	2.7 - SORN			X	Not maintained in SOR.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
TR-2	System of Records Notices and Privacy Act Statements	2.7 - SORN			X	Not maintained in SOR.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.



Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
TR-3	Dissemination of Privacy Program Information	Common Control	X			Addressed by DOT CPO.
UL-1	Internal Use	2.10 - Internal and External Use			X	No internal data exchange.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13
UL-2	Information Sharing with Third Parties	2.10 - Internal and External Use	X			Information not authorized for disclosure beyond DOT/DOT-contractors.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.

DOT CPO Adjudicated



DOT CPO Adjudicated 03/01/2021