



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)

Safety Assurance System (SAS)





## 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 Threshold 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 07/16/2022



## PROGRAM MANAGEMENT

**SYSTEM name:** Safety Assurance System (SAS)

**Cyber Security Assessment and Management (CSAM) ID:** 1996

**SYSTEM MANAGER CONTACT Information:**

**Name:** John Frye

**Email:** John.Frye@faa.gov

**Phone Number:** 703-598-9186

**Is this a NEW system?**

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

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

- Yes:
  - Date:** 4/16/2018
- No

## 1 SUMMARY INFORMATION

### 1.1 System TYPE

- Information Technology and/or Information System
  - Unique Investment Identifier (UII):** 021-189475443
  - Cyber Security Assessment and Management (CSAM) ID:** 1996
- Paper Based:
- Rulemaking
  - Rulemaking Identification Number (RIN):**
  - Rulemaking Stage:**
    - Notice of Proposed Rulemaking (NPRM)
    - Supplemental NPRM (SNPRM):
    - Final Rule:
  - Federal Register (FR) Notice:** [Click here to enter text.](#)



- Information Collection Request (ICR)<sup>3</sup>**
  - New Collection**
  - Approved Collection or Collection Renewal**
    - OMB Control Number:**
    - Control Number Expiration Date:**
- Other:**

## 1.2 System OVERVIEW:

This is an update to the Federal Aviation Administration (FAA) Safety Assurance System (SAS) previously adjudicated Privacy Threshold Assessment (PTA) dated April 16, 2018. The Office of Aviation Safety (AVS) uses SAS to support the System Approach for Safety Oversight (SASO) program office's safety and risk management operations. SAS is deployed at The Office of Information and Technology Services Enterprise Data Center (AIT EDC)<sup>4</sup> at the Mike Monroney Aeronautical Center (MMAC) in Oklahoma City, OK.

Since the adjudicated of the previous PTA, the following system changes have occurred:

- SAS now includes the Certificate Application Process, a Risk Assessment Model, Activity Recording, and the addition of CFR Parts 141, 142, and 147 into SAS.
- SAS contains new, hazardous materials reporting module that is used by the Office of Hazardous Materials Safety (AXH) to conduct surveillance on Certificate Holders (CHs) and other entities that offer or transport hazardous materials.
- SAS now exchanges data with Accident Incident Data System (AIDS),<sup>5</sup> Designee Management System (DMS),<sup>6</sup> and Aviation Safety Inspector Credential Program (110A).<sup>7</sup>

### **SAS Modules**

SAS is a public-facing, web-based system used by airmen, air carriers, pilot schools, training centers, air maintenance technical (AMT) schools, repair stations, or any entity that applies for certificates or holds a certificate from the FAA. Flight Standards (FS) and AXH personnel use SAS as an oversight tool to capture data associated with aviation certification, Continued Operational Safety (surveillance), Other Regulated Entities (ORE) oversight, hazardous material incident reporting and

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

<sup>4</sup>AIT EDC (CSAM ID: 1631) has an adjudicated PTA, dated February 25, 2019.

<sup>5</sup>AIDS (CSAM ID: 1911) has an adjudicated PTA, dated November 11, 2016.

<sup>6</sup>DMS (CSAM ID: 2022) has an adjudicated PTA, dated September 17, 2018.

<sup>7</sup>110A (CSAM ID: 1366) has an adjudicated PTA, dated ~~February 16, 2017~~ May 19, 2021.



investigations, and certificate management of certificate holders and applicants (CH/As).<sup>8</sup>

The SAS modules provide for initial certification, Continued Operational Safety (COS), and hazardous materials incident reporting through Configuration, Planning, Resource Management, Data Collection, and Analysis Assessment Action.

**Module 1 – Configuration:** This module is the first step in initial certification and provides information to FAA regarding the identity and particular characteristics of a certificate applicant. It is accessible by the SAS internal portal (<https://sas.avs.faa.gov>) and public portal (<https://sas.faa.gov>), which are described in detail below.

**Module 2 – Planning:** This module allows authorized internal FAA users to establish oversight plans for inspectors in order to perform regulatory compliance on certificate holders. Chief Inspectors (CI) plan inspections of certificate holders; assign inspectors to assess CHs; and schedule inspections using the planning module. The module maintains designee information, via an interconnection with the Designee Management System (DMS), to provide workload and resourcing information so CPMs can view what work designees are conducting and adjust the workload of these designees as appropriate. Designees are non-FAA employees that conduct certification oversight on behalf of the FAA. The Planning Module is only accessible through the SAS internal portal.

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**Module 3 – Resource Management:** This module allows CIs to develop resource allocation based on established oversight plans. If, for example, an assessment required resources beyond those available to a Flight Standards District Office (FSDO), a CI might assign staff from a neighboring FSDO to assist. This module is only accessible through the SAS internal portal.

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**Module 4 – Data Collection & Activity Recording:** This module, which is accessible through the internal and public portals, allows Aviation Safety Inspectors (ASIs) to collect regulatory compliance and safety data on current certificate holders and allows external users and current certificate holders to provide data on themselves utilizing the Self-Assessment/Self-Audit for 14 Code of Federal Regulations (CFR) Part 145s. CH/As, specifically business entities, use DCTs to submit data on themselves utilizing the Self-Assessment/Self-Audit for [14 CFR Part 121, 135, 141, 142, 145 and 147](#). A DCT consists of questions designed by the FAA to determine if a CH/A meets the regulatory requirements and safety standards. CH/As manually select the correct designations from drop-down text boxes as part of the self-assessment/audit process. The DCTs do not collect PII, though; they do contain an open text field in which a Flight Standards (FS) employee could

<sup>8</sup> Includes airmen, air carriers, commuter airlines, repair stations, flight schools, air passengers, aircraft maintenance training schools.



inadvertently submit PII. However, SAS Program staff would subsequently redact the PII.

ASIs use Activity Recording to document inspections and other work associated with CHs and individual airmen. Unlike DCT, Activity Recording is not shared with CH/As using the external portal. DCTs are performed both before and after certification and typically do not contain Personally Identifiable Information (PII); however, some DCTs contain open text fields that could allow an ASI to inadvertently enter PII. In the infrequent cases where PII is inadvertently submitted, SAS program staff redact the PII. The purpose of collecting data is to gather information that Principle Inspectors use to make informed decisions about the CH/A's operating systems (1) before approving or accepting them when required to do so by regulation, and (2) during recurring Performance Assessments (PAs).

**Module 5 – Analysis Assessment Action:** This module allows for the analysis and assessment of design, performance, and level of risk in CH/As. Based on the information collected through the Data Collection Module and DCTs, SASO determines whether changes to a CH's configuration (e.g. equipment at a repair station; number of seats on an airplane) are necessary and/or whether additional planning, resource management, and data collection is necessary for further assessment.

#### ***User Registration***

CH/As use the SAS public portal, <https://sas.faa.gov>, to electronically submit an aviation certificate application, amend an existing certificate, or communicate with their local FSDO. The certificate application process begins with the applicant registering for a SAS account on the public portal. FAA personnel, such as ASIs, Principal Inspectors (PIs) and Hazardous Material Aviation Safety Inspectors (HM ASIs), use the SAS to help with their certification and safety oversight by providing tools for planning and scheduling, helping to identify hazards within an environment, and helping to eliminate or control risk.

CH/As must register for an SAS account at <https://sas.faa.gov> to submit a certificate request and receive full access to the website. The CH/A manually enters and submits their full name, zip code and email address to register for an account. Upon submission, SAS generates an email notification of receipt to the CH/A, which includes a User ID, temporary password, and link to log into the SAS public portal. SAS prompts each CH/A, upon initial login, to complete security questions and answers (which could contain their mother's maiden name) and replace the temporary password with a permanent password. The CH/A clicks on the registration link (valid for only 24 hours) which takes the applicants to the Application Submission Page.



FAA personnel, such as ASIs, PIs, and HM ASIs access the SAS internal portal via their Personal Identity Verification (PIV) card through Integrated Windows Authentication (IWA)<sup>9</sup> at <https://sas.avs.faa.gov>.

### ***System Functionality***

The CH/A begins the certificate request at the Application Submission page. The CH/A manually enters the following information into SAS:

- Full name of certificate applicant (individual or authorized individual of business);
- Job title;
- Business address;
- Country (if foreign);
- Business phone number; and
- Business email address.

Upon submission, the applicant navigates to the final screen of the Application Submission page and manually enters information in the Form [8400-6](#), *Preapplication Statement of Intent* and either Form [8420-8](#), *Pilot School Certification* or Form [8310-3](#), *Application for Repair Station Certificate and/or Rating* into SAS depending on the type of certificate requested. These forms collect PII directly from the CH/A that is detailed in Section 2.2. If CH/As choose not to fill out these forms electronically in the SAS public portal, they can email or mail the completed, paper forms to the local FSDO. Once received, the Principal Inspector (PI) or Certification Program Manager (CPM) manually enter the information from the emailed or mailed forms into SAS. Upon completion of information submission, the emailed or mailed forms are either scanned and uploaded into a Knowledge Services Network (KSN) shared drive accessible by authorized AFS personnel or stored in a locked file cabinet, based upon preference of the local FSDO.

The FSDO begin the review and approval process in SAS for the submitted certificate request. The Certification Project Team<sup>10</sup> reviews the certificate submission with the regulatory requirements, FAA's policy and guidance for the process, and verifies the accuracy of answers provided by the CH/A, and determines if the changes in the process design meet the requirements for approval and acceptance. The Certification Project Team may manually enter comments regarding their evaluation of the certificate request in an open-text comments box. This review process allows the CH/A and the FAA to see how the proposed changes affects the CH/A's operating profile and Comprehensive Assessment Plan (CAP).<sup>11</sup> Once the PI approves the certificate request, SAS updates the CH/A operating profile

<sup>9</sup> FAA Directory Services (CSAM ID: 2062) has an adjudicated PTA, dated September 25, 2020.

<sup>10</sup> Certification Project Team consists of a Certification Project Manager (CPM) and Aviation Safety Inspectors (ASIs) and other employees as needed.

<sup>11</sup> The CAP is a quarterly plan developed by inspectors and their managers to plan and schedule oversight activities.





and CAP to reflect the new information. SAS sends a notification to the CH/A to inform them of the approval of their certificate request.

Once approved, the CH use SAS to change their configuration data in the SAS public portal and submit the proposed changes to their FSDO for approval, known as a change request. Configuration data is a set of characteristics or attributes that describe a CH's scope of operations and specifications. CHs manually enter the following information in the SAS public portal that consists of their configuration data:

- **Operations specifications** information includes route structures, fleet size, number of aircraft in fleet, fleet composition, number of repairmen, facility locations, and number of seats in aircraft;
- **Vitals** includes the company's Chief Executive Officer's (CEO) full name, address, business phone number, county of operations, fax number, and email address; and
- **Contractor's** information includes all the full names, addresses, telephone numbers, email addresses, fax numbers, and company names for all service providers that contracts with the certificate holding company.

The FSDO receives the change request in SAS and reviews to determine how the proposed changes affects the CH's operating profile and Comprehensive Assessment Plan (CAP).<sup>12</sup> The Operating Profile is a list of systems/subsystems, elements and questions that are applicable to a CH's scope of operation. CHs create the Operating Profile (OP) in the public portal, based on the list of the functions that a CH/A performs, as well as applicable regulatory requirements, hazard analysis, configuration information, and performance history. Once the PI approves the change request, SAS updates the CH/A operating profile and CAP to reflect the new information.

Once a certificate request or change request has been granted, CHs continue to access the SAS public portal to perform the following functions:

### **Schedule of Events**

The Schedule of Event tab provides a checklist of events; drop down menus indication the status of the event; and fields to select proposed, current, accepted baseline and completion dates using electronic calendars. The CH/A sets a timeline for the completion of events for their certification process. For example, CH/A submit proposed dates of completion for each event that is listed. Each event has an

<sup>12</sup> The CAP is a quarterly plan developed by inspectors and their managers to plan and schedule oversight activities.



open text field for CH/As to input comments on the status of events, which are viewed by FAA personnel. These events include meetings and other items needed for certification.

### **Document Management**

The Document Management tab allows CH/As submitting supporting documentation to ASIs. If PII is inadvertently included in this documentation, FAA personnel will redact the PII in accordance with exemption six (6) of the Freedom of Information Act (FOIA). Folders contained in the Document Management tab are for the following: Formal Application, Other Certification, Configuration Changes, and Data Collection. CH/As upload documents in the Formal Application folder for certificate application review. CH/As upload supporting documents that they believe are applicable to their certificate application but are not listed in the Formal Application folder in the Other Certification folder. When uploading documents, CH/As enter a description of the uploaded document in an open-text comment box. SAS sends the applicable ASI a notification when the applicant uploads a document in the Document Management. ASIs and the CH/A can submit documents in this tab.

### **Hazardous Materials Incident Reporting**

The Office of Hazardous Materials Safety (AXH), as prescribed by [49 CFR Parts 171-180](#), use the SAS internal portal to conduct surveillance on CHs and other entities that offer or transport hazardous materials. AXH surveillance includes the investigation of hazardous materials incidents, or data related to a CH's discovery of hazardous materials in a passenger's baggage. [49 CFR 175.31](#) requires each person as defined by [49 CFR 171.8](#) who discovers a discrepancy<sup>13</sup> relative to the transportation of hazardous materials, to notify the nearest FAA Regional or Field Security office by telephone or email ([9-AWA-AXH-175-31PaxNotifications@faa.gov](mailto:9-AWA-AXH-175-31PaxNotifications@faa.gov)) outside of SAS. AXH personnel monitor the email inbox and manually enter reports into the Passenger Module in SAS. AXH personnel must collect the following data for each hazardous material discrepancy:

- Full name and telephone number of the person reporting the discrepancy;
- Name of the aircraft operator;
- Specific location of the shipment concerned Type of hazardous material found;
- Full name of the airplane passenger (shipper of hazardous material);
- Nature of the discrepancy; and
- Address of the shipper or individual responsible for the discrepancy, if known, by the air carrier.

<sup>13</sup> Discrepancy involves improperly described, certified, labeled, marked, or packaged hazardous materials.



AXH personnel evaluate all the reports for risk based on item reported and the hazardous material regulations.<sup>14</sup> All higher risk items or conditions are processed as enforcement investigations outside of SAS. Only low-risk items or conditions are processed within SAS and passengers of record are mailed a stakeholder outreach letter.<sup>15</sup> SAS sends the outreach letter as the only communication to the passenger of record. The letter states the following information:

- (1) the discovery of hazardous material found in the passenger's bag;
- (2) legal citation ([49 CFR 175.10](#)) that prohibits the transport of hazardous materials;
- (3) contact information for the passenger to reach out in regards to confiscated items; and
- (4) the notation that the discrepancy matter is closed.

SAS retains all data, including the name and address of the shipper (passenger), contained in the outreach letters for a period of ten years; however, passenger PII (name and address) is expunged by AXH via system automation once outreach letters are mailed to the passenger. SAS retains the name of the aircraft operator, name of the hazardous material, and location found for trend analysis.

Shipping incidents that deal with hazardous material leakages require the individual or entity that discovers the spill to report the information to the Department of Transportation (DOT), and many instances to the FAA. The report is made on [DOT FORM F 5800.1](#), sent to the DOT, and investigated by AXH personnel if the report is made to the FAA. AXH personnel would input some of the following information from [FORM F 5800.1](#) into the SAS *Other Regulated Entities (ORE) Module*:

- Full name of the reporting CH (air operator);
- Business address of the reporting CH (air operator);
- Full name and mailing address of the shipper;
- Full name of the CH's authorized representative;
- Job title of CH's authorized representative; and
- Business address, telephone number, email address and fax number of the CH's authorized representative.

AXH personnel conduct the investigation against the person/company that offered the shipment of the hazardous material(s). AXH personnel manually enter investigation findings into the comments box within the module. This module would capture any referral to the AXH enforcement process, which occurs outside of SAS. If the investigation leads to an enforcement action, AXH personnel complete the

<sup>14</sup> The quantity and hazard class of the item determines risk. Explosives are high risk, while aerosols are low risk, not investigated and entered into the Passenger Module.

<sup>15</sup> Records are reviewed and approved for continued processing if the entered data meets the criteria for an outreach letter and that the hazmat classification is not contradictory.



enforcement action in EIS,<sup>16</sup> yet, SAS would not annotate the enforcement decision or disposition.

Section 2.10 fully details all the data exchanges that SAS shares with other internal and external systems.

SAS generates and maintains various system reports that track application submissions, CH/A reporting history, activity recordings, hazardous material reporting, safety investigations, AXH Priority Index Report and other events as detailed in Appendix A. These reports could contain the following PII:

- Full name of CH/A (individual or business entities);
- Full name of ASI;
- CH/A's business address;
- CH/A's business email address;
- CH/A's business telephone number;
- CH/A's company name;
- Full name of reporting air carrier (for hazardous material reporting); and
- Full name of repair station.

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SAS generates audit logs that track system login activity, changes to user profiles, and changes in user roles and functions. Audit logs contain the User IDs of CH/As or the email addresses of FAA users, depending on the type of user captured in the logs.

## 2 INFORMATION MANAGEMENT

### 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.

<sup>16</sup> EIS (CSAM ID: 1374) has an adjudicated PIA dated August 29, 2012.



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

**Members of the Public (includes airmen, air carriers, certificated pilot schools, training centers, air maintenance technical schools, repair stations, and air passengers)**

- CH/A's full name
- Business email address
- Business address with zip code
- Business telephone number
- Job title
- Airman certificate number and type
- User ID
- Password
- Password recovery security questions and answers
- FAA tracking number (FTN)
- CH's Chief Executive Officer's (CEO's) full name
- CEO's email address
- CEO's business address
- County of CH's operations
- Full name of all CH's contractors (repair stations only)
- Business contact information (email address, business address, and telephone number) of all CH's contractors (repair stations only)
- FAA precertification number
- **FAA** Designator code<sup>17</sup>
- Instructor's full name and certificate number
- Examiner's full name
- Main operating base address
- Satellite location address
- Aircraft make, model, and series
- Full name of simulator sponsor
- Full name of person responsible for scheduling simulator
- Simulator region ID (FAA region where simulator exists)
- Enforcement Investigative Report (EIR) number and status

<sup>17</sup> The FAA designator code is an FAA-issued code for certificated entities.



- Full name of FAA Designee
- FAA Designee identification number and type
- FAA Designee expiration date
- FAA Designee office code
- FAA Designee fax number
- Hazardous material registration number<sup>18</sup>

**Form 8400-6, Preapplication Statement of Intent (completed by all applicants)**

- Full name of business
- Mailing address of business
- Address of principal base where operations will be conducted
- Requested three-letter company identifier
- Business email address
- Doing Business As (DBA)
- Management personnel information (full name, title, telephone number, and email address)
- Aircraft serial number and types
- Aircraft make, model, and series
- Open-text comments box to enter additional information to provide FAA a better understanding of proposed operation or business (FAA personnel will redact any unnecessary PII upon review contained in this box)
- Full name and title of authorized point of contact (POC) for company
- Authorized POC's signature and date

**Form 8420-8, Application for Pilot School Certification**

- Full name of school
- Telephone number of school
- Address of principal business office
- Location of main operations base
- Location of satellite base(s)
- Reason for application submission – issuance, renewal or amending to pilot school certificate
- Identification of training courses
- Signature and job title of authorized POC

**Form 8310-3, Application for Repair Station Certificate and/or Rating**

- Full name of repair station;
- Repair station certificate number (if applicable)



- Location where business is conducted
- Official mailing address;
- Doing business as (DBA)
- Open-text comment box for the repair station to list of maintenance functions contracted to outside agencies (FSDO personnel will redact any unnecessary PII upon review contained in this box)
- Full name of owner(s)
- Date, full name of authorized POC, job title, and signature

**Hazardous Material Reporting Module (airplane passengers and air carriers)**

- Full name of airplane passenger (shipper of hazardous material)
- Airplane passenger's home address (shipper of hazardous material)
- Location of shipping incident (city, state, country, zip code)
- Reporting air carrier's full name
- Reporting air carrier's address
- Hazardous material destination address
- Agency name and report number (if report submitted to another DOT agency)
- Authorized representative's full name and job title
- Authorized representative's telephone number

**Members of the Federal and Contract Workforce**

- Full name
- Telephone number
- Email address
- Title
- FSDO office and location
- FSDO representative's full name
- ASI's full name and signature
- ASI's region and office code
- Supervising inspector's full name and signature
- Open-text comments box for FAA inspectors to include remarks in their evaluation of certificate requests

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

**Yes:** SAS collects information pertaining to certificate holders, certificate applicants, airplane passengers, and organizations involved in aviation surveillance activities (described above in the System Overview). The system also collects information pertaining to FAA employees tasked with inspection, certification, and/or management of inspection and certification (also described above in the System Overview). SAS maintains audit logs for its Internet Information Services

<sup>18</sup> This number is not considered PII, as it is not linked or linkable to any individual.



(IIS) server, which contains no PII and a Database Audit Log that contains the PII saved in the SAS database (described above).

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: SAS collects Airman Certificate Numbers that, in some cases, may be the airman's Social Security Number (SSN). For their convenience, some airmen have kept their SSN as their certificate number. The Civil Aviation Registry discontinued the practice of using the SSN as a certificate number for original or new certificates in June of 2002. The Civil Aviation Registry web site provides instructions for requesting a new certificate that does not include the SSN. The airman can complete the request online or mail a completed AC Form 8060-67 (10/09), Request for Change of Certificate Number to the Airmen Certification Branch, AFS-760.

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/FAA 801, Aircraft Registration Records, 81 FR 54187 \(August 15, 2016\)](#)

[DOT/FAA 847, Aviation Records on Individuals, 75 FR 68849 \(November 9, 2010\)](#)

[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:** DOT/FAA 847, [Aviation Records on Individuals](#), November 9, 2010 75 FR 68849. Records in this system that relate to administrative actions and legal enforcement actions are exempted from certain access and disclosure requirements of the Privacy Act of 1974, pursuant to 5 U.S.C. 552a(k)(2).

**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:** A PIA is in development.



**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 Data Exchanges:**

**Accident and Incident Data System (AIDS)**

SAS receives aviation accident-related data from AIDS via Transmission Control Protocol (TCP). AIDS sends the following information related to the aviation accident or incident:

- Airman's full name;
- Airman's date of birth (DOB);
- Airman certificate number (may include Airman's social security number);
- Certificate type;
- Air operator's full name;
- Domicile zip code;
- Aircraft registration number;
- Aircraft serial number;
- Aircraft make and model name;
- Type of injury;
- Full name of ASI (Inspector-in-Charge, or IIC);
- IIC region and office code; and
- Number of casualties or injuries for an accident or incident.

The purpose of this data exchange is to provide a count of the number of Accident and Incidents for all CH/As over a period of five years and assist in the calculation of a risk score for each CH/A in SAS. A MOU is in effect for this data exchange.

**Civil Aviation Registry Applications (AVS Registry) (Aircraft Registry System (ARS) subcomponent)<sup>19</sup>**

SAS receives aircraft registration data from the ARS subcomponent of AVS Registry via a Structured Query Language (SQL) service replication in real time. ARS sends the following information:

- Aircraft serial number (N-number);
- Full name of aircraft owner;
- Business address;
- Aircraft make/model/serial number;
- Aircraft manufacturer name;

<sup>19</sup> AVS Registry (CSAM ID: 1416) has an adjudicated PTA, dated April 10, 2019.



- Engine manufacturer/model name to SAS; and
- Certificate class and date.

The purpose of the data exchange is to validate the aircraft information within SAS. A MOU is in effect for this exchange (and the CAIS exchange referenced below).

#### **Aviation Safety Inspector Credential Program (110A)**

SAS sends 8430-13 en route inspection book data to the 110A system every four hours via a Structured Query Language (SQL) Server Integration Services (SSIS) protocol. SAS sends the following information:

- Full name of inspector;
- 8430-13 number (8 digit number on a physical paper form); and
- DCT ID.

The purpose of the data exchange is to assure that all of the ten coupons in the ASI's 8430-13 inspection book have been completed prior to the return of the book to the 110A program office. A MOU between SAS and 110A has been drafted and waiting approval from each Program office.

#### **Comprehensive Airman Information System (CAIS), subcomponent of AVS Registry**

SAS receives airmen information from CAIS, a subcomponent of AVS Registry, via a SQL server replication. CAIS sends the following information daily:

- Full name of airman;
- Airman certificate number; and
- Certificate type.

The purpose of the exchange is for oversight and validating airmen information within SAS. A MOU is in effect for this data exchange with AVS Registry.

#### **Designee Management System (DMS)**

SAS receives read-only designee data sent nightly by DMS via SQL server replication. DMS sends the following information:

- Full name of designee;
- Designee number and type;
- Designee expiration date;
- Aircraft make and model name (associated with designee oversight activity);
- Designee office code;
- Designee oversight activity type name; and
- Designee oversight activity tracking number.



The purpose of this data exchange is to provide workload and resourcing information on the Office Workload list so CPMs can view what work designees are conducting and adjust the workload of these designees as appropriate. Designees conduct certification oversight on behalf of the FAA. A MOU is in effect between DMS and SAS.

#### **Enhanced Flight Standards Automation System (eFSAS)<sup>20</sup>**

SAS sends and receives configuration information about CHs with eFSAS via an automated call. CFR Parts 121, 135, and 145 configuration data is replicated to SAS. eFSAS sends the following information to SAS:

- Full name of air operator company;
- Full name of CEO;
- DBA name;
- Business address;
- Inspector name;
- Inspector office;
- Designator code; and
- ODA.

SAS users update the CH configuration information in SAS with changes sent to eFSAS via a web service. The purpose of the data exchange is to provide updated CH information in eFSAS. A MOU is not in effect for this data exchange.

#### **Enforcement Information System (EIS)**

SAS receives enforcement investigative report (EIR) data from EIS nightly via SQL remote-stored procedure. EIS sends the EIR Number, designator code, and status to SAS. The purpose of the exchange is to supply SAS with any valid open EIR numbers relevant to a certificate in its system. A MOU is in effect for this data exchange.

#### **FAA Management Information System (FAAMIS)<sup>21</sup>**

SAS sends and receives data with FAAMS nightly via SQL service broker. SAS receives National airman reference, aircraft, and simulator data from FAAMIS. FAAMIS receives all PTRS and activity reference data from SAS, such as:

- Full name of inspector;
- Record ID;
- Activity number;
- Designator code;
- Aircraft make/model/series;
- Airman certificate number;

<sup>20</sup> eFSAS (CSAM ID: 1896) has an adjudicated PTA, dated June 29, 2018.

<sup>21</sup> FAAMIS (CSAM ID: 1981) does not have an adjudicated PTA. The FAA Privacy Office is currently developing a PTA with the FAAMIS Program Office.



- Full name of airman;
- Examiner full name;
- Instructor full name;
- Instructor certificate number;
- Aircraft serial number; and
- Aircraft manufacture name.

SAS sends data to FAAMIS for use by other downstream systems that FAAMIS provides information. A MOU is in effect for this data exchange.

#### **Flight Standards Information System (FSIMS)<sup>22</sup>**

SAS sends and receives inspection data with FSIMS via File Transfer Protocol (FTP). SAS receives the FAA Order 8900.1 data to inform inspection duties. No PII is exchanged between the two systems. SAS sends DCTs to the FSIMS via FTP for the FSIMS librarian to manually upload from an Excel spreadsheet into FSIMS. A MOU is in effect for this data exchange.

#### **Integrated Airmen Certification and Rating Application (IACRA)<sup>23</sup>**

SAS receives Program Tracking and Reporting Subsystem (PTRS) data and sends eFSAS data using New Technology (NT) Local Area Network (LAN) manager protocol. SAS sends and receives the following PII data:

- DBA full name;
- Inspector code;
- Office code;
- Airman certificate number;
- Full name of CH/A;
- Examiner name;
- Full name of instructor; and
- Instructor certification number.

The purpose of the data exchange is to accurately plan surveillance, investigation, and certification work activities. A MOU is in effect for this data exchange between the two systems.

#### **Simulator Inventory and Evaluation Scheduling System (SIESS)<sup>24</sup>**

SAS receives data from SIESS via SQL server replication on a weekly basis. SIESS sends the following information to SAS:

- Simulator ID;
- Simulator manufacture ID;

<sup>22</sup> FSIMS (CSAM ID: 1395) has an adjudicated PTA, dated October 1, 2015. The FAA Privacy office is currently developing an updated PTA with the FSIMS Program Office.

<sup>23</sup> IACRA (CSAM ID: 1398) has an adjudicated PTA, dated October 25, 2020.

<sup>24</sup> SIESS (CSAM ID: 1420) has an adjudicated PTA, dated ~~November 20, 2018~~ July 16, 2021.



- Aircraft make, model, and series;
- Simulator location (city);
- Full name of simulator sponsor;
- Full name of person responsible for scheduling simulator;
- Simulator region ID (FAA region where simulator exists); and
- Simulator designator code.

The purpose of the data exchange is to assist inspectors with the assessment of CH's aircraft. SAS displays the list of simulators in the DCT module. A MOU is in effect for this data exchange.

#### **Safety Performance Analysis System (SPAS)<sup>25</sup>**

SAS sends inspection/National Transportation Standards Bureau (NTSB) data on CHs to SPAS through SQL server replication in real time. SAS sends the following PII data elements to SPAS:

- CH/A's full name;
- CH/A's email address;
- Company name;
- Title;
- Employee position;
- Address;
- Telephone number;
- Airman certificate number and type;
- Aircraft registration number;
- Aircraft make/model/serial number;
- Aircraft manufacturer name;
- Engine manufacturer/model name; and
- Aircraft owner's full name and address.

The purpose of the data exchange is to count the number of fatal accidents and non-fatal accidents for all CH/As over a period of five years and calculate a score for three risk factors, comprising the Certificate Holder Index (CHI), for each CH/A in SAS. SPAS is the subscriber to SAS published database. A MOU is required for this data exchange.

#### **Web-based Operations Safety System (WebOPSS)<sup>26</sup>**

SAS receives inspection data from WebOPSS via SQL server replication. WebOPSS sends the following data elements to SAS:

- CH/As operator information
- Areas of operation;

<sup>25</sup> SPAS (CSAM ID: 1422) has an adjudicated PTA, dated June 26, 2019.

<sup>26</sup> WebOPSS (CSAM ID: 1410) has an adjudicated PTA, dated September 26, 2018.



- Type of operation (passenger and/or cargo);
- Airport data (Airport ID and Location);
- Deviations and exemptions;
- Aircraft listings;
- Types and numbers of aircraft;
- Inspector ID;
- Designator code;
- Aircraft serial number;
- Certificate ID;
- Certificate holder name; and
- Aircraft registration number.

The purpose of the data exchange is to enable SAS to produce a CH operating profile (CHOP) for each CH/A by SIESS sending authorizing information and aircraft listing that apply for each CH/A. The CHOP provides a list of applicable assessments for each certificate holder. A MOU is in effect for this data exchange.

#### **FAA Directory Services (FAA DS)**

SAS connects to FAA DS for the purpose of identity access and authentication for FAA users. FAA DS sends the email address to SAS to authenticate all FAA users into the system. DOT/ALL 13 provides SORN coverage for this exchange. An enterprise-wide data sharing agreement is needed for the data exchange with FAA DS.

#### **External Data Exchanges:**

##### **U.S Government Publishing Office (GPO) Federal Digital System (FDsys)**

SAS receives CFR data manually on an ad-hoc basis in XML format from the FDsys website. FDsys is a system offered by the U.S. Government Publishing Office (GPO) that provides free online access to official publications from all three branches of the Federal Government. SAS uses FDsys as the statement of record regarding Title 14 Code of Federal Regulations Parts 121, 135, and 145 covering Air Carrier Certifications, Air Operator Certifications, and Air Agency Certifications. A MOU is not required because the information is public available. There is no PII obtained through 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:**

[General Records Schedule \(GRS\) 3.2, Information System Security Records, Approved September 2016.](#)



**Schedule Summary:**

Item 30. System access records. Temporary. Destroy when business use ceases.  
DAA-GRS-2013-0006-0003.

**□ In Progress:**

NARA, DAA-0237-2020-0034



DAA-0237-2020-0034  
SAS.pdf

**Item 1: Certification (includes data concerning certification and applicants).** Temporary. Destroy five years after certificate is no longer active or when no longer needed for reference, statistics or when information is superseded or becomes obsolete, whichever is sooner.

**Item 2: Risk assessment.** Temporary. Destroy five years after certificate is no longer active or when no longer needed for reference, statistics or when information is superseded or becomes obsolete, whichever is sooner.

**Item 3: Planning.** Temporary. Destroy ten years or when no longer needed for reference, statistics or when information is superseded or becomes obsolete, whichever is sooner.

**Item 4: Resource Worklist.** Temporary. Destroy ten years or when no longer needed for reference, statistics or when information is superseded or becomes obsolete, whichever is sooner.

**Item 5: Data Collection Tool Data.** Temporary. Destroy after ten years, or when no longer needed for reference, statistics or when information is superseded or becomes obsolete, whichever is sooner.

**Item 6: Analysis, Assessment, and Action Data.** Temporary. Destroy after ten years or when no longer needed for reference, statistics or when information is superseded or becomes obsolete, whichever is sooner.

**Item 7: On the Job Data.** Temporary. Destroy after ten years or when no longer needed for reference, statistics or when information is superseded or becomes obsolete, whichever is sooner.

**Item 8: Internal User/External User Information.** Temporary. Destroy ten years after the employee has departed the FAA and after all related records have been disposed.

**Item 9: Passenger Module Data (includes passenger and related hazardous goods violations).** Temporary. Destroy related content after ten years, passenger PII is expunged after evaluated or letter processed.

**Item 10: Certification, configuration and data collection data provided by external users.** Temporary. Certification and Configuration data: Destroy five years after certificate is no longer active. Data Collection: Destroy after ten years





The FAA Records Information Management (RIM) office and SAS Program Office have drafted the above referenced records schedule. The records schedule has yet to be finalized and submitted to NARA.

**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:**

**No:**

**Not Applicable:** System is not currently an electronic system.

Proceed to Section 4.

#### 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:**

- SAS now includes the Certificate Application Process, a Risk Assessment Model, Activity Recording (PTRS was moved from eFSAS to SAS), and the addition of CFR Parts 141, 142, and 147 into SAS.
- SAS installed a hazardous materials incident reporting module that is used by the Office of Hazardous Materials Safety (AXH) to conduct surveillance on Certificate Holders (CHs) and other entities that offer or transport hazardous materials.
- SAS now exchanges data with Accident Incident Data System (AIDS), Designee Management System (DMS), and Aviation Safety Inspector Credential Program (110A).

**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. [Click here to enter text.](#)

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

**Yes:**

**Date of Initial Authority to Operate (ATO):** 3/30/2020

**Anticipated Date of Updated ATO:** 3/30/2023

**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

SAS is a public-facing, privacy sensitive system that monitors and manages aviation certificate holders, applicants for certificates, continued operational safety (COS) surveillance activities, and hazardous materials reporting. SAS collects and maintains PII from members of the public, such as airmen, aircraft owners, certificated repair stations, training schools, airplane passengers, and flight instructors, and the FAA employee and contract workforce. A Privacy Impact Assessment is required for the collection of PII from members of the public acting within an individual capacity.

SORN coverage is required for the individual certificate holder and applicant records because a unique identifier, such as the CH/A's full name and/or credential number, retrieves records about these individuals. DOT/FAA 847, *Aviation Records on Individuals*, 75 FR 68849 (November 8, 2010) and DOT/FAA 801, *Aircraft Registration Records* 81 FR 54187 (August 15, 2016) provides SORN coverage for the CH/A records. SORN coverage for FAA network access records falls under DOT/ALL 13, *Internet/Intranet Activity and Access Records*, 67 FR 30757 (May 7, 2002).

Certain records in SAS come from individual aviators, business entities, and data exchanges with various FAA systems. The Program Office and FAA RIM have determined these records to be certification, risk assessment & planning, surveillance, and hazardous material reporting records covered under DAA-0237-2020-0034, Items 1-10. National Archives and Records Administration (NARA) has not finalized or approved this schedule. Additionally, the IT access records are covered under NARA, General Records Schedule 3.2, approved January 2017, *Information System Security Records*, Item 30 System Access Records are temporary records that may be destroyed when business use ceases.

The following Plan of Action and Milestones (POA&Ms) are recommending to remediate the following privacy risks:

- AR-2(b) Privacy Impact and Risk Assessment (PIA)
  - **Issue:** SAS collects PII from members of the public acting in an individual capacity as airmen, air passengers, business entities, and aircraft owners.
  - **Requirement:** A PIA is required for the SAS system.
- DM-2 Data Retention and Disposal/Retention/Scheduling/Secure Destruction



- **Issue:** Referenced records schedule in the last adjudicated SAS PTA did not match FAA declaration that records are about individuals nor did it match the stated purpose of the system. Local FSDOs do not retain or maintain SAS Forms in a consistent manner. Emailed or mailed forms are either scanned and uploaded into a KSN shared drive or paper copies are maintained in a locked file cabinet at the FSDO. The Program office and FAA RIM developed a new Records File Plan and Disposition Schedule (DAA-0237-2020-0034).
- **Requirement:** The SAS Program Office and FAA RIM developed a new Records File Plan and Disposition Schedule (DAA-0237-2020-0034). The SAS Records Retention Plan was approved by the DOT CPO and presented to NARA. The Records Retention Plan has yet to be approved by NARA.
- UL-1 Internal Use
  - **Issue:** There is not a PII Data Sharing Agreement in place with 110A, eFSAS, SPAS, and FAA DS.
  - **Requirement:** The SAS Program Office has been notified and is developing PII Data Sharing Agreements with 110A, eFSAS, and SPAS. An FAA enterprise-wide sharing agreement is needed for the data exchange with FAA DS.  
**Note: AIDS adjudicated PTA does not cite the data exchange with SAS and needs to be updated to account for the interconnection.**

**Note: Form 8130-3, Application for Repair Station Certificate and/or Rating, has an expired OMB control number, dated October 31, 2018. The Paper Reduction Act (PRA) office instructed that Form 8130-3 has a rolling month-to month expiration date until OMB provides final approval.**

The FAA is working to realign privacy risk management activities with the security authorization process. In support of this effort, the SAS privacy risk management assessment schedule is as follows:

- March 2020 – New ATO issued (no privacy risk assessment completed)
- June 2021- New PTA (this document)
- March 2022 – Privacy Continuous Monitoring (PCM) Assessment
- March 2023 – New PTA (when receiving new ATO)



## 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.

<b>Component Reviewer</b>	<b>Name</b>	<b>Review Date</b>
Business Owner	John Frye	5/21/2021
General Counsel	<i>Sarah Leavitt</i>	<i>7/7/2021</i>
Information System Security Manager (ISSM)	Click here to enter text.	
Privacy Officer	Essie Bell	6/28/2021
Records Officer	Richard Allen	4/7/2021

DOT CPO Adjudicated 07/15/2021



Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
AP-1	Authority to Collect	1.2 - Overview	X			<a href="#">14 CFR Part 121, 135, 141, 142, 145 and 147</a> <a href="#">49 CFR Parts 171-180, 49 CFR 175.31, 49 CFR 171.8</a>  <a href="#">DOT/FAA 847 - Aviation Records on Individuals</a> - 75 FR 68849 - November 9, 2010  <a href="#">DOT/FAA 801, Aircraft Registration Records, 81 FR 54187 - August 15, 2016</a>  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
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		<b>POA&amp;M</b> <b>Issue:</b> System meets eGov requirements for PIA because it collects and maintains information from members of the public. <b>Requirement:</b> submit PIA. <b>Timeline:</b> 180 days.
AR-3	Privacy Requirements for Contractors and Service Providers	3.3 - Contractor System			X	The system is owned and managed by Federal employees.
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.



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Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
AR-6	Privacy Reporting	Common Control	X			Addressed by DOT CPO.
AR-7	Privacy-Enhanced System Design and Development	2.5 - SSN Reduction			X	SAS collects Airman Certificate Numbers that, in some cases, may be the airman's Social Security Number (SSN). The Civil Aviation Registry discontinued the practice of using the SSN as a certificate number for original or new certificates in June of 2002. The Civil Aviation Registry web site provides instructions for requesting a new certificate that does not include the SSN.  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			FAA is responsible for accounting of disclosures consistent with SORNs - DOT/FAA 847, Aviation Records on Individuals, November 9, 2010 75 FR 68849 and DOT/FAA 801, Aircraft Registration Records, 81 FR 54187 - August 15, 2016.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
DI-1	Data Quality	1.2 - System Overview	X			Data quality is determined by OA information system owners.
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			Collection of PII commensurate with purpose of the system.



Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
DM-2	Data Retention and Disposal	2.11 - Records Disposition Schedule	X			Retention schedule in progress. <b>Note:</b> Any unscheduled records, and records with schedules pending NARA's approval, must be kept indefinitely until NARA has approved the applicable schedule. PIA must be updated to reflect schedules once approved.
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			<a href="#">DOT/FAA 847 - Aviation Records on Individuals</a> - 75 FR 68849 - November 9, 2010  DOT/FAA 801, Aircraft Registration Records, 81 FR 54187 (August 15, 2016)  Information is collected directly from individual to the extent practicable and authorized by law.  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
IP-2	Individual Access	2.8 – Exemption Rule	X			<a href="#">DOT/FAA 847, Aviation Records on Individuals</a> , November 9, 2010 75 FR 68849. Records in this system that relate to administrative actions and legal enforcement actions are exempted from certain access and disclosure requirements of the Privacy Act of 1974, pursuant to 5 United States Code 552a(k)(2). The exemption is published in <a href="#">49 CFR Part 10, Appendix</a> ("B. The following systems of records are exempt from subsections (c)(3) (Accounting of Certain Disclosures) and (d) (Access to Records) of 5 U.S.C. 552a, in accordance with 5 U.S.C. 552a(k)(2): 1. General Air Transportation





Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
						Records on Individuals, maintained by various offices in the Federal Aviation Administration (DOT/ FAA 847)."  Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.
IP-3	Redress	2.7 - SORN	X			Privacy Act processes in place to support redress requests for records maintained under DOT/FAA 847 and DOT/FAA 801. 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			SAS is a privacy sensitive, PII system. System categorization at Moderate Confidentiality is appropriate. The Adjudicated PTA or copy of controls/POA&Ms should be included in the risk acceptance package for the system.  The Adjudicated PTA should be uploaded into CSAM as evidence that the required privacy analysis for this system has been completed. POA&Ms from assessment must be entered in CSAM.  The PTA should be updated not later than the next security assessment cycle and must be approved by the DOT CPO prior to the authorization decision. Component policy or substantive changes to the system may require that the PTA be updated prior to the next security assessment cycle.
SE-2	Privacy Incident Response	Common Control	X			Addressed by DOT CPO.
TR-1	Privacy Notice	2.7 - SORN	X			DOT/ALL-13, DOT/FAA 847 and DOT/FAA 801 published on Departmental website; transportation.gov/privacy
TR-2	System of Records Notices and Privacy Act Statements	2.7 - SORN		X		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		<p><b>POA&amp;M</b>  <b>Issue:</b> SAS does not have PII Data Sharing Agreement with 110A, eFSAS, SPAS, DS. <b>Requirement:</b> Establish Data Sharing Agreement.  <b>Timeline:</b> 365 days or prior to next accreditation cycle.</p> <p>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13</p> <p><b>Note:</b> AIT EDC, AIDS, DMS, DS, EIS, AVS Registry, eFSAS, FAAMIS, FSIMS, IACRA, SPAS, WebOPSS, and AVS Registry require updated PTA/PCM as appropriate. POA&amp;Ms need to be entered into CSAM for each system under AR-2.</p>
UL-2	Information Sharing with Third Parties	2.10 - Internal and External Use	X			No PII exchanged.