



U.S. Department of Transportation

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

Privacy Threshold Assessment (PTA)

**Federal Aviation Administration (FAA)
Office of Human Resource Management
(AHR)**

**Automated Vacancy Information Access
Tool for Online Referral (AVIATOR)**





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 system¹ 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),² 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

¹ 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.

² 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. 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.

DOT CPO Adjudicated 11/04/2024



PROGRAM MANAGEMENT

SYSTEM name: Automated Vacancy Information Access Tool for Online Referral (AVIATOR)

Cyber Security Assessment and Management (CSAM) ID: 1307

SYSTEM MANAGER CONTACT Information:

Name: Alpha O. Woodson-Smith

Email: alpha.o.woodson-smith@faa.gov

Phone Number: 202-267-6051

Is this a NEW system?

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

Is there a PREVIOUSLY ADJUDICATED PTA for this system?

- Yes:
 - Date:** 9/17/2018
- No

1 SUMMARY INFORMATION

1.1 System TYPE

- Information Technology and/or Information System
 - Unique Investment Identifier (UII):** 021-752206662
 - Cyber Security Assessment and Management (CSAM) ID:** 1307
- 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)³**
 - 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) Automated Vacancy Information Access Tool for Online Referral (AVIATOR) Privacy Threshold Assessment (PTA) dated September 17, 2018. AVIATOR is a Web-based system current Department of Transportation (DOT)/FAA employees for the purpose of developing and responding to FAA job announcements. AVIATOR is also used by members of the public (individuals applying for a position at DOT/FAA), using the Office of Personnel Management's (OPM) USAJOBS website. AVIATOR provides support for the FAA hiring process with instant certification of qualified candidates for employment by facilitating on-line application submittal, screening and testing, scoring and notification, eligibility list placement, and generating a referral list for interviews. AVIATOR is located at the Enterprise Services Center Enterprise Data Center⁴ (ESC-EDC), 6500 South MacArthur Blvd. Oklahoma City, Oklahoma 73169.

Since the adjudication of the last PTA, the following changes have occurred:

- Effective January 2021, AVIATOR implemented an enhancement to remove the everyday collection, search, and display functionality of Social Security Numbers (SSN), including the last 4 of the SSN.
 - Records contained in AVIATOR prior to the SSN being removed are still contained in AVIATOR and must be maintained in the system until the current litigation hold on AVIATOR is removed.
 - Any SSNs which still exist in AVIATOR are encrypted, are only displayed as masked in records and reports, and are accessed by limited, authorized users.
- The data exchange with the Office of Security and Hazardous Materials Safety (ASH) Investigation Tracking System (ITS) used to contain SSNs; however, it has been updated to remove the SSN from the data exchange. The updated AVIATOR/ITS data exchange agreement is currently circulating for signatures.

³ See 44 USC 3501-3521; 5 CFR Part 1320

⁴ ESC-EDC (CSAM ID: 1349) has a DOT adjudicated PTA dated April 7, 2021.



Users and Access and Authentication:

There are two AVIATOR web interfaces that contain PII from the following users:

- Members of the public (individuals applying for a position at DOT/FAA)
- FAA employees and contractors (managing the system/program)

FAA employees and contractors that have a business need to access AVIATOR, receive approval from the Office of Human Resource Management (AHR). AHR determines the applicable user role with corresponding privilege/access. AHR then creates a user account within AVIATOR that includes the FAA employee and contractor user's first and last name, work email, work telephone (in certain circumstances) and their FAA Region of duty station (in certain circumstances). Once the user account is established, the user logs into AVIATOR, using their issued FAA PIV credentials, via Uniform Resource locator (URL) <https://aviator.faa.gov>. This URL is only available inside the FAA intranet to the FAA Office of Human Resource Management (AHR), Human Resource (HR) personnel, or their HR designees. Only the AVIATOR technical/software developer team log into the database management tool, Toad for Oracle using username and password because Toad does not support PIV.

Members of the public (applicants) first log into an external website, USAJOBS and are authenticated with a unique user ID and password through LOGIN.GOV. The login process is outside of the AVIATOR authorization boundary. Once authenticated, they create a profile (see details below), and then when clicking on a FAA job they are interested in, are automatically transferred and have access to AVIATOR via single sign-on (SSO) transfer from the USAJOBS interface. No other log in is needed to access AVIATOR from USAJOBS.

Business Process:

In order for an applicant to apply for a FAA job listed on USAJOBS, they must create a profile at USAJOBS via URL <https://www.usajobs.gov>. The applicant voluntarily enters the following information *into USAJOBS to create their profile*: applicant's full name, mailing address, telephone numbers (home, work, cell, and other), email address(es), citizenship status, military status, along with resume' data such as educational records, military records, and employment status and records. Additional information may be provided voluntarily by the applicant and is used for statistical purposes only: race, national origin, and disability information. They may also provide supplemental information beyond the information requested in the general profile. Additionally, applicants often provide non-requested personal information, such as salary information and/or place of birth.

All of the above applicant's data is used to create the USAJOBS profile, which is then sent to AVIATOR via a data exchange with USAJOBS, when the applicant applies for a FAA position. AVIATOR sends to USAJOBS the applicant status and job announcements. A signed Interconnection Security Agreement (ISA), dated June



1, 2021, is in place to cover the real-time data transfer of PII from USAJOBS to AVIATOR.

In a typical transaction, an applicant navigates to USAJOBS and reviews FAA job announcements. When the applicant clicks the link to apply to a FAA job announcement, USAJOBS redirects them to AVIATOR to apply. AVIATOR verifies the applicant via USAJOBS SSO and downloads the USAJOBS applicants' profile data (fully listed in section 2.2 below) into AVIATOR and any documents they want attached to the application. The applicant then completes the FAA job-specific questionnaire and submits it, along with their supplementary documents for hiring consideration within AVIATOR. Depending on the position being applied for, an applicant may be required to complete the OPM forms and/or the following FAA forms: FAA-3300-43; FAA-3300-43-1; FAA 2152, FAA-3300-473. The date of birth (DOB) is only specifically requested for certain positions and only when needed.

Reports and Audit Logs:

Reports containing AVIATOR data, which is either received from a data exchange with USAJOBS or provided to AVIATOR from the applicant, are created via a data exchange with the Tableau system (see specifics in section 2.10), which is used to aggregate reports to formulate business office visuals and analysis. The reports may include the following PII (full name, mailing address, telephone numbers (home, work, cell, other), email address(es), DOB (job series 2152 only), phone number(s), citizenship status, military status, medical qualification/disqualification (for jobs that require medical testing), drug testing (for jobs that require drug testing), employment status and records (optional), applicant ID (system generated record number)-

In addition, AVIATOR has audit logs and they contain the FAA employee/contractor user identification/username, event type, date and time of event. Internet protocol (IP) address, success or failure of access attempts and security actions taken by system administrators or security officers.

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.

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

Members of the Public: (applicants applying for a position at DOT/FAA):

- Full Name
- Mailing Address
- Telephone Numbers (Home, Work, Cell, Other)
- Email Address(es)
- DOB
- SSN⁵
- Phone Number(s)
- Citizenship Status
- Education Records (transcripts)
- Work History (resume, SF-5013)
- Military Status and Records (DD-21414)
- Medical Qualification/Disqualification (for jobs that require medical testing)
- Drug Testing (for jobs that require drug testing)
- Employment Status and Records (optional)
- Race, National Origin, and Disability Information (optional)
- Applicant ID/ unique customer ID (AVIATOR generated record number)

⁵ Records contained in AVIATOR prior to the SSN being removed are still contained in AVIATOR and must be maintained in the system until the current litigation hold on AVIATOR is removed. Any SSNs which still exist in AVIATOR are encrypted, are only displayed as masked in records and reports, and are accessed by limited, authorized users.



FAA Employees and contractors (that manage the system/program):

- Username
- Email
- Password
- IP Address

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



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.

- Yes:** The information in AVIATOR relates to members of the public who apply for a job with the FAA. It also includes information on FAA employees and contractors that manage the system, which is also included within audit logs. **No:**

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

- Yes:**

Authority:

Purpose:

- No:** 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: [OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records](#), 71 FR 35356 (June 19, 2006)

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

SORN: [OPM/GOVT-5 - Recruiting, Examining, and Placement Records](#), 71 FR 35351 (June 19, 2006)

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: Records in this system that relate to investigative materials that are used solely to determine the appropriateness of a request for approval of an objection to an eligible person's qualifications for Federal civilian employment or vouchers received during the processing of an application. The Privacy Act, at 5 U.S.C. 552a (k)(5), permits an agency to exempt such investigative material from certain provisions of the Act. The exemption is published at 49 CFR Part 10, Appendix.

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: [Automated Vacancy Information Access Tool for Online Referral \(AVIATOR\)](#) Privacy Impact Assessment (PIA), June 24, 2021.



No:

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 System to System Data Exchanges:

Tableau: Tableau receives non-PII data from AVIATOR using Oracle Transparent Network Substrate (TNS) to create aggregate reports to formulate business office visuals and analysis. No PII is exchanged. AVIATOR has a signed Memorandum of Understanding (MOU) AVIATOR Interface for Tableau Data Analytics and Presentation, dated June 1, 2020.

MyAccess: MyAccess sends the FAA employee and contractor username and personal identification number (PIN) to AVIATOR, which is PIV-enabled, for authentication and access. This exchange requires a PII sharing agreement. The program has been advised to develop the PII data sharing agreement/MOU needed for the data exchange. The FAA is planning to develop a universal Data Sharing Agreement for all systems in which MyAccess provides data to for access/authentication; however, this agreement is not yet in development.

Office of Aerospace Medicine (AAM) Covered Positions Decision Support System (CPDSS): AVIATOR sends the applicant full name, applicant ID (unique to Advanced Air Mobility/AAM), DOB, gender, city, state, zip, TOL (tentative offer letter) Authored Date (also known as CIL (clearance instruction letter) Authored Date), first contact with region, schedule date for exam, final medical determination (i.e., pending, cleared, or not cleared), date of final disposition, clearance expiration date, and actual date of drug test via Oracle TNS to CPDSS to oversee the onboarding process for specific ATCS positions. An Interface Control Document (ICD) dated July 22, 2021 covers the exchange.

Investigations Tracking System (ITS): AVIATOR sends the applicant AVIATOR applicant ID, full name, city, state, zip, DOB, gender, create date, e-QIP initiated date, number of days in e-QIP, number of days as an applicant with the agency, fingerprint submission date, cleared for hire date, waiver status, and effective date of waiver using SSL with ITS to complete the ATCS background investigation process. The recent AVIATOR enhancement removed the SSN collection, search, and display functionality. AVIATOR updated the agreement to remove the SSN from the data exchange with ASH ITS and the updated agreement is currently circulating for signatures.

**Internal Manual Data Exchanges:**

Air Traffic Skills Assessment (ATSA): The Aviation Careers Branch (AHF-C420) manually sends the applicant full name, AVIATOR applicant ID, home address, phone number(s), and email address to the external testing vendor for the ATSA, a computer-based, entry-level employment selection test battery designed to assess the critical knowledge, skills, abilities, and other personal characteristics required for the ATSC, prior to final date of hire. The ATSA is not integrated with AVIATOR. Applicants who meet the basic qualifications for the position must complete the ATSA at an external, non-FAA testing center. The Human Capital Programs Division (AHF-200) is the business owner of ATSA, and AHF-C420 provides operations management of the ATSA. A signed MOU, dated June 3, 2021, covers this data exchange.

External System to System Data Exchanges:

USAJOBS: USAJOBS sends, in a one-way data exchange, the member of the public (applicant) profile and demographic data including full name, mailing address, telephone numbers (home, work, cell, other), email address(es), DOB, phone number(s) as well as documents that contain employment history, work history, and other PII that an applicant deems pertinent to applying for consideration for a federal job vacancy) to AVIATOR via Secure Socket Layer (SSL) Hypertext Transfer Protocol (HTTP). AVIATOR sends to USAJOBS the applicant status and job announcements. A signed ISA, dated June 1, 2021, is in place to cover the real-time data transfer of PII from the USAJOBS site to the AVIATOR database.

No

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

Yes:

Schedule Identifier: [NARA GRS 3.2 Information Systems Security Records, September 2016.](#)

Schedule Summary: Item 030: Temporary. Destroy when business use ceases. DAA-GRS-2013-0006-0003.

Schedule Identifier: NARA [GRS 2.1: Employee Acquisition Records, Approved July 2017.](#)

Schedule Summary: Item 22: *All other related records.* Temporary. Destroy when position description is final, but longer retention is authorized if required for business use. (DAA-GRS-2014-0002-0003).

Item 50: *Job vacancy case files. Records of one time competitive and Senior Executive Service announcements/selections.* Temporary. Destroy 2 years after selection certificate is closed or final settlement of any associated litigation; whichever is later. (DAA-GRS-2017-0011-0001).



Item 51: *Job vacancy case files. Records of standing register competitive files for multiple positions filled over a period of time.* Temporary. Destroy 2 years after termination of register.(DAA-GRS-2017-0011-0002).

Item 60: *Job application packages.* Temporary. Destroy 1 year after date of submission. (DAA-GRS-2014-0002-0011).

NOTE: At this time, all AVIATOR records (except records covered by GRS 3.2) are subject to a continuing litigation hold. They cannot be destroyed until the litigation hold is removed.

In Progress

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:

Other:

- Effective January 2021, AVIATOR implemented an enhancement to remove the everyday collection, search, and display functionality of SSN, including the last 4 of the SSN. Records contained in AVIATOR prior to the SSN being removed are still contained in AVIATOR and must be maintained until the current litigation hold on AVIATOR is removed.



- The data exchange with ASH ITS used to contain SSNs; however, it has been updated to remove the SSN from the data exchange. The updated AVIATOR/ITS data exchange agreement is currently circulating for signatures.

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): 10/1/2019

Anticipated Date of Updated ATO: 10/1/2022

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: Bud Gordon

Email: bud.gordon@faa.gov

Phone Number: 202-409-2287

COMPONENT PRIVACY OFFICER Analysis

This is an update to the previously adjudicated AVIATOR PTA, dated September 17, 2018. AVIATOR is a web-based privacy sensitive system used by current FAA employees and contractors for developing FAA job announcements and to manage the program. AVIATOR is also used by *members of the public* “applicants” to respond and/or apply to the FAA job announcements. AVIATOR collects and and/or maintains limited PII on FAA employees and contractors that manage the program including username, email, password, and IP address. AVIATOR also collects and maintains PII on applicants applying for a position at the FAA through USAJOBS and includes name, address, telephone number, email address, DOB, phone number, citizenship status, education records, work history, military status and records, medical qualification/disqualification, drug testing, employment status and records, race, national origin, and disability information. The SSN has been removed from the system as described above; however, the SSNs which still exist in AVIATOR are encrypted, are only displayed as masked in records and reports, and are accessed by limited, authorized users.

AVIATOR retrieves information about individuals by a personal identifier; therefore, it is a System of Records under the Privacy Act. These records are protected under the Privacy Act and must be maintained in accordance with SORNs OPM/GOVT-5, OPM/GOVT-7, and DOT/ALL 13. Because AVIATOR contains members of the public information, a PIA is required and new, updated PIA was adjudicated and published on June 24, 2021.



Substantive records in AVIATOR are maintained according to the following GRSs: NARA GRS 2.1: *Employee Acquisition Records*, Approved July 2017, Item 22: *All other related records*; Item 50: *Job vacancy case files. Records of one time competitive and Senior Executive Service announcements/selections*; Item 51: *Job vacancy case files. Records of standing register competitive files for multiple positions filled over a period of time*; Item 60: *Job application packages*. Authentication, access, and audit log records in AVIATOR are maintained according to NARA GRS 3.2 *Information Systems Security Records*, September 2016, Item 030. NOTE: At this time, all AVIATOR records (except records covered by GRS 3.2) are subject to a continuing litigation hold. They cannot be destroyed until the litigation hold is removed.

The previous AVIATOR PTA had the following Plan of Actions and Milestones (POA&Ms):

- *AR-2(a) - Privacy Impact and Risk Assessment/Risk Assessment*
 - **Issue:** PTA is incomplete and therefore privacy risk determination and establishment of appropriate plan is not possible.
 - NOTE: With the adjudication of this PTA, this POA&M is resolved and should be removed.
- *AR-2(b) – Privacy Impact and Risk Assessment/PIA*
 - **Issue:** Current PIA for precursor system is incomplete and does not accurately reflect AVIATOR.
 - NOTE: The PIA was adjudicated and published on June 24, 2021. This POA&M is resolved and should be removed.
- *SE-1(a) – Inventory of Personally Identifiable Information/Inventory*
 - **Issue:** reference is made to generic SSN reduction plan, however no specific activities vis-à-vis this system for reducing SSN holdings is identified.
 - NOTE: AVIATOR has removed SSNs from the system, except where they remain per the litigation hold. This POA&M is resolved and should be removed.

The following privacy risks were identified:

- The MyAccess PTA has expired and is currently being updated.
- As of September 2020, AVIATOR ceased collection of SSNs and the unique customer ID will be used; however, records contained in AVIATOR prior to the SSN being removed are still contained in AVIATOR and must be maintained in the system until the current litigation hold on AVIATOR is removed. Any SSNs which still exist in AVIATOR are encrypted, are only displayed as masked in records and reports, and are accessed by limited, authorized users.

The following privacy risks should be addressed to finalize the AVIATOR Privacy Plan and be tracked as POA&M items:



- UL-2 Information Sharing with Third Parties
 - **Issue:** AVIATOR has a data exchange with MyAccess; however, there is no PII sharing agreement/ memorandum of understanding (MOU) covering the data exchange.
 - **Requirement:** The program has been advised to develop the PII data sharing agreement/MOU needed for the data exchanges.
 - **NOTE:** The FAA is planning to develop a universal Data Sharing Agreement for all systems in which MyAccess provides data to for access/authentication; however, this agreement is not yet been finalized.

- TR-2 System of Records, Notices and Privacy Act Statements (PAS)
 - **Issue:** AVIATOR FAA forms FAA-3300-43; FAA-3300-43-1; FAA 2152; FAA-3300-473 collect PII from members of the public, but do not have PAS or the PAS may need to be updated.
 - **Requirement:** The program has been advised to work with the FAA CPO to draft and place the approved PASs on all forms.

- AP-1 Authority to Collect
 - **Issue:** AVIATOR FAA forms FAA-3300-43; FAA-3300-43-1; FAA 2152; FAA-3300-473 are collecting PII from members of the public without Office of Management and Budget (OMB) authorization or approval or existing OMB authorization may be expired.
 - **Requirement:** The program has been advised to work with the Paperwork Reduction Act (PRA) Manager and ensure that the forms are compliance with PRA requirements. Additionally, the program should ensure that all FAA forms used by the program have been reviewed by the FAA Forms Manager.

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

- October 2021 – New PTA (this document)
- October 2022 – Privacy Continuous Monitoring (PCM) Assessment
- October 2023 – PCM Assessment
- October 2024 – New PTA (to align with expected new Authority to Operate (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.

Component Reviewer	Name	Review Date



Business Owner	Alpha O. Woodson-Smith	10/18/2021
General Counsel		
Information System Security Manager (ISSM)		
Privacy Officer	Bud Gordon	10/18/2021
Records Officer	Richard Allen	10/5/2021

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

DOT CPO Adjudicated 11/04/2021



U.S. Department of Transportation

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>POA&M Issue: AVIATOR FAA forms FAA-3300-43; FAA-3300-43-1; FAA 2152; FAA-3300-473 are collecting PII from members of the public without Office of Management and Budget (OMB) authorization or approval or existing OMB authorization may be expired. Requirement: Work with the Paperwork Reduction Act (PRA) Manager and ensure that the forms are compliance with PRA requirements. Additionally, the program should ensure that all FAA forms used by the program have been reviewed by the FAA Forms Manager. Timeline: 30 days. Note: This needs to be a priority as there should not be collection without OMB approval.</p> <p>Under Sections 1302, 3301, and 3304 of Title 5 of the U.S. Code, OPM is authorized to rate applicants for Federal jobs. Section 1104 of Title 5 enables OPM to authorize other Federal Agencies to rate applicants for Federal jobs. Additionally, the FAA has the authority to collect and maintain personally identifiable information within the AVIATOR system under 5 U.S.C. §§ 1302, 3109, 3301, 3302, 3304, 3305, 3307, 3309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, 5532, 5533; and 5 U.S.C. 7201</p> <p>SORN: OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35356 (June 19, 2006)</p> <p>SORN: OPM/GOVT-5 - Recruiting, Examining, and Placement Records, 71 FR 35351 (June 19, 2006)</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.



U.S. Department of Transportation

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
AR-1	Governance and Privacy Program	Common Control	X			Addressed by DOT CPO.
AR-2	Privacy Impact and Risk Assessment	Program Management	X			PIA published: https://www.transportation.gov/sites/dot.gov/files/2021-06/Privacy-FAA-AVIATOR-PIA%20-%20Final.pdf POA&M can be closed. Note: review PIA to ensure it accurate and up to date.
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.
AR-6	Privacy Reporting	Common Control	X			Addressed by DOT CPO.
AR-7	Privacy-Enhanced System Design and Development	2.5 - SSN Reduction	X			Records contained in AVIATOR prior to the SSN being removed are still contained in AVIATOR and must be maintained in the system until the current litigation hold on AVIATOR is removed. Any SSNs which still exist in AVIATOR are encrypted, are only displayed as masked in records and reports, and are accessed by limited, authorized users.
AR-8	Accounting of Disclosures	2.7 - SORN	X			FAA is responsible for accounting of disclosures consistent with: OPM/GOVT-5 - Recruiting, Examining, and Placement Records, 71 FR 35351 (June 19, 2006)



U.S. Department of Transportation

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
						OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35356 (June 19, 2006) Non-substantive records used for system management and security are covered by DOT/ALL-13.
DI-1	Data Quality	1.2 - System Overview	X			Data quality addressed in published PIA.
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.
DM-2	Data Retention and Disposal	2.11 - Records Disposition Schedule	X			Records Schedule established.
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			Information collected directly from individuals.
IP-2	Individual Access	2.8 – Exemption Rule	X			Individuals have right of access under Privacy Act to records covered by OPM/GOVT-5 - Recruiting, Examining, and Placement Records , 71 FR 35351 (June 19, 2006)



U.S. Department of Transportation

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
						<p>OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35356 (June 19, 2006)</p> <p>Non-substantive records used for system management and security are covered by DOT/ALL-13.</p>
IP-3	Redress	2.7 - SORN	X			<p>Privacy Act processes in place to support redress requests for records maintained under</p> <p>OPM/GOVT-5 - Recruiting, Examining, and Placement Records, 71 FR 35351 (June 19, 2006)</p> <p>OPM/GOVT-7 - Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35356 (June 19, 2006)</p> <p>Non-substantive records used for system management and security are covered by DOT/ALL-13.</p>
IP-4	Complaint Management	Common Control	X			Addressed by DOT CPO.
SE-1	Inventory of PII	Common Control	X			<p>AVIATOR is a privacy sensitive 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.</p> <p>The Adjudicated PTA should be uploaded into CSAM as evidence that the required privacy analysis for this system has been completed.</p> <p>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</p>



U.S. Department of Transportation

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	DOT CPO Notes
						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			All SORNs are published on the DOT Privacy Program website.
TR-2	System of Records Notices and Privacy Act Statements	2.7 - SORN		X		POA&M Issue: AVIATOR FAA forms FAA-3300-43; FAA-3300-43-1; FAA 2152; FAA-3300-473 collect PII from members of the public, but do not have PAS or the PAS may need to be updated. Requirement: work with the FAA CPO to draft and place the approved PASs on all forms. Timeline: 90 days.
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		POA&M Issue: AVIATOR does not have a Data Sharing Agreements with MyAccess, AJR, or NASR. Requirement: Develop sharing agreements. Timeline: 365 days or prior to next assessment cycle. 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			A signed ISA, dated June 1, 2021, is in place to cover the real-time data transfer of PII from the USAJOBS site to the AVIATOR database.



DOT CPO Adjudicated 11/04/2021