



U.S. Department of Transportation

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

**Privacy Continuous Monitoring (PCM)
v.1.0**

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

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



**Privacy Continuous Monitoring (PCM)
Annual Privacy Plan Review**

1. SYSTEM OVERVIEW

System Overview	
Component	FAA
System Name	Automated Vacancy Information Access Tool for Online Referral
System Acronym	AVIATOR
CSAM ID	1307
UII	021-752206662
Contractor Operated	No
ATO Expiration	12/17/2024
PTA [Year 1]	11/04/2021
PCM 1 [Year 2]	
PCM 2 [Year 3]	2/15/2023
OMB Control Number	N/A
PIA	06/24/2021 https://www.transportation.gov/sites/dot.gov/files/2021-06/Privacy-FAA-AVIATOR-PIA%20-%20Final.pdf
SORN(s)	OPM/GOVT-5, Recruiting, Examining, and Placement Records, 71 FR 35351 (June 19, 2006) OPM/GOVT-7, Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35356 (June 19, 2006) DOT/ALL 13, Internet/Intranet Activity and Access Records, 67 FR 30757 (May 7, 2002)

STOP: If the system does not have a DOT CPO adjudicated PTA or the DOT CPO PTA adjudication statement is older than 3 years the system is not eligible for PCM. Conduct an initial or updated PTA and upload to PWS. If the system is eligible for PCM, continue to Section 2.

2. DOT CPO-identified PLANS OF ACTION AND MILESTONES (POA&M): DOT must ensure that officials are aware of any unmitigated privacy risks.

- No. No privacy POA&Ms issued for the system
- Yes. Privacy POA&Ms issued for system. **(NOTE: DOT CPO review required for POA&Ms with status other than "closed".)**

<u>Control ID</u>	<u>POA&M ID</u>	<u>Mitigation or Status Description</u>	<u>Status</u>
AP-1	<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.</p> <p>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.</p> <p>Timeline: 30 days.</p> <p>Note:</p>	<p>These forms are not stored within AVIATOR and the program is not responsible for oversight. The forms are owned by AHF 200 and are not part of or associated with MyITSM. Furthermore, the forms are not collecting PII from member of the public and thus have no PRA requirements.</p>	CLOSED

	This needs to be a priority as there should not be collection without OMB approval.		
TR-2	<p>POA&M</p> <p>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.</p> <p>Requirement: work with the FAA CPO to draft and place the approved PASs on all forms.</p> <p>Timeline: 90 days.</p>	These forms are not stored within AVIATOR and the program is not responsible for oversight. The forms are owned by AHF 200 and are not part of or associated with MyITSM. Furthermore, the forms are not collecting PII from member of the public and thus do not need a Privacy Act Statement (PAS).	CLOSED
UL-1	<p>POA&M</p> <p>Issue: AVIATOR does not have a Data Sharing Agreements with MyAccess, AJR, or NASR.</p> <p>Requirement: Develop sharing agreements.</p> <p>Timeline: 365 days or prior to next assessment cycle.</p>	<p>MyAccess: The data exchange is covered in the Personally Identifiable Information (PII) Sharing Agreement Between AFN-AIT MyAccess and AVIATOR.</p> <p>AJR: There is no data exchange between AVIATOR and the AJR.</p> <p>NASR: There is no data exchange between AVIATOR and the NASR.</p>	CLOSED

3. Have there been any CHANGES to the system that negatively impact privacy? DOT must monitor changes to information systems and environments of

operation that create, collect, use, process, store, maintain, disseminate, disclose, or dispose of PII.

- No. No changes made to system.
- No. Changes do not negatively impact Privacy Risk.

Type	Description
Choose an item.	
Choose an item.	

- Yes. Changes **negatively** impact Privacy Risk. **(NOTE: DOT CPO Review Required)**

Type	Control ID	Description	Mitigation
Other			
Choose an item.			

4. Is the system operating per the PRIVACY PLAN? DOT must assess privacy plans to verify the continued effectiveness of all privacy controls selected and implemented at the agency across the agency risk management tiers to ensure continued compliance with applicable privacy requirements and manage privacy risks.

- Yes. System review validates that system operates per the privacy plan.
- No. **New privacy risks** were identified. **(NOTE: DOT CPO review required)**

Control ID	Description	Mitigation	Status	POA&M ID
			Choose an item.	
			Choose an item.	

5. Did the system operate without new INCIDENTS IMPACTING PRIVACY or new PRIVACY COMPLAINTS? DOT must ensure privacy risk mitigation strategies are implemented correctly, operating as intended, and sufficient to ensure compliance with applicable privacy requirements.

- Yes. No privacy incidents or complaints were reported for the system.
- No. Describe incident below. **(NOTE: DOT CPO review required)**

<u>Incident ID</u>	<u>Description</u>	<u>Mitigation</u>	<u>Status</u>
			Choose an item.
			Choose an item.

6. Component REVIEW: Component Privacy Officer is responsible for determining if there is new or unmitigated privacy risk for the system and action taken to address.

6.1. Privacy Officer Analysis

See below.

6.2. Reviewers¹

<u>Role</u>	<u>Name</u>	<u>Date</u>
Business Owner*	Alpha Woodson-Smith	5/5/2022
General Counsel		
Information System Security Officer (or equivalent)	None	None
Privacy Officer*	Dwoyne Lewis	5/25/2022
Records Officer	Richard Allen	5/4/2022

7. Send for DOT CPO review? New and unmitigated privacy risk must be reviewed by the DOT CPO.

- Yes
- Required
- Component Request <<Reason for DOT CPO review.>>
- No.

¹ "*" Indicates that review by these individuals is required of all Components. Review by others is at Component discretion. Components must document process and provide to privacy@dot.gov

If PCM is not referred to DOT CPO – watermark, digitally sign, and upload PCM to CSAM. If PCM requires DOT CPO review, upload to PWS. Systems requiring DOT CPO review may not receive authority to operate without a DOT CPO adjudicated PCM.

8. DOT CPO Review

8.1. Adjudication Statement

See below.

8.2. Reviewer

Role	Name	Date
DOT Privacy Office	Karyn Gorman	2/16/2023

DOT CPO Adjudicated 02/16/2023

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
AP-1	Authority to Collect	1.2 - Overview	X			<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>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>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p> <p>Previously Issued POA&M:</p> <p>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.</p> <p>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. This needs to be a priority as there should not be collection without OMB approval.</p> <p>Note: These forms are not stored within AVIATOR and the program is not responsible for oversight. The forms are</p>	<p>Concur</p> <p>Previously issued POA&M can be closed.</p>

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
						owned by AHF 200 and are not part of or associated with MyITSM. Furthermore, the forms are not collecting PII from member of the public and thus have no PRA requirements. The FAA CPO recommends closure of this POA&M.	
AP-2	Purpose Specification	1.2 - Overview	X			<p>Purpose defined. AVIATOR is used for developing and responding to FAA job announcements and provides 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.</p> <p>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p>	Concur
AR-1	Governance and Privacy Program	Common Control	X			Addressed by DOT CPO.	Concur
AR-2	Privacy Impact and Risk Assessment	Program Management	X			<p>A Privacy Impact Assessment (PIA) is required and was published on 06/24/2021.</p> <p>https://www.transportation.gov/sites/dot.gov/files/2021-06/Privacy-FAA-AVIATOR-PIA%20-%20Final.pdf</p>	<p>Concur</p> <p>Note: PIA to be reviewed annually to ensure it remains accurate and up to date.</p>
AR-3	Privacy Requirements for Contractors and Service Providers	3.3 - Contractor System			X	The system is owned and managed by Federal employees.	Concur
AR-4	Privacy Monitoring and Auditing	Common Control	X			Addressed by DOT CPO.	Concur
AR-5	Privacy Awareness and Training	Common Control	X			Addressed by DOT CPO.	Concur
AR-6	Privacy Reporting	Common Control	X			Addressed by DOT CPO.	Concur

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
AR-7	Privacy-Enhanced System Design and Development	2.5 - SSN Reduction	X			<p>SSNs are maintained in the system.</p> <p>AVIATOR is listed in the FAA SSN Reduction Elimination Plan V18.2 and has the authority to contain SSNs and will retain SSNs, either the whole number or truncated SSN. Both of these are encrypted in these system and SSN is contained in one master table and linked to other system tables using the system's Universally Unique Identifier (UUID).</p> <p>Note: 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.</p>	Concur
AR-8	Accounting of Disclosures	2.7 - SORN	X			<p>The FAA is responsible for accounting of disclosures consistent with the following SORNs:</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>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p>	Concur
DI-1	Data Quality	1.2 - System Overview	X			Data quality addressed in published PIA.	Concur
DI-2	Data Integrity and Data Integrity Board	3.4 - Security Risk Categorization			X	Activity does not constitute sharing covered by the CMA.	Concur

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
DM-1	Minimization of PII	2.2 – Information About Individuals	X			Collection of PII commensurate with purpose of the system. Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.	Concur
DM-2	Data Retention and Disposal	2.11 - Records Disposition Schedule	X			Records Schedule established.	Concur
DM-3	Minimization of PII Used in Testing, Training, and Research	2.2 – Information About Individuals			X	System not used for testing, training, research.	Concur
IP-1	Consent	2.7 - SORN	X			Information collected directly from individuals and consent handled in accordance with SORNs: OPM/GOVT-5, Recruiting, Examining, and Placement Records, 71 FR 35351 (June 19, 2006) OPM/GOVT-7, Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35356 (June 19, 2006) Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.	Concur
IP-2	Individual Access	2.8 – Exemption Rule	X			Individuals have right of access under the Privacy Act to records covered under SORNs: OPM/GOVT-5, Recruiting, Examining, and Placement Records, 71 FR 35351 (June 19, 2006) OPM/GOVT-7, Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35356 (June 19, 2006) SORN OPM/GOVT-5 claims the following exemption: Records in this system that relate to investigative materials that are used solely to determine the appropriateness of a	Concur

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
						<p>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.</p> <p>SORN OPM/GOVT-7 claims the following exceptions: This system contains testing and examination materials that are used solely to determine individual qualifications for appointment, career development, or promotion in the Federal service. The Privacy Act, at 5 U.S.C. 552a(k)(6), permits an agency to exempt all such testing and examination material and information from certain provisions of the Act, when the disclosure of the material would compromise the objectivity or fairness of the testing or examination process. OPM has claimed exemptions from the requirements of 5 U.S.C. 552a(d), which relates to access to and amendment of records.</p> <p>This system contains records required to be maintained and used solely for statistical purposes. The Privacy Act, at 5 U.S.C. 552a(k)(4), permits an agency to exempt all such statistical records from certain provisions of the Act, when the disclosure of the material would compromise the objectivity and fairness of these records. OPM has claimed exemptions from the requirements of 5 U.S.C. 552a(d), which relates to access to and amendment of records.</p> <p>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p>	

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
IP-3	Redress	2.7 - SORN	X			<p>Privacy Act processes in place to support redress requests for records maintained under SORNs:</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>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p>	Concur
IP-4	Complaint Management	Common Control	X			Addressed by DOT CPO.	Concur
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. Any POA&Ms resulting from assessment must be entered in CSAM.</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 changes to the system may require that the PTA be updated prior to the next security assessment cycle.</p>	Concur
SE-2	Privacy Incident Response	Common Control	X			Addressed by DOT CPO.	Concur
TR-1	Privacy Notice	2.7 - SORN	X			<p>OPM/GOVT-5, OPM/GOVT-7, and DOT/ALL-13, published on Departmental website; https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices/DOT-ALL</p>	Concur

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
TR-2	System of Records Notices and Privacy Act Statements	2.7 - SORN	X			<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>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p> <p>Previously Issued POA&M:</p> <p>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 Privacy Act Statement (PAS) or the PAS may need to be updated.</p> <p>Requirement: Work with the FAA CPO to draft and place the approved PASs on all forms. Timeline: 90 days.</p> <p>NOTE: These forms are not stored within AVIATOR and the program is not responsible for oversight. The forms are owned by AHF 200 and are not part of or associated with MyITSM. Furthermore, the forms are not collecting PII from member of the public and thus do not need a Privacy Act Statement (PAS). The FAA CPO recommends closure of this POA&M.</p>	Concur Previously issued POA&M can be closed.
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>Previously Issued POA&M:</p> <p>Issue: AVIATOR does not have a Data Sharing Agreements with MyAccess, AJR, or NASR.</p> <p>Requirement: Develop sharing agreements. Timeline: 365 days or prior to next assessment cycle.</p>	Concur with closure of PAO&Ms

Control #	Control Name	Primary PTA Question	Satisfied	Other than Satisfied	N/A	Component PO Assessment	DOT CPO Assessment
						<p>Note: MyAccess: The data exchange is covered in the Personally- Identifiable Information (PII) Sharing Agreement Between AFN-AIT MyAccess and AVIATOR. The FAA CPO recommends closure of this POA&M.</p> <p>AJR: There is no data exchange between AVIATOR and the AJR. The FAA CPO recommends closure of this POA&M. It was issued in error.</p> <p>NASR: There is no data exchange between AVIATOR and the NASR. The FAA CPO recommends closure of this POA&M. It was issued in error.</p> <p>Records created for the purposes of account creation, logging, auditing, etc. are covered by DOT/ALL-13.</p>	
UL-2	Information Sharing with Third Parties	2.10 - Internal and External Use	X			The only external sharing that is authorized is with USAJOBS. This exchange is covered by a signed ISA, which expires June 1, 2024. No other external sharing is authorized.	Concur

DOT CPO Adj

DOT CPO Adjudicated 02/16/2023