



Privacy Impact Assessment
for the
TSA Contact Center

DHS/TSA/PIA-047

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Contact Point

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Abstract

The Transportation Security Administration (TSA) Contact Center (TCC) is TSA's main portal for traveler questions and feedback. The management of TSA customer inquiries and complaints was consolidated under the TCC in 2007, and the TCC's collection of contact information from members of the public was covered by the Department of Homeland Security's (DHS) General Contact Lists Privacy Impact Assessment (PIA).¹ Because the TCC may also collect additional Personally Identifiable Information (PII), such as date of birth while facilitating and resolving customer complaints, TSA is publishing its own PIA for the TCC.

Overview

The TCC is an integral part of TSA's customer service program. The TCC receives and responds to large volumes of non-media public inquiries and complaints, and communicates accurate, consistent messages regarding general organizational information and the impact of transportation security policy on the traveling public. Travelers can submit a complaint or inquiry by calling or emailing the TCC or completing an online form at TSA's Contact page.² The TCC also maintains a self-service menu of frequently asked questions on the TCC Interactive Voice Response system and TSA's Customer Service website, which are available 24 hours a day/7 days a week. The TCC hears directly from the public about the challenges individuals face when traveling, and can assist in addressing travelers' inquiries by responding directly or directing the inquiry to the appropriate airport or office for action. Accordingly, the TCC collects contact information from members of the public, such as name, email address, and phone number, to respond to specific traveler inquiries. It is also possible that members of the public will submit additional PII as part of an inquiry, such as date of birth.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

Pursuant to the Aviation and Transportation Security Act, TSA is responsible for security in all modes of travel,³ including security screening of all commercial air passengers and baggage,⁴ and for carrying out such other duties relating to transportation security as it considers appropriate.⁵ TSA established the TCC to assist travelers and others with inquiries relating to TSA activities.

¹ See DHS/ALL/PIA-006 DHS General Contact Lists, available at <https://www.dhs.gov/privacy>.

² The contact forms are available at <https://www.tsa.gov/contact/contact-forms>.

³ 49 U.S.C. § 114(d).

⁴ 49 U.S.C. § 114(e).

⁵ 49 U.S.C. § 114(f)(15).

1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

Information collected through the TCC is covered by the DHS/TSA-006 Correspondence and Matters Tracking Records System of Records Notice.⁶

1.3 Has a system security plan been completed for the information system(s) supporting the project?

Yes. The system initially completed the Certification and Accreditation process and received its Authority To Operate in 2007. It completed the reaccreditation process most recently in August 2015.

1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

TCC records are maintained for one (1) year after resolution, or when no longer needed for business use, whichever is appropriate, in accordance with NARA General Records Schedule 6.5, Item 010/TSA Code 5000.15.1, *Public Customer Service Operations Records*.

1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

The OMB Control number for this collection is 1652-0030.

Section 2.0 Characterization of the Information

2.1 Identify the information the project collects, uses, disseminates, or maintains.

The TCC collects PII directly from individuals on a voluntary basis in order to communicate with travelers who submit an inquiry or complaint to TSA. The PII collected includes the traveler's or the traveler representative's⁷ name, phone number, and email address. In certain cases the TCC also collects general information about the individual's travel experience or reason for contacting the TCC. For example, when individuals request screening assistance from TSA before traveling, the TCC collects travel information including departure or return flight information (date, airport, airline, flight number, time), the type of assistance needed, and the names of any traveling companions. In limited circumstances, the TCC may also request date of

⁶ See DHS/TSA 006 Correspondence and Matters Tracking Records, 75 FR 18863 (Apr. 13, 2010).

⁷ The traveler's representative can be anyone authorized by the individual (e.g., child, parent, attorney, sibling, companion, or other advocate).

birth to verify the identity of a TSA Pre✓™⁸ applicant with the same or similar name as another TSA Pre✓™ applicant.

2.2 What are the sources of the information and how is the information collected for the project?

The TCC collects information directly from members of the traveling public or their representatives. Individuals contact the TCC by phone, email, or online submission form.

2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

No. The TCC does not use information from commercial sources or publicly available data.

2.4 Discuss how accuracy of the data is ensured.

Information submitted by the individual is assumed to be generally accurate, though the TCC may contact the individual or others for confirmation. For example, if the individual has contacted TSA regarding problems with a known traveler number, TSA may seek to confirm that the number provided was accurate. Similarly, if the individual has complained about his or her experience at a checkpoint, TSA may seek to verify the individual's version of events through airport closed circuit television footage, if available, or through incident reports.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: The TCC may collect more information than necessary from the traveling public.

Mitigation: This risk is mitigated because the TCC collects the minimum amount of information needed to address the matter raised by the individual. Input from the traveling public helps TSA make informed decisions concerning transportation security and improve security procedures by making them as efficient, effective, and user-friendly as possible. In an effort to further minimize the amount of data collected, the TCC maintains a self-service menu of frequently asked questions on the TCC Interactive Voice Response system and the Customer Service website, which are available 24 hours a day/7 days a week. For individuals who still require assistance, the TCC provides online submission forms that are tailored to the type of information the individual wants to relay to TSA: complaint; compliment; request for information; request for assistance; or

⁸ See DHS/TSA/PIA-41 TSA Pre✓™ Application Program (January 22, 2016), available at <https://www.dhs.gov/privacy>.

security issue. This information is collected on a voluntary basis directly from the individual or the individual's representative.

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

The TCC uses relevant information collected from passenger screening-related comments, issues, concerns, and complaints to respond and provide explanation or clarification of the matter to the individual. The TCC monitors the number and nature of complaints TSA receives to track trends and identify areas of concern that require special attention. TCC information is also analyzed as non-identifiable aggregate metrics about TSA customer-service performance and to help identify improvements needed in TSA's screening and customer service programs. In addition, the TCC may share communications by individuals making threats against transportation security for operational response. TCC may also share communications by individuals involved in security incidents when requested for purposes of investigation or other official purpose.

3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

No. The TCC does not use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or anomaly.

3.3 Are there other components with assigned roles and responsibilities within the system?

No other DHS components have assigned roles and responsibilities within the TCC.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: Information may be accessed or used for purposes other than responding to a passenger's inquiry or any security threat or other matter that is raised.

Mitigation: This risk is mitigated because all TCC records are protected from unauthorized access through appropriate administrative, physical, and technical safeguards. These safeguards include restricting access to authorized personnel who have a need-to-know, using locks, and password-protection identification features. Inquiries that raise a security threat, such as a bomb threat called into the TCC, would be shared internally with TSA operations personnel for evaluation and response, before possibly being shared externally with law enforcement, if warranted. Information collected by the TCC will be used only in accordance with the described

uses in this PIA and DHS/TSA-006 Correspondence and Matters Tracking Records SORN,⁹ by integrating administrative, technical, and physical security controls that place limitations on the collection of PII, and protect PII against unauthorized disclosure, use, modification, or destruction. System users receive privacy training, and system managers were involved in the drafting of this PIA.

Section 4.0 Notice

4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

The TCC provides notice via the Privacy Act Statement on TSA's Customer Service website at <https://www.tsa.gov/contact/customer-service> (see Appendix A, *Privacy Act Statement*). This PIA also provides notice.

4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Individuals contact the TCC on a voluntary basis and are not required to submit their contact information, however, the TCC may not be able to provide assistance without such information. Individuals may submit anonymous contacts, but that may limit TSA's ability to verify the matter.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: Individuals contacting the TCC may be unaware of the uses of their PII.

Mitigation: This risk is mitigated because the TCC provides notice via the Privacy Act Statement at the bottom of the TCC's online submission forms page at <https://www.tsa.gov/contact/contact-forms> (see Appendix A, *Privacy Act Statement*). This PIA also provides notice of the uses of information.

Section 5.0 Data Retention by the project

5.1 Explain how long and for what reason the information is retained.

The TCC retains the information no longer than useful for carrying out the inquiry response or complaint resolution purposes for which it was originally collected. All records are deleted or destroyed one (1) year after the inquiry or complaint was resolved, or when no longer needed for

⁹ See DHS/TSA 006 Correspondence and Matters Tracking Records, 75 FR 18863 (Apr. 13, 2010).

business use, whichever is appropriate, in accordance with NARA General Records Schedule 6.5, Item 010/TSA Code 5000.15.1, *Public Customer Service Operations Records*.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that TCC information may be maintained for a longer period than necessary.

Mitigation: This risk is mitigated because the TCC is required to maintain records for only one (1) year after resolution of the inquiry after which the records may be destroyed unless needed for a business use. This retention period is necessary to ensure that the TCC has adequate time to review, investigate, and respond to inquiries or complaints, as well as maintain a historical record of recent issues and their resolution. The TCC searches for and deletes on an annual basis records of inquiries that have been closed for at least one (1) year and are no longer needed for a business use in accordance with NARA General Records Schedule 6.5, Item 010/TSA Code 5000.15.1, *Public Customer Service Operations Records*.

Section 6.0 Information Sharing

6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

The TCC does not share information outside of DHS as part of the normal agency operations. If appropriate, any external sharing of TCC information would be conducted in accordance with the published routine uses under the DHS/TSA-006, Correspondence and Matters Tracking Records SORN.¹⁰ For example, in the event a bomb threat is called into the TCC, the threat would be shared internally with TSA operations personnel for evaluation and response, and possibly shared externally with law enforcement as warranted.

6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

The TCC does not share information outside of DHS as part of the normal agency operations. For the bomb threat example above, sharing would be appropriate internally under the Privacy Act, 5 U.S.C. § 552a(b)(1), and further external sharing is compatible under the DHS/TSA-006, Correspondence and Matters Tracking Records SORN. Routine use G states that information may be shared to an appropriate federal, state, tribal, local, international, or foreign agency, including law enforcement, or other appropriate authority charged with investigating or prosecuting a violation or enforcing or implementing a law, rule, regulation, or order, where a

¹⁰ See DHS/TSA 006 Correspondence and Matters Tracking Records, 75 FR 18863 (Apr. 13, 2010).

record, either on its face or in conjunction with other information, indicates a violation or potential violation of law, which includes criminal, civil, or regulatory violations and such disclosure is proper and consistent with the official duties of the person making the disclosure.

6.3 Does the project place limitations on re-dissemination?

No. This program does not place limitations on re-dissemination.

6.4 Describe how the project maintains a record of any disclosures outside of the Department.

Not applicable. Any Freedom of Information Act (FOIA) or Privacy Act disclosures to individuals who request their own information submitted to the TCC would be recorded by the TSA FOIA branch, which receives those requests.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information may be shared inappropriately.

Mitigation: The TCC mitigates the risk by only sharing TCC information in accordance with published routine uses under the DHS/TSA-006 Correspondence and Matters Tracking Records SORN.¹¹

Section 7.0 Redress

7.1 What are the procedures that allow individuals to access their information?

Individuals can request access to any inquiries or complaints by submitting a FOIA request to the FOIA Branch. Instructions for submitting a FOIA request to TSA are found at <https://www.tsa.gov/foia/requests>.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Individuals can contact the TCC by phone, email, or online form at <https://www.tsa.gov/contact/contact-forms> to correct any inquiries or complaints.

7.3 How does the project notify individuals about the procedures for correcting their information?

Individuals that contact the TCC are notified of the procedures for correcting their information through this PIA and the DHS/TSA-006, Correspondence and Matters Tracking

¹¹ See DHS/TSA 006 Correspondence and Matters Tracking Records, 75 FR 18863 (Apr. 13, 2010).

Records SORN.¹²

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: Individuals may not know how to amend their TCC records.

Mitigation: The risk is mitigated because individuals who wish to retract or amend complaints may contact the TCC to do so. In addition, individuals are notified of rights to redress through this PIA and the DHS/TSA-006 Correspondence and Matters Tracking Records SORN.¹³

Section 8.0 Auditing and Accountability

8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?

The TCC system permissions are based on user roles; only certain users can modify or delete a record. The system has access logs to ensure there is no unauthorized access and undergoes periodic auditing to ensure proper handling of all TCC information.

8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.

TSA employees and contractors are required to complete initial and refresher privacy training on the proper handling of PII on an annual basis.

8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?

The system administrator grants access to the TCC upon request of the program manager for personnel with a need-to-know in the performance of their official duties.

¹² See DHS/TSA 006 Correspondence and Matters Tracking Records, 75 FR 18863 (Apr. 13, 2010).

¹³ See DHS/TSA 006 Correspondence and Matters Tracking Records, 75 FR 18863 (Apr. 13, 2010).

8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?

The TCC does not have any information sharing agreements and does not allow other DHS Components or external agencies access to the TCC. Any potential sharing of information or new use of information by the TCC is reviewed by the TSA Privacy Officer.

Responsible Officials

Michelle Cartagena, Branch Manager
Customer Service Branch
TSA Office of Civil Rights & Liberties, Traveler Engagement and Ombudsman
Department of Homeland Security

Approval Signature

Original, signed copy on file with the DHS Privacy Office.

Philip S. Kaplan
Chief Privacy Officer
Department of Homeland Security

Appendix A, Privacy Act Statement

AUTHORITY: 49 USC § 114(f)(15).

PRINCIPAL PURPOSE(S): This information will be used to manage and respond to traveler inquiries or complaints.

ROUTINE USE(S): This information may be shared in accordance with the Privacy Act of 1974, 5 USC § 552(a), for routine uses identified in the TSA system of records, DHS/TSA-006 Correspondence and Matters Tracking Records, or as further described in the Privacy Impact Assessment DHS/TSA/PIA-046 TSA Contact Center, and subsequent updates, available at www.dhs.gov/privacy.

DISCLOSURE: Furnishing this information is voluntary; however, failure to provide the requested information may prevent TSA from being able to respond to a traveler's inquiry or complaint.