U.S. Department of Transportation

Federal Aviation Administration (FAA)
Office of Aviation Safety (AVS)

Privacy Impact Assessment
Airmen Certification System

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Executive Summary

Airmen certification is the process by which airmen, as defined by 49 United States Code (U.S.C.) 44703, submit applications to the Federal Aviation Administration (FAA) to apply for airmen certificates. In support of this process the FAA has developed two integrated systems to receive, manage, issue, and modify airmen certificates; the web-based Integrated Airman Certification and Rating Application (IACRA) and the Civil Aviation Registry (AVS Registry or Registry Modernization System (RMS)). IACRA is the front end system used by applicants to submit required documentation for certification and registration and serves as a temporary repository until the application information is accepted into the official airmen record maintained in the AVS Registry. The AVS Registry serves as the national repository for airmen certification records and provides the central services necessary for control of these records. The FAA is publishing this Privacy Impact Assessment (PIA) in accordance with the E-Government Act of 2002, to address the privacy risks associated the Airmen Certification business processes and the systems used to support them.

The Airmen Certification Branch which manages the AVS Registry, serves as the national repository for airmen certification records and provides the central services necessary for control of these records. Airmen certification and aircraft registration share a common technical architecture and the privacy risks for the system were previously addressed in the Privacy Impact Assessment (PIA) for the Airmen/Aircraft Registry Modernization System. To improve public understanding of the unique privacy risks and mitigations for each business process, is publishing separate PIAs for each business process. This PIA is limited Airmen Certification processes, systems and records.[1]

What is a Privacy Impact Assessment?

The Privacy Act of 1974 articulates concepts for how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining and disseminating

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[1] Aircraft Registry processes, systems, and records are now covered under a separate PIA *See* https://www.transportation.gov/individuals/privacy/privacy-impact-assessment-faa-office-aviation-safety-aircraft-registration

information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.[2]

Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we collect, store, retrieve, use and share. It is a comprehensive analysis of how the DOT's electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:

- *Making informed policy and system design or procurement decisions. These decisions must be based on an understanding of privacy risk, and of options available for mitigating that risk;*

- *Accountability for privacy issues;*

- *Analyzing both technical and legal compliance with applicable privacy law and regulations, as well as accepted privacy policy; and*

- *Providing documentation on the flow of personal information and information requirements within DOT systems.*

Upon reviewing the PIA, you should have a broad understanding of the risks and potential effects associated with the Department activities, processes, and systems described and approaches taken to mitigate any potential privacy risks.

Introduction & System Overview

The Federal Aviation Act of 1958 gives the Federal Aviation Administration (FAA) the responsibility to carry out safety programs to ensure the safest, most efficient aerospace system in the world. The FAA is responsible for:

- Regulating civil aviation to promote safety;

- Encouraging and developing civil aeronautics, including new aviation technology;

- Developing and operating a system of air traffic control and navigation for both civil and military aircraft;

- Developing and carrying out programs to control aircraft noise and other environmental effects of civil aviation; and

- Regulating U.S. commercial space transportation.

One of the ways the FAA supports this mission is through the certification of airmen[3], as required under 49 United States Code (U.S.C.) 44703. FAA issues certificates as evidence

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[2]Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo of M-03-22 dated September 26, 2003).

[3] Examples of airmen ratings include: airplane single engine land, airplane single engine sea, airplane multiengine land or airplane multiengine sea. Under 49 USC § 40102(a)(8), airman is defined as any individual: (1) in command, or as pilot, mechanic, or member of the crew, who navigates aircraft when under way; (2) who is directly in charge of inspecting, maintaining, overhauling, or repairing aircraft, aircraft engines, propellers, or

that an individual is authorized to exercise certain privileges. For example, a pilot is certified to fly aircraft at one or more named privilege levels and, at each privilege level, rated to fly aircraft of specific categories. Airmen must complete an FAA Airman Certificate and/or Rating Application by one of two means: using paper based forms[4] or electronically, using the IACRA in order to apply for a FAA airmen certificate.

IACRA

IACRA is a web-based application (iacra.faa.gov) that guides prospective airmen through the stages of certification. IACRA serves as a temporary repository of certification applications until they are accepted as part of the official airman record, maintained in the AVS Registry. IACRA allows applicants to manage existing applications, start a new application, or review the status of a previously submitted application. Regardless of the process used, all approved certifications will result in an AVS Registry record. The electronic process consists of four primary processes; Establishing User Account, Application, Review of Application, and Decision.

Establishing User Account[5]

In order to submit an electronic application for an airmen certification to the FAA, the applicant must first establish an account in the IACRA system which requires the creation of a user profile. To create a user profile the applicant provides their name, date of birth, sex, email address, certificate number and date of issue (if previously holds airmen certificate). The applicant then selects two security questions from a drop down list, enters answers, and creates their unique IACRA login; username and password. Once the account is established, IACRA displays confirmation that the applicant is registered, their user name, and the system generated FAA Tracking Number (FTN). The FTN is a unique and permanent number assigned to each registered user and can be used to track their certification. xxxxx. The FTN is not the same as the certificate number.

Once an IACRA account is established, the applicant must log into IACRA with the user name and password selected by the applicant during the registration process to initiate the application process.

1. *Application*

Once logged into IACRA the applicant selects the application and certification type for which they are applying.[6] IACRA auto fills the application with the personal information

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appliances (except to the extent the FAA Administrator may provide otherwise for individuals employed outside the United States); or (3) who serves as an aircraft dispatcher or air traffic control tower operator.

[4] Use of IACRA is not mandatory and individuals may choose to use the paper-based process for submitting their certification applications. A discussion of the paper-based process is found in Appendix A.

[5] IACRA uses roles to determine levels of access granted to the user. Users include but are not limited to Applicants, Recommending Instructor, Designated Examiner, Aviation Safety Inspector/Aviation Safety Technician and School Examiner.

[6] See Appendix B for a full list of certification applications available in IACRA.

provided during the registration process. The applicant reviews the accuracy of their personal information and makes any necessary changes (i.e. name change, address, or color of hair).

Depending upon the certification sought, the applicant may be requested to provide some or all of the following information;

Biographic

- Full Name
- Date of Birth (DOB)

Unique Identifier

- Social Security number (SSN) (optional)
- Driver License Number, expiration date and state of issuance
- Passport number, expiration date and country of issuance
- Military identification number and expiration date.
- Student identification number and expiration date
- Other government issued identification number, expiration date and type of government-issued document.

Citizenship

- Place of Birth (POB)
- Citizenship

Contact

- Residential Address
- Mailing Address, if not the same as residential address
- Home Phone Number
- Email Address

Biometric Description

- Hair color
- Eye color
- Height
- Weight
- Gender

Previously Issued Airmen certificate Number

- Airman Certificate Number (This may be the Airman's SSN)[7]
- Date of issuance

Aviation Experience

- Air Carrier Name (when using an Air Carrier Course for experience)
- Foreign Pilot's License number, ratings, limitations (when used as the basis to obtain an FAA certificate)

Certification Application

- FAA Tracking Number (FTN)
- Designated Examiner Name, Designation Number and certificate number
- Inspector Name, certificate number (if applicable) and FAA Flight Standards District Office (FSDO)/Office code
- Name, Location of Training Center and School Certification number (when provided for experience/qualification)
- Medical Certificate information (date of issue, certificate class, Aviation Medical Examiner's Name)
- English Proficiency (Y/N)
- Certificate or rating for which tested; approved or disapproved
- Recommending Instructors Name and certificate number (if applicable)

The applicant then identifies the type of certificate held, date of issuance, and pilot type, and reviews the application prior to submission. Additionally, for each application type, the applicant must submit the required documentation in accordance with 14 CFR 61.

2. **Review of Application**

After the application is started in IACRA, it may require signature by a recommending instructor. The recommending instructor logs into IACRA and verifies that the applicant meets the requested certification's regulatory eligibility requirements for the rating sought and that the application has been completed properly. [8]

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[7] The Airmen Certification Branch discontinued the practice of using the SSN as a certificate number for original or new certificates in June of 2002. For their convenience, some airmen have kept their SSN as their certificate number. The Civil Aviation Registry web site provides instructions for requesting a new certificate that does not include the SSN. Airmen 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, AFB-720. Because the AVS Registry serves as a historical record of airmen certification, the system may contain documents that include the SSNs of individuals who have since changed their certificate number to a non-SSN.

[8] Any person authorized to instruct applicants and consider them ready for the practical test.

The application is submitted to the certifying official to schedule a practical test with the applicant. Depending on the test to be administered, the certifying official could be an authorized designated[9] examiner, airmen certification representative, training center evaluator, aviation safety inspector or aviation safety technician. Prior to the practical test, the certifying official will verify applicant eligibility and positively identify the applicant in accordance with the Drug Enforcement Assistance Act of 1988. Identification of the applicant is accomplished by viewing the applicant's driver license, passport, military identification, student identification, or other government issued identification, as provided in 14 CFR 61.3(a)(2). Once verified, the certifying official enters the form of identification verified, the identification number, expiration date, and state of issuance (if applicable) into IACRA.

Once the identification information has been entered, the applicant logs into IACRA and electronically signs the application before taking the practical test. The practical test is not conducted via IACRA but another FAA system.[10] The test results are provided electronically to IACRA via Structure Query Language (SQL) Server. Once the practical test has been completed, the certifying officer will log back in and enter the results of the practical test, review the application for errors, and then electronically sign the application.

Once the certifying official signs the application, IACRA will generate a Notice of Disapproval, a Letter of Discontinuance, or a confirmation that the application has been approved.[11] The application is transmitted through IACRA as a Tagged Image File Format (TIFF) via secure file transfer protocol (FTP) to the Comprehensive Airman Information System (CAIS)[12] which is a subsystem of the AVS Registry for final processing.

3. Decision

The Airmen Certification Branch, AFB-720, reviews all airman certificate applications and supporting documents[13] and issues certificates to airmen. Once the airman's application is received for final processing, the FAA consolidates all biographic and certificate information

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[9]A designee is authorized to perform the duty as a certifying official. They are not employed or otherwise compensated by the FAA for their work.

[10] Practical Test are delivered by the Airmen Testing Standards (ATS). ATS is scheduled to be replaced by Assessment Technology and License Administration System Aviation (ATLAS Aviation).

[11] A Temporary Airman Certificate is considered an approved application.

[12] CAIS is the repository that maintains all airmen and certification records. CAIS data includes information derived from airman certification applications, temporary airman certificates, knowledge test results, notices of disapprovals, disapproved applications, enforcement actions, correspondence, requests for replacement certificates, changes to the record, letters of verification of authenticity, and other documents to support the issuance of airman certificates.

[13] The term supporting documents refers to all documents that are included with the FAA application, i.e. knowledge test, temporary certificate, graduation certificates, completion certificates, certified statements, college transcripts, discontinuances, and any attachment that the airman deems important for inclusion into their airman record. These documents are provided by the applicant or by the certifying official, whichever is applicable for the rating sought.

into a single file. The FAA places the file on a secure portal. Information in the portal is retrieved by the Transportation Security Administration (TSA) to perform security vetting. The FAA provides TSA the airman's SSN (if provided by the airman)[14], last, first, and middle name, name suffix, previous name, date of birth, citizenship full address, certificate information (active, type, level and number), and FTN. The TSA then conducts security vetting of the applicant against the National Terrorism Screening Database (NTSDB) to ensure the individual does not pose, or is not suspected of posing, a threat to transportation or national security. The TSA returns the airman's last, first, middle name, date of birth, SSN if provided, FTN and results of the security vetting to the FAA. The process for security vetting is outlined is the TSA Airmen Certificate Vetting Privacy Impact Assessment (PIA)[15].

Fair Information Practice Principles (FIPPs) Analysis

The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Privacy Act, are mirrored in the laws of many U.S. states, as well as many foreign nations and international organizations. The FIPPs provide a framework that will support DOT efforts to appropriately identify and mitigate privacy risk. The FIPPs-based analysis conducted by DOT is predicated on the privacy control families articulated in the Federal Enterprise Architecture Security and Privacy Profile (FEA-SPP) v3[16], sponsored by the National Institute of Standards and Technology (NIST), the Office of Management and Budget (OMB), and the Federal Chief Information Officers Council and the Privacy Controls articulated in Appendix J of the NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations[17].

Transparency

Sections 522a(e)(3) and (e)(4) of the Privacy Act and Section 208 of the E-Government Act require public notice of an organization's information practices and the privacy impact of government programs and activities. Accordingly, DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their personally identifiable information (PII). Additionally, the Department should not maintain any system of records the existence of which is not known to the public.

The FAA's public facing website includes frequently-asked questions that speaks to the requirements for an airman certification.[18] The records in the IACRA and the AVS Registry are retrieved by the individual's name and other personal identifiers, and are subject to the provisions of the Privacy Act. FAA maintains these records in accordance with the

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[14] TSA does not mandate the use of the SSN, but the SSN will be used to prevent misidentifying persons who may have the same name or other identifiers on the watch lists or other lists if provided.

[15] The PIA is located at https://www.dhs.gov/publication/dhstsapia-011-airmen-certificate-vetting-program.

[16] http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf

[17] http://csrc.nist.gov/publications/drafts/800-53-Appdendix-J/IPDraft_800-53-privacy-appendix-J.pdf

[18] *See -* http://www.faa.gov/licenses_certificates/airmen_certification/

Department's published System of Records Notice (SORN), DOT/FAA 847, Aviation Records on Individuals, November 9, 2010, 75 FR 68849. Also, as required by the Privacy Act of 1974, a Privacy Act Statement informing applicants of the Department's privacy practices regarding collection, use, sharing, safeguarding, maintenance, and disposal of PII is included on all applicable paper and web-based forms[19]. Information on the Department's privacy program may be found at www.transportation.gov/privacy.

The publication of this PIA demonstrates DOT's commitment to provide appropriate transparency into the IACRA and AVS Registry.

Individual Participation and Redress

DOT should provide a reasonable opportunity and capability for individuals to make informed decisions about the collection, use, and disclosure of their PII. As required by the Privacy Act, individuals should be active participants in the decision making process regarding the collection and use of their PII and be provided reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.

Airmen submit their applications to the FAA to apply for airmen certificates. The FAA collects the information directly from airmen through the use of IACRA or paper application. Once received by the FAA, these documents are converted into electronic documents and maintained in CAIS, a subsystem of the AVS Registry.

Certification applications input into IACRA but not yet "submitted" may be edited by applicants. Once an application is officially submitted to FAA, and is received by AVS Registry, airmen may update their information through the Airmen Online Services. The Airmen Online Services allows airmen to update their addresses, order replacement certificates, remove SSNs as a certificate number, request temporary authority to exercise certificate privileges, request verification of certificate privileges, and get notices of FAA safety meetings via email. Airmen must create an account using an online form to apply for access to Airmen Certification Online Services. To establish an account, airmen must submit their name, date of birth, email address and certificate number.

Under the provisions of the Privacy Act, individuals may request searches to determine if any records are maintained in the system that may pertain to them. Individuals wishing to know if their records appear in a system may inquire in person or in writing to:

> Federal Aviation Administration
> Privacy Office
> 800 Independence Ave. SW
> Washington, DC 20591

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[19] The complete list of airmen registration forms may be found on the FAA's public website - http://www.faa.gov/forms/

Included in the request must be the following:

- Name
- Mailing address
- Phone number and/or email address
- A description of the records sought, and if possible, the location of the records

Individuals wanting to contest information about themselves that is contained in IACRA and AVS Registry should make their requests in writing, detailing the reasons for why the records should be corrected to the following address:

Federal Aviation Administration
Privacy Office
800 Independence Ave. SW
Washington, DC 20591

Purpose Specification

DOT should (i) identify the legal bases that authorize a particular PII collection, activity, or technology that impacts privacy; and (ii) specify the purpose(s) for which its collects, uses, maintains, or disseminates PII.

The FAA is required to collect and maintain information about airmen in order to provide airman certification under 49 U.S.C. 44703. The Aviation Registry subsystem CAIS is the official repository of aviation records on individuals. This repository is required to be maintained in connection with the FAA's oversight and enforcement of compliance with safety regulations and statutes, and orders issued under 49 U.S.C. 44703. The statute also authorizes the FAA to issue airman certificates to individuals after it has been determined that the individual is qualified for, and is physically able to perform the duties related to, the position authorized by the certificate. These records may also be required to be made available upon request, to other agencies, certain members of the public (*e.g.,* Aviation Medical Examiners), or the public at large.

Consistent with 49 U.S.C. 44703, the FAA makes the "Airmen Certification Registry" including airmen's name, address, and rating publicly available. Contact information provided during the application process is also used to inform airmen of meetings and seminars conducted by the FAA regarding aviation safety.

Data Minimization & Retention

DOT should collect, use, and retain only PII that is relevant and necessary for the specified purpose for which it was originally collected. DOT should retain PII for only as long as necessary to fulfill the specified purpose(s) and in accordance with a National Archives and Records Administration (NARA)-approved record disposition schedule.

The FAA manages risk by minimizing the amount of PII collected by the AVS Registry through the creation of the standardized forms. These forms were created to provide a

standardized way for airmen to submit information that is otherwise submitted in an ad hoc manner to the FAA. Using these forms limit the chance that an airman will submit unnecessary or irrelevant PII to the FAA.

IACRA acts as a temporary repository for airman registration and application data. The paper forms are maintained until it has been confirmed that the digital image meets quality standards, and in accordance with retention, policies are destroyed upon completion of quality review. Upon transfer to the AVS Registry, IACRA files are deleted or destroyed when related applications are superseded or obsolete in accordance with National Archives and Records Administration (NARA) Schedule.

The digital images of airman certification are the official legal records. The FAA maintains Airman certification files in accordance with 36 CFR 1234.30 and 1234.32. Once accepted into the AVS Registry, they are cut off annually and destroyed 60 years after the cutoff or when no longer needed to conduct agency business, whichever is later. [20]

Use Limitation

DOT shall limit the scope of its PII use to ensure that the Department does not use PII in any manner that is not specified in notices, incompatible with the specified purposes for which the information was collected, or for any purpose not otherwise permitted by law.

IACRA is used by applicants to submit required documentation for certification. Applicants provide their name, date of birth, sex, email address, certificate number and date of issue (if previously holds airmen certificate) to create an IACRA user account. Once the account is created, as part of the application process, the FAA collects PII discussed in the overview for the purpose of determining applicant's eligibility for a certificate and/or rating. The application is transmitted to CAIS, a subsystem of the AVS Registry as a TIFF via secure file transfer protocol FTP. AFB-720 uses the information in the airman certificate applications and supporting documents for final processing and to issue certificates to airmen.

The FAA share with TSA the airman's SSN (if provided by the airman), last, first, and middle name, name suffix, previous name, date of birth, citizenship full address, certificate information and FTN. TSA uses the information to perform security vetting. TSA returns the airman's last, first, middle name, date of birth, SSN if provided, FTN and results of the security vetting to the FAA. The FAA and TSA has a Memorandum of Agreement in place which addresses the sharing of applicant's information and use of the information.

ATS which is to be replaced by ATLAS Aviation provides test results daily to the IACRA via SQL Server. The information provided includes the applicant's exam ID, exam date,

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[20] There is a discrepancy in the retention and disposal of DOT/FAA 847 Aviation Records on Individuals and the approved NARA schedule for AVS Registry. The FAA is working to resolve these discrepancies. The discrepancies will be addressed in upcoming revision to DOT/FAA 847, records retention schedule, and this PIA as appropriate.

grade, exam type code, score, exam take, full name, FTN, exam title, site ID, expiration date, and missed subject areas.

Certain information about certified airmen such as the name and date of birth, maintained by CAIS is accessible to the public via the Airmen Inquiry website.[21]

The DOT/FAA 847, Aviation Records on Individuals, includes the following specific routine uses permitting the sharing of Privacy Act records:

- Provide basic airmen certification and qualification information to the public upon request; examples of basic information include: The type of certificates and ratings held; The date, class, and restrictions of the latest physical airman's certificate number; The status of the airman's certificate *(i.e.,* whether it is current or has been amended, modified, suspended or revoked for any reason); The airman's home address, unless requested by the airman to be withheld from public disclosure per 49 U.S.C. 44703(c); Information relating to an individual's physical status or condition used to determine statistically the validity of FAA medical standards; and Information relating to an individual's eligibility for medical certification, requests for exemption from medical requirements, and requests for review of certificate denials.

- Use contact information to inform airmen of meetings and seminars conducted by the FAA regarding aviation safety.

- Disclose information to the National Transportation Safety Board (NTSB) in connection with its investigation responsibilities.

- Provide information about airmen to Federal, State, local and Tribal law enforcement agencies when engaged in an official investigation in which an airman is involved.

- Provide information about enforcement actions or orders issued thereunder to government agencies, the aviation industry, and the public upon request.

- Make records of delinquent civil penalties owed to the FAA available to the U.S. Department of the Treasury (Treasury) and the U.S. Department of Justice (DOJ) for collection pursuant to 31 U.S.C. 3711(g).

- Make records of effective orders against the certificates of airmen available to their employers if the airmen use the affected certificates to perform job responsibilities for those employers.

- Make airmen records available to users of FAA's Safety Performance Analysis System (SPAS), including the Department of Defense Commercial Airlift Division's Air Carrier Analysis Support System (ACAS) for its use in identifying safety hazards and risk areas, targeting inspection efforts for certificate holders of greatest risk, and monitoring the effectiveness of targeted oversight actions.

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[21] See https://amsrvs.registry.faa.gov/airmeninquiry/

- Provide information about airmen through the airmen registry certification system to the Department of Health and Human Services, Office of Child Support Enforcement, and the Federal Parent Locator Service that locates noncustodial parents who owe child support. Records in this system are used to identify airmen to the child support agencies nationwide in enforcing child support obligations, establishing paternities, establishing and modifying support orders and location of obligors. Records named within the section on Categories of Records will be retrieved using Connect: Direct through the Social Security Administration's secure environment.

- Make personally identifiable information about airmen available to other Federal agencies for the purpose of verifying the accuracy and completeness of medical information provided to FAA in connection with applications for airmen medical certification.

- Make records of past airman medical certification history data available to Aviation Medical Examiners (AMEs) on a routine basis so that AMEs may render the best medical certification decision.

- Provide information about airmen to Federal, State, local, and Tribal law enforcement, national security or homeland security agencies whenever such agencies are engaged in the performance of threat assessments affecting the safety of transportation or national security.

The Department has also published 14 additional routine uses applicable to all DOT Privacy Act systems of records, including this system. The routine uses are published in the Federal Register at 75 FR 82132, December 29, 2010 and 77 FR 42796, Jul 20, 2012, under "Prefatory Statement of General Routine Uses" available at http://www.transportation.gove/privacy/privacynotices).

Data Quality and Integrity

In accordance with Section 552a(e)(2) of the Privacy Act of 1974, DOT should ensure that any PII collected and maintained by the organization is accurate, relevant, timely, and complete for the purpose for which it is to be used, as specified in the Department's public notice(s).

IACRA collects information directly from the individual during the certification process. IACRA uses an auto fill feature that populates the application with information provided by the applicant during the certification process. As information is entered into IACRA, that same data will appear on the results document, such as the temporary certificate. Applicants are strongly encouraged to completely review their application prior to submission. IACRA displays a copy of the application that the applicant can review to ensure the correct information has been entered on the application. If corrections need to be made, the application can make the appropriate changes prior to submitting the application.

Once the data is submitted via IACRA, the AVS Registry performs extensive edit checks on all data that is entered into the system. It maintains images of the documents it received from airmen as the legal record; database entries are checked against these images and the images

can be referred to at any time as an authoritative source. The airman information is inspected by Quality Control and Quality Assurance processes to ensure accuracy.

Airman records may also be checked against existing records or supporting legal documents submitted during an application process. The application process includes positive identification of the applicant. Airmen have access to their own records and may update or correct certain information; other information may be updated or corrected with supporting legal documentation in accordance with FAA policy and 14CFR Part 61, 63 and 65, 121 or 135, as applicable.

Security

DOT shall implement administrative, technical, and physical measures to protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.

The FAA protects PII with reasonable security safeguards against loss, unauthorized access, destruction, usage, modification, and disclosure. These safeguards incorporate standards and practices required for federal information systems under the Federal Information Security Management Act (FISMA) and are detailed in Federal Information Processing Standards (FIPS) Publication 200, Minimum Security Requirements for Federal Information and Information Systems, dated March 2006, and National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations, dated April 2013.

IACRA was issued a three-year authority to operate (ATO) on September 30, 2016. Users are required to register for access to the system by entering their user name and password to access. IACRA uses roles to determine the level of access a person has to the system and validates an individual against their FAA credentials. In addition, the AVS Registry was issued a three-year ATO on June 19, 2019. Access to the system is limited to those with appropriate security credentials, authorized purpose and need-to-know.

Accountability and Auditing

DOT shall implement effective governance controls, monitoring controls, risk management, and assessment controls to demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals.

The FAA's Office of the Chief Information Officer, Office of Information Systems Security, Privacy Division is responsible for governance and administration of FAA Order 1370.121, FAA Information Security and Privacy Program and Policy. FAA Order 1370.121 implements the various privacy laws based on the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-3470), the Federal Information Security Management Act (FISMA), Department of Transportation (DOT) privacy regulations, Office

of Management and Budget (OMB) mandates, and other applicable DOT and FAA information and information technology management procedures and guidance.

In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to the protection, retention, and destruction of PII. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing, and security privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, as well as FAA Privacy Rules of Behavior. The DOT Privacy Office and the FAA Security Compliance Division (AIS-200) will conduct periodic privacy compliance reviews of IACRA and AVS Registry with the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

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Appendix A

Airmen Certificate applicants are required to complete the appropriate paper application to the rating sought. The following example for a Part 61 applicant applying for a private pilot certificate on FAA Form 8710-1, *Airman Certificate and/or Rating Application* with a designated examiner acting as the Certifying Official:

The applicant reviews the Privacy Act statement and then completes the application by entering the applicable information discussed previously in the Application section of this PIA. The FAA Form 8710-1 application includes five sections:

- Section I contains applicant information, certificate information and other regulatory questions that demonstrate eligibility.
- Section II is certification or rating the applicant applied for.
- Section III provides an area for the pilot to record their pilot time.
- Section IV asks about previous disapproved applications.
- Section V is the applicant's signature and date signed.

Once the form is complete, the applicant takes the FAA Form 8710-1 and a copy of their knowledge test if required to a recommending instructor. The recommending instructor will review the paperwork and will indicate a recommendation for the applicant to take the test on top of the back of the FAA Form 8710-1 in an area called "Instructor Action."

The applicant will then schedule a flight test with a designated pilot examiner. Before the flight test, the applicant will give the FAA Form 8710-1 and supplemental application documentation (such as a knowledge test and medical certificate) to the designated pilot examiner for review. The designated pilot examiner will review the application and check for a instructor recommendation prior to administering the test.

After the flight test has been completed, the designated pilot examiner will complete the "Designated examiner or Airmen Certification Representative Report" located on the back of the application form where they will indicate specifics of the test and the type of certificate to be issued.

The designated pilot examiner will issue a temporary airman certificate to the applicant and then submit the entire application package to their local Flight Standard Office (FSDO) for review.

An FSDO inspector or technician will review the package for accuracy and either route the package back to the designated examiner for correction or sign the last line of the "Aviation Safety Inspector or Technician Report" prior to sending the application package to the Registry for processing.

Once the application arrives at the Registry, the application is digitized and indexed. A Legal Instruments Examiner from the Airmen Certification Branch will review the application package and determine if all requirements have been met. The Legal Instruments Examiner will scan and upload the information into CAIS or return the application package back to the FSDO for correction if necessary. Application packages that are accepted by Legal Instruments Examiners will be reviewed by quality control procedures prior to being transferred to the printing company for creation and distribution of the airman certificate.

Appendix B

Forms available in IACRA include the following:

- FAA Form 8400-3, *Application for an Airman Certificate and/or Rating (Aircraft Dispatcher),* OMB No. 2120-0007

- FAA Form 8610-1, *Mechanic's Application for Inspection Authorization,* OMB No. 2120-0022

- FAA Form 8610-2, *Airman Certificate and/or Rating Application (Repairman),* OMB No. 2120-0022

- FAA Form 8710-1, *Airman Certificate and/or Rating Application,* OMB No. 2120-0021

- FAA Form 8710-11, *Airman Certificate and/or Rating Application – Sport Pilot* OMB No, 2120-0690

- FAA Form 8710-13, *Remote Pilot Certificate and/or Rating Application* - OMB No. 2120-0021