



U.S. Department of Transportation

Federal Aviation Administration (FAA)

Privacy Impact Assessment

**Assessment Technology and License Administration System Aviation
(ATLAS Aviation)**

Responsible Official

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Executive Summary

The Federal Aviation Administration's (FAA's) Office of Aviation Safety (AVS) partnered with PSI Services LLC (PSI) to develop the Assessment Technology and License Administration System (ATLAS) Aviation, (ATLAS Aviation). ATLAS Aviation supports the FAA's scheduling and administration of FAA Airmen Knowledge Tests (AKTs). Aviation industry individuals, e.g., pilots, parachute riggers, drone operators, airline engineers and inspectors (hereafter referred to as examinees), are required to pass examinations testing their knowledge of aviation safety regulations and requirements to obtain an FAA certification. Examinees use ATLAS Aviation to schedule and take the required AKTs. FAA employees and contractors develop the AKT questions and PSI maintains the registration and testing system and administers the AKTs. The FAA conducted this Privacy Impact Assessment (PIA) in accordance with the [E-Government Act of 2002](#) because ATLAS Aviation collects, disseminates, and uses the personally identifiable information (PII) of examinees and PSI staff responsible for system administration, scheduling, and administering of the AKTs. This PIA also addresses the privacy risks for FAA staff and contractors who access the system in their official capacity.

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 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.¹

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;*

¹Office 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).



- *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 FAA oversees the administration of approximately 150,000 AKTs annually to individuals seeking FAA certification. To meet this high demand for testing, the FAA partnered with PSI Services LLC (PSI) to develop and deploy the ATLAS Aviation environment to automate the fee-based delivery of AKTs. PSI is a professional testing services company with a global presence and is a recognized leader in the high-stakes testing industry. PSI has been the FAA's knowledge testing vendor since 1996, providing test delivery services under the now retired Airman Knowledge Testing (AKT) Organization Designation Authorization (ODA) Program. PSI supports the FAA in its development, assessment, maintenance, and enhancement of test items, tests, and supplementary materials with automated state-of-the-art technology and academic expertise.

Creating an Account

Examinees must create an account, schedule an AKT exam and take the exam. The tests are administered by Test Center Administrators who are PSI employees.

Examinees

To create an account profile in ATLAS Aviation, an examinee navigates to the [ATLAS website](#) and enters their name and FAA Tracking Number (FTN)². ATLAS Aviation then compares the name and FTN against data maintained in the Integrated Airman Certification and Rating Application (IACRA). If the data match, the examinee is authorized to complete creation of their ATLAS Aviation account. To complete account creation, the examinee provides ATLAS Aviation their email address, date of birth (DOB), phone number, address (including city, state, zip code, country), and citizenship³, and

² The FAA Tracking Number (FTN) is a unique and permanent number assigned to an individual and is used to track the examinee certification. All examinees must establish an FTN within the FAA's Integrated Airman Certification and Rating Application (IACRA) before creating an ATLAS Aviation account, or taking any AKT. This identification number will be printed on the applicant's Airman Knowledge Test Report (AKTR) in replacement of the Applicant ID number.

³ In accordance with the standard set forth in the [ICAO International Standards and Recommended Practices, Annex 1](#), Ch. 5.1.1.1, contracting states must issue licenses to ensure that other states are able to easily determine the license privileges and the validity of ratings. In furtherance of this requirement, Annex 1 requires certain details to appear on the license, including nationality. See Ch. 5.1.1.2. Accordingly, FAA must collect citizenship information during the test registration process to comply with this requirement, which ensures that airmen with United States certifications are able to conduct foreign operations without additional



establishes a username and password. If the data do not match, the examinee cannot continue with creating their account profile and would need to access IACRA to update their name and confirm their FTN.

PSI Test Center Administrators (TCA)

TCAs who are PSI employees create an account by entering their name, work phone number, postal code, country, work email address, unique login identification (ID), password, and select a security question and answer which are used to verify the TCA's identity in the event a password reset is required. Once submitted, the account request is sent to the PSI administrator for account approval. Once approved, a PSI administrator generates an email advising the TCA that their account has been approved.

FAA Employees and Contractors

A limited number of FAA employees and contractors require access to ATLAS Aviation to create AKT questions. FAA employees and contractors provide their name and email address to request access. PSI Administrators create the FAA employees and contractors account, and then emails the FAA employee or contractor their username and initial temporary password. The password must be reset after first use.

Scheduling and Paying for Airman Knowledge Test (AKT) Exam

To schedule an AKT, the examinee logs into ATLAS Aviation, navigates to the *test selection* screen, and enters their zip code to display the nearest testing locations. The examinee then selects an AKT testing location, the AKT they wish to take, and the test date and time. PSI is authorized by the FAA to collect fees associated with the administration of AKTs; payments made in ATLAS Aviation are made directly to PSI and not the FAA. When prompted, the examinee provides their credit card information which is transferred to PSI's payment vendor, Braintree (a PayPal company).⁴ Braintree returns a payment authorization code for successful payment, or decline status if payment was not successful, which ATLAS Aviation maintains. The code is used to verify that examinee successfully paid for the AKT they wish to take. ATLAS Aviation does not store or maintain the credit card information.

Upon successful payment, ATLAS Aviation sends an email to the examinee confirming they have scheduled the AKT. This confirmation email includes the examinee's name, testing date, time, testing authorization code, and testing location.

complications and registration requirements. [FAA Order 8080.6H](#) sets forth the requirements for all data captured during the test registration process, to include citizenship.

⁴ Credit card payment information is encrypted via Transport Layer Security (TLS) version 1.2 (TLS 1.2) and transmitted in real-time.



Taking an AKT Exam

Prior to taking the AKT at the registered PSI location, the examinee must provide proof of identity by presenting a valid government issued photo identification (ID)⁵. The TCA reviews the photo ID to verify the picture on the ID matches the individual presenting the ID (identity verification), and that the name and address⁶ on the photo ID matches that of the examinee's ATLAS Aviation account. The TCA scans the photo ID into ATLAS Aviation if they are able to verify that the identity and the name match. If the TCA is not able to verify the examinee's identity or their name does not match, their photo ID will not be scanned and the examinee will not be permitted to take the AKT.

Once identity is verified, the TCA escorts the examinee to an ATLAS Aviation AKT workstation. The TCA enters their username and password to log into the workstation and launches the scheduled AKT. Upon AKT completion, the examinee is presented with their score and pass/fail status. ATLAS Aviation transmits the examinee's name, FTN, client ID (ATLAS Aviation identifier), assessment provider ID (PSI identifier), client order ID (ATLAS Aviation internal identifier for the assessment attempt), and exam information (e.g. date, title, test type) to IACRA. IACRA uses the information to process the airmen certification. Examinees may log into ATLAS Aviation to verify that their exam activity and results were correctly recorded.

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) v3⁷, 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 Organizations⁸.

⁵ Examinees must present a photo ID in accordance with 14 CFR Part 61.35, that contains a photograph, signature, date of birth, and address. [FAA Order 8080.6H, Conduct of Airmen Knowledge Tests](#) establishes what constitutes an acceptable ID under the regulation. Specifically, U.S. citizens/resident aliens are required to present a driver's license or passport. Non-U.S. citizens/non-resident aliens are required to present two government-issued identifications, one must be a passport.

⁶ If the address is a P.O. Box, a supporting document (e.g., bank statement or bill) must be presented by the examinee showing a valid physical address. The supporting document is not scanned into ATLAS Aviation.

⁷ <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

⁸ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



Transparency

Citations 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 employs multiple techniques to ensure that individuals are informed of the purpose for which the FAA collects, uses, disseminates, and retains their PII within ATLAS Aviation.

A Privacy Act Statement is available on the ATLAS Aviation website which provides notice to examinees of the FAA's legal authority, purpose, and uses of their information. In addition, the ATLAS Aviation website includes a link to PSI's privacy policy which explains its authorized use of examinee data.

Records pertaining to examinees' testing information within ATLAS Aviation (i.e., examinees' test results) are considered "convenience copies." The official version of these records is maintained in the AVS Registry. In ATLAS, these records are retrieved by examinee's name or FTN; therefore, the FAA protects and maintains these records in accordance with DOT published System of Records Notice (SORN) [DOT/FAA 847 - Aviation Records on Individuals \(75 FR 68849 - November 9, 2010\)](#). This SORN covers both the convenience copies maintained within ATLAS, and the official record that is maintained in the AVS Registry. ATLAS Aviation also maintains account profile records in accordance with [DOT/ALL 13, Internet/Intranet Activity and Access Records](#), (May 7, 2002 67 FR 30758).

The publication of this PIA also demonstrates DOT's commitment to provide transparency about its privacy practices to examinees who use ATLAS Aviation. The FAA.gov website has information about the testing requirement. Additionally, there was a change management campaign that provided examinees with information about test requirements.

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.

ATLAS Aviation collects examinee name, FTN, DOB, phone number, city, state, zip code, country, and citizenship directly from the individuals. ATLAS Aviation maintains a scanned copy of the photo ID that is used for verification of the examinee. The photo ID is retained in the event that the FAA's Office of Security and Hazardous Materials Safety (ASH) is required to investigate incidents of suspected fraud on the testing process.



An examinee may log into their ATLAS Aviation account at any time and update any of their information, except for their name and FTN.⁹ Name changes must be completed in IACRA. Once the name change is completed in IACRA, the examinee can log back into ATLAS Aviation and select the “update” feature. At that time, ATLAS Aviation automatically pulls the updated name through a data exchange with IACRA. ATLAS Aviation account information may also be updated by contacting PSI via phone at 1 (800) 211-2754.

ATLAS Aviation maintains convenience copies of testing records that are retrievable by name and FTN. The FAA protects and maintains records in accordance with DOT/FAA 847 - Aviation Records on Individuals. The official records are maintained in the [AVS Registry](#) and an individual’s right to access, correct, and amend their records is afforded through the AVS Registry. Additionally, ATLAS Aviation maintains account profile records in accordance with DOT/ALL 13, Internet/Intranet Activity and Access Records.

TCAs provide their name, work phone number, postal code, country, and work email. Security question/answers are used to verify the individual’s identity if a password reset is required.

FAA employees and contractors provide their name and email address to create an account in order to develop AKT questions.

Under the provisions of the Privacy Act, individuals may request searches of the AVS Registry to determine if any records have been added that may pertain to them. Individuals wishing to know if their records appear in this system may inquire in person or to:

Federal Aviation Administration
Privacy Office
800 Independence Avenue (Ave), SW
Washington, DC 20591

The request must include the following information:

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

Contesting record procedures: Individuals wanting to contest information about themselves that is contained in ATLAS Aviation should make their request in writing, detailing the reasons why their records should be corrected and addressing their letter to the following address:

Federal Aviation Administration
Privacy Office

⁹ The examinee’s name can only be updated in IACRA (see the IACRA PIA for the process). The FTN is an automatically generated IACRA number, which cannot be changed.



800 Independence Avenue (Ave), SW
Washington, DC 20591

Additional information about the Department's privacy program may be found at www.transportation.gov/privacy. Individuals may also contact the DOT Chief Privacy Officer at privacy@dot.gov.

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.

Under the authority of [49 U.S. Code § 44703](#), the FAA Administrator may, "...issue an airman certificate to an individual when the Administrator finds, after investigation, that the individual is qualified for, and physically able to perform the duties related to, the position to be authorized by the certificate."

Use of a third party testing provider is authorized, under the general procedures, of [14 CFR Part §61.33](#), which gives the FAA Tests discretion in designating the times, places, and persons authorized to officiate tests.

[14 CFR Part § 61.35](#) Knowledge test: Prerequisites and passing grades establishes the specific identity verification requirements examinees must adhere to when applying for an AKT. The regulations state that the individual must provide:

.....

(3) Proper identification at the time of application that contains the applicant's—

(i) Photograph;

(ii) Signature;

(iii) Date of birth, which shows:

(A) For issuance of certificates other than the ATP certificate with an airplane category multiengine class rating, the applicant meets or will meet the age requirements of this part for the certificate sought before the expiration date of the airman knowledge test report;

(B) Prior to August 1, 2014, for issuance of an ATP certificate with an airplane category multiengine class rating under the aeronautical experience requirements of §§61.159 or 61.160, the applicant is at least 21 years of age at the time of the knowledge test; and

(C) After July 31, 2014, for issuance of an ATP certificate with an airplane category multiengine class rating obtained under the aeronautical experience requirements of §§61.159 or 61.160, the applicant is at least 18 years of age at the time of the knowledge test;



- (iv) If the permanent mailing address is a post office box number, then the applicant must provide a current residential address.

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ATLAS Aviation uses the examinee's name, FTN, DOB, phone number, city, state, zip code, country, and citizenship to create an account, determine test eligibility, and administer the AKT. The photo ID is used to verify the identity of examinee.

ATLAS Aviation collects the TCA's name, work phone number, postal code, country, and work email to create an account and security question/answers such best friend's name and mother's maiden name that is used when a TCA forgets their password. Lastly, the system collects FAA employee and contractor's name and email address to create user accounts.

The examinee's photo ID, tests results, dates, times and locations of a test is shared with ASH upon request to investigate potential fraudulent activities. ATLAS Aviation also shares the examinee's name, FTN, client ID, assessment provider ID, client order ID, and information about the examinee's score and exam (ex. date, title, exam type) with IACRA. IACRA uses the information to process the airmen certification. The FAA has established appropriate data sharing instruments between FAA program offices to document data protection requirements.

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 retains airmen test applications for four years and completed tests for 60 days in accordance with NARA approved records schedule, ([NC1-237-77-03](#), item 23). FAA has proposed to modify the schedule to retain both applications and completed tests for five years; the longest period for which an AKT may be valid. The extended timeframe supports on-going access to testing history for applicants, as well as the FAA's need to access records in the event of an investigation of suspected testing fraud or regulatory violations. Additionally, the five-year retention period supports FAA efforts to ensure that the service provider complies with testing standards. The FAA will continue to comply with the current schedule until the new schedule is approved by NARA.

The system access records are retained and disposed of by the FAA in accordance with National Archives and Records Administration ([NARA](#)) [Information Systems Security Records 3.2 General Records Schedule Item 30, System access Records](#). The records are destroyed when business use ceases.



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.

ATLAS Aviation maintains “convenience copies” of examinee AKT records to support the FAA’s business needs for knowledge test administration for FAA airman certification. These convenience copies are maintained in ATLAS Aviation to enable examinees to see the name of test they have taken, score report and review/update their account profile.

ATLAS Aviation maintains convenience copies and there is no external sharing of records maintained in this system. The AVS Registry is the official repository of airmen testing records and sharing of the records from that system is authorized in accordance with DOT/FAA 847 - Aviation Records on Individuals.

ATLAS Aviation maintains account profile records in accordance with [DOT/ALL 13, Internet/Intranet Activity and Access Records](#). In addition to other disclosures generally permitted under 5 U.S.C. §552a(b) of the Privacy Act, all or a portion of the records or information contained in this system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows:

- To provide information to any person(s) authorized to assist in an approved investigation of improper access or usage of DOT computer systems;
- To an actual or potential party or his or her authorized representative for the purpose of negotiation or discussion of such matters as settlement of the case or matter, or informal discovery proceedings;
- To contractors, grantees, experts, consultants, detailees, and other non-DOT employees performing or working on a contract, service, grant cooperative agreement, or other assignment from the Federal government, when necessary to accomplish an agency function related to this system of records; and
- To other government agencies where required by law.

The Department has also published 15 additional routine uses applicable to all DOT Privacy Act systems of records. These routine uses are published in the Federal Register at 75 FR 82132, December 29, 2010, and July 20, 2012, 77 FR 42796, under “Prefatory Statement of General Routine Uses” (available at <http://www.transportation.gov/privacy>).

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).

The FAA ensures that the collection, use, and maintenance of examinees’ information is accurate, complete, and up-to-date. To ensure accuracy of the name and FTN the examinee enters, ATLAS



Aviation interfaces with IACRA and compares the names and FTN. If the name and FTN are not a match, the examinee cannot continue with creating their account profile and would need to access IACRA to update their name and confirm their FTN.

When the examinee arrives to take their AKT, they must present a photo ID to the TCA to confirm their identity. The TCA verifies the accuracy of examinee's name, address, and DOB by reviewing the examinee's photo ID. If the name on the photo ID do not match the name in ATLAS Aviation, the examinee is not permitted to take the AKT and are required to correct their information. The examinee can access ATLAS Aviation and make updates to their DOB, phone number, city, state, zip code, country, and citizenship account when required.

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 or unauthorized access, destruction, usage, modification, or 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 Publication 200, *Minimum Security Requirements for Federal Information and Information Systems*, dated March 2006, and The National Institute of Standards and Technology Special Publication (NIST) 800-53, Revision 4, *Security and Privacy Controls for Federal Information Systems and Organizations*, dated April 2013. ATLAS Aviation received its initial Authorization to Operate (ATO) on November 6, 2019 and will undergo the FAA's annual information systems security Certification and Accreditation process.

ATLAS Aviation implements administrative, technical, and physical measures to protect examinee PII against loss, unauthorized access, or disclosure. Specifically, ATLAS Aviation takes the following steps to safeguard PII: identification and authentication, physical security, user roles and permissions, and encryption. Physical security includes physical access and environmental controls for the building that houses the ATLAS Aviation servers. ATLAS Aviation manages access to its information through specific user roles and permissions. This practice prohibits the unauthorized access of examinee information. All users must agree to the Rules of Behavior (ROBs), which emphasize privacy protective practices. All TCAs must pass a successful background check before being granted access to the ATLAS Aviation system.

Braintree, a division of PayPal, is PSI's chosen payment processor. Braintree undergoes an annual assessment by a qualified security assessor (QSA) to ensure its compliance with the security standards for payment processors established by the PCI Security Standards Council.¹⁰ Additionally,

¹⁰ <https://www.pcisecuritystandards.org>



Braintree has been assessed according to the American Institute of Certified Public Accountants (AICPA)¹¹ standards and received a State of Standards for Attestation Engagements -18 (SSAE-18) System and Organization Controls (SOC)-2 report.¹² Review of the Braintree assessments is the responsibility of PCI. The FAA only receives confirmation of payment and does not process or receive any other payment related data.

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.

FAA Order 1370.121, FAA Information Security and Privacy Program, implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the FISMA, DOT privacy regulations including DOT Privacy Risk Management Policy Order 1351.18, 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 access, protection, retention, and destruction of PII. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, as well as FAA Order 1370.121. The FAA will conduct periodic privacy compliance reviews of ATLAS Aviation relative to the requirements of OMB Circular A-130.

Responsible Official

Ryan Smith
System Owner

Approval and Signature

Claire W. Barrett
Chief Privacy & Information Asset Officer
Office of the Chief Information Officer

¹¹ <https://www.aicpa.org/>

¹² SOC 2[®] Reporting on an Examination of Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy - <https://www.aicpastore.com/SOC/reporting-on-controls-at-a-service-organization-re/PRDOVR~PC-0128210/PC-0128210.jsp>