



**U.S. Department of Transportation**  
**Privacy Impact Assessment**  
**Federal Aviation Administration (FAA)**  
**Office of Information & Technology Services (AIT)**  
**Pilot Records Database (PRD)**

**Responsible Official**

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## Executive Summary

Section 203 of the Airline Safety and Federal Aviation Administration Extension Act of 2010 (hereafter called the “Act”), Pub. L. 111-216, requires the Federal Aviation Administration (FAA) to create a database to provide air carriers and other operators<sup>1</sup> (hereafter collectively called “operators”) electronic access to information maintained by the FAA concerning pilots’ training, certification and enforcement history, certain records related to pilots’ employment history and qualifications, and national driver registry records, in order for the operator to make a decision whether or not to hire an individual as a pilot.

To meet this requirement, the FAA developed the Pilot Records Database (PRD) to provide air carriers a centralized electronic repository of pilot information to access before allowing an individual to begin services as a pilot.

In accordance with Section 208 of the E-Government Act of 2002, the FAA previously published a Privacy Impact Assessment (PIA) for PRD in January of 2017. This PIA is being updated to address the changes made to PRD since the original publication.

## 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)*

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<sup>1</sup> Air carriers and operators include each operator that holds an air carrier or operating certificate issued in accordance with part 119 and is authorized to conduct operations under part 121, 125, or 135; that holds management specifications for a fractional ownership program issued in accordance with subpart K of part 91; that holds a letter of authorization issued in accordance with § 91.147; that operates two or more aircraft described in paragraphs (i) or (ii) of § 111.1(4), in furtherance of or incidental to a business, solely pursuant to the general operating and flight rules in part 91, or that operates aircraft pursuant to a Letter of Deviation Authority issued under § 125.3; and that conducts public aircraft operations as defined in 49 U.S.C. § 40102(a)(41) on a flight that meets the qualification criteria for public aircraft status in 49 U.S.C. § 40125, unless the entity is any branch of the US Armed Forces, National Guard, or reserve component of the Armed Forces.



*examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.<sup>2</sup>*

*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**

### ***Background***

On February 12, 2009, Colgan Air, Inc., flight 3407 crashed, resulting in the death of all 49 passengers on board and one person on the ground. The National Transportation Safety Board (NTSB) determined that the probable cause of this accident was the captain's inappropriate response to the activation of the stick shaker, which led to an aerodynamic stall from which the airplane did not recover. Additional safety issues identified by the NTSB included certain deficiencies in the operator's recordkeeping system, as well as the operator's analysis of the flight crew's qualifications and previous performance.

The NTSB Aircraft Accident Report discussed the accident and the safety issues. The report focused on strategies to prevent flight crew monitoring failures, pilot professionalism, fatigue, remedial training, pilot training records, airspeed selection procedures, stall training, FAA oversight, flight operational quality assurance programs, use of personal portable electronic devices on the flight deck, the FAA's use of safety alerts for operators to transmit safety-critical information, and weather information

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<sup>2</sup> 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).



provided to pilots. The report included recommendations of safety issues for the FAA to address.

As a result of this incident, and others, Congress enacted the Act, which replaced the Pilot Records Improvement Act (PRIA) with PRD, thereby changing the process for operators to access pilot records and decreasing the timeline of creating and providing records for a hiring decision. The law mandated that the FAA create PRD and that PRD contain pilot, FAA, operator, and National Driver Register (NDR)<sup>3</sup> data for use by operators in their pilot hiring decision process. Section 2101 of The FAA Extension, Safety, and Security Act of 2016 (Public Law 114-190) required the FAA establish PRD no later than April 30, 2017.

The FAA provided notice to the public about this requirement on March 30, 2020 through the [publication of the PRD notice of proposed rulemaking \(NPRM\)](#). The FAA plans to publish the PRD final rule, which will establish PRD and implements regulations to satisfy Section 203 of Public Law 111-216. Under the final rule, operators are required to enter relevant data about pilots into PRD. All operators, as set forth in the applicability of the final rule at 14 CFR 111.1, are required to use PRD and evaluate the available records for each pilot candidate prior to making a hiring decision. Under the final rule, the PRIA will remain in effect for three years and 90 days from the date of publication after which time it will be sunset.

### ***Pilot Records Database (PRD)***

PRD improves aviation safety by automating the process for an operator to access information from the FAA about a pilot's history and qualifications prior to the pilot being hired. By integrating data from various FAA systems: Comprehensive Airman Information System (CAIS), part of AVS Registry, Enforcement Information System (EIS), Enhanced Flight Standards Automation System (eFSAS), and Accident Incident Data System (AIDS), into a single interface, PRD streamlines the access and review of pilot records thereby increasing process efficiency and availability of critical pilot information.

In addition, PRD facilitates pilot<sup>4</sup> access to records about them maintained by the FAA, such as their current airman certificates, including airman medical certificates and associated type ratings, and information on any limitations to those certificates and ratings; failed practical tests that were failed on or after August 1, 2010; closed enforcement actions; and accidents/incidents that occurred within the previous five years, prior to the pilot making those certificates available to the operator. Pilots must also enter and update

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<sup>3</sup> Driver records are provided by the states through the DMV. PRD will only contain a record of when the hiring operator *requested* the pilot's DMV records. PRD will not maintain any DMV records.

<sup>4</sup> PRD defines a "pilot" as an airman who has the duty position of pilot-in-command or Captain and second-in-command or First Officer.



their last five years of employment history, or confirm their employment history listed in PRD (for the past five years), when granting consent to an operator for records review.

All Title 14, Code of Federal Regulations (CFR) part 119 certificate holders, fractional ownership programs, persons authorized to operate air tour operations in accordance with § 91.147, persons operating a corporate flight department, and public aircraft operators are required to enter relevant records into PRD. These records include those from operators that employ pilots regarding pilot training, qualification, proficiency, professional competence, drug and alcohol testing, final disciplinary action, and final separation from employment action. Additionally, PRD includes records which were maintained by an operator pursuant to the PRIA on the publication date.

PRD has been implemented in four stages:

- Stage 1** Requirements Development: The FAA completed technical requirements and design documents from the Public Law 111-216, Section 203 specifications to build and establish PRD. This stage was completed February 29, 2016.
- Stage 2** Initial Operating Capability: PRD provided access to limited pilot information maintained by FAA which was previously obtained through PRIA, Freedom of Information Act (FOIA), and Privacy Act (PA) requests for pilot records. Through PRD, pilots provided consent, specified by the pilot, for operator(s) to access their records. PRD was made available for use by operators on a voluntary basis by December 30, 2017.
- Stage 3** Enhancement to add Designated Agents:<sup>5</sup> By July 31, 2017, PRD was updated to allow operators' designated agents to use PRD to conduct pre-employment pilot history checks. Stage 3 also added functionality for non-certificated operators to create accounts with PRD. This allowed non-certificated operators to voluntarily review PRD data with the pilot's consent as part of the hiring process. While this review was not required by regulation, it was recommended as a best-practice.
- Stage 4** Final Operating Capability: With the publication of the final rule, there are multiple requirements for full compliance. Specific timeline requirements are listed below, however, full compliance with the final rule by all parties is required within three years and 90 days after publication of the final rule.

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<sup>5</sup> Under PRIA, designated agents include proxies, or third-party users and others such as a personnel agency are those acting for an operator to review the pilot information for employment purposes. Designated agents must complete the authentication process just as pilots and operators and must be registered in PRD. A valid agreement must exist between the operator and the designated agent and be approved by FAA AFS. PRD requires designated agents to be approved by the PRD administrator or operator Responsible Person before granting them a PRD user role.



- The use of PRD by operators and pilots is mandatory 180 days after publication of the final rule.
- The FAA must retain all pilot records in PRD for the life of the pilot, which the FAA has interpreted as 99 years or upon notification of that pilot's death per 49 United State Code (U.S.C.) 44703(i)(5) - *The Administrator shall maintain all records entered into the database under paragraph (2) pertaining to an individual until the date of receipt of notification that the individual is deceased.* This is required within six months after publication of final rule.
- Operators are required to begin entering records they maintain on pilots into PRD within one year of the publication of the final rule.
- Pilots are required to enter their last five years of employment history into PRD within six months after publication of the final rule.
- Responsible Persons<sup>6</sup> from industry must set up their user accounts within 90 days after publication of the final rule.
- Industry must evaluate FAA records in PRD within 180 days after publication of the final rule.
- Pilots must *electronically* consent (see full discussion on consent in typical transaction section below) to allow an operator to access their PRD Airman Record<sup>7</sup> (PAR).

### **PRD Processes:**

PRD includes seven distinct processes, each of which are explained below: User Identity Validation, User Registration, Proxy Management, External Records, PAR Development, Providing Consent, and Operator Access.

#### **User Identity Validation**

Before any users can access the PRD, they must create a MyAccess account which includes identity verification. The FAA integrated LexisNexis's identity verification services with its MyAccess portal to ensure individuals that request access to PRD are who they claim to be. Once the individual's identity is validated, the individual is issued a FAA user identification (ID) that must be used to access PRD. MyAccess is also used to validate the user each time they wish to access the system. The MyAccess user validation

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<sup>6</sup> A Responsible Person is an individual at the operator serving in a required management position, which may include Director of Safety, Director of Operations, Chief Pilot, Director of Maintenance, Chief Inspector, or other responsible management position who will provide supervisory control concerning the PRD process.

<sup>7</sup> The PAR aggregates records entered from the pilot and operators as well as from data exchanges with the following FAA systems: CAIS, EIS, eFSAS, and AIDS.





process is outside of the scope of the PRD PIA. For more information on the MyAccess process, see the MyAccess/Electronic Identity Authentication Service PIA.<sup>8</sup>

### User Types & Registration

Once validated and assigned an FAA user ID and password through MyAccess, the user is required to also initially register in PRD to become an authorized user of PRD at Uniform Resource Locator (URL) <https://prd.faa.gov/>. Individuals must register and be authorized by the FAA for one of four roles in PRD: Pilot, Responsible Person, Authorized User, and Designated Agent. Some users will be registered as a pilot in addition to one of the other three roles. To register in PRD, all first-time users are routed to a registration page. A general description of each of the roles and the information required for registration is described below.

- **Pilot**: Pilots registered in PRD may review their records for accuracy, provide consent for specified operators to review their records in the form of a PAR, and designate the number of days the PAR may be accessed by the operator. To accomplish this, the pilot must register in PRD by submitting their full name, their certificate number, and date of issuance. The pilot's certificate number is compared to information held in the CAIS to ensure the individual registering is a current pilot.
- **Responsible Person**: These individuals are accountable for operator compliance with the requirements to upload, access, monitor consent, and edit data in PRD. This user type is the only role required to be established by each operator and acts as the primary user for each operator. Responsible Persons may seek to delegate authority to other individuals (i.e., authorized users and designated agents) for system usage.
- **Authorized User**: Authorized users may be issued access rights by a Responsible Person to complete an assignment from the Responsible Person. These include the Authorized Consumer role, the User Manager role, and Authorized Contributor role. Authorized Consumers may review records in the PRD. Authorized Contributors may enter records into the PRD. User Managers may manage additional user roles on behalf of the Responsible Person.
- **Designated Agent**: A third party company may be used by the operator to review the pilot's record prior to hiring. Only the PRD administrator can enter the designated agent company(s) information into PRD, which has been authorized by the operator. Designated agents have the same user roles as operators except that they are referred to as Proxy Responsible Person (PRP), Proxy Authorized Consumer, and so on.

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<sup>8</sup> <https://www.transportation.gov/sites/dot.gov/files/docs/resources/individuals/privacy/282206/faa-myaccess-pia-05312017.pdf>.



The responsible person, authorized user, and designated agent users follow the following steps for initial registration to PRD:

After authentication and access to PRD via MyAccess, the responsible person, authorized user, or designated agent enters their first and/or middle name, manager name, email, telephone number, and business postal address into PRD. PRD displays the last name and user ID from a read-only data exchange with MyAccess. The operator enters the first few characters of their company name and a display of operators matching those characters can then be selected. The display of operators comes from the data exchange with the National Vital Information Subsystem (NVIS) and Enhanced Vital Information Database (eVID) (data portal for NVIS)), which are both components of the eFSAS. Additionally, if the user is working for a designated agent, they enter the first few characters of the designated agent name into PRD and a display of designated agent names appear. In order for the designated agent name to appear in PRD, the operator must contact the PRD administrator to document who is authorized to be a designated agent. Finally, the user submits the request and receives a confirmation email message stating that the registration request was submitted. The PRD administrator must review, approve, and grant access to PRD for all responsible persons. All other registrations are reviewed and approved by the respective responsible person. Once the registration process is complete, the user may sign into PRD at URL <https://prd.faa.gov/>.

### **Proxy Management**

Each designated agent must select a PRP for each operator for which they have been contracted. A PRP user is required for each proxy-operator relationship. The PRP is required to complete the PRD registration process by requesting the role of PRP for each specified operator. For example, if a proxy company is contracted to review records in the PRD for three separate operators, three separate PRPs are required. This may be the same person who could hold three PRP registrations in the PRD, or it could be different individuals who are all employed by the designated agent. Upon receipt of a PRP registration request, the PRD administrator contacts the designated agent to ensure they wish to grant the proxy access to the records with the related operator. If the operator Responsible Person concurs, the PRP will be approved. The PRP can then approve registration requests for other proxy roles such as Proxy Authorized Consumer or Proxy User Manager. The Proxy User Manager, Proxy Authorized Consumer, and Proxy Authorized Contributor roles are required to complete the PRD registration process and be approved by a PRP before access is granted to PRD.

### **PRD Airmen Record (PAR) Development**

The PAR is a comprehensive view of the pilot's records from CAIS, EIS, eFSAS, AIDS, employment history provided by the pilot, records entered by operators who employ pilots, and certain drug and alcohol tests results from operators in a single consolidated report. These records are maintained by the PRD until the pilot reaches 99 years old or the FAA is





notified the pilot is deceased. A new PAR is created in “real-time” from these sources each time the pilot grants consent to an operator and includes the following information:

- CAIS - CAIS data in PRD includes information copied from airman certification applications, notices of disapprovals<sup>9</sup> and medical certificates held and date of issuance.
- EIS - EIS data in PRD includes information on individuals, investigations, final enforcement actions, and FAA field activities pursuant to enforcement actions involving the pilot. Records integrated into a pilot’s PAR are limited to closed enforcement actions occurring on or after August 1, 2010.<sup>10</sup>
- AIDS - AIDS data in PRD includes records of aircraft accidents and incidents<sup>11</sup> occurring in the United States (US) and those involving US-registered aircraft, if outside of the US. AIDS records displayed in the PRD are limited to accidents and incidents dated from October 1, 2015. For incidents, AIDS provides PRD the complete record for incidents. For accidents, NTSB provides AIDS an indication that an accident is on file and instructs the reviewer to obtain the NTSB accident report for full details. The full NTSB accident reports do not appear directly in PRD. The PAR includes the following information from AIDS regarding an accident: the type of event; accident date and location (city, state, zip); NTSB ID number; the pilot’s first name, middle initial, and last name; certification type; certificate number; and the aircraft registration number, make, and model. The PAR also includes a link to the NTSB’s Aviation Accident Database & Synopses system,<sup>12</sup> where airlines may review the complete accident report, if desired.<sup>13</sup>
- External Records - In addition to records integrated from other FAA systems, PRD contains records entered by pilots and operators (external records). Pilots provide their last five years of employment history and may include operator name, POC name, POC title, POC email address, POC address, and POC phone number. Operators enter training, qualification, proficiency and competency events (see the full list of requirements for pilots and operators below in PAR discussion).
- Pilot provided employment history – Pilots manually enter all their previous operators<sup>14</sup> into PRD for the previous five years including company name, company contact name, contact title, contact email address, address, and phone

<sup>9</sup> Notices of disapproval from CAIS in PRD are limited to those occurring on or after August 1, 2010.

<sup>10</sup> The PIA for EIS is located at <https://www.transportation.gov/individuals/privacy/privacy-impact-assessments>

<sup>11</sup> “Aircraft accidents” and “incidents” are defined in 49 CFR 830.2.

<sup>12</sup> <http://www.nts.gov/layouts/ntsb.aviation/index.aspx>

<sup>13</sup> Once published the AIDS PIA will be made available at [www.transportation.gov/privacy](http://www.transportation.gov/privacy).

<sup>14</sup> Only operators who hired the person to be a pilot are required to be entered. For example, employment as a flight instructor would not need to be entered.



number. PRD displays the company name provided by the pilot and matches it to an existing operator when possible. In cases where the previous operator is no longer in business or is otherwise not listed in PRD, the pilot manually adds the operator.

- Operator provided records – Certain operators<sup>15</sup> who employ pilots are required to enter data directly into PRD. The completion of training, qualification, proficiency and competency events which are required by a specific provision of title 14
- Other pilot training, qualification, proficiency or competency events, which may be mandated by the operator
- Final disciplinary actions
- Final separation from employment actions
- Verification that an NDR record search was conducted and that any relevant state driving records were obtained and evaluated before allowing an individual to begin service as a pilot (via link in PRD or use of FAA form)
- Records currently being maintained by an operator pursuant to §44703(h)(4) of the PRIA from August 1, 2005
- PRD date of hire
- Assignments to duty positions
- Operator provided drug and alcohol test results – Operators who are required to have a drug and alcohol program in accordance with [14 CFR 120.111 and 120.219\(a\)](#) and [49 CFR 40.333\(a\)](#) enter certain<sup>16</sup> test results into PRD. There may be other positive drug test results or refusals to test which were part of the employment screening of a prospective pilot. The drug and alcohol testing rule, 14 CFR part 120, requires that if a pilot tests positive for a drug(s), has an alcohol concentration of 0.04 or greater, or refuses to submit to testing, they are disqualified from performing until completing the return-to-duty process. Because those pilots may have never been hired by the operator, those records would not be entered into PRD by that potential operator. In accordance with § 120.219(a), operators are required to report to the Federal Air Surgeon (FAS) any pilot or individual holding a part 67 medical certificate who violates the drug and alcohol testing requirements, including a pre-employment test. Both the operator and the FAS enter these types of pilot records into PRD. The

<sup>15</sup> Operators who must report records to the PRD are operators that hold an air carrier or operating certificate issued in accordance with part 119 and is authorized to conduct operations under part 121, 125, or 135; that holds management specifications to operate in accordance with subpart K of part 91; that holds a letter of authorization to conduct air tour operations in accordance with § 91.147; each operator described in § 111.1(b)(4); and each entity that conducts public aircraft operations as described in § 111.1(b)(5).

<sup>16</sup> A list of specific test results which must be reported are found in [Advisory Circular -120-68H](#).



determining factor regarding if the record is entered by the operator or the FAS is if the pilot was employed by the operator at the time of the test or event. For example, if an operator performs a pre-employment drug test and the pilot does not pass, the operator may not hire the pilot. Because the operator did not employ the pilot, they are not able to enter any records into the PRD related to that pilot. That record would be provided to the FAA as a normal course of business and the FAS would then enter that record into the PRD. Otherwise, if the operator does employ a pilot, the related drug and alcohol records will be entered into the PRD by the operator.

### **Managing Consent**

The FAA requires pilots to provide explicit consent for an operator to access information about the pilot in PRD. After the pilot logs into PRD, they navigate to the consent tab. Through a data exchange with the FAA's eVID system, PRD provides a list of authorized operators. The pilot selects the specific operator from the list in PRD that the pilot intends to allow access to their PAR. The pilot also selects the period for which the consent is valid (30, 45 or 60 days). Before the consent is activated the pilot is provided an additional opportunity to review the PAR for accuracy.<sup>17</sup> Once the pilot affirms their intention to share the PAR with the selected operator, PRD stores the consent, user ID, date, and time of consent action, and the specific PAR version at the time of consent for 99 years. The pilot may also choose to revoke consent at any time, after which the operator may not access the PAR. A pilot may give consent for multiple operators to view their PAR, and may have multiple PARs in PRD, but the pilot may only grant each operator access to one PAR at any given time. To facilitate the pilot's management of their consent decisions, PRD includes an "expiration clock" for each PAR/operator consent and access to each PAR will be cancelled when the selected time period passes. The pilot may also revoke access the PAR before the time period expires if they wish.

Pilots may access the PRD transaction log within PRD to review if any operator has viewed their PAR. To review the transaction log, the pilot logs into PRD, selects the transaction log option, which brings them to a search function. The pilot then enters a date range. The transaction log identifies who viewed the PAR and includes the operator name, action, date, and time the operator requested access to the PAR.

Pilots who cannot access PRD, such as those located outside of the US or those that are unable to create a MyAccess account, may use FAA Form 8060-14, "Pilot Consent/Revocation for Air Carrier Access to Pilot Records Database,"<sup>18</sup> to grant consent and update their employment history. Pilots may submit as many FAA Form 8060-14s as needed to process their consent decisions. This form, and all other related and/or necessary PRD forms, are described in FAA Advisory Circular 120-68 (as amended) and

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<sup>17</sup> The "Individual Participation and Redress" section below further details remedies available to pilots who identify inaccuracies in their records.

<sup>18</sup> OMB CONTROL NUMBER: 2120-0607.



can be reviewed and downloaded from the FAA's forms repository URL <https://www.faa.gov/forms/index.cfm/go/document.list?omni=Forms&rows=10&startAt=0&parentTopicID=&display=current&q=8060/>. The pilot provides their full name, FAA pilot certificate number, mailing address, and an optional email address on the form. Pilots also list the operators for which they want to grant or revoke consent and select the consent period 30, 45, or 60 days. This consent period begins as soon as the PRD administrator enters the consent into PRD. Additionally, pilots document their last five years of employment history on the form. The signed form is returned to the PRD administrator either in-person, via fax, or email. The PRD administrator then logs into PRD and manually enters the authorized consent and/or revocation on behalf of the pilot. A copy of the PAR is mailed to the pilot's address of record to notify them that the requested actions were completed and provide the pilot an opportunity to review the PAR. The PAR may alternatively be emailed to the pilot if they provided their email address on the form.

### **Operator Access**

Authorized Consumers and Proxy Authorized Consumers may access the pilot's PAR by providing the pilot's certificate number and either the pilot's last or first name upon logging into PRD. The operator's access to the PAR is limited to the timeframe specified by the pilot when consent was given. If an operator seeks access to a pilot's records for which consent is not active, PRD displays a message that there is no record available.

Operators may return to review the PAR as many times as necessary as long as the pilot consent is active. The pilot name, certificate number, and date/time stamp of consent appear on the bottom of each page of the PAR. Each page of the PAR also includes notice to the operator that data contained in the PAR must be used solely for hiring decisions and must not be copied or distributed except in accordance with Public Law 111-216.

### **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<sup>19</sup>, 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<sup>20</sup>.*

<sup>19</sup> <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

<sup>20</sup> [http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft\\_800-53-privacy-appendix-J.pdf](http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf)



## 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 publication of this PIA demonstrates the Department of Transportation (DOT) commitment to provide transparency about its privacy practices to the users of PRD. DOT deploys multiple techniques to ensure pilots and operators are aware of PRD and the purposes for which the DOT collects and maintains PII in support of PRD.

PRD is not a Privacy Act (PA) System of Records because they are *copies* of records received from these source systems: CAIS, EIS, eFSAS, AIDS. These *source systems* are subject to the DOT's published system of record notice (SORN) DOT/FAA 847, Aviation Records on Individuals, (November 9, 2010, 75 FR 68849), which provides notice of the privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal. These records are used to create the PAR, however, they are not used by the Department in support of its mission. Rarely, they may be retrieved for limited administrative purposes to respond to external criminal investigations or inquiries into an operator's required PRD use, however, this is not the primary purpose of PRD. The FAA is committed to ensuring that these sensitive records are managed in a manner consistent with the PA and the Fair Information Practice Principles, and they are protected in accordance with the DOT's [Privacy Risk Management Policy, DOT Order 1351.18](#) and applicable Office of Management and Budget (OMB) Guidance for the protection of PII.

Authentication and access records in PRD are subject to the published SORN entitled [DOT/ALL 13, Internet/Intranet Activity and Access Records](#), (May 7, 2002, 67 FR 30757). DOT/ALL 13 provides notice of its privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of these records in PRD.

## Individual Participation and Redress

*DOT provides 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 they are provided reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.*

During the PRD registration process, as described above, the FAA collects the pilot's name and pilot certificate number, which is used to determine if the individual registering is a current pilot. Pilots are directly involved in the creation of PARs and dictate which operators





may access their PAR. Pilots are responsible for reviewing the information in the PAR to ensure its accuracy before authorizing operator access.

As previously mentioned, PRD is not a PA System of Records and does not provide users the opportunity to access, amend, or delete their information in PRD that comes from FAA CAIS, EIS, eFSAS, and AIDS systems. Any corrections or updates must be made in those source systems using the redress processes specific to those source systems identified in the source systems PIAs and SORNs, which can be found on the DOT Privacy Program website at URL [www.transportation.gov/privacy](http://www.transportation.gov/privacy).

If the pilot determines that the information in the PAR is inaccurate, the pilot can request changes. For FAA specific information, the pilot must request the change be made through the FAA source system. For example, if the pilot discovers inaccuracies related to a certificate number, the pilot would request a change through CAIS, the appropriate source system for certificate information. If the FAA agrees that the record is inaccurate and amends the record in the source system, the amended information will then be reflected in PRD once the FAA source system is updated.

For non-FAA records that originated from an operator, for example, training records, the pilot may mark the record as “in dispute” and PRD will generate an email to the source operator noting that the pilot believes a record is inaccurate. The operator determines the accuracy of the information and if a correction to the record is appropriate. The operator may choose not to make a correction. The system will email the pilot when the operator has updated a record. The pilot must seek a resolution through that operator and PRD will only reflect any corrected records after they are updated. Records that are disputed are marked as disputed and are still included in the PAR. The record could remain marked as in dispute indefinitely.

The FAA also provides a PRD User Help Desk available 24 hours a day, seven days a week. If users have a PRD support-related question not found in the PRD [Frequently Asked Questions](#) (FAQ), they may call the National Service Desk at 1-844-FAA-MYIT (322-6948) or email at [helpdesk@faa.gov](mailto:helpdesk@faa.gov). Additionally, a link to the [FAA’s Privacy and Website Policy](#) is located at the bottom of the PRD website main page.

Although PRD is not a Privacy Act system, the FAA allows individuals to request searches to determine if any records have been added to the system that may pertain to them. Individuals wishing to know if their records appear in PRD, as well as individuals wanting to contest information about them that is contained in FAA source systems, may contact the PRD Program Office via email at [9-amc-avs-prdsupport@faa.gov](mailto:9-amc-avs-prdsupport@faa.gov) or by calling phone number 405-954-4431. They may also contact the FAA Privacy Office via [privacy@faa.gov](mailto:privacy@faa.gov), in-person, or in writing at:

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, and
- A description of the records sought, and if possible, the location of the records.

Individuals may also use the above address to register a complaint or ask a question regarding FAA's privacy practices.

Additional information about the DOT's privacy program may be found at [www.transportation.gov/privacy](http://www.transportation.gov/privacy). Individuals may also contact the DOT Chief Privacy Officer at [privacy@dot.gov](mailto:privacy@dot.gov).

Last, there must be a match between the operator and the pilot in order for the operator to add records to a pilot's record in PRD. The system will not allow records to be entered into PRD unless there is a match.

## 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 it collects, uses, maintains, or disseminates PII.*

The FAA is specifically authorized to collect and use pilot's PII, as described below.

- [Airline Safety and Federal Aviation Administration Extension Act of 2010, Section 203, Pub. L. 111-216](#), requires the FAA to create a database to provide operators electronic access to information maintained by the FAA concerning pilots' training, certification and enforcement history, certain records related to pilots' employment history and qualifications, and national driver registry records, in order for the operator to make a decision whether or not to hire an individual as a pilot.

The FAA does not use PRD for FAA mission-related purposes, including but not limited to using pilot information for enforcement actions against individual pilots. The FAA is required by statute to maintain PRD for use by operators to inform their decisions when hiring pilots. The FAA may take enforcement action up to and including fines and the revocation of operator certificates for any operator, trustee, or proxy found to have abusing access or inappropriately using PARs.

PRD provides a centralized, reliable source of historical information on pilots to enable operators to make hiring decisions. PRD allows pilots seeking potential employment with an



operator to view their current airman certificates, including airman medical certificates and associated type ratings and information on any limitations to those certificates and ratings; failed practical tests that were failed on or after August 1, 2010, closed enforcement actions; accidents/incidents that occurred within the previous five years; and any records provided by previous or current operators. An operator may print or locally save PARs they access; however, the operator must take steps to protect the privacy and confidentiality of the PAR including ensuring that PARs are not divulged to any individual that is not directly involved in the hiring decision. The system includes the following explicit notice concerning the authorized use of the system and PARs:

- In accordance with Public Law 111-216, The Act, a PRD record may be used solely for hiring decisions.
- PRD record presents verification of a pilot's airman and medical certificates; ratings and limitations information; summaries of legal enforcement actions that have not been overturned resulting in a finding of a violation—which may include violation on current and previous certificates, summaries of accidents or incidents and historical employment records. This PRD record contains personally sensitive information and must be protected from unintended disclosure.

The FAA requires a high degree of certainty that the individual requesting access to PRD is who they claim to be. The FAA contracted with LexisNexis for identity verification services and has created a portal through the MyAccess system to facilitate this process. Pilot and operators information is collected and is exchanged between PRD and MyAccess for the specific purpose of identity verification and to allow access to PRD, and is consistent with the purposes for which it is collected in accordance with [DOT/ALL 13, \*Internet/Intranet Activity and Access Records\*, May 7, 2002 67 FR 30757](#).

### **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.*

The FAA collects the pilot's full name, FAA pilot certificate number, and address, which is the minimum necessary data to enable pilots and operators to authenticate, access, and create the PAR in PRD. There are no SSNs collected or maintained in the system.

Certain records contained in PRD come from data exchanges with other FAA source systems (CAIS, EIS, eFSAS, and AIDS). The records created from these data inputs are *copies*, and are considered transitory and intermediary, by National Archives and Records Administration (NARA) General Records Schedule (GRS) [5.2, \*Transitory and Intermediary Records\*](#) approved July 2017. These records are temporary and are destroyed upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.



The PAR is considered a distinct record from the “input” records and consists of a snapshot of the records within PRD pertaining to that specific pilot at the moment in time when the PAR is created. The PAR does not exist until the pilot grants consent. The PAR, therefore, is a new category of record, not covered under GRS 5.2. This new category of records must be saved in PRD, per [the Airline Safety and Federal Aviation Administration Extension Act of 2010](#), for the life of the pilot. FAA made a policy decision that 99 years is consistent with the Congressional intent. The FAA has submitted a retention/disposition schedule to NARA to address PARs maintained and stored in PRD. The records that must be stored in PRD for 99 years include the activity logs, PRD audit reports, air carrier audit reports, records entered by operators (as detailed in the typical transition section), and a copy that specific PAR. When a pilot revokes consent to view the PAR or the pilot’s consent for the operator to view the PAR expires, the operator, pilot, and the FAA can no longer view the PAR, but a copy of that specific PAR version is stored in PRD for 99 years.

Activity logs are used to view activity records logged by the PRD application (Internal and External) for all users. The activities logged may be those performed by the following users: Pilot, Air Carrier (Authorized Consumer) and PRD Administrator. The PRD Administrator is the only user able to access and view the PRD Logs. The PRD Administrator may manually generate the PRD User Log for review to identify any suspicious behavior. The PRD Administrator navigates to the Activity tab and selects the PRD User Logs. The PRD Administrator enters a date range and performs the Search. The results of user accesses for the specified period of time displays in the grid. The PRD Administrator can select "Export to Excel" and download the file. The PRD User Log file can be sorted and filtered by Action, Action Date, User, Air Carrier, Acted Upon and Acted Upon Type for review.

The PRD Audit Report page is used to view database record changes in the PRD. The record changes are for the following user roles: Pilot, PRD Auditor, AAM user, and FAA PRD Administrator. The FAA PRD Administrator is the only user able to access the audit report for the PRD. This report can be accessed at any time during the use of the PRD application by clicking Audit Report in the top-level menu. The PRD Audit Report page is displayed. To retrieve a specific or a group of PRD Audit Log Records in the Search section, enter a specific table from the PRD database and a date range. The results are displayed in the grid and the PRD Administrator can select "Export to Excel" and download the file.

Activity logs and audit reports contained in PRD are covered under NARA GRS 3.2, Item 030, [Information Systems Security Records](#), approved September 2016.

## 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.*



The PRD's purpose is to support operator's hiring processes for pilots by providing a central repository for pilots to provide their prospective operators with information maintained about the pilot by the FAA.

When a pilot is seeking employment with an operator, the pilot logs into PRD, creates their PAR, and authorizes the operator to access the selected PAR limited period of time for the purpose of reviewing the pilot's history and for the operator to use that information to make a decision on whether to hire the pilot. The pilot initiates the compilation of the PAR (not the FAA) and directs the operator's access to the PAR. The records contained in the PAR are records from the CAIS, EIS, eFSAS, and AIDS systems as well as employment history provided by the pilot and employment records as provided by current and previous operators. Public Law 111-216 provides that operator may only use the PAR for hiring decisions and must restrict dissemination of the information to individuals directly involved in the hiring decision.

Public Law 111-216 also prohibits the FAA from disclosing the information contained in PRD under the FOIA, unless disclosure is (1) of de-identified, summarized information to explain the need for changes in policies or procedures, (2) information to correct a condition that compromises aviation safety, (3) information to carry out a criminal investigation or prosecution, or (4) information regarding threats to civil aviation to comply with 49 U.S.C. 44703.

PRD is not the official system of records for pilot information. Requests under FOIA or the Privacy Act for pilot information that is contained in PRD will not be processed by accessing PRD, but by accessing the system of record for the primary source of the information (CAIS, EIS, eFSAS, and AIDS). For further information about how FAA collects, uses, maintains information from these source systems, see the SORN DOT/FAA 847, Aviation Records on Individuals.

### **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 collects, uses, and retains data that is relevant and necessary for the purpose for which it was collected. Although PRD is not the authoritative source of data, automating the data exchanges between PRD and CAIS, EIS, eFSAS, and AIDS facilitates data integrity by avoiding human error. PRD receives data in real time from EIS and AIDS and is updated daily by eFSAS and CAIS. PRD collects PII directly from the pilot and operator, where feasible, and the pilot is required to review the data contained in the PAR before consenting to have an operator review the PAR. If the pilot believes PRD contains inaccurate information, the pilot may submit a correction request. For records provided directly by operators, the pilot must seek a resolution via that operator. PRD will generate an email to a



past or current operator showing that a record is in dispute. If the authoritative source determines an update is appropriate, the authoritative source submits the corrected record to the FAA and it will be reflected in PRD when updated. The pilot receives notification when an update to PRD data occurred. FAA plays no role in determining the accuracy of pilot or operator provided records.

To ensure that the records used in the hiring process are complete and accurate, PRD is configured to disallow the creation of a partial PAR. Therefore, if any of the data sources are unavailable, PRD will not create a PAR. Operators cannot create PARs. Pilots must create the PAR before the PAR may be used by operators in the hiring process.

### 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 (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 January 2015.

PRD implements administrative, technical, and physical measures to protect PII against loss, unauthorized access, or disclosure. PRD ta safeguards PII through validation, identification, and authentication, physical security, roles and permissions, and encryption controls. PRD manages access to information through FAA user roles and all PRD users must agree to the Rules of Behavior, which emphasize privacy protective practices.

PRD is a moderate risk system and has received an Authorization to Operate (ATO). It is also subject to the FAA's annual information systems security Certification and Accreditation process. Access to PRD is limited to those with appropriate security credentials, an authorized purpose, and need-to-know. The FAA deploys role-based access controls in addition to other protection measures reviewed and certified by the FAA's cybersecurity professionals to maintain the confidentiality, integrity, and availability requirements of the system.

### 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 requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), FISMA, DOT privacy regulations, 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 access, protection, retention, and destruction of PII. Federal employees and contractors who work with PRD 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 Order 1370.121 and FAA Privacy Rules of Behavior. The DOT and FAA Privacy Offices conduct periodic privacy compliance reviews of PRD relative to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

### **Responsible Official**

Karen Lucke  
System Owner  
AFS-620 Branch Manager, Flight Standards Service

### **Approval and Signature**

Karyn Gorman  
Acting Chief Privacy Officer  
Office of the Chief Information Officer