



U.S. Department of Transportation

**Privacy Impact Assessment
Office of Aviation Safety (AVS)
Aircraft Registration**

**Civil Aviation Registration Electronic Services
CARES**

Responsible Official

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Executive Summary

The Federal Aviation Administration is developing the Civil Aviation Registry Electronic Services (CARES) system, which is a web-based system that gives the aviation community the ability to securely submit applications, upload documentation, and provide the data necessary for the Civil Aviation Registry to perform aircraft registration and airman certification services. CARES will become the central and legal repository of all aircraft registration and airmen certification records and will replace the AVS Registry Service when fully implemented. CARES is implemented in three phases:

- **Phase 1** - Aircraft Registration Services¹: Initial Operating Capability “IOC” (estimated delivery date: December 2022); Aircraft Registration: Full Operating Capability “FOC” (estimated delivery date: Fall 2023)
- **Phase 2** - Airman Examination Service: Initial Operating Capability “IOC” (estimated delivery date: Fall 2024); Airman Certification and Rating: Full Operating Capability “FOC” (estimated delivery date: Fall 2025), and
- **Phase 3** - Unmanned Aircraft Services “UAS” (estimated delivery date: Fall 2025)

The FAA is publishing a Privacy Impact Assessment (PIA) for CARES, in accordance with the E-Government Act of 2002, because CARES collects personally identifiable information (PII) from individuals when registering their aircraft. This PIA will cover the submission of the application for aircraft registration only. An update or separate PIA will be published for the approval process for Aircraft Registration, Airmen Certification Services, and Unmanned Aircraft Services as they are phased in.

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

¹ This phase will not include the approval process; only the electronic submission of documents to the aircraft registration branch. Also, only manned aircraft registration will be incorporated into this initial phase; the FAA plans to incorporate UAS registration into CARES in Phase 3.



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.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 primary mission of the FAA is to provide the safest, most efficient aerospace system in the world. One of the ways the FAA serves this mission is through the registration of aircraft, as required under Title 49 of the United States Code. The FAA's rules governing all aviation activities in the United States can be found in Title 14 of the Code of Federal Regulations (CFR). A wide variety of aviation-related activities are regulated, such as airplane design, typical airline flights, pilot training activities, hot-air ballooning, and even model rocket launches. The rules are designed to promote safe aviation while protecting pilots, passengers, and the general public from unnecessary risk. Aircraft owners are responsible for compliance and familiarity with the applicable 14 CFR part(s) concerning the operation and maintenance of their aircraft. Aircraft owners must register aircraft they purchase and intend to operate in the National Air Space (NAS) with the FAA Office of Civil Aviation Registry.

²Office 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).



The Office of Civil Aviation Registry is responsible for the national programs of aircraft registration including that of Unmanned Aircraft Systems (UAS). In addition, the Office of Civil Aviation Registry is responsible for the recording of encumbrances against U.S. civil aircraft, identification of registered aircraft, inspection support, and law enforcement assistance as it involves the aircraft registration program. The Aircraft Registration Branch, commonly referred to as Aircraft Registry, under the Office of Civil Aviation Registry is tasked to register aircraft in accordance with 49 U.S.C. §§ 44102 through 44103, and to provide a system for recording conveyances that affect an interest in civil aircraft of the United States under 49 U.S.C. §§ 44107 and 44108. The FAA must also ensure that registration and recordation systems effectively serve the needs of buyers and sellers of aircraft, officials responsible for enforcing laws related to the regulation of controlled substances, and others users of the Aircraft Registry under 49 U.S.C. § 44111.

CARES will be the central repository of all registered aircraft information when fully implemented. The Aircraft Registry satisfies treaty obligations under the Convention on International Civil Aviation (ICAO), Annex 7, and uses systems to collect, manage, and store information. It is also used to determine that aircraft are registered in accordance with statutory requirements. The central repository provides summary descriptive statistics for the development of analytical studies in support of FAA safety programs and agency management and provides aircraft owners and operators information about potential mechanical defects or unsafe conditions of their aircraft in the form of airworthiness directives. Aircraft owners, including UAS owners, are required to register aircraft over 55 pounds or record any applicable conveyance.

System Access

Authorized FAA employees and contractors access CARES using their Personal Identification Verification (PIV) Card credentials via MyAccess. Applicants use MyAccess for identity proofing and to create an account for access to CARES. See the [MyAccess PIA](https://www.transportation.gov/individuals/privacy/privacy-impact-assessments) published at <https://www.transportation.gov/individuals/privacy/privacy-impact-assessments> for more information. MyAccess provides CARES a token once the user's name and password credentials are confirmed.

First time CARES users create a CARES user profile by providing their name, physical address, phone number, mailing address (if different from physical address), email and confirmation of US Citizenship. There are circumstances where users are asked to attest to US Citizenship or permanent residency for certain registration services.



Aircraft Registration

Once the user profile is completed, the applicant can register their aircraft using CARES by completing an electronic application or downloading and completing the portable document file (PDF) Aeronautical Center (AC) Form 8050-1, Aircraft Registration Application. In both instances, the applicant navigates to CARES using the designated Uniform Resource Locator (URL) web address <https://cares.faa.gov>. Profile information for electronic applications is prepopulated and the applicant manually enters the remaining information. The application collects the following information:

- Full Name;
- Address;
- Phone Number;
- Email Address;
- Aircraft Registration Number (N Number);
- Aircraft Information (manufacturer make and model and serial number); and
- Upload Legal Documents/Records (e.g., evidence of ownership, such as bill of sale).

The applicant digitally signs the application using DocuSign³ and is required to pay a fee to register their aircraft. CARES passes the amount owed and a unique generated CARES-ID to Pay.gov and redirects the applicant to Pay.gov to process the payment. In doing so, Pay.gov collects the billing address, credit card number, security code, and expiration date to process the payment. See the Pay.gov PIA available at <https://www.fiscal.treasury.gov/files/pia/paygov-pclia.pdf> for more details. Once the transaction is complete, Pay.gov only sends the CARES transaction code and the fee amount paid.

When completing the PDF AC Form 8050-1, the applicant enters the same information mentioned above. The applicant digitally signs, scans and then uploads the AC 8050-1 to CARES. Once uploaded, the applicant submits their application and follows the process discussed above to complete payment for registering their aircraft.

³ The digital signature gives CARES the ability to replace physical signatures with digital signatures. CARES will use a third-party digital signature software service called DocuSign to obtain digital signatures on documents. CARES will send encrypted documents that require a digital signature to DocuSign using an encrypted session token. DocuSign will return the signed documents encrypted back to CARES.



The review process of the electronic and PDF applications submitted through CARES will be implemented at a later date; until then, it will be managed in the AVS Registry. See the [Aircraft Registration](#) PIA for a full discussion of that process.

Aircraft Registration Renewal

Aircraft owners are required to renew their aircraft registration every three years. The FAA sends aircraft owners an Expiration of Aircraft Registration letter that includes a unique security code six months before the aircraft owner's registration expires. The letter instructs users to visit <https://amsrvs.registry.faa.gov/renewregistration/> to renew their registration using the security code provided, or users may use CARES to renew the aircraft registration. Aircraft owners who choose to use CARES to renew their aircraft registration are required to fill out an AC 8050-1 B and then upload it into CARES in PDF format. When using CARES, the aircraft owner logs into CARES and selects the Aircraft Registration Renewal service. The service asks the user to enter the aircraft's N-Number where the aircraft owner registration information is displayed. If no changes are necessary, the aircraft owner affirms that the information is accurate and proceeds with payment for the renewal. If changes are necessary, the individual must update the required information, pay the \$5 registration renewal fee and submit the application in CARES. The application for renewal is processed by the Aircraft Registration Branch in the order in which it was received. An employee of the Aircraft Registration Branch examines the AC 8050-1B and upon completion of examination of the AC 8050-1B, a Certificate of Aircraft Registration is mailed to the applicant. A Certificate of Registration is generally valid until the owner's address changes, the aircraft is sold, the aircraft has been destroyed, the owner's eligibility status has changed, the aircraft gets registered in a foreign country, or the registration has expired under the three-year renewal period.

CARES is also used to process other forms associated with aircraft registration. See Appendix A for a complete list of forms that can be processed through CARES.

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)



v3⁴, 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 Organizations⁵.

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 DOT deploys multiple techniques to ensure that individuals are informed of the need to register their aircraft and the purposes for which the Department collects and maintains PII in support of aircraft registration activities.

The FAA retrieves records in CARES by an individual's name and other personal identifiers and protects Privacy Act records in accordance with the Department's published system of records notice (SORN) entitled [DOT/FAA 801 Aircraft Registration Records](#). As required, a Privacy Act statement discussing the Department's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of PII is included on all applicable forms used to register aircraft with the FAA.⁶ A Privacy Act Statement will also be available on CARES.

The publication of this PIA further demonstrates DOT's commitment to provide appropriate transparency into the CARES application.

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

⁴ <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

⁵ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf

⁶ A complete listing of Aircraft Registration forms can be found at:

https://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry/aircraft_regn_forms/



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.

Under the provisions of the Privacy Act, individuals may request searches 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 in writing to:

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

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

Contesting record procedures:

Individuals wanting to contest information about themselves contained in this system 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

All aircraft must be registered with the FAA to operate in the NAS. For aircraft registered under 14 CFR part 47, CARES collects information directly from the applicant with uploaded supplemental documentation submitted by the aircraft owner. Aircraft owners may update their information during the registration renewal process or at any other time the aircraft owner chooses by mailing an address change application or submitting an address change through CARES.

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 PII contained in PTB is utilized for transit subsidy usage reconciliation, reporting for the agency, monitoring, and tracking participant usage.

Under 49 U.S.C. §§ 44102 and 44103, the FAA is required to register aircraft and maintain an aircraft registry. The Aircraft Registry is used to:

- Provide a register of United States civil aircraft to aid in the national defense and to support a safe and economically strong civil aviation system, and to meet treaty requirements under the Convention on International Civil Aviation, Annex;
- Determine that aircraft are registered in accordance with the provisions of 49 U.S.C. 44103;
- Support FAA safety programs and agency management;
- Aid law enforcement and aircraft accident investigations;
- Serve as a repository of legal documents to determine legal ownership of aircraft;
- Provide aircraft owners and operator information about potential mechanical defects or unsafe conditions of their aircraft in the form of airworthiness directives;
- Educate owners on safe operating requirements; and
- Receive and record payment of aircraft registration fee(s).

The FAA collects the applicant's name, physical address, phone number, and mailing address (if different from physical address) and status as a US citizen or permanent resident of the US to set up their profile and to ensure the FAA has accurate contact information for those who register their aircraft. In addition the FAA collects the applicant's email address, aircraft registration number (N Number), aircraft manufacturer make and model, serial number and uploads legal documents/records (e.g., evidence of ownership (such as bill of sale), and the information is used to register their aircraft. The information is also used to assist the FAA in its compliance efforts by allowing the FAA to identify the owner when there is an incident and educate them on safe operating requirements and, when appropriate, take enforcement action against individuals who violate the rules or operate unsafely. In compliance with 14 CFR Part 47, the information collected through CARES is appropriate and necessary to facilitate the FAA's requirement to collect and record the appropriate documentation that establishes legal title and liens pertaining to registered aircraft.

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.



CARES collects the minimum amount of information for aircraft registration. CARES will maintain records in accordance with the National Archives and Records Administration (NARA) approved records disposition schedule [NI-237-04-03](#) and the records will be maintained permanently. The permanent retention of the records allows for research and a complete history of specific aircraft and documents the development and progression of registration of the Aircraft Registration System.

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 FAA maintains aircraft registration records in accordance with Department published System of Records Notice [DOT/FAA 801 Aircraft Registration System 81 FR 54187 – August 15, 2016](#). In addition to other disclosures generally permitted under 5 U.S.C. §552(a)(b) of the Privacy Act, all or a portion of the records or information contained in the system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C § 552a(b)(3) as follows:

- To the public (including government entities, title companies, financial institutions, international organizations, FAA designee airworthiness inspectors, and others) information through the Aircraft Registry, including aircraft owner's name, address, phone number, email addresses, United States Registration Number, aircraft type, and legal documents related to title or financing. Credit card information will not be disclosed pursuant to this Routine Use.
- To law enforcement when necessary and relevant to a FAA enforcement activity.

The Department has also published 15 additional routine uses applicable to all DOT Privacy Act systems of records, including this system. These routine uses are published in the Federal Register at 75 FR 82132, December 29, 2010, and 77 FR 42796, July 20, 2012, under "Prefatory Statement of General Routine Uses."

Available at <https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices>.



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).

FAA collects, uses, and retains data that is relevant and necessary for the purpose for which it was collected. CARES performs extensive edit checks on all data that is entered into the system. It maintains images of the documents it receives on aircraft owners as the legal record; database entries are checked against these images and the images can be referenced at any time as an authoritative source. The aircraft information is inspected by Quality Control and Quality Assurance processes to ensure accuracy.

Aircraft owners must renew their aircraft registration every three years; at that time, they must certify that the information associated with their registration is still accurate. If it is not accurate, they are required to make appropriate updates. In accordance with 14 CFR Part 47, registered owners are required to notify the FAA in writing of any change of address within 30 days after any change in owner's mailing address. Registered owners can also send a letter to the FAA for name change.

Occasionally, applicants inadvertently send sensitive personally identifiable information (SPII) not necessary to accomplish aircraft registration or record a conveyance. Any individual whose SPII appears in the aircraft record may request the redaction of that information, and the FAA will take immediate action to redact SPII from publically accessible records. Likewise, if the FAA discovers SPII when reviewing registration records, the FAA will take immediate action to redact SPII from publicly accessible records.

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 April 2013.

CARES was issued an authority to operate (ATO) on September 16, 2022, and requires an annual security review to maintain its ATO. Access to CARES is limited to public users who apply and meet the security credential requirements for public access. CARES internal users are limited to FAA personnel with appropriate security credentials, and are authorized to use CARES to perform internal functions. CARES has been developed and secured to allow access or alter system information for specific and need-to-know purposes. CARES is a role-based system and access controls are employed to protect the system from unauthorized use. Protection measures and security requirements are reviewed and certified annually 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 Chief Information Officer, operating under the Office of Information Systems Security and Privacy Division, is responsible for the governance and administration of FAA systems in accordance with Order 1280.1B, Protecting Personally Identifiable Information (PII). FAA Order 1280.1 implements the various privacy laws based on the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347, 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, policies and procedures will be consistently applied, especially as they relate to the access, protection, retention, and destruction of personally identifiable information. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing, and securing 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 and FAA Privacy Offices will conduct periodic privacy compliance reviews of CARES systems in accordance with OMB Circular A-130.

Responsible Official

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Approval and Signature

Karyn Gorman
Chief Privacy Officer
Office of the Chief Information Officer

DOT Privacy Office - Approved - 11 30 2022



APPENDIX A

List of uploaded forms/documents in CARES that would contain PII:

[AC 8050-1B](#), *Aircraft Registration Renewal Application*

[AC 8050-88](#), *Affidavit of Ownership for Amateur-built and other Non-type Certificated Aircraft*

[AC 8050-88A](#), *Affidavit of Ownership for Light-Sport Aircraft*

[AC 8050-98](#), *Aircraft Security Agreement*

[AC 8050-2](#), *Bill of Sale*

[AC-8050-4](#), *Certificate of Repossession*

[REGAR-ADCHG-1](#), *Aircraft Owner Change of Address Notification Form*

[AC 8050-5](#), *Dealer's Application*

[REGAR-LLC-1](#), *Limited Liability Company (LLC) Registration Information Sheet*

[REGAR-DIO-1](#), *Declaration of International Operations*

[REGAR-HEIR-1](#), *Heir-at-Law Form*

Power of Attorney (POA) Form

Evidence of Ownership of Business (one of the following):

- Certificate of Formation
- Articles of Organization
- Operating Agreement