



**U.S. Department of Transportation**

## **Privacy Impact Assessment**

**Federal Aviation Administration**

**FAA**

### **Airmen Certification System**

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## Executive Summary

Airmen certification is the process by which airmen, as defined by 49 United States Code (U.S.C.) 44703, submit applications to the Federal Aviation Administration (FAA) to apply for airmen certificates. In support of this process, the FAA developed two integrated systems to receive, manage, issue, and modify airmen certificates; the web-based Integrated Airman Certification and Rating Application (IACRA) and the Civil Aviation Registry (AVS Registry or Registry Modernization System (RMS)). Both the IACRA and RMS programs are managed by the Flight Standards Service's Office of Foundational Business, Airmen Certification Branch, AFB-720, in Aviation Safety (AVS). IACRA is the front-end system used by applicants to submit required documentation for certification and registration and serves as a temporary repository until the application information is accepted into the official airmen record maintained in the AVS Registry. The AVS Registry serves as the national repository for airmen certification records and provides the central services necessary for control of these records.

The FAA is updating this Privacy Impact Assessment (PIA) in accordance with the E-Government Act of 2002, to reflect system changes which address the privacy risks associated with the Airmen Certification business processes and the systems used to support them. Those system changes include: 1) use of multifactor authentication to increase system security, 2) use of new features such as address validation and ability of Aviation Safety Inspectors to edit applications, which increase data integrity, 3) introduction of new data sharing arrangements with other FAA systems, 4) inclusion of new form collecting personally identifiable information (PII) and 5) expanded records retention schedules. This PIA is limited to Airmen Certification processes, systems, and records.<sup>1</sup>

## 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*

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



*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.<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**

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

- Regulating civil aviation to promote safety;
- Encouraging and developing civil aeronautics, including new aviation technology;
- Developing and operating a system of air traffic control and navigation for both civil and military aircraft;
- Developing and carrying out programs to control aircraft noise and other environmental effects of civil aviation; and
- Regulating U.S. commercial space transportation.

One of the ways the FAA supports this mission is through the certification of airmen<sup>3</sup>, as

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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).

<sup>3</sup> Examples of airmen ratings include airplane single engine land, airplane single engine sea, airplane multiengine land or airplane multiengine sea. Under 49 USC § 40102(a)(8), airman is defined as any



required under 49 United States Code (U.S.C.) 44703. FAA issues certificates as evidence that an individual is authorized to exercise certain privileges. For example, a pilot is certified to fly aircraft at one or more named privilege levels and, at each privilege level, rated to fly aircraft of specific categories. Airmen must complete an FAA Integrated Airman Certificate and/or Rating Application (IACRA) by one of two means: using paper-based forms<sup>4</sup> or electronically, using IACRA to apply for a FAA airmen certificate.<sup>5</sup>

### ***IACRA***

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

### **Establishing User Account<sup>6</sup>**

To submit an electronic application for an airmen certification to the FAA, the applicant must first establish an account in the IACRA system which requires the creation of a user profile. To create a user profile, the applicant provides their name, date of birth, sex, email address, certificate number and date of issue (for a previously held airmen certificate). The applicant then selects two security questions from a drop-down list, enters answers, and creates their unique IACRA login; username and password.

Once the account is established, IACRA displays confirmation that the applicant is

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individual: (1) in command, or as pilot, mechanic, or member of the crew, who navigates aircraft when under way; (2) who is directly in charge of inspecting, maintaining, overhauling, or repairing aircraft, aircraft engines, propellers, or appliances (except to the extent the FAA Administrator may provide otherwise for individuals employed outside the United States); or (3) who serves as an aircraft dispatcher or air traffic control tower operator. The minimum age to apply for certification for piloting a glider or balloon is 13 years of age as long as the applicant attains 14 years of age when the certification is formally issued.

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

<sup>5</sup> IACRA will be incorporated into the Civil Aviation Registration Electronic Services (CARES) once CARES is fully implemented. The CARES PIA can be found [here](#).

<sup>6</sup> IACRA uses roles to determine levels of access granted to the user. Users include but are not limited to Applicants, Recommending Instructor, Designated Examiner, Aviation Safety Inspector/Aviation Safety Technician and School Examiner.



registered, their username, and the system generated FAA Tracking Number (FTN). The FTN is a unique and permanent number assigned to each registered user and can be used to track their certification. The FTN is not the same as the certificate number.

Every 30 days, IACRA requires users to re-verify their credentials using multifactor authentication. When this occurs, IACRA instructs the user to insert a 6-digit security code which is sent to the email address in the user's profile. Once the user enters the code, IACRA lets the user log in.

Authorized FAA employees and FAA contractors access IACRA using their Personal Identification Verification (PIV) card.

### ***1. Application***

Once logged into IACRA the applicant selects the application and certification type for which they are applying.<sup>7</sup> IACRA auto-fills the application with the personal information provided during the registration process. The applicant reviews the accuracy of their personal information and makes any necessary changes (i.e., name change, address<sup>8</sup>, or color of hair).

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

#### *Biographic*

- Full Name
- Date of Birth

#### *Unique Identifier*

- Social Security Number (SSN) (optional)
- Driver License number, expiration date and state of issuance
- Passport number, expiration date and country of issuance
- Military identification number and expiration date
- Student identification number and expiration date

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<sup>7</sup> See Appendix B for a full list of certification applications available in IACRA.

<sup>8</sup> Residential addresses are checked for authenticity against an address validation program which determines if an address is not standardized, a business address, or an unknown address. New registrations or existing users changing their residential address in the User Profile will also be required to validate their address.



- Other government issued identification number, expiration date and type of government-issued document

#### *Citizenship*

- Place of Birth (POB)
- Citizenship

#### *Contact Information*

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

#### *Biometric Description*

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

#### *Drug Convictions*

- Yes or No?
- Dates of convictions

#### *Previously Issued Airmen Certificate Number*

- Airman Certificate Number (This may be the Airman's SSN)<sup>9</sup>

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<sup>9</sup> The Airmen Certification Branch discontinued the practice of using the SSN as a certificate number for original or new certificates in June of 2002. For their convenience, some airmen have kept their SSN as their certificate number. The Civil Aviation Registry web site provides instructions for requesting a new certificate that does not include the SSN. Airmen can complete the request online or mail a completed AC Form 8060-67 (08/17), Request for Change of Certificate Number to the Airmen Certification Branch, AFB-720. Because the AVS Registry serves as a historical record of airmen certification, the system may contain documents that include the SSNs of individuals who have since changed their certificate number to a non-SSN. The airman certificate number is now assigned when a student pilot certificate is issued so that certificate number is available for display when application is made for a private pilot certificate.



- Date of issuance
- Grade of Certificate

*Aviation Experience*

- Air Carrier Name (when using an Air Carrier Course for experience)
- Foreign Pilot's License number, country of issuance, grade of license, ratings, limitations (when used as the basis to obtain an FAA certificate), Copy of Foreign Pilot's License
- Military competence (Rank or Grade, Service, Military Specialty Code)
- Record of Pilot Time
- Experience Month and Year, Employer and Location and Type of Work Performed
- Indication of Senior or Military Rigger

*Certification Application*

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

The applicant then identifies the type of certificate held, date of issuance, pilot type, and reviews the application prior to submission. Applicants must complete the entire application before subsequent review of the application can start by examiners. Additionally, for each application type, the applicant must submit the required documentation in accordance with 14 CFR Part 61.



Some application paths require that a foreign license is verified prior to making application for an FAA certificate or rating. These applicants would complete the [FAA Form 8060-71 Verification of Authenticity of Foreign License and Medical Certification](#) application requesting that the Registry verify their foreign license with their respective Civil Aviation Authority (CAA). The form collects the name, date of birth, place of birth, country of citizenship, email address, and mailing address of the foreign license holder. The form additionally collects the country from which the foreign license was issued, the license number, level, rating, and revocation/suspension status. The applicant must also provide the country from which their medical certificate comes from and whether it is current. Finally, the applicant must declare what type of FAA certificate or authorization is sought from the FAA. The FAA contacts the country of license origin requesting they verify the authenticity of the individual's name and foreign license number. This "handshake" allows the FAA to then create a verification letter which is uploaded to the user's IACRA console so the applicant can use that document in a future application package.

## ***2. Review of Application***

For applicant certification, a practical test is always required and sometimes a knowledge test as well. The knowledge test, if required, is taken first and consists of a computerized or written test with questions keyed to the certification type. The practical test consists of an oral evaluation and a flight evaluation. The FAA Flight Standards District Offices conduct practical tests for pilot certification either at the office's location or periodically in cities within the district. The offices are usually located on or adjacent to an airport. FAA has also designated many flight instructors as pilot examiners. After the application is started in IACRA, it may require signature by a recommending instructor<sup>10</sup>. The recommending instructor logs into IACRA and verifies that the applicant meets the requested certification's regulatory eligibility requirements for the rating sought and that the application has been completed properly. If a knowledge test is required for the rating sought, the recommending instructor at this point can add the knowledge test requirement to the IACRA application. If the knowledge test is required and is not added by the recommending instructor, it is required to be added later by the certifying official.

The application is submitted to the certifying official to schedule a practical test with the applicant. Depending on the practical test to be administered, the certifying

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<sup>10</sup> A recommending instructor is any person authorized to instruct applicants and consider them ready for the practical test.



official could be an authorized designated<sup>11</sup> examiner, airmen certification representative, training center evaluator, aviation safety inspector (ASI) or aviation safety technician (AST). Prior to the practical test, the certifying official verifies applicant eligibility and positively identifies the applicant in accordance with the FAA Drug Enforcement Assistance Act of 1988. Identification of the applicant is accomplished by viewing the applicant's driver license, passport, military identification, student identification, or other government issued identification, as provided in 14 CFR 61.3(a)(2). Once verified, the certifying official enters the form of identification verified, the identification number, expiration date, and state of issuance (if applicable) into IACRA.

The knowledge test, if required for an application path, is taken beforehand via a FAA contract vendor<sup>12</sup> and is not taken in IACRA. The recommending instructor or certifying official links the applicant's successfully completed knowledge test results with their IACRA application by keying in the applicant's FTN. The test results are then provided electronically by Atlas Aviation to IACRA via Structure Query Language (SQL) server.

Once the positive identification information described above has been entered by the certifying official and the knowledge test results linked (if required), the applicant logs into IACRA and electronically signs the application before taking the practical test. Once the practical test has been completed, the certifying officer logs back in and enters the results of the practical test, reviews the application for errors, and then electronically signs the application.

Once the certifying official signs the application, IACRA will generate a Notice of Disapproval, a Letter of Discontinuance, or a confirmation that the application has been approved.<sup>13</sup> The application is transmitted through IACRA as a Tagged Image File Format (TIFF) via secure file transfer protocol (FTP) to the Comprehensive Airman Information System (CAIS)<sup>14</sup> which is a subsystem of the AVS Registry for

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<sup>11</sup> A designee is authorized to perform the duty as a certifying official. They are not employed or otherwise compensated by the FAA for their work.

<sup>12</sup> Knowledge tests are delivered by a contract vendor which is overseen by the Airman Testing Standards Branch, AFB-630.

<sup>13</sup> A Temporary Airman Certificate is considered an approved application.

<sup>14</sup> CAIS is the repository that maintains all airmen and certification records. CAIS data includes information derived from airman certification applications, temporary airman certificates, knowledge test results, notices of disapprovals, disapproved applications, enforcement actions, correspondence, requests for replacement certificates, changes to the record, letters of verification of authenticity, and other documents to support the issuance of airman certificates.



final processing.

### **3. Decision**

The Airmen Certification Branch, AFB-720, in FAA's Aviation Safety (AVS) reviews all airman certificate applications and supporting documents<sup>15</sup> and issues certificates to airmen. If the application has incorrect or missing information (for instance a missing superseded certificate of issuance), the application can be returned to the Flight Standards Office (FSO) for correction through IACRA<sup>16</sup>. Once the airman's application is correct and received for final processing, the FAA consolidates all biographic and certificate information into a single file. The FAA places the file on a secure portal. Information in the portal is retrieved by the Transportation Security Administration (TSA) to perform security vetting. The FAA provides TSA the airman's SSN (if provided by the airman)<sup>17</sup>, last, first, and middle name, name suffix, previous name, date of birth, citizenship full address, certificate information (active, type, level and number), and FTN. The TSA then conducts security vetting of the applicant against the National Terrorism Screening Database (NTSDB) to ensure the individual does not pose, or is not suspected of posing, a threat to transportation or national security. The TSA returns the airman's last, first, middle name, date of birth, SSN (if provided), FTN and results of the security vetting to the FAA. The process for security vetting is outlined in the TSA Airmen Certificate Vetting Privacy Impact Assessment (PIA)<sup>18</sup>.

### **4. Subsequent Airman Certification Application Services**

Once an airman becomes certified, they can request certain services connected with their certification via the AVS Registry's [Airmen On-Line Services](#) web application. The web application requires an account and a password to perform most functions. To request access, an applicant fills out a form which asks for last name, first name, middle initial, DOB, email address, and certification number. Application services include name inquiry, address change, request of a temporary certification, request of a letter verifying certification, and replacement of their SSN as their certificate number with a pseudo number.

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<sup>15</sup> The term supporting documents refers to all documents that are included with the FAA application, i.e., knowledge test, temporary certificate, graduation certificates, completion certificates, verification letter, certified statements, college transcripts, discontinuances, and any attachment that the airman deems important for inclusion into their airman record. These documents are provided by the applicant or by the certifying official, whichever is applicable for the rating sought.

<sup>16</sup> IACRA's correction notice work queue assists AFB-720 with allowing the application to be sent back to FSO for necessary correction by the ASIs and ASTs.

<sup>17</sup> TSA does not mandate the use of the SSN, but the SSN will be used to prevent misidentifying persons who may have the same name or other identifiers on the watch lists or other lists if provided.

<sup>18</sup> The PIA is located at <https://www.dhs.gov/publication/dhstsapia-011-airmen-certificate-vetting-program>.



Authorized FAA employees and FAA contractors access AVS Registry with a username and password.

### **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, 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.*

### **Transparency**

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

The FAA's public facing website includes frequently asked questions that speak to the requirements for airman certification.<sup>19</sup> The records in the IACRA and the AVS Registry are retrieved by the individual's name and other personal identifiers and are subject to the provisions of the Privacy Act. FAA maintains these records in accordance with the Department's published System of Records Notice (SORN), [DOT/FAA 847, "Aviation Records on Individuals", November 9, 2010, 75 FR 68849](#) and [DOT/FAA 856, "Airmen Medical Records", June 7, 2023, 88 FR 37301](#). The FAA retrieves system access records in IACRA and AVS Registry by user name and protects those Privacy Act records in accordance with Department published [SORN DOT/ALL 13, "Internet/Intranet Activity and Access Records," 67 FR 30757 \(May 7, 2002\)](#).

Also, as required by the Privacy Act of 1974, a Privacy Act Statement informing applicants of the Department's privacy practices regarding collection, use, sharing, safeguarding, maintenance, and disposal of PII is included on all applicable paper

<sup>19</sup> See - [http://www.faa.gov/licenses\\_certificates/airmen\\_certification/](http://www.faa.gov/licenses_certificates/airmen_certification/)



and web-based forms found in Appendix B<sup>20</sup>. In addition, a Privacy Act Statement is displayed on the main IACRA page.

Information on the Department's privacy program may be found at [www.transportation.gov/privacy](http://www.transportation.gov/privacy).

The re-publication of this PIA demonstrates DOT's commitment to provide appropriate transparency into the IACRA, AVS Registry, and the airman certification process.

### **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.*

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

Certification applications input into IACRA, but not yet "submitted", may be edited by applicants. Once an application is officially submitted to FAA, and is received by AVS Registry, airmen may update their information through the [Airmen Online Services](#). The Airmen Online Services allows airmen to update their addresses, order replacement certificates, remove their SSN as their certificate number, request temporary authority to exercise certificate privileges, and request verification of certificate privileges.

Additionally, the Airmen Certification Branch, AFB-720, reviews all airman certificate applications and supporting documents for accuracy. If the application has incorrect or missing information, the application can be returned through IACRA to the FSO for correction by the ASIs or ASTs.

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

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<sup>20</sup> The complete list of airmen registration forms may be found on the FAA's public website - <http://www.faa.gov/forms/>



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
- A statement under penalty of perjury that the requester is the individual who he or she claims to be.

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

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

### Purpose Specification

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

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



IACRA and AVS Registry data on airman certification will be used by the FAA consistent with the purposes for which it was collected as described in the SORN for [DOT/FAA 847, “Aviation Records on Individuals”, 75 FR 68849 \(November 9, 2010\)](#) and [DOT/FAA 856, “Airmen Medical Records”, June 7, 2023, 88 FR 37301](#). System access data will be used by the FAA consistent with the purposes for which it was collected as described in the [SORN DOT/ALL 13, “Internet/Intranet Activity and Access Records,” 67 FR 30757 \(May 7, 2002\)](#).

IACRA or AVS Registry CAIS sends or receives the following information to or from other FAA systems:

For the purpose of populating the IACRA system with the results of the knowledge test results, Atlas Aviation sends the test results (including the applicant’s exam title, site ID, expiration date, and missed subject areas) to IACRA after first receiving the applicant’s FTN to confirm the applicant’s full name in IACRA.

For the purpose of initiating the airman certificate process and sending the corresponding application document to the Airman Certification Branch, IACRA sends airman applications to the AVS Registry. The PII transferred includes all the PII elements outlined in the Application section of the System Overview.

For the purpose of conducting educational outreach, the CAIS subsystem of AVS Registry shares airmen contact data with the FAA Safety Team (FSTW).

For the purpose of planning surveillance, investigations and certification work activities, IACRA sends the inspector’s name, designator, affiliated designator, applicant’s name and certificate number, recommending instructor’s name and certificate number to the Safety Assurance System (SAS).

For the purpose of authenticating users into the IACRA system to allow access, IACRA sends the FAA employee’s/contractor’s business email to MyAccess. AVS Registry authenticates FAA employees and FAA contractors with their username and password.

For the purpose of testing airmen to ensure they meet the requirements for the certificates they are seeking, IACRA and the Designee Management System (DMS) exchange information. IACRA provides DMS the airmen’s name, address, phone, email address, and airman certificate number. IACRA receives the airman’s name and application identification numbers to allow IACRA to send practical test information to DMS. The information that IACRA sends to DMS includes test type, test date, test location, success or failure data and the aircraft used.



## 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 manages privacy risk by minimizing the amount of PII collected by IACRA and the AVS Registry through the creation of standardized forms used in the airman certification process. These forms provide a standardized way for airmen to submit information that is otherwise submitted in an ad hoc manner to the FAA. Using these forms limit the chance that an airman submits unnecessary or irrelevant PII to the FAA.

IACRA application records are governed by [National Archives and Records Administration \(NARA\) record schedule N1-237-09-14](#), approved in September 2009. IACRA acts as a temporary repository for airman registration and application data. This data's permanent repository is within the Airman Registry. As a result, for a period of time, airman application and registration data is duplicated between IACRA and the Airman Registry with IACRA housing the redundant copy. Airman Registry houses the permanent data once transferred from IACRA. IACRA application records are deleted or destroyed when they are superseded or obsolete.

The digital images of airman certification records are the official legal records. The FAA maintains airman certification files in accordance with NARA-approved records schedule [N1-237-06-1](#). Once accepted into the AVS Registry, they are cut off annually and destroyed 60 years after the cutoff.

System access records are governed by [NARA General Records Schedule \(GRS\) 3.2](#), approved January 2023, Information Systems Security Records and 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.*

IACRA is used by applicants to submit required documentation for certification. Applicants provide their name, date of birth, sex, email address, certificate number and date of issue (for previously held airmen certificate) and answer two security questions to create an IACRA user account. Once the account is created, as part of the application process, the FAA collects PII discussed in the System Overview for the purpose of determining an applicant's eligibility for a certificate and/or rating. The application is transmitted to CAIS, a subsystem of the AVS Registry as a TIFF via secure file transfer protocol FTP. The AVS



Registry uses the information in the airman certificate applications and supporting documents for final processing and to issue certificates to airmen.

The FAA shares with TSA the airman's SSN (if provided by the airman), last, first, and middle name, name suffix, previous name, date of birth, citizenship full address, certificate information and FTN. TSA uses the information to perform security vetting. TSA returns the airman's last, first, middle name, date of birth, SSN if provided, FTN and results of the security vetting to the FAA. The FAA and TSA have a Memorandum of Agreement in place which addresses the sharing of applicant's information and use of the information. Consistent with 49 U.S.C. 44703, the FAA makes the "Airmen Certification Registry" including airmen's name, address, and rating publicly available. Contact information provided during the application process is also used to inform airmen of meetings and seminars conducted by the FAA regarding aviation safety.

Certain information about certified airmen, such as the name and certificates/ratings held by airmen<sup>21</sup> maintained by CAIS is accessible to the public via the Airmen Inquiry website.<sup>22</sup>

DOT discloses IACRA and AVS Registry information outside DOT in accordance with [DOT/FAA 847, "Aviation Records on Individuals," 75 FR 68849 \(November 9, 2010\)](#). 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 IACRA may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) to:

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

<sup>21</sup> On the website, the date of birth can be used to narrow the pool of search returns; but that date of birth is not displayed in the search returns.

<sup>22</sup> See <https://amsrvs.registry.faa.gov/airmeninquiry/>



from medical requirements, and requests for review of certificate denials.

- Use contact information to inform airmen of meetings and seminars conducted by the FAA regarding aviation safety.
- Disclose information to the National Transportation Safety Board (NTSB) in connection with its investigation responsibilities.
- Provide information about airmen to Federal, State, local and Tribal law enforcement agencies when engaged in an official investigation in which an airman is involved.
- Provide information about enforcement actions or orders issued thereunder to government agencies, the aviation industry, and the public upon request.
- Make records of delinquent civil penalties owed to the FAA available to the U.S. Department of the Treasury (Treasury) and the U.S. Department of Justice (DOJ) for collection pursuant to 31 U.S.C. 3711(g).
- Make records of effective orders against the certificates of airmen available to their employers if the airmen use the affected certificates to perform job responsibilities for those employers.
- Make airmen records available to users of FAA's Safety Performance Analysis System (SPAS), including the Department of Defense Commercial Airlift Division's Air Carrier Analysis Support System (ACAS) for its use in identifying safety hazards and risk areas, targeting inspection efforts for certificate holders of greatest risk, and monitoring the effectiveness of targeted oversight actions.
- Provide information about airmen through the airmen registry certification system to the Department of Health and Human Services, Office of Child Support Enforcement, and the Federal Parent Locator Service that locates noncustodial parents who owe child support. Records in this system are used to identify airmen to the child support agencies nationwide in enforcing child support obligations, establishing paternities, establishing and modifying support orders and location of obligors. Records named within the section on Categories of Records will be retrieved using Connect: Direct through the Social Security Administration's secure environment.
- Make personally identifiable information about airmen available to other Federal agencies for the purpose of verifying the accuracy and completeness of medical information provided to FAA in connection with applications for airmen medical certification.



- Make records of past airman medical certification history data available to Aviation Medical Examiners (AMEs) on a routine basis so that AMEs may render the best medical certification decision.
- Provide information about airmen to Federal, State, local, and Tribal law enforcement, national security or homeland security agencies whenever such agencies are engaged in the performance of threat assessments affecting the safety of transportation or national security.

DOT discloses IACRA and AVS Registry information outside DOT in accordance with [DOT/FAA 856, “Airmen Medical Records” 88 FR 37301 \(June 7, 2023\)](#). 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 IACRA may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) to:

- Sharing with the public information relating to an individual's eligibility for medical certification, requests for exemptions from medical requirements, and requests for review of certificate denial.

The sharing of user account information in the IACRA system and AVS Registry is conducted in accordance with [SORN DOT/ALL 13, “Internet/Intranet Activity and Access Records”, 67 FR 30758 \(May 7, 2002\)](#). 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 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.
- 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, including this system. The routine uses are published in the Federal Register at [75 FR 82132, December 29, 2010](#) and [77 FR 42796, Jul 20, 2012](#), under “Prefatory Statement of General Routine Uses”.<sup>23</sup>

<sup>23</sup> [Notice of amendment to existing Privacy Act general routine use](#) - 84 FR 55222 - October 15, 2019



## Data Quality and Integrity

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

IACRA collects information directly from the individual during the certification process. IACRA uses an auto fill feature that populates the application with information provided by the applicant during the certification process. As information is entered into IACRA, that same data will appear on the results document, such as the temporary certificate. Applicants are strongly encouraged to completely review their application prior to submission. IACRA displays a copy of the application that the applicant can review to ensure the correct information has been entered on the application. If corrections need to be made, the application can make the appropriate changes prior to submitting the application. Additionally, the Airmen Certification Branch, AFB-720, reviews all airman certificate applications and supporting documents for accuracy. If the application has incorrect or missing information, the application can be returned through IACRA to the FSO for correction by the ASIs or ASTs.

Once the data is submitted via IACRA, the AVS Registry performs extensive edit checks, such as address verification, on all data that is entered into the system. It maintains images of the documents it received from airmen as the legal record; database entries are checked against these images and the images can be referred to at any time as an authoritative source. The airman information is inspected by Quality Control and Quality Assurance processes to ensure accuracy.

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

## Security

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

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.

IACRA and the AVS Registry employ specific administrative, technical, and physical measures to protect PII against loss, unauthorized access, or disclosure. All PII is encrypted in transit and at rest. Personnel receive guidance on their duties as they relate to collecting, using, processing, and securing PII. This includes mandatory annual security and privacy awareness training, as well as a review of the FAA Rules of Behavior. The DOT and FAA Privacy Offices conduct periodic privacy compliance reviews of IACRA and the AVS Registry with the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

FAA has in place a privacy/security incident response plan which includes procedures for detection of a privacy/security incident, remediation and response if one occurs, and notification where appropriate to protect and inform impacted individuals. In addition, the IACRA and AVS Registry administrators, privacy personnel, and security personnel have conducted a privacy/security incident response exercise to evaluate the effectiveness of this plan.

IACRA and the AVS Registry have system security plans in place. The IACRA system was issued an Authority to Operate (ATO) on March 2, 2022. The AVS Registry was issued an ATO on June 19, 2022. Both systems have therefore completed the authorization and accreditation process that reviews security controls and procedures and that validates that they are compliant with appropriate information security processes and policies.

### **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 1370.121B, FAA Information Security and Privacy Program & Policy, implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), 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, the FAA will implement additional policies and procedures as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors are given clear guidance about their duties as related to collecting, using, and processing privacy data. Guidance is provided in mandatory annual security and privacy awareness training, as well as FAA Order 1370.121B. The FAA will conduct periodic privacy compliance reviews of the IACRA and the AVS Registry as related to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

### **Responsible Official**

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### **Approval and Signature**

Karyn Gorman  
Chief Privacy & Information Asset Officer  
Office of the Chief Information Officer



## Appendix A

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

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

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

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

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

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

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

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

Once the application arrives at the Registry, the application is digitized and indexed. A



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

DOT Privacy Office - Approved - 09/29/2023



## Appendix B

Forms available in IACRA include the following:

- FAA Form 8400-3, [\*Application for an Airman Certificate and/or Rating \(Aircraft Dispatcher\)\*](#), OMB No. 2120-0007
- FAA Form 8610-1, [\*Mechanic's Application for Inspection Authorization\*](#), OMB No. 2120-0022
- FAA Form 8610-2, [\*Airman Certificate and/or Rating Application \(Repairman\)\*](#), OMB No. 2120-0022
- FAA Form 8710-1, [\*Airman Certificate and/or Rating Application\*](#), OMB No. 2120-0021
- FAA Form 8710-11, [\*Airman Certificate and/or Rating Application – Sport Pilot\*](#) OMB No. 2120-0690
- FAA Form 8710-13, [\*Remote Pilot Certificate and/or Rating Application\*](#) - OMB No. 2120-0021
- FAA Form 8060-71, [\*Verification of Authenticity of Foreign License and Medical Certification\*](#), OMB No. 2120-0724