



U.S. Department of Transportation

Privacy Impact Assessment

Federal Aviation Administration

FAA

Assessment Technology and License Administration

System Aviation

ATLAS Aviation

Responsible Official

Ryan Smith

Email: Ryan.C.Smith@faa.gov

Phone Number: 405-651-5400

Reviewing Official

Karyn Gorman

Chief Privacy Officer

Office of the Chief Information Officer





Executive Summary

The Federal Aviation Administration's (FAA's) Office of Aviation Safety (AVS) partnered with PSI Services LLC (PSI) to develop the Assessment Technology and License Administration System (ATLAS) Aviation (ATLAS Aviation), a system that supports FAA's scheduling and administration of FAA Airmen Knowledge Tests (AKTs). Information solicited by ATLAS Aviation is under the authority of [49 U.S. Code § 44703](#) and [14 CFR Part 61.35](#). Aviation industry individuals, e.g., pilots, parachute riggers, aviation maintenance technicians, drone operators, airline engineers, and inspectors (hereafter referred to as "Examinees"), are required to pass AKTs, which test their knowledge of aviation safety regulations and requirements, to obtain an FAA certification. Examinees use ATLAS Aviation to schedule and take their required AKTs. Through ATLAS Aviation, FAA employees and contractors develop the AKT questions, and PSI maintains the registration and testing system and administers the AKTs.

The FAA conducted this Privacy Impact Assessment (PIA) in accordance with the E-Government Act of 2002 because ATLAS Aviation collects, disseminates, and uses the Personally Identifiable Information (PII) of Examinees and PSI staff responsible for system administration, scheduling, and administering of the AKTs. The PIA is updated to reflect process changes related to administration of AKTs, the updated system of records notice (SORN), the updated records disposition schedule, and other administrative items to clarify content.

What is a Privacy Impact Assessment?

The Privacy Act of 1974 articulates concepts for how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.¹

¹Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo of M-03-22 dated September 26, 2003).



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 FAA oversees the administration of an estimated 250,000 AKTs annually to individuals seeking FAA certification. To meet this high demand for testing, the FAA partnered with PSI Services LLC (PSI) to develop and deploy ATLAS Aviation, which automates the delivery of AKTs. One piece of ATLAS is the Mechanic Test Generator (MTG) module which is used for the generation of aviation maintenance technician oral and practical tests. The MTG generates oral and practical tests based on questions the Examinee missed on the knowledge test. ATLAS Aviation exchanges PII with FAA's Designee Management System (DMS)² to facilitate the generation of standardized testing of Aviation Maintenance Technician (AMT) applicants. ATLAS Aviation provides a designee number to DMS, which in turn provides ATLAS Aviation with the corresponding designee name, account status, expiration date, training date, and authorizations.

PSI is a professional testing services company with a global presence and is a recognized leader in the high stakes testing industry. PSI has been the FAA's knowledge testing vendor since 1996, providing test delivery services under the now retired Airman Knowledge Testing (AKT) Organization Designation Authorization (ODA) Program. PSI supports the FAA in its development, assessment, maintenance, and enhancement of test items, tests, and supplementary materials with automated state-of-the-art technology and academic expertise.

Creating an Account

² DMS has a [PIA](#) published on the Department of Transportation PIA site.



Examinees must create an account, schedule an AKT exam and take the exam. The tests are administered by Test Center Administrators who are employees of either PSI or third-party testing centers contracted with PSI.

Examinees

To create an account profile in ATLAS Aviation, an Examinee navigates to the ATLAS website and enters their first name, last name, and FAA Tracking Number (FTN).³ ATLAS Aviation then compares the name and FTN against data maintained in the Integrated Airman Certification and Rating Application (IACRA).⁴ If the data matches, the Examinee can create their ATLAS Aviation account. To create their account, the Examinee provides ATLAS Aviation their email address, date of birth (DOB), phone number, address (including city, state, zip code, and country), and citizenship,⁵ and establishes a username and password. If the data does not match, the Examinee cannot continue creating their account profile. An Examinee whose data did not match must access IACRA to update their name and confirm their FTN prior to continuing to create their account to ensure that data matches.

PSI Test Center Administrators

Test Center Administrators (TCAs) are PSI personnel who proctor AKT exams at test centers. TCAs may create an account by entering their name, work phone number, postal code, country, work email address, and selecting a security question and answer, which are used to verify the TCA's identity in the event a password reset is required. The TCA then creates a unique login identification (ID) and password for their account. Additionally, TCAs choose their requested role and testing center from where they will proctor. Once submitted, the account request is sent to the PSI administrator who is responsible for account

³ The FAA Tracking Number (FTN) is a unique and permanent number assigned to an individual and is used to track the examinee certification. All examinees must establish an FTN within the FAA's Integrated Airman Certification and Rating Application (IACRA) before creating an ATLAS Aviation account or taking any AKT. This identification number will be printed on the applicant's Airman Knowledge Test Report (AKTR) in replacement of the Applicant ID number.

⁴ The role of IACRA within the [Airman Certification Process](#) is described in a PIA of the same name on the Department of Transportation website for PIAs.

⁵ In accordance with the standard set forth in the [ICAO International Standards and Recommended Practices, Annex 1](#), Ch. 5.1.1.1, contracting states must issue licenses to ensure that other states are able to easily determine the license privileges and the validity of ratings. In furtherance of this requirement, Annex 1 requires certain details to appear on the license, including nationality. See Ch. 5.1.1.2. Accordingly, FAA must collect citizenship information during the test registration process to comply with this requirement, which ensures that airmen with United States certifications are able to conduct foreign operations without additional complications and registration requirements. The [FAA Order 8080.6H](#) and the ACTS Statement of Work (SOW) set forth the requirements for all data captured during the test registration process, to include citizenship.



approval and oversight of TCAs. Once approved, a PSI administrator generates an email advising the TCA that their account has been approved.

FAA Employees and Contractors

A limited number of FAA employees and contractors require access to ATLAS Aviation to create AKT questions, view or edit testing site information, and view or edit examinee information. FAA employees and contractors must provide their name and email address to request access. PSI Administrators create the FAA employee and contractor accounts and email the FAA employee or contractor their username and initial temporary password. The password must be reset upon first use.

Scheduling and Paying for Airman Knowledge Test (AKT) Exam

To schedule an AKT, the Examinee logs into ATLAS Aviation, navigates to the test selection screen, selects the AKT they wish to take, enters their authorization code and “take count” information,⁶ and enters their zip code and preferred testing dates to display the nearest testing locations. The Examinee then selects an AKT testing location, the test date and time. PSI is authorized by the FAA to collect fees associated with the administration of AKTs; payments made in ATLAS Aviation are made directly to PSI and not the FAA. When prompted, the Examinee provides their credit card information which is transferred to PSI’s payment vendor, Braintree (a PayPal company)⁷. Braintree returns a payment authorization code for successful payment or declines the credit card if payment was not successful. The authorization code is used to verify that the Examinee successfully paid for the AKT they wish to take. ATLAS Aviation does not store or maintain credit card information.

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

Taking an AKT Exam

Prior to taking the AKT at the registered PSI location, the Examinee must successfully complete an identity verification. The examinee must present a valid government-issued photo identification (ID)⁸ to complete proof of identity. The TCA reviews the photo ID to

⁶ The “take count” is the number of times an Examinee has previously taken the same test.

⁷ Credit card payment information is encrypted via Transport Layer Security (TLS) version 1.2 (TLS 1.2) and transmitted in real-time. Braintree’s Privacy Statement is located at: [Braintree Privacy Statement | Braintree Payments](#).

⁸ Examinees must present a photo ID in accordance with 14 CFR Part 61.35, that contains a photograph, signature, DOB. The ACTS SOW and [FAA Order 8080.6H](#), Conduct of Airmen Knowledge Tests establishes what constitutes an acceptable ID under the regulation. Specifically, U.S. citizens/resident aliens are required



verify the picture on the ID matches the individual presenting the ID (identity verification), the name on the ID matches the Examinee's ATLAS Aviation account, and the ID includes a DOB, signature, and address.⁹ The TCA scans the photo ID into ATLAS Aviation if they are able to verify that the ID meets all requirements. If the TCA is not able to verify the Examinee's identity or the ID does not meet all requirements, their photo ID will not be scanned, and the Examinee will not be permitted to take the AKT. The Examinee must also present any required authorization for the selected AKT. The TCA reviews the authorization to verify it meets the Federal Acquisition Regulation (FAR) requirements and subsequently scans the authorization if it meets requirements. If the TCA is not able to verify that the authorization meets FAR requirements, then the authorization will not be scanned, and the Examinee will not be permitted to take the AKT. If the authorization is successful, the TCA enters the DOB from the photo ID. If the DOB matches the DOB from the Examinee's ATLAS Aviation account, the TCA completes the identity verification and receives a Single Sign On (SSO) access code which will be used by the Examinee to launch the test. If the DOB does not match the examinee's ATLAS Aviation account, then the Examinee must access their ATLAS Aviation account to correct the DOB or else they will not be permitted to take the AKT.

If the Examinee's identity is verified, the TCA escorts the examinee to an ATLAS Aviation AKT workstation. The TCA enters the Examinee's username and password to log into the workstation so that the Examinee can start their AKT. The TCA or the Examinee subsequently enters the SSO code to launch the scheduled AKT. The TCA prints a knowledge test report and presents it to the Examinee. The knowledge test report has the Examinee's name, FTN, score, date of test, date of test expiration, site ID of where the test was taken, exam ID, and Airman Certification Codes for the subject areas missed.

ATLAS Aviation transmits the Examinee's name, FTN, client ID (ATLAS Aviation identifier), assessment provider ID (PSI identifier), client order ID (ATLAS Aviation internal identifier for the attempted AKT), and exam information (e.g. date, title, test type, score) to IACRA. IACRA uses the information to process the airmen certification.

Examinees may log into ATLAS Aviation to verify that their exam activity and results were recorded correctly.

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

to present a driver's license or passport. Non-U.S. citizens/non-resident aliens are required to present two government-issued identifications, one must be a passport.

⁹ If the address is a P.O. Box, a supporting document (e.g., bank statement or bill) must be presented by the examinee showing a valid physical address. The supporting document is not scanned into ATLAS Aviation.



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) v3¹⁰, 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 Organizations¹¹.

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

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

Records pertaining to Examinees' testing information within ATLAS Aviation (i.e., Examinees' test results) are considered "convenience copies." The official version of these records is maintained in the AVS Registry.¹² In ATLAS, these records are retrieved by Examinee's name or FTN; therefore, the FAA protects and maintains these records in accordance with DOT published System of Records Notice (SORN) [DOT/FAA 847 - Aviation Records on Individuals \(89 FR 48956 - June 10, 2024\)](#). This SORN covers both the convenience copies maintained within ATLAS, and the official record that is maintained in the AVS Registry. ATLAS Aviation also maintains account profile records in accordance with [DOT/ALL 13, Internet/Intranet Activity and Access Records, \(May 7, 2002, 67 FR 30758\)](#).

¹⁰ <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

¹¹ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf

¹² The Airmen Certification System (including AVS Registry and IACRA) PIA is located at: [PIA-AVS-IACRA-3/22/2023](#).



The publication of this PIA also demonstrates DOT's commitment to providing transparency about its privacy practices to examinees who use ATLAS Aviation for their knowledge testing. The [FAA.gov](https://www.faa.gov) website has information about the testing requirement.

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.

ATLAS Aviation collects Examinee name, FTN, DOB, email address, phone number, city, state, zip code, country, and citizenship directly from the individuals. ATLAS Aviation maintains a scanned copy of the photo ID and authorization that was used to verify the Examinee's identity prior to them being approved to take the AKTs. The photo ID and authorization are retained in case the FAA's Office of Security and Hazardous Materials Safety (ASH) is required to investigate incidents of suspected fraud in the testing process.

An Examinee may log into their ATLAS Aviation account at any time and update any of their information, except for their name and FTN.¹³ Name changes must be completed in IACRA. Once the name change is completed in IACRA, the Examinee can log back into ATLAS Aviation and select the "update" feature to refresh their information. At that time, ATLAS Aviation automatically pulls the updated name through a data exchange with IACRA and presents it on the screen. The ATLAS Aviation account information may also be updated by contacting PSI via phone at 844-704-1487.

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

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

FAA employees and contractors create an account by providing their name and email address to develop AKT questions.

¹³ The Examinee's name can only be updated in IACRA (see the IACRA PIA for the process). The FTN is an automatically generated IACRA number, which cannot be changed.



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

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

The request must include the following information:

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

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

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

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

Purpose Specification

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

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



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

14 CFR Part § 61.35 “Knowledge test: Prerequisites and passing grades” establishes the specific identity verification requirements Examinees must adhere to when applying for an AKT. The regulations state that the individual must provide:

- (3) Proper identification at the time of application that contains the applicant's—
 - (i) Photograph;
 - (ii) Signature;
 - (iii) Date of birth, which shows:
 - (A) For issuance of certificates other than the ATP certificate with an airplane category multiengine class rating, the applicant meets or will meet the age requirements of this part for the certificate sought before the expiration date of the airman knowledge test report;
 - (B) Prior to August 1, 2014, for issuance of an ATP certificate with an airplane category multiengine class rating under the aeronautical experience requirements of §§61.159 or 61.160, the applicant is at least 21 years of age at the time of the knowledge test; and
 - (C) After July 31, 2014, for issuance of an ATP certificate with an airplane category multiengine class rating obtained under the aeronautical experience requirements of §§61.159 or 61.160, the applicant is at least 18 years of age at the time of the knowledge test;
 - (iv) If the permanent mailing address is a post office box number, then the applicant must provide a current residential address.

ATLAS Aviation uses the Examinee’s name, FTN, DOB, phone number, email address, city, state, zip code, country, and citizenship to create an account, determine test eligibility, and administer the AKT. The photo ID is used to verify the Examinee’s identification.

ATLAS Aviation collects the TCA’s name, work phone number, postal code, country, and work email to create an account. TCAs also provide a security question and answer that can be used to reset their password. Lastly, the system collects FAA employee and contractor names and email addresses to create user accounts.

The Examinee’s photo ID, authorization, tests results, test dates, test times, and test locations are shared with ASH upon request to investigate potentially fraudulent activities.



ATLAS Aviation also shares the Examinee's name, FTN, client ID, assessment provider ID, client order ID, and information about the Examinee's score and exam (ex. date, title, exam type) with IACRA. IACRA uses the information to process the airmen certification. ATLAS Aviation provides the designee number to FAA's Designee Management System (DMS) and DMS then provides the designee's name, account status, expiration date, training date, and authorizations back to ATLAS Aviation. The purpose of this sharing with DMS is to facilitate the generation of standardized testing of Aviation Maintenance Technician (AMT) applicants by ensuring DME designees are active and authorized to generate that test. The FAA has established appropriate data-sharing instruments between FAA program offices to document data protection requirements.

Data Minimization & Retention

DOT should collect, use, and retain only PII that is relevant and necessary for the specified purpose for which it was originally collected.

The FAA retains airmen knowledge tests within ATLAS for five years based on schedule DAA-0237-2024-0001; the longest period for which an AKT may be valid. The current retention timeframe supports ongoing access to testing history for applicants, as well as the FAA's need to access records in the event of an investigation of suspected testing fraud or regulatory violations. Additionally, the five-year retention period supports FAA efforts to ensure that the service provider complies with testing standards.

Per FAA Order 8080.6H, Conduct of Airman Knowledge Tests, the photo identification required to validate the Examinee becomes a part of the Test Center daily log which is retained for five years. The retention requirement for this data is additionally outlined in PSI's Statement of Work (SOW) with the FAA.

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

Use Limitation

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

ATLAS Aviation maintains "convenience copies" of examinee AKT records to support the FAA's business needs for knowledge test administration for FAA airman certification.



These convenience copies are maintained in ATLAS Aviation to enable examinees to see the name of tests they have taken, score reports and review/update their account profile.

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

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

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

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

Data Quality and Integrity

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

The FAA ensures that the collection, use, and maintenance of Examinees’ information is accurate, complete, and up to date. To ensure accuracy of the name and FTN the examinee enters, ATLAS Aviation interfaces with IACRA and compares the names and FTN. If the name and FTN are not a match, the Examinee cannot continue with creating their account



profile. To complete their account, the Examinee must access IACRA to update their name and confirm their FTN.

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

Security

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

The FAA protects PII with reasonable security safeguards against loss or unauthorized access, destruction, usage, modification, or disclosure. These safeguards incorporate standards and practices required for federal information systems under the Federal Information Security Management Act (FISMA) and are detailed in Federal Information Processing Standards Publication 200, Minimum Security Requirements for Federal Information and Information Systems, dated March 2006, and The National Institute of Standards and Technology Special Publication (NIST) 800-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations, dated April 2013. ATLAS Aviation received its updated Authorization to Operate (ATO) on September 27, 2022, and undergoes the FAA's annual information systems security Certification and Accreditation process.

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



Braintree, a division of PayPal, is PSI's chosen payment processor. Braintree undergoes an annual assessment by a qualified security assessor (QSA) to ensure its compliance with the security standards for payment processors established by the PCI Security Standards Council¹⁴. Additionally, Braintree has been assessed according to the American Institute of Certified Public Accountants (AICPA)¹⁵ standards and received a State of Standards for Attestation Engagements -18 (SSAE-18) System and Organization Controls (SOC)-2 report.¹⁶ PCI is responsible for reviewing the Braintree assessments. The FAA only receives confirmation of payment and does not process or receive any other payment-related data.

Accountability and Auditing

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

FAA Order 1370.121B, 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 who work with the ATLAS Aviation receive clear guidance about their duties as related to collecting, using, and processing privacy data. Mandatory annual security and privacy training awareness training, as well as FAA Order 1370.121B, provide additional guidance. The FAA will conduct periodic privacy compliance reviews of all information systems as related to the requirements of OMB Circular A-130, Managing Information as a Strategic Resource.

¹⁴ <https://www.pcisecuritystandards.org/>

¹⁵ <https://www.aicpa-cima.com/home>

¹⁶ SOC 2® Reporting on an Examination of Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy - <https://www.aicpastore.com/SOC/reporting-on-controls-at-a-service-organization-re/PRDOVR~PC-0128210/PC-0128210.jsp>



Responsible Official

Ryan Smith
System Owner
COR/ACTS Program Manager
General Aviation and Commercial Division, AFS-800

Prepared by: Barbara Stance, FAA Privacy Officer

Approval and Signature

Karyn Gorman
Chief Privacy Officer
Office of the Chief Information Officer

DOT Privacy Office - Approved - 02/20/25