
Office of Inspector General

Audit Report

**FAA DELAYS IN ESTABLISHING A PILOT
RECORDS DATABASE LIMIT AIR
CARRIERS' ACCESS TO BACKGROUND
INFORMATION**

Federal Aviation Administration

Report Number: AV-2015-079

Date Issued: August 20, 2015





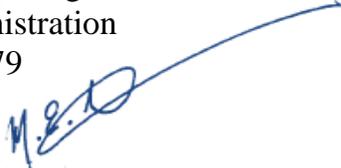
U.S. Department of
Transportation

Office of the Secretary
of Transportation
Office of Inspector General

Memorandum

Subject: **ACTION:** FAA Delays in
Establishing a Pilot Records Database Limit
Air Carriers' Access to Background Information
Federal Aviation Administration
Report No. AV-2015-079

Date: August 20, 2015

From: Matthew E. Hampton 
Assistant Inspector General
for Aviation Audits

Reply to
Attn. of: JA-10

To: Federal Aviation Administrator

Ensuring that air carrier pilots are qualified and competent is a key component of maintaining our Nation's excellent air safety record. The Federal Aviation Administration (FAA) and air carriers maintain extensive information that can be used to evaluate the competence and qualifications of pilots during the hiring process. However, U.S. air carriers have experienced multiple accidents that were attributed in part to errors made by pilots who had been hired without sufficient background safety checks. Further, the National Transportation Safety Board (NTSB) has raised concerns that carriers may not receive comprehensive data on pilots when hiring. During the investigation of the 2009 Colgan Air crash in New York, NTSB noted that the carrier was unaware of the captain's previous flight check failures because they were not included in the standard pilot record review process.

As a result, the 2010 Airline Safety and Extension Act¹ (the Act) mandated that FAA create a pilot records database (PRD) to ensure FAA and air carrier pilot records are retained for the life of the pilot and that air carriers review those records when making hiring decisions. The new database enhances the Pilot Records Improvement Act of 1996 (PRIA),² which requires airlines to request 5 years of training records; DOT drug and alcohol test results from previous

¹ Airline Safety and FAA Extension Act of 2010, Pub. L. 111-216, August 1, 2010.

² Pilot Record Improvement Act of 1996, Pub. L. No. 104-264, Title V, October 9, 1996.

employers; basic certificate and medical information from FAA, including enforcement actions taken against the pilot; and any violations reported to the national driver registry.

Concerned about FAA's progress in establishing the PRD, the Chairman and Ranking Member of the House Transportation and Infrastructure Aviation Subcommittee requested that we update our previous work³ regarding FAA and the industry's progress in implementing the new database. Accordingly, our audit objectives were to: (1) evaluate FAA's progress in developing and implementing the PRD, and (2) determine what pilot records are available for air carriers to obtain and review for new applicants.

To conduct our work, we interviewed FAA officials responsible for developing the database and maintaining existing pilot records at the Mike Monroney Aeronautical Center in Oklahoma. We also visited nine randomly selected Part 121⁴ air carriers representing both large and small operations and their respective FAA oversight offices. We conducted our work in accordance with generally accepted Government auditing standards. Exhibit A details our scope and methodology, and exhibit B lists organizations we visited or contacted.

RESULTS IN BRIEF

FAA's progress in developing and implementing the PRD remains limited, and its completion remains uncertain. According to FAA's regulatory timeline, the Agency does not expect to issue a PRD rulemaking until 2017, and the database will likely not be fully implemented until more than a decade after Congress mandated its creation in 2010. FAA has yet to make key decisions regarding historical records or how air carriers will transition to the database and have access to all available data. Further, despite concerns raised by our office in January 2013, FAA waited nearly 2 years to begin assessing whether air carriers were retaining required records for the database. As a result, three of the nine carriers we visited had not revised their policies to retain these records. In addition, pilot training records from previous employers may not be attainable because FAA has not established a process to ensure their records are maintained when air carriers cease operations. In fact, in the 4 years since the Act's passage, more than 750 companies, including commercial carriers, merged or went out of business and relinquished their FAA certificate. Representatives from eight of the nine air

³ *FAA and Industry Are Advancing the Airline Safety Act, but Challenges Remain To Achieve Its Full Measure* (OIG Report Number AV-2013-037), January 31, 2013. OIG reports are available on our Web site at <http://www.oig.dot.gov/>.

⁴ 14 CFR Part 121, Operating Requirements: Domestic, Flag, and Supplemental Operations. Carriers that operate larger aircraft with primarily scheduled flights.

carriers we visited told us they were not able to obtain pilot records from an applicant's previous employer. Continued delays in FAA's implementation of the PRD limit the number of pilot records that carriers can evaluate when hiring pilots.

Air carriers, in large part, do not have all relevant pilot records available to review when evaluating pilot applicants and making hiring decisions. During FAA's 2009 Call to Action on Airline Safety, air carriers made voluntary commitments to obtain additional pilot records from FAA (beyond those required by PRIA) when evaluating a pilot for potential employment. However, FAA has not determined whether air carriers have followed through on their commitments to request additional records that would include notifications of unsatisfactory FAA evaluations. According to FAA data from 2012 to 2014, air carriers submitted more than 20,000 requests for records available under PRIA, but submitted fewer than 8,000 requests for more extensive FAA records that air carriers committed to obtain. Even though FAA communicated with the airlines regarding the availability of additional information, six of the nine air carriers we reviewed are not obtaining additional pilot records outside of PRIA. As a result, air carriers are not able to fully evaluate prior performance when deciding whether or not to hire a pilot as intended by the 2010 Act.

We are making recommendations to improve FAA's implementation of the PRD and the current process used by air carriers to obtain pilot records during hiring.

BACKGROUND

Between 1987 and 1994, the U.S. airline industry suffered seven major accidents⁵ that were attributed in part to errors made by pilots who had been hired without background safety checks. In all cases, the hiring airlines lacked access to, or failed to obtain, the pilots' flight qualifications and other safety records from FAA and/or previous employers before completing the hiring process. As a result, Congress enacted PRIA, which requires carriers to request qualifying information from FAA and previous employers when hiring pilots. In 2005, NTSB recommended that FAA also require air carriers to obtain any notices of disapproval for pilots before making a hiring decision—which was not required under PRIA. Notices of disapproval are provided to pilots when they fail to satisfactorily complete a flight test (e.g., instrument rating, flight instructor, or airline transport pilot certificate). In response, the Agency stated that rulemaking would be necessary to require air carriers to obtain the records. Instead, FAA

⁵ The NTSB defines major accidents as: the aircraft was destroyed, or there were multiple fatalities, or there was one fatality and substantial damage to the aircraft.

opted to revise guidance to inform carriers of the availability of additional pilot records.

During the investigation of the 2009 Colgan Air accident in New York, NTSB found that the captain of the flight failed to disclose failed proficiency checks that occurred prior to his employment with the airline. The carrier had requested pilot records in accordance with PRIA, but remained unaware of the additional problems the pilot experienced because the carrier had not specifically requested records on failed evaluations.

Following the 2009 Colgan Air crash, FAA requested that air carriers implement policies for asking pilot applicants to voluntarily disclose their records, including any unsatisfactory flight tests. Additionally, through the 2010 Airline Safety and Extension Act, Congress mandated that FAA develop and implement a PRD consisting of pertinent information from FAA, air carriers, and other records (including the National Driver Register). The records are to be maintained in the database for the life of a pilot to ensure comprehensive pilot records are available to air carriers during the hiring process.

FAA REMAINS YEARS AWAY FROM DEVELOPING A CENTRALIZED DATABASE FOR PILOT RECORDS

Since the Act mandated FAA to create a PRD in 2010, the Agency's progress has been limited. FAA has yet to make critical decisions regarding historical records and how carriers will transition to the new database. In addition, FAA has not ensured air carriers are retaining records for inclusion in the database. As a result, once FAA's PRD is implemented, it may lack key records that could help air carriers make informed hiring decisions.

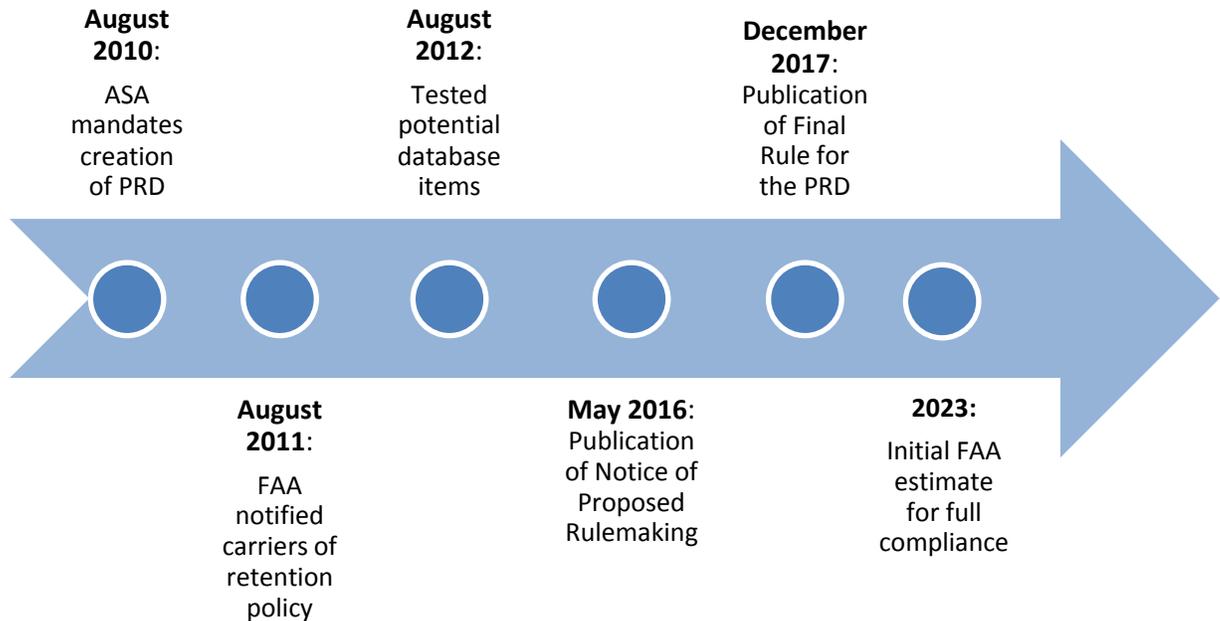
FAA Has Not Made Significant Progress on Issuing a PRD Rulemaking

FAA has been slow to establish a PRD. Agency officials stated that this is in part because the Act did not contain deadlines for its development or implementation. As a result, FAA opted to allocate resources to other Act requirements that had deadlines, such as raising standards in pilot training and performance, and improving rest requirements. To fulfill the Act's PRD mandate, FAA determined that a rulemaking initiative would be necessary to require carriers to provide records for the database. However, little progress has been made.

Further, FAA continues to extend internal milestones, making it unclear when the PRD will be fully implemented. For example, in the past year, FAA delayed the publication date for a Notice of Proposed Rulemaking (NPRM) four times. As a

result of these delays, FAA projects a final rule will not be published until 2017. FAA is also considering extending the implementation period, which could allow air carriers until 2023 to achieve full compliance with the rule (see figure 1).

Figure 1. Current FAA Milestones for the Pilot Records Database



Source: OIG analysis

To date, FAA's preliminary work on the database has been minimal and focused primarily on basic design elements. In 2012, an FAA contractor developed and tested processes needed for users to input and retrieve pilot records. Although it cost \$3.8 million, the project was performed only on a small scale to determine database design feasibility. Further, FAA currently estimates that additional development costs will range from \$4 to \$9 million, and operating costs will range from \$11 to \$27 million for the first 10 years. FAA stated it would not select a contractor to develop the database until an NPRM was published. While FAA officials stated they would use the information from the initial demonstration when they restart development, it is likely that major system and design changes will be needed based on industry feedback to the rule. As a result, the final cost of the PRD remains unknown.

In addition, FAA has not yet begun developing and populating the database with currently available pilot records. According to FAA, the rulemaking process is

necessary to establish air carrier requirements for inputting pilot records. However, not all steps for developing the PRD depend on a rulemaking, such as consolidating its existing databases to streamline the process carriers use to request data. For example, currently, carriers must contact two separate FAA offices to obtain background information on a pilot's qualifications, experience, and safety record, because pilot certification data is managed by a different office than accident, incident, and enforcement information. In the new PRD, these processes will be consolidated. But rather than starting to combine these data sources now, FAA has opted to wait until the rulemaking process is complete, which will delay the streamlining of air carrier access to more comprehensive pilot records.

FAA Has Not Yet Resolved Challenges Regarding Historical Records

FAA has not made key decisions regarding the scope of historical air carrier records to be included in the database and how carriers will make the transition. This includes addressing concerns about the immense record entry requirements for carriers and resolving differences in air carrier recordkeeping systems that could impact data collection.

First, one of FAA's biggest remaining challenges is deciding how to lessen the "paperwork burden" on air carriers, particularly in obtaining and inputting pilot data as far back as 2005 as the Act requires.⁶ While most air carriers use electronic recordkeeping systems, some carriers still have paper-based systems or archive older records, making them more difficult to retrieve. FAA will also have to resolve data gathering issues related to differences in the amount and type of data carriers maintain on pilots. For example, some air carriers use Advanced Qualification Programs (AQP)⁷ while others use traditional training programs. The comments from instructors in AQPs are used to analyze performance trends across the entire program without identifying specific pilots' names, whereas comments in traditional training programs are maintained in a pilot's individual training record. Regardless of the system used, carriers must record whether the pilot successfully completed the training event. FAA has not determined how to resolve these differences to obtain each pilot's training records and ensure comprehensive historical information is included in the database.

⁶ The Airline Safety Act requires air carriers to retain required records as of the date of enactment (August 2010). Since PRIA requires carriers to keep an inactive pilot's records for at least 5 years, FAA interprets the Act's retention requirement to include air carrier records going back to August 2005.

⁷ Advanced Qualification Program (AQP) is a voluntary alternative to traditional training regulations that replaces programmed hours with proficiency-based training, and incorporates data-driven processes enabling air carriers to refine training based on identified individual needs.

Second, FAA has yet to determine how to transition from current recordkeeping practices mandated by PRIA, which provides limited information from the previous 5 years, to the new database, which will contain more extensive information. Once FAA issues its PRD rule, carriers will be required to undertake extensive record retrievals and submit all pilot records dating back to 2005—a process that could take several years, according to FAA. FAA will not be able to fully implement the database until carriers complete this process. However, in the meantime, FAA has not yet developed a process for how carriers can retrieve pilot records during the multi-year transition period between when the final rule is issued and when the database is implemented. As a result, air carriers may not receive all available information for a pilot's background and past training performance during this transition period.

To its credit, FAA has made progress in determining what records it will propose to be included in the database. For example, FAA has determined that the database should include records documenting the outcome of training and evaluation events, such as proficiency and line checks, disciplinary actions related to flying, and resignations or terminations from previous employers, among others.

FAA Has Not Ensured Carriers Are Retaining Records To Populate the New Database

FAA inspectors have not evaluated whether air carriers are retaining pilot training records for future inclusion into the PRD. In August 2011, FAA issued guidance⁸ to air carriers for retaining and submitting pilot training records for the new database. Additionally, in January 2013, our office recommended that FAA inspectors determine whether carriers changed their policies in accordance with the guidance. While FAA concurred with our recommendation, it took nearly 2 years to inform inspectors that they must review and evaluate air carrier training records to ensure that the appropriate records are being retained.⁹ During our review, we determined that three of the nine carriers we visited had not updated their policies to ensure they were keeping records as required by the Act. As a result, records that are more than 5 years old (i.e., the length of time that carriers were required to maintain records prior to the Act) may be lost or not accessible to future hiring carriers through the new database.

Furthermore, delays in the PRD are limiting the information carriers have on pilots who flew for companies that are no longer operating. While the Act requires active

⁸ In FO 11014: Retention of Pilot Records for the Pilot Records Database (PRD)—voluntary guidance from FAA to air carriers recommending policies on pilot records retention.

⁹ Notice 8900.279: Pilot Record Retention Responsibilities Related to the Airline Safety and FAA Extension Act of 2010, December 12, 2014.

carriers to maintain records on pilots' past performance, FAA does not have procedures to secure these records when carriers stop operating, such as when a carrier goes out of business. Instead, hiring carriers can use the "Good Faith Exception," which allows them to hire a pilot when records are not available. Eight of nine air carriers we visited encountered instances when records from previous employers were not available. When asked how often carriers rely on the exception when hiring pilots, FAA officials stated they did not know.

In the 4 years since the Act's passage, more than 750 companies, including commercial carriers, have ceased operations and no longer hold an FAA certificate. Applying this historical average, we estimate that more than 550 companies could be added to this figure by the time FAA publishes the rule. This could result in thousands of irretrievable pilot records. Because the development and implementation of the PRD remains many years away, air carriers' ability to obtain pilot records from previous employers will continue to be a significant issue as more carriers cease to operate.

FAA HAS NOT ENSURED AIR CARRIERS HAVE ALL RELEVANT PILOT RECORDS AVAILABLE WHEN EVALUATING NEW APPLICANTS

Air carriers do not yet have all the relevant pilot records that are currently available when hiring new applicants. During FAA's 2009 Call to Action on Airline Safety, air carriers committed to request additional pilot records beyond those required by PRIA. Air carriers, with a pilot's consent, can obtain these additional records from FAA through Privacy Act or Freedom of Information Act (FOIA) requests. Information contained in these additional records would go beyond 5 years and include closed enforcement actions,¹⁰ accident/incident information, and notices of disapproval for failed FAA flight tests (see table 1). Most of these records would not be included on FAA's standard PRIA response letter to carriers.

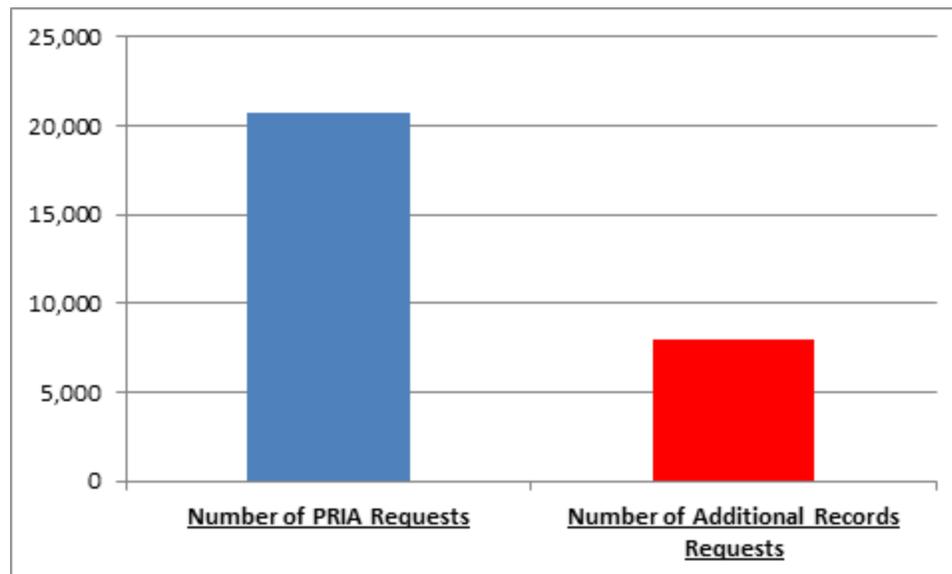
¹⁰ FAA findings of a violation that have been fully adjudicated and not subsequently overturned.

Table 1. FAA Airman Data Available Through Air Carrier Requests

	PRIA	Privacy Act	FOIA
Airman Certificate / Medical Certificate	✓		
Closed Enforcement Action	✓	✓	✓
Notices of Disapproval		✓	✓
Accident / Incident Information		✓	✓

Source: OIG analysis

Despite these commitments, the Agency has not followed up with air carriers to determine whether they implemented new policies to obtain all available records. Further, FAA has not moved forward in developing its portion of the database, which could provide hiring carriers streamlined access to these additional records. As a result, we found that many carriers have requested records through PRIA but have not requested additional records through other available means. Figure 2 below displays the large discrepancy between PRIA requests and additional record requests among Part 121 carriers.

Figure 2. Number of PRIA Requests Compared to Requests For Additional Pilot Records 2012—2014

Source: OIG analysis

Six of the nine air carriers we visited did not request additional records from FAA when hiring pilots despite communications from the Agency encouraging carriers

to request them. Without these additional records, air carriers may be unaware of unsatisfactory evaluation events or other items that could indicate performance issues for a pilot. Many of these records are expected to be part of the new database; however, until FAA moves forward to develop the database and provide carriers with a streamlined process to request records, there will likely remain a large discrepancy in the records obtained by carriers.

CONCLUSION

Ensuring air carriers have all available information on a pilot's training performance remains a critical safety area for FAA. In particular, the importance of enhancing the screening process of newly hired pilots came to light after the 2009 Colgan Air crash. However, since that time, the Agency has not done enough to emphasize the significance of obtaining comprehensive pilot records, and still has considerable work ahead in developing a centralized database. A key step will be updating carriers on their progress developing the database, while ensuring carriers retain all pilot records—especially given that the PRD may not be fully operational for another 8 years. Until FAA addresses these shortcomings and fulfills the Act's requirements, significant gaps will persist in the extent and level of data reviewed by airlines prior to hiring pilots.

RECOMMENDATIONS

As we previously recommended, FAA should complete inspections to ensure pilot records are being retained for inclusion in the PRD. Also, to better manage its implementation of the PRD and ensure that air carriers have all available information on a pilot's training performance, we recommend that FAA:

1. Develop a clearly defined and expedited schedule for the development and implementation of a PRD, including cost estimates and project timelines.
2. As part of the standard PRIA response letter, incorporate a written notification to air carriers that additional records may be available through FOIA and Privacy Act requests.
3. Establish the FAA-records portion of the database and develop a single process for air carriers to request and obtain records currently available through PRIA, notices of disapproval, and summaries of enforcement actions in accordance with the Act.

AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE

We provided FAA a copy of our draft report on June 17, 2015, and received its response—including in full in the appendix—on July 31, 2015. FAA concurred with our three recommendations and agreed to implement them as written. In addition, FAA stated that it would provide a more detailed response to all of our recommendations at a later date. Based on FAA's response so far, we consider recommendations 1 and 2 resolved but open pending the detailed response and completion of planned actions. However, for recommendation 3, FAA's response only indicated that it would develop a plan to implement our recommendation and did not confirm that the Agency would begin establishing its portion of the database. Therefore, we consider recommendation 3 unresolved and request that FAA provide this confirmation in its detailed response.

ACTIONS REQUIRED

We consider recommendations 1 and 2 resolved but open pending FAA's detailed response and completion of the planned actions. For recommendation 3, we request that FAA provide additional information in its detailed response. In accordance with DOT Order 8000.1C, we request that FAA provide its detailed response to our recommendations within 30 days of this report. Until we receive this information, we consider recommendation 3 open and unresolved.

We appreciate the courtesies and cooperation of Federal Aviation Administration representatives during this audit. If you have any questions concerning this report, please call me at (202) 366-0500 or Tina Nysted, Program Director, at (404) 562-3770.

#

cc: DOT Audit Liaison, M-1
FAA Audit Liaison, AAE-100

EXHIBIT A. SCOPE AND METHODOLOGY

We conducted this review between February 2014 and June 2015 in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Our audit objectives were to (1) evaluate FAA's progress in developing and implementing the pilot record database and (2) determine what pilot records are available for air carriers to obtain and review for new applicants.

To evaluate FAA's progress in developing and implementing the PRD, we collected FAA documentation regarding database planning, feasibility, and internal benchmarks. We determined what information regarding the PRD and associated requirements had been disseminated to FAA field personnel. We also interviewed FAA representatives responsible for establishing the PRD to determine what technical headway the Agency has made and what challenges exist in database creation, and to ascertain the status of PRD rulemaking.

To determine FAA's progress in ensuring air carriers have access to relevant pilot records for evaluation, we obtained and compared FAA data on pilot record requests for PRIA and additional records. We also reviewed FAA data on air carriers that have ceased operations since the passage of the 2010 Airline Safety Act to demonstrate the breadth of pilot records that are lost as PRD implementation continues to be delayed.

We randomly selected 9 out of 81 Part 121 and Part 121/135 carriers and interviewed their management and hiring/recruitment personnel regarding their pilot record retention policies and their experience with FAA record requests. We also interviewed the respective FAA Certificate Management Teams that are tasked with overseeing those 9 carriers to identify their knowledge of air carrier policies concerning pilot records, as well as their knowledge of the PRD.

We did not test FAA internal controls during the course of this audit.

EXHIBIT B. ORGANIZATIONS VISITED OR CONTACTED

Federal Aviation Administration (FAA) Headquarters

Flight Standards, Regulatory Support Division	Oklahoma City, OK
Flight Standards, Civil Aviation Registry Division	Oklahoma City, OK
Flight Standards, ASI Rulemaking Coordination	Phoenix, AZ
Flight Standards, Airmen Certification Branch	Oklahoma City, OK
Flight Standards, Aviation Data Systems Branch	Oklahoma City, OK
	Washington, DC

FAA Flight Standards District Offices (FSDO)

Minneapolis FSDO	Minneapolis, MN
Charlotte FSDO	Charlotte, NC
East Michigan FSDO	Belleville, MI

FAA Certificate Management Offices (CMO)

Dallas/Fort Worth CMO	Irving, TX
United CMO	Des Plaines, IL
Alaska CMO	SeaTac, WA
Phoenix CMO	Phoenix, AZ

Air Carriers

Omni Air	Dallas, TX
Alaska Airlines	Seattle, WA
Endeavor Air	Minneapolis, MN
US Airways	Charlotte, NC
United Airlines	Denver, CO
Kalitta Charters II	Ypsilanti, MI
USA Jet	Belleville, MI
Swift Air	Phoenix, AZ
Mesa Airlines	Phoenix, AZ

EXHIBIT C. MAJOR CONTRIBUTORS TO THIS REPORT

<u>Name</u>	<u>Title</u>
Tina Nysted	Program Director
Travis Wiley	Project Manager
Marshall Anderson	Senior Analyst
Andrew Farnsworth	Senior Analyst
Galen Steele	Senior Auditor
Audre Azuolas	Writer/Editor

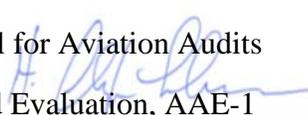


Federal Aviation Administration

Memorandum

Date: July 31, 2015

To: Matthew E. Hampton, Assistant Inspector General for Aviation Audits

From: H. Clayton Foushee, Director, Office of Audit and Evaluation, AAE-1 

Subject: Federal Aviation Administration's (FAA) Response to Office of Inspector General (OIG) Draft Report: Establishing a Pilot Records Database

The pilot records database (PRD) is under development as an electronic clearinghouse that will contain personally identifiable information and records on the performance of approximately 866,000 pilots, as required by the Airline Safety and Federal Aviation Administration Extension Act of 2010 (Public Law 111-216). However, the FAA must conduct rulemaking to issue regulations, processes, and procedures to manage the use of the database and to ensure that information is reliably and securely received and reported to approximately 5,000 air carriers, operators, and an estimated 10,000 additional users.

The rulemaking process requires the FAA to estimate and analyze the costs and benefits of the proposed requirements, consider public comments to the proposal, receive Department of Transportation (DOT) and Office of Management and Budget (OMB) clearance, and issue final requirements. As noted in the OIG draft report, this particular rulemaking project is a complex and lengthy undertaking due to the requirements that the proposed rule be fully examined for acceptable alternatives to mitigate costs and for cyber security risks to the Federal government, aviation industry, and individual pilots. Even though the complexity of this project is significant, a lot progress has been made concerning the design and management of the database.

While the FAA completes the process to issue a Notice of Proposed Rulemaking for the *Pilot Records Database* (RIN 2120-AK31), the FAA is:

- Continually inspecting air carriers and operators for their compliance with Title 49 of the United States Code 44703(i)(4)(B)(ii)(II)¹, requiring pilot records to be retained from August 1, 2005.
- Pursuing the automation of Pilot Records Improvement Act (PRIA) records which will provide air carriers direct access to FAA pilot records and significantly reduce the time it takes to acquire them.

¹ Airmen Certificates, FAA Pilot Records Database

- Developing proposed regulations to address the inconsistent formats with historical and present recordkeeping practices. The proposed solution could mitigate the extensive time necessary for an air carrier to fully comply with the PRD's requirements while still providing useful and reliable information to hiring air carriers.
- Identifying ways to reduce the data entry burden.

After our review of the draft report, the Agency concurs with all of OIG's recommendations, as written. For recommendation 1, the FAA will complete a schedule for the development and implementation of the PRD, based on the required rulemaking events, by October 31, 2015. The Agency plans to fully implement recommendation 2 by October 31, 2015 by incorporating a written notification to air carriers in the FAA's standard PRIA response letter indicating that additional records may be available through a Freedom of Information Act and Privacy Act request. The FAA will develop a plan to implement recommendation 3 by January 31, 2016 to enhance the current PRIA process and facilitate the development of the PRD. The Agency will provide a detailed response to each recommendation after the publication of the final report.

We appreciate this opportunity to offer additional perspective on the OIG draft report. Please contact H. Clayton Foushee at (202) 267-9000 if you have any questions or require additional information about these comments.