



## UPDATE FROM THE FAA

### Pilot Record Database FAQs for Public Aircraft Operators (PAO)

This info is current as of 19 May 2022

**Background:** This PRD modernizes pilot record-sharing as it occurs currently under Pilot Records Improvement Act (PRIA). The PRD will serve as a repository for pilot records and will contain records from a pilot's current and former employers, as well as the FAA. The FAA envisions that the PRD not only will be an indicator of pilots' abilities or deficiencies, but also that it will prompt conversations between applicants and hiring employers. PRD is intended to help ensure that no records about a pilot's performance with previous employers that could influence a future employer's decision go unidentified.

**Deadline:** Within 30 day of June 10, 2022, agencies must begin reporting current pilot records, historical records; begin reviewing operator records in the PRD.

**How to Comply:** Instructions on how to comply with the rule can be found at [https://www.faa.gov/regulations\\_policies/pilot\\_records\\_database](https://www.faa.gov/regulations_policies/pilot_records_database)

#### **Frequently Asked Questions:**

- **Does a PAO have to enter information on all their pilots into the PRD?**
  - **Answer:** 14 CFR 111.200 requires the PAO to enter information for all pilots they employ, but PAO can delay reporting certain records *until and unless* they receive a request from a reviewing authority. Records which are not reported contemporaneously must be maintained for five years. If, however, the record memorializes a disciplinary action resulting in permanent or temporary removal of the pilot from aircraft operations or separation from employment resulting in termination, the record must be reported to the PRD within 30 days of becoming final.
- **Who is the authorized responsible person (RP)?**
  - **Answer:** That is the person appointed by the PAO who is responsible for the maintenance and upkeep of the data in the PRD
- **Can the RP delegate access to the PRD?**
  - **Answer:** yes, but they are still responsible for compliance with Part 111.
- **How does a RP get access to the PRD?**
  - **Answer:** RPs must apply for access to the PRD. See for instructions: [https://www.faa.gov/sites/faa.gov/files/regulations\\_policies/pilot\\_records\\_database/resources/Register\\_RP.pdf](https://www.faa.gov/sites/faa.gov/files/regulations_policies/pilot_records_database/resources/Register_RP.pdf)
- **What does a RP do with the PRD?**
  - **Answer:** They will manage records and user accounts, and be responsible for all actions taken within the PRD for a particular operator, entity, or trustee. They can also add or edit pilot records as well as review pilot records for new hires.
- **When does the PAO need to start entering data into the PRD?**
  - **Answer:** PAO will begin reporting the applicable new pilot records within 30 days after 6/10/2022 unless they elect to maintain the records for five years and report only on request. Keep in mind some records must always be reported and don't qualify for the report on request option.

- **What information is required in the PRD?**
  - **Answer:** PAO are required to report training qualification and proficiency records, certain final disciplinary action records, or certain records concerning separation of employment. See AC 120-68J for the specific list of what records are to be reported as well as more information about the PRD, the process, and the information required.
  
- **How long are the data to be maintained?**
  - **Answer:** records must remain in the database until either the FAA receives official notification of a pilot's death or an FAA audit of the database indicates that 99 years have passed since the date of birth on record for a particular pilot.
- **Are all PAOs required to conduct a search in the PRD prior to allowing an employed pilot to fly for them?**
  - **Answer:** No. Subpart B or Part 111 excludes PAO from the requirement. They may elect to review the records for new hires if they like.
- **How does a PAO enter data on (non-FAA certificated) PAO self-certificated pilots?**

**Answer:** The PRD requires entry for all pilots employed by the PAO. PAO certified pilots who do not possess a Part 107 or Part 61 certificate need alternate means of data entry, and this remains to be worked out due to current technical limitations of the PRD.
- **What should a PAO do if a negative issue turns up in the PRD search on one of their pilots?**
  - **Answer:** That's for the PAO to determine.
- **Where can a PAO go to get more information about PRD?**
  - **Answer:** See the Federal Register / Vol. 86, No. 110 / Thursday, June 10, 2021, AC 120-68J, and [prdsupport@faa.gov](mailto:prdsupport@faa.gov)
- **Who are authorized reviewing entities?**
  - **Answer:** Reviewing authorities are each operator holding an air carrier or operating certificate issued in accordance with part 119 and authorized to conduct operations under part 121, part 125, or part 135; operators holding an LOA issued under § 91.147; operators holding management specifications for a fractional ownership program under subpart K of part 91; operators conducting operations as a corporate flight department with two or more types rated aircraft or rotorcraft; entities conducting certain PAO operations; trustees in bankruptcy of any operator; pilots; and other persons who might access the PRD. Part 111 does not apply to any foreign air carrier or foreign operator of U.S. registered aircraft.
- **Does a pilot have to give consent to the reviewing authority before the pilot's record can be reviewed?**
  - **Answer:** Reviewing authorities must review a pilot's records in the PRD prior to permitting the pilot to begin service as a required flight crewmember. In order to access and evaluate a pilot's records, a reviewing entity must receive consent from that pilot.
- **If an otherwise qualified public aircraft entity chooses to only operate as a civil aircraft under part 107, do the PRD data entry requirements apply to that entity?**
  - **Answer:** If they only fly under Part 107, the PRD requirements are not applicable. Part 111 does not apply to Part 107 operators.

## **FOR FURTHER INFORMATION CONTACT:**

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