



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Flight Standard Service

800 Independence Ave., S.W.
Washington, D.C. 20591

Mr. Christopher Cooper
Aircraft Owners and Pilots Association (AOPA)
601 Pennsylvania Avenue NW
Washington, DC 20004

Dear Mr. Cooper:

Thank you for your March 9, 2023, letter regarding your organization and the undersigned organization's identified concerns for the current and future state of the Federal Aviation Administration's (FAA) Airman Knowledge Testing Program.

The FAA's contract with PSI Services, LLC (PSI) is a fixed-price indefinite-delivery services contract called the Airman Certificate Testing Service (ACTS). The ACTS contract provides a comprehensive, best practices approach to enhance the overall quality of FAA Airman Knowledge Testing. Like any contract, the FAA cannot dictate PSI's internal fees, compensation structures, salaries, etc., for any internal positions.

Knowledge Test Accessibility

PSI recently introduced a standardized compensation structure across all testing centers administering the FAA Airman Knowledge Tests (AKT). PSI introduced the standardized compensation structure only after extensive analysis to mitigate potential risks. Results of the research indicated no material impact on either access or availability of testing. Year-to-date scheduling volume and availability are consistent with historical norms over the previous two years. The continued increase in volume and demand year-over-year is being accommodated very well. This availability of scheduling/seats has been maintained even with a 20% increase in test volume this year.

Our information does not indicate that changes imposed by PSI have created any obstructions to FAA airman certification. Since PSI's second phased fee reduction announcement in mid-November of 2022, only 17 out of 797 authorized (number changes daily) testing centers have given notice of their intention to leave the network. All those testing centers were delivering low volumes of tests. All but one of those locations already had an alternative PSI location within an average of 10 miles of the previous location. An active alternative location is being finalized for the remaining one. Therefore, please know that 98% of the aviation testing centers operating before January 1, 2023, continue to administer FAA tests within PSI's new compensation structure. This is significantly less than the yearly average turnover as testing centers come and go frequently. Similarly, many new testing centers are continuing to join the network of

administering FAA AKTs, many of which are flight schools. We are very confident in the entire seat capacity available for FAA testing.

PSI's testing centers authorized to administer FAA knowledge tests have always been publicly available on PSI's test registration website. Testing center numbers frequently change with turnover, location and personnel moves, suspensions, etc.

Knowledge Test Facilitation

The ACTS contract is held and proactively managed by the FAA. PSI remains in excellent performance and has been fully transparent with the FAA in its execution of the ACTS contract. Many of the areas of concern you have highlighted reside within Flight Standards, as opposed to PSI, and our information does not indicate shortcomings. Regarding the issues you've identified, we do not have enough information to investigate the specifics. If you have additional information on these issues, please send them to AFS630Comments@faa.gov or AirmanKnowledgeTesting@faa.gov, and we'll be happy to address them.

Future Opportunities and Recommendations

We've evaluated your recommendations as indicated below.

Recommendation 1. Perform and publish an independent FAA assessment of knowledge test accessibility before and after the January 1, 2023 fee change, including quantifying the net change in seat capacity for each FAA test, the impact to testing accessibility (i.e., decreased access geographically), and PSI's ability to provide quality replacements for third-party testing center seats that leave the network.

As part of our business operations, the FAA and PSI have assessed the impacts of the changes made in PSI's compensation structure, as indicated in the paragraphs above. The effects from January 1, 2023, fee change were minimal, and alternative testing centers were already in place to meet the testing needs in those areas.

The FAA does not publish reviews of contractor performance or organizational capabilities in accordance with the Federal Acquisition Regulations (FAR) 42.1503 and 9.105-2.

Recommendation 2. Develop additional ways to increase testing capacity and lessen industry exposure from the current single-provider framework. Alternative proctoring methods and other providers should be explored, including virtual proctoring and utilizing the existing network of accredited institutions holding part 141 and 147 air agency certificates.

PSI continues to partner with numerous aviation-oriented businesses as part of their test delivery network, which includes many parts 141 and 147 schools. In partnership with PSI, we continually explore opportunities to evolve and

implement the AKT process within the framework of contractual parameters, which currently doesn't allow for virtual proctoring. However, in the future, we will be happy to consider other proctoring methods that help us achieve our objectives in the knowledge testing program.

Feedback from the aviation and testing industries is critical to developing requirements for knowledge testing. We welcome organizations that wish to offer their expertise to future contracts to respond to the FAA through the formalized market research procedures established in the FAA's procurement process. We are looking to start the formal Request for Information (RFI) process in three to four years, where your input will be needed.

Recommendation 3. Using stakeholder feedback, produce and publish an assessment of PSI's performance under the FAA contract, what benchmarks have not been met, and shortfalls that should be addressed to ensure proper performance through the initial term.

The FAA regularly reviews the performance of contractors in accordance with the FAA's Acquisition Management System (AMS) procedures. The FAA does not publish a contractor's past performance in accordance with FARs 42.1503 and 9.105-2. You may consider requesting this information through the Freedom of Information Act (FOIA) process where it can be properly vetted prior to public release, if not covered by a disclosure exemption under FOIA.

Recommendation 4. Assess the FAA's certification process, assessing the effectiveness of the agency's strong emphasis and reliance on knowledge exams relative to other forms of competency testing.

We believe the outcomes of the Call-to-Action Subgroup (CtA SG) Data Team effort and other ongoing initiatives will provide a holistic analytical approach toward making positive enhancements to the overall airman competency testing and certification processes.

For further information and discussion on these topics, please contact Karen Lucke, Manager of the Regulatory Support Division at Karen.Lucke@faa.gov.

We hope this helps to clarify the issues you raised. The FAA thanks you for your support of the Airman Knowledge Testing Program.

Sincerely,

Lawrence Fields
Acting Executive Director, Flight Standards Service

