The Recreational UAS Safety Test (TRUST)

Test Administrator (TA) Operating Rules

June 2022

Contents

OMB CONTROL NO. 2120-0794

Revision History

Rev	Description of Change	Effective Date
0	Original as posted for TA Application	02/23/2021
1	Detail added to amplify current requirements; Clarifications made by providing examples; Establishes 2022 application period; Application RFI response shortened to 5 days	06/05/2022

General

Purpose

Congress directed the Federal Aviation Administration to focus on Unmanned Aircraft Systems (UAS) or drones and their integration into the National Airspace System (NAS) in the FAA Modernization Reform Act of 2012 and the FAA Reauthorization Act of 2018. This included new regulatory requirements for UAS operated for recreational purposes. Title 49 of the United States Code (49 U.S.C.) § 44809 "Exception for Limited Recreational Operations of Unmanned Aircraft" directed the FAA to develop an

OMB CONTROL NO. 2120-0794

[aeronautical knowledge and safety test](#), which recreational flyers must pass per § 44809(a)(7). Test Administrators (TAs) will be entities designated by the FAA to administer the aeronautical knowledge and safety test, called The Recreational UAS Safety Test (TRUST).

The Test Administrator Operating Rules ("Operating Rules") outline the conditions and requirements for TRUST TAs. Any entity that wishes to administer the TRUST on behalf of the FAA must understand and comply with the requirements of this document.

Statutory Authorization

Administration of the TRUST by TAs is authorized by title 49 of the United States Code (49 U.S.C.) § 44809(g)(1).

An approved TA will be authorized to administer the TRUST to recreational flyers operating under Section 44809. The TRUST implements the requirements of Section 44809(g)(1) and permits those individuals who complete the TRUST to meet the requirement of Section 44809(a)(7).

Note: Completing the TRUST provides no airman certification or authority to operate UAS on behalf of the TA or the FAA.

Updates

The FAA reserves the right to modify the Operating Rules if the FAA determines, at its sole discretion, the modification is in the best interests of the United States Government, the aviation industry, or the general public. The FAA will provide written notice thirty (30) calendar days in advance, absent good cause. The FAA retains unilateral authority to alter the Operating Rules for reasons in the best interest of the federal government, the aviation industry, or the general public.

Upon receipt of such notice, an authorized TA may, within 30 days, raise an objection (which the FAA will consider) or end their participation in accordance with their Memorandum of Agreement (MOA).

In the event that the Operating Rules are updated or modified, the TA is responsible, at its own expense, for providing and maintaining or updating any hardware, software, communications equipment, and any other resources needed to continue to administer the TRUST.

The current revision of the Operating Rules will always be available on [FAA.gov](#)

The Recreational UAS Safety Test (TRUST)

OMB CONTROL NO. 2120-0794

TRUST is designed to provide basic aeronautical knowledge to recreational drone operators through training and knowledge check questions. TRUST content was developed in collaboration with industry and reflects the minimum information needed to safely operate recreational UAS in the National Airspace System (NAS) pursuant to 49 U.S.C. Section 44809.

All persons wishing to operate under 49 U.S.C. Section 44809 must pass the TRUST.

TAs may be permitted to add supplemental content to the TRUST. For example, a TA that is a UAS manufacturer may wish to include information on how their software can help with a preflight safety check. Any supplemental TRUST content must be approved by the FAA and be in compliance with the Operating Rules as discussed in more detail in the Supplemental TRUST Content Approval section.

Tokens

TAs must be able to generate a random, non-repeatable, alphanumeric token number which must be printed on a TRUST completion certificate. This token number must also be provided to the FAA in accordance with the Operating Rules. See UAS TRUST Token Database System section

Only TRUST completion certificates with a TA-generated token number will be considered valid.

Learning Management System (LMS)

TRUST must be delivered through an LMS, which is managed by the TA. TAs are permitted to use any LMS system as long as it is Shareable Content Object Reference Model (SCORM) 1.2 or better compliant.

SCORM is a set of technical standards for eLearning software products and is the de facto industry standard for eLearning interoperability. SCORM tells programmers how to write their code so that it is compatible with other eLearning software. Specifically, SCORM governs how online learning content and LMSs communicate with each other.

TA Application Process

General

All applicants must provide the necessary documentation and information to demonstrate compliance with the Operating Rules, and include a TA Point of Contact (POC) for the FAA to contact to request additional information.

OMB CONTROL NO. 2120-0794

Applications will be reviewed to determine eligibility within 30 days of the application period closing. Eligible applications will be invited to begin the onboarding process.

For 2022 the FAA will conduct an application process consisting of three main steps (See below).

Application period: October 3 – November 11, 2022
FAA Submission Review: November 14 – December 9, 2022
Validation and Formal Onboarding: December 12, 2022– February 10, 2023

Application Period:

Applicants must read the published versions of the following documents prior to applying:

- TRUST Test Administrator Application
- Test Administrator Operating Rules
- Memorandum of Agreement (MOA)

The TA Application Package must include:
- TRUST Test Administrator Application Checklist (completed by the applicant)
- All supporting materials e.g. proof of SCORM compliance
- The MOA signed by the TA applicant

Email all documentation and the completed TA Application Checklist to 9-AVS-RecFlyer-Test-Admin@faa.gov. Include "[ORGANIZATION NAME] TRUST TA Application" in the subject line

FAA Submission Review period:

The FAA will review all complete application packets that are submitted by the application closing date. During the FAA submission review period, the FAA may send TA applicants a Request for Information (RFI). Applicants are expected to provide any requested information in a timely manner. The FAA will not review any application packages that are incomplete or submitted past the application closing date.

Onboarding

When a TA's application package has been reviewed and accepted by the FAA, the FAA will send an invitation via email inviting the applicant to onboard. The onboarding process will verify the TA applicant can deliver the TRUST in the LMS environment and meet the requirements of the MOA and the Operating Rules.

1. TA applicants will receive the TRUST content and a TA Onboarding Checklist.

2. TA applicants must complete Onboarding Checklist.
3. TA applicants upload TRUST content into their LMS and begin functional testing.
4. Once the TA applicant has successfully tested the TRUST in the LMS environment, the FAA will begin functional testing of the TA's LMS. Any supplemental material the TA wishes to include must be approved by the FAA and a Letter of Authorization issued.
5. The TA will demonstrate to the FAA that TRUST Tokens and certificates can be generated and Tokens uploaded into the TRUST Token Database.
6. In order to be an authorized TA, the FAA enters into an Other Transactional Agreement (OTA) contract with the prospective TA. This requires the TA applicant to obtain a DUNS (Data Universal Numbering System) number and be registered in SAM (System Award Management). If the TA applicant does not yet have a DUNS number, or no one knows it, visit the [Dun & Bradstreet (D&B) website](#) or call 1-866-705-5711 to register or search for a DUNS number. To register in SAM see [SAM.gov | Home.](#)
7. When the onboarding checklist has been completed, it must be submitted to the FAA for final verification.
8. FAA verifies Onboarding Checklist items have been completed satisfactorily.

After the TRUST TA applicant successfully completes the Onboarding Process, the FAA will sign the MOA and authorize the TA to administer the TRUST.

Supplemental TRUST Content Approval

Supplemental content to the TRUST is permitted, subject to FAA review and approval. During onboarding, a TA applicant may provide any supplemental TRUST content they wish to include to the FAA for review. Supplemental TRUST content is approved through a Letter of Authorization (LOA) attached to the MOA.

Note: Only supplemental content approved by the FAA via an LOA may be used. Any revisions to supplemental content must be submitted for prior approval by the FAA through a new LOA.

Supplemental TRUST content must meet the following requirements:

1. Must have a version control number;
    a. The version numbering system used is at the discretion of the TA;
2. No changes were made to the FAA-developed TRUST content;
3. No modifications were made to the FAA-developed TRUST questions;
4. TAs may not add any knowledge check questions;
5. Supplemental content must not contradict any of the following:
    a. FAA-developed TRUST content
    b. Federal regulations or statutes
    c. FAA guidance
6. Any supplemental content must follow FAA-supplied TRUST content
    a. Cannot precede or be interspersed

OMB CONTROL NO. 2120-0794

Application Outcomes

Approval

The FAA will issue a signed MOA to applicants that meet Test Administrator requirements, and successfully complete onboarding.

Upon receipt of the signed MOA, TAs are authorized to provide the TRUST to the public.

Request for Information (RFI)

If the FAA needs additional information from an applicant, the TA applicant POC will receive an RFI from the FAA.

Applicants have five business days to respond to an RFI. If the applicant fails to respond, the FAA will terminate its review of the pending application.

Denial

Applicants that do not meet the application requirements will receive a Letter of Denial from the FAA. The Letter of Denial will explain why the application was denied.

TA applicants who have been denied may apply again during a future application period.

Memorandum of Agreement

The Memorandum of Agreement (MOA) is the agreement document between the FAA and the TA applicant that allows the TA to administer the TRUST under the agreed terms. The MOA is valid for 24 calendar months from the month of issuance. Continued compliance with the MOA and the Operating Rules are required and non-compliance may result in suspension or revocation.

Test Administration

General

Once the onboarding process is complete and the FAA signs the MOA, the TA is authorized to begin administering the TRUST.

OMB CONTROL NO. 2120-0794

Costs

The FAA will not provide any funds to Test Administrators.

Any equipment costs associated with administering the TRUST (hardware, software, communications equipment, etc.) are the responsibility of the TA. Each TA will bear the full cost it incurs in performing, managing, and administering the TRUST.

Note: Test Administrators are prohibited from charging a fee, either directly or indirectly (i.e. requiring membership) to individuals taking the TRUST.

TRUST Content

- TAs are not allowed to alter the FAA-supplied TRUST content.
- TAs are permitted (and encouraged) to add images which support the TRUST content. Images added must directly support or compliment the TRUST content in which they are displayed alongside. The FAA will have the final say in the use of any images during the functional testing TA's LMS.
- TAs are not allowed to alter or add any of the knowledge check questions or answers.
- TAs are permitted (and encouraged) to randomize the order in which a set of answers appears for a particular question.

Supplemental TRUST Content

If a TA has been approved to include supplemental TRUST content it must be placed after the FAA-supplied TRUST content. TAs may not insert their approved supplemental TRUST content prior to, or in-between, any FAA-supplied TRUST content.

TAs which are authorized to include supplemental TRUST content must notify anyone taking the TRUST that their LMS contains additional content not required by the FAA which may increase the time needed to complete the TRUST.

Note: No additional knowledge check questions or answers may be added by a TA.

Website Information and Advertising

After receiving the FAA signed MOA, TAs are permitted to advertise their status as an approved Test Administrator of the TRUST. A TRUST icon will be provided to the TA which will signify they have been FAA-approved. The TRUST icon must be used on all website, communications, or advertising concerning the TA's authorization to administer the TRUST. TA's may not use the FAA seal on any of their products.

FAA approved TAs will be listed on the FAA's website in alphabetical order.

OMB CONTROL NO. 2120-0794

Approved TA's must provide recreational flyers with information about the TRUST on a dedicated webpage that the FAA reviews and approves before TA's can begin to administer the TRUST. This is the page that the FAA will use to link to from FAA.gov. This landing page must prominently show the link to enter the TRUST content. Other links or advertisement may be on the landing page but may not obscure the TRUST content link or other links be required to click in order to enter the TRUST content. The TRUST content must be directly accessible from this webpage.

Data Retention

TAs are not allowed to permanently store information on individuals taking the TRUST. Only information necessary for an individual to receive a TRUST completion certificate may be temporarily collected. For example:

- First and last name
- Email address

Information on individuals taking the TRUST must be removed from a TA's data servers or LMS account upon issuance of a TRUST completion certificate. The TA may not store tokens in a manner such that they are retrievable by the test taker's unique identifier, or otherwise linked or linkable to the test taker. TAs must remove any corresponding token information from the TA's data servers or LMS account before the token is submitted to the FAA. This policy also applies to any third party the TA may use, and the TA is wholly responsible for compliance of the data retention policy of that third party.

TAs may store qualitative and quantitative data such as test question answer selection as long as the information does not contain any Personally Identifiable Information (PII).

Regarding MOA Article 18c)ii), which states "TAs may collect tokens with PII on test takers for other purposes related to the test taker as a member of the organization. The TA may not store tokens in a manner such that they are retrievable by the test taker's unique identifier, or otherwise linked αlinkable to the test taker." This allows a TA, who is a community-based organization, for example, to retain the names of members who have completed the TRUST consistent with the programming of that organization. Similarly, TAs may retain only token numbers used so as to not assign a duplicate number to future test takers. In no case may a TA store such information such that either of these data can be linked to a test taker's name or token number.

TRUST Completion Certificate

The FAA will provide all TAs with a TRUST Completion Certificate template. Once an individual completes the TRUST, they must be issued a TRUST completion certificate.

OMB CONTROL NO. 2120-0794

TAs must make the TRUST completion certificate available for the individual to print or save electronically. The TRUST completion certificate will include first and last name of the test taker, name of the TA administering the TRUST, date of completion, and the token number. The TRUST completion certificate serves as evidence a recreational flyer has complied with 49 U.S.C. Section 44809(a)(7).

Test Administrator Oversight/Renewal

Annual Oversight

FAA authorized TAs must complete an annual oversight checklist in order to continue administering the TRUST. TAs must complete the Test Administrator Oversight Checklist and submit it to the FAA every 12 calendar months from the issuance of their MOA.

The intent of the oversight is to ensure that the TA remains in compliance with their MOA and the Operating Rules. It is also an opportunity for the TA to discuss any concerns or suggestions with the FAA.

Oversight Process

The TA must complete the oversight checklist every 12 calendar months and submit the completed checklist via email to 9-AVS-RecFlyer-Test-Admin@faa.gov. Once a completed oversight checklist is received by the FAA, the FAA will verify all checklist items to determine the TA's compliance is satisfactory or unsatisfactory.

Oversight Outcomes

Satisfactory
The FAA will notify the TA of a satisfactory oversight through email and will provide the FAA- verified oversight checklist.

Unsatisfactory
The FAA will notify the TA by email of any discrepancies and will be provided 15 calendar days to correct those discrepancies. If the discrepancies cannot be resolved, the FAA may terminate the agreement in accordance with the MOA.

Memorandum of Agreement Renewal

TAs must renew their MOA every 24 calendar months from issuance. Renewal of an MOA does not require a TA to complete the application and onboarding process again if there are no changes in the TA's administration of the TRUST. If a TA is requesting

OMB CONTROL NO. 2120-0794

changes from their original application (different LMS, providing supplemental TRUST content, etc.), the applicable parts of the onboarding process must be repeated to verify compliance with MOA and these Operating Rules.

Memorandum of Agreement Renewal Process

TAs wishing to renew their MOA must notify the FAA at least thirty (30) calendar days in advance. A MOA renewal should coincide with the annual oversight process and the TA provide a newly signed MOA along with the completed Oversight checklist. A successful annual oversight may be used as the basis for renewal.

Memorandum of Agreement Renewal Outcomes

Memorandum of Agreement Re-Issued

A renewed MOA will be issued to the TA. The renewed MOA will be valid for 24 calendar months from the date of issuance.

Request for Information (RFI)

Any discrepancies or issues noted during the annual oversight process must be addressed by the TA prior to the renewal of an MOA. Any unresolved discrepancies will result in a delay in the renewal of the MOA and potentially cause a suspension in TRUST administration by the TA.

Denial

Discrepancies identified in the annual oversight or at the time or renewal which cannot be resolved to the satisfaction of the FAA will result in a cancellation of the agreement in accordance with the MOA.

UAS TRUST Token Database System

UAS TRUST System

The FAA will utilize a UAS TRUST Token Database System for documenting TRUST certificate issuance. This database will store TA-issued TRUST completion tokens. A TRUST completion token is a random 15 character alphanumeric identifier. The first four characters are always an FAA-assigned TA identifier.

Authorized TAs may access the UAS TRUST system through a standard Personal Computer (PC), laptop, or mobile device. The UAS TRUST system website is compatible with Internet Explorer (IE) 11, Microsoft Edge, Chrome, Firefox, and Safari.

No special software is required to access the UAS TRUST system.

Requirement to Submit Tokens

Authorized TAs administering the TRUST are required to submit tokens to the UAS TRUST system. Tokens may be uploaded at any time, but must be uploaded by the end of the calendar month in which they were issued.

TRUST Token Storage

TAs should delete tokens once they verify the information has been submitted to FAA successfully, if not retained as mentioned in the data retention section. The TA must not store tokens in a manner such that they are retrievable by the test taker's unique identifier, or otherwise linked or could be linked to the test taker.

Appendix A

Abbreviations

14 CFR   Title 14, Code of Federal Regulations

49 U.S.C.   Title 49, United States Code

AC   Advisory Circular

AFS   Flight Standards Service

AOA   Office of the Administrator of the FAA

ATO   Air Traffic Organization

AUS   UAS Integration Office

AVS   Aviation Safety

CBO   Community Based Organization

DOT   Department of Transportation

FAA   Federal Aviation Administration

FSDO   Flight Standards District Office

LMS   Learning Management System

LOA   Letter of Authorization

MOA   Memorandum of Agreement

NAS   National Airspace System

POC   Point of Contact

RC   Radio Controlled

RFI   Request for Information

SCORM   Shareable Content Object Reference Model

TA   Test Administrator

TRUST   The Recreational UAS Safety Test

UA   Unmanned Aircraft

UAS   Unmanned Aircraft System