



November 1, 2007

Subject: **Noverant Statement of Compliance - 49 CFR 1552**

Noverant Online is a training and compliance management system which is used by many industries to maintain compliance to various regulations, including 49 CFR 1552. The web-based system is an effective, efficient and compliant method to train, track and verify the security training as required per 49 CFR 1552.

This memorandum serves as an official *Statement of Compliance to 49 CFR 1552*. As it relates to such compliance, the following are critical factors to note:

- Noverant Online meets the guidelines of 21 CFR Part 11 for electronic signature and record keeping. As such, all transactions meet strict guidelines regarding electronic signature integrity, revision tracking, transaction processing and general audit capabilities.
- DHS officially informed Noverant (April, 2007) and confirmed that an electronic record of training is acceptable for compliance to 49 CFR 1552.
- Noverant's training content is compliant per 49 CFR 1552:
  1. *Initial Training* – Noverant provides initial training by linking users directly to the TSA web-site, i.e., users participate directly in the TSA-approved initial training module.
  2. *Recurrent Training* – While TSA offers simplistic yet compliant recurrent training known as Recurrent Flight School Security Awareness (RFSSA), Noverant has expanded upon RFSSA and created a compliant recurrent training module called *Recurrent Security Awareness Training (RSAT)*. RSAT includes all elements of the TSA-approved RFSSA training, **plus** additional information, graphics, and useful links. RSAT is updated as required to reflect the latest 49CFR1552 requirements.
- After completing initial or recurrent training, users must provide an electronic signature which certifies their satisfactory completion of the training and meeting 49CFR1552 requirements.
- Users may print Noverant-certified transcripts and certificates at any time. Users do *not* have access to manipulate any of their electronic training records.
- Revisions to training, whether due to content improvements or regulatory changes, are made by Noverant and assigned to all users. The system tracks all revision(s) completed by each user.
- Noverant does not disclose any records to government inspectors without express user consent.
- While Noverant will make every reasonable effort to maintain compliance to changing regulations, users should note that the Federal government is authorized to amend any regulation, at any time, for any reason, and with no notice. As such, users are urged to remain vigilant to changing requirements and closely monitor local, state and Federal announcements, including, but not limited to, Temporary Flight Restrictions (TFRs), Notices to Airmen (NOTAMs) and other similar communication channels.

## Noverant Quality Assurance

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