

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.521

National Policy

Effective Date: 8/30/19

Cancellation Date: 8/30/20

SUBJ: Policy on Aviation Safety Inspector Image and Video Capture of Airman Information

1. Purpose of This Notice. This notice alerts aviation safety inspectors (ASI) to existing Flight Standards Service (FS) policy for capturing images and/or video of airman certificates and/or medical certificates.

2. Audience. The primary audience for this notice is the FS Safety Assurance offices' ASIs who collect airman certificate information. The secondary audience includes the Safety Standards and Foundational Business offices.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avs.faa.gov. Operators can find this notice on the Federal Aviation Administration's (FAA) website at http://fsims.faa.gov. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. FS has learned that, contrary to standing policy, some ASIs are using their Personal Electronic Devices (PED) to take pictures of airman certificates in order to record that information into either the Safety Assurance System (SAS) database or the Program Tracking and Reporting Subsystem (PTRS) database.

5. Discussion. The information contained in airman certificates and/or medical certificates is considered Personally Identifiable Information (PII). This type of information, including other types of sensitive information, is strictly controlled. FAA Order 1370.121, FAA Information Security and Privacy Program & Policy, addresses creation, storage, and access of Sensitive Unclassified Information (SUI). The order states that under no circumstances will the FAA permit the storage and access of FAA Sensitive Security Information (SSI) or PII data on any unapproved device and/or third-party service.

a. Access Control for Mobile Devices. Order 1370.121, Appendix 2, Access Control (AC), states that all FAA information on all portable devices must be encrypted using a validated encryption technology. Under no circumstance does the FAA permit storage or processing of PII and SSI information on a device that is not encrypted with a compliant encryption mechanism. For further information, refer to Order 1370.121.

b. Security of PII Data. Order 1370.121, Appendix 24, Security (of PII Data), states that the FAA must encrypt PII on mobile computers and devices using FAA-provided encryption methods that are compliant unless an applicable exception has been granted by the FAA Chief Information Security Officer (CISO) and Chief Privacy Officer.

6. Action. Any ASIs gathering airman information through any device that captures images and/or videos must immediately cease and desist. This applies to both PEDs and FAA-issued devices unless they meet the encryption compliance mechanism referred to in Order 1370.121.

7. Disposition. We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Air Transportation Division at 202-267-8166.

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