

ORDER

**DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**

8000.38F

5/14/03

SUBJ: AVIATION SAFETY INSPECTOR CREDENTIAL PROGRAM

1. PURPOSE. This Order provides guidance on the agency policy and criteria for issuance, use, and control of Federal Aviation Administration (FAA) Form 110A, Aviation Safety Inspector's Credential, and numbered badge. It also discusses certain restrictions on the use of FAA Form 8430-13, Request for Access to Aircraft.

2. DISTRIBUTION. This Order is distributed to the Associate Administrator for Regulation and Certification; to the division level in the Office of Security and Investigations; to branch level in the Flight Standards Service, Aircraft Certification Service, and the Office of Aviation System Standards; to branch/staff level in the regional Flight Standards, Security and Investigations divisions, and the Aircraft Certification Directorates; to the Regulatory Standards and Compliance Division of the FAA Academy; to all Flight Standards, Flight Inspection, and International Aviation field offices; and to all Aircraft Certification Offices.

3. CANCELLATION. The publication of this revision cancels the following documents:

- Order 8000.38E, Aviation Safety Inspector Credential Program, dated August 3, 1996;
- AFS-1 memorandum to all Flight Standards Division Managers, dated April 6, 1999, Subject: Clarification of Training Required for Issuance of Inspector Credentials;
- FAA Form 8000-39, Operations Area Identification Card;
- Advisory Circular 13-1, Aviation Safety Inspector Work Site Access, dated December 28, 1995;
- The informational brochure (unnumbered) *Airport Security Requirements: FAA Form 8000-39 and the Aviation Safety Inspector*; and
- N 8000.285, Use of FAA Aviation Safety Inspector Credentials to Access Secure Areas of Airports within the United States, dated April 28, 2003.

4. EXPLANATION OF CHANGES. This Order has been revised to:

- a. Clarify issuance criteria for FAA Form 110A.
- b. Add a numbered badge for Aviation Safety Inspectors (ASI).
- c. Provide instructions and guidance on the procedures for issuance and processing of the credential and badge.
- d. Change Federal Aviation Regulations references to Title 14 of the Code of Federal Regulations (14 CFR).
- e. Cancel FAA Form 8000-39 and other associated documents.

Distribution: A-W(VR)-1; A-W(SI)-2; A-W(FS/IR/VN)-3;
A-X(FS/SI/CD)-3; A-FFS/FIA/FAC-0(LTD);
AMA-200 (80 cys)

Initiated By: AFS-100

- f. Incorporate information on the use of inspector credentials to access secure areas of U.S. airports.

5. DEFINITIONS.

a. FAA Form 110A. The identification required to be carried by an ASI and an Aircraft Certification Specialist when on official duty and presented when identification is requested.

b. FAA Form 8430-13. Issued by ASI's (Operations, Airworthiness, Cabin Safety, and Aircraft Dispatch) to all 14 CFR part 121 and 135 air carriers and 14 CFR part 125 operators when required by job functions.

6. CRITERIA FOR ELIGIBILITY.

a. Aviation Safety Inspectors. The basic training course requirement for all ASIs (except Flight Procedures and Aircraft Certification) is the successful completion of the entire string indoctrination course, as applicable for the specialty of the inspector, as specified by the National Training Division. (The basic training courses for Flight Procedures specialists are specified in subparagraph (5) below.) In addition to the basic course requirements, all on-the-job training, in accordance with the inspector's assigned duties, must also be successfully completed prior to obtaining the credential.

(1) Operations inspectors currently assigned to the 1825 series will be issued an FAA Form 110A credential and a numbered badge provided they meet the criteria prescribed in:

- (a) Order 8400.10, Air Transportation Operations Inspector's Handbook; or
- (b) Order 8700.1, General Aviation Operations Inspector's Handbook; and
- (c) Order 8000.75A, Aviation Safety Inspector En Route Inspection Procedures; and
- (d) The criteria contained in this Order.

(2) Airworthiness inspectors currently assigned to the 1825 series will be issued an FAA Form 110A credential and a numbered badge provided they meet the criteria prescribed in:

- (a) Order 8300.10, Airworthiness Inspector's Handbook;
- (b) Order 8000.75A; and
- (c) The criteria contained in this Order.

(3) Cabin Safety inspectors assigned to the 1825 series will be issued an FAA Form 110A credential and a numbered badge provided they meet the criteria prescribed in:

- (a) Order 8400.10;
- (b) Order 8000.75A; and
- (c) The criteria contained in this Order.

(4) Aircraft Dispatch inspectors currently assigned to an 1825 position will be issued an FAA Form 110A credential and a numbered badge provided they meet the criteria prescribed in:

- (a) Order 8400.10;
- (b) Order 8000.75A; and
- (c) The criteria contained in this Order.

(5) Flight Procedures inspectors assigned to Flight Standards in the 1825 series may be issued an FAA Form 110A credential and a numbered badge for the purpose of conducting en route evaluations of the airspace system provided they complete:

- (a) Course 21607, Air Carrier Operations Indoctrination; and
- (b) Course 0050, Introduction to Flight Procedures Analysis.

b. Aircraft Certification Specialists. Engineers and flight test pilots involved in the type certification of transport category aircraft, including engines for transport category aircraft to be used in air carrier service, will be issued an FAA Form 110A. This credential will be issued, restricting its use for observation purposes only, when it is determined by the Director of Aircraft Certification Service (AIR) that performance of their duties in the aircraft certification function will be enhanced by the observation of flightcrew and aircraft operations in air carrier service.

NOTE: A numbered badge does NOT accompany this FAA Form 110A credential.

7. APPLICATION PROCEDURES. The Organizational Resources and Program Management Division, Administrative Resources Branch, AFS-110, is the focal point for all headquarters Flight Standards Divisions for the issuance of the credential.

a. Aviation Safety Inspectors.

(1) The following are the necessary documents needed to apply for an FAA Form 110A credential and a numbered badge:

(a) A completed and signed electronic Department of Transportation (DOT) Form 1681, Identification Card/Credential Application with the immediate supervisor's signature through an electronic signature pad as the authorizing official. The electronic application card will contain specific information as to the applicant's satisfactory completion of the required training (course numbers, titles, and dates completed) and the class/type ratings on his or her commercial pilot certificate, when applicable.

(b) A full-faced photograph of the applicant, captured with a digital camera (provided with the credential equipment).

(2) The following is the application process:

(a) The Flight Standards field offices will electronically transmit the above documents through appropriate channels to the regional Flight Standards Division.

(b) The regional Flight Standards Division will:

- 1 Verify the applicant's eligibility and need for issuance of the requested credential;

2 Verify the qualifications, completion of the required training, position, and need for the credential;

3 Send an electronic message requesting issuance to AFS-110; and

4 Electronically transmit the electronic application card and the photograph to AFS-110 for processing.

b. Aircraft Certification Specialists. All requests for the FAA Form 110A credentials must be approved by the Director, Aircraft Certification Service, AIR-1. The following is the process to apply for an FAA Form 110A credential:

(1) Submit a memorandum from the directorate/division manager to AIR-1, through AIR-100, justifying the need for and requesting approval of the credential. (The memorandum will contain an approval line for AIR-1.)

(a) Upon AIR-1 approval on the need for the credential, AIR-100 will forward the original of the approved memorandum to AFS-110. At the same time, AIR-100 will fax a copy to the applicant's directorate/division manager indicating approval has been obtained.

(b) The specialist must then contact the nearest Flight Standards office to complete the electronic application forms. The specialist must have with him/her a copy of the approved memorandum when completing the forms.

(2) With the assistance of the Flight Standards office, the applicant will complete an electronic DOT Form 1681, including electronic signature.

NOTE: The "Credential Justification" portion of the form should indicate that, "Duties will be enhanced by the observation of flightcrew and aircraft operations. The applicant understands that he/she is not authorized to issue FAA Form 8430-13 for free transportation or to otherwise insist on entry to the pilots' compartment if not agreed to by the pilot in command."

(3) A photograph of the applicant will be captured with the digital camera provided with the credential equipment.

(4) The Flight Standards office will then electronically transmit the application card and photograph to AFS-110 for processing.

(5) AFS-110 will complete the process and deliver the completed credential to AIR-100 for forwarding to the directorate/division manager for issuance to the applicant.

8. RESPONSIBILITIES: ISSUANCE, REISSUANCE, CANCELLATION, AND SECURITY MEASURES.

a. Identification of Inspector or Specialist Function. One of the following titles will be entered, as appropriate, on the credential by the Flight Standards Service (AFS) Organizational Resources and Program Management Division, Administrative Resources Branch, AFS-110:

(1) Aviation Safety Inspector; or

- (2) Aircraft Certification Specialist.

b. Issuance and Control.

- (1) AFS-110 is responsible for the overall management and control of the Aviation Safety Inspector Credential Program.

- (2) As requests are received, AFS-110 will review each electronic application for accuracy, qualifications, and eligibility. A number will then be assigned to the credential and badge and the appropriate information put on the electronic credential.

- (3) Following completion of the required action by AFS-110, the credential, badge (when applicable), and carrying case will be forwarded to the region for delivery to the applicant's supervisor (except in the case of the Aircraft Certification Specialists in which the credentials will be hand-delivered to AIR-100 for forwarding to the applicant's organization).

- (4) The supervisor will then present the inspector with his or her credential.

- (5) AFS-110 will maintain the electronic database of all copies of DOT Form 1681 and photographs.

- (6) AFS-110 will also maintain a database log identifying every credential issued by number, employee's name, region, district office, duty station, type of credential held, specialty, and status of credential (active or inactive). Upon written notification by the regional office, the database and application card will be updated to reflect location changes.

- (7) All equipment supplied to each office must be maintained in a secured/locked area with access provided only to authorized personnel.

c. Loss or Theft.

- (1) Care should be used to protect the integrity of all credentials and badges to prevent physical loss and damage. However, if a credential or badge is lost or stolen, the inspector or specialist must notify his or her supervisor, regional/center servicing security element (e.g., AGL-700, ANE-700, etc.), and AFS-110 within 48 hours of the incident surrounding the loss or theft. An information copy of the report describing the incident will be provided to the servicing security element. The report will address circumstances surrounding the loss or theft and follow-up actions taken to recover the credential and/or badge. In accordance with the latest edition of Order 1600.25, FAA Identification Media, Official Credentials Passport, and Vehicle Identification Media, the security element manager shall issue a security bulletin reporting the loss or theft of the credential to appropriate law enforcement, government, airport, and air carrier authorities with an information copy to the Office of Security and Investigations, Internal Security Division, ASI-100.

- (2) A replacement credential and numbered badge (when applicable) will be issued once AFS-110 receives notification describing the loss or theft. The issuance of a replacement credential and numbered badge (when applicable) requires the same application process as for an original issuance. AFS-110 will assign a new numbered credential and badge (when applicable).

- (3) In the event of a second or successive occurrence of loss or theft of a credential and numbered badge because of the negligence of the holder, the supervisor will implement actions outlined in the applicable conduct and discipline policy guidelines and procedures.

(4) The need for care in maintaining the integrity of the credential program cannot be overemphasized. In the event more than 5 percent of FAA Form 110A credentials or numbered badges have been lost or stolen, or if it is discovered by audit that more than 5 percent are unaccounted for, a complete reissuance of all FAA Form 110A credentials and badges must be undertaken.

d. Reissuance of Credentials.

(1) Credentials will be reissued when any of the following circumstances exist:

- (a) Name change of the holder;
- (b) Mutilation or excessive wear of the credential; or
- (c) Change in holder's personal appearance.

(2) Issuance of replacement credentials requires the same application procedures as defined for the original issuance and will require endorsement from the immediate supervisor stating the reasons for replacement.

(3) If the credential and badge (when applicable) are reissued for (a), (b), and/or (c) above, the supervisor should present the new credential and badge (when applicable) and obtain the inspector's or specialist's old credentials/badge for return via overnight mail to AFS-110. (For Aircraft Certification Specialists, the old credential will be returned to AIR-100.) This should include a note explaining the reason for the return of the credential and badge (when applicable).

e. Surrender of Credentials and Badge (When Applicable).

(1) Holders of an FAA Form 110A credential and badge (when applicable) shall surrender their credentials for return to AFS-110 under any of the following conditions:

- (a) Upon termination of employment, including resignation, retirement, expiration of appointment, etc.;
- (b) Upon reassignment to a position which does not meet the eligibility requirements contained in paragraph 6; or
- (c) Upon the request of FAA management.

(2) In the case of a deceased inspector or specialist, the AFS or AIR division manager or Directorate will make a reasonable effort to recover the credential and badge (when applicable) for return to AFS-110 for cancellation. If requested, the credential will be canceled and returned to the spouse or surviving family member.

f. Retention of Credentials by Retired Employees.

(1) Upon retirement, all holders of FAA Form 110A credentials shall return credentials to AFS-110.

(2) Retirees may request the invalidated credential be returned as a memento by submitting an accompanying request with a specified forwarding address at the time the credential is surrendered. It is important that the request for retention accompany the credential; otherwise, the credential will be

destroyed upon receipt. Unless invalidated by AFS-110, retention of an FAA Form 110A credential is not authorized.

(3) When appropriately invalidated (canceled), the ASI's credential obviously has no official status. Upon request, it can be returned to the authorized holder as a memento and gesture of appreciation on the part of the FAA. This procedure applies ONLY TO EMPLOYEES WHO LEAVE FAA IN A RETIRED STATUS.

9. ANNUAL REPORT REQUIREMENTS/RESPONSIBILITIES.

a. Each headquarters and regional office division manager or directorate is responsible for maintaining current records on all credential holders within their office/region. Each office, division, or directorate is responsible for updating a report called "List of Aviation Safety Inspector and Aircraft Certification Specialists Credential Card Holders." AFS-110 will provide a copy of the report to each Flight Standards division and AIR-100 within 30 days following the end of each calendar year. This report lists all ASIs and Aircraft Certification Specialists in possession of credentials in each organization, including credential number, full name of inspector/specialist, duty assignment (for example, Aviation Safety Inspector - Operations (Air Carrier), etc.), and official duty station location.

b. The above information will be reviewed with AFS-110's data identified in paragraph 9a to ensure consistency and accuracy of all files. This information, as well as the completed applications and correspondence on this subject, will be maintained by AFS-110 to provide for accountability and ready reference concerning all ASI-related credentials.

10. FAA FORM 8430-13, REQUEST FOR ACCESS TO AIRCRAFT.

a. FAA Form 8430-13 can be issued to all part 121 and 135 air carriers and to part 125 operators. FAA Form 8430-13 may be issued only by individuals holding an FAA Form 110A and whose specialty is either Operations, Airworthiness, Cabin Safety, or Aircraft Dispatch.

b. The supervisor will establish necessary procedures to ensure that an FAA Form 8430-13 is issued only by those inspectors authorized to use them, will periodically audit their use, and will ensure the physical protection of those FAA Forms 8430-13 which have not been issued. Specific guidance is contained in Order 8000.75A, paragraph 17.

c. FAA Form 8430-13 must not, under any circumstances, be issued for personal transportation.

11. USE OF FAA AVATION SAFETY INSPECTOR CREDENTIALS TO ACCESS SECURE AREAS OF U.S. AIRPORTS. As aviation security measures continue to evolve, ASI functions and related security personnel functions must be clarified. Proper use of identification credentials, checkpoint procedures, and resolution of misunderstandings with airlines and other government agencies are crucial for the creation of an environment where ASI's can carry out effective inspections and surveillance. Both the FAA Flight Standards Service and the Transportation Security Administration (TSA) have reaffirmed the necessity of ASI access to Security Identification Display Areas (SIDA) and Airport Operations Areas (AOA). However, because of TSA's enhanced screening process and other airport security measures, ASI's must undergo extra steps when entering an SIDA.

a. Official Duty. The use of ASI credentials is for official duties only. These duties are authorized by an inspector's supervisor. Inspectors shall use their FAA credential in accordance with the requirements of this order, their respective inspector handbooks, and within the authorization of the respective supervisor.

b. Credential Use at Security Point Access. Form 110A is universally recognized as an ASI's authority for unescorted movement in SIDA's to perform official duties (ACO-1 letter, May 1, 2000). An ASI must prominently display FAA Form 110A on his or her outermost garment. Any part of the Form 110A may be displayed by hanging it on a chain around the neck or wearing it on the jacket or shirt pocket. The accompanying badge, in and of itself, does not constitute the authority and privileges of Form 110A and should not be removed from its leather case or displayed separately from Form 110A. The possibility for interaction between an ASI, airline, and security personnel and the presentation of an ASI's credentials exist in at least the following areas:

(1) When checking a bag at the ticket counter, an ASI's checked baggage is subject to the same security controls applied to all passengers' checked baggage (AFS-1 letter, March 15, 2002).

(2) When entering the sterile area through a passenger-screening checkpoint, an ASI must undergo screening. Carry-on baggage must be cleared in accordance with local security procedures (AFS-1 letter, March 15, 2002). TSA will advise its personnel that the FAA credential authorizes an ASI unescorted access to sterile areas as necessary to perform official duties (Office of Civil Aviation Security Operations, ACO-1, letter, May 1, 2000). An inspector approaching a passenger screening point may not bypass screening. (Refer to FAA Order 8400.10, volume 9, chapter 1, paragraph 49B(2).) An ASI is not authorized to process through a Law Enforcement Officer's (LEO) checkpoint lane.

(3) When accessing the aircraft or ramp area from the check-in counter located at a gate or when conducting surveillance on the ramp, an ASI need not be subject to random screening at the gate and should be permitted to board the aircraft at any time, even if general passenger boarding has not commenced (AFS-1 letter, March 15, 2002).

NOTE: FAA Form 110A allows for free and uninterrupted access to restricted areas at airports.

(4) ASI's must adhere to the applicable paragraph below when gaining access to a secure area without passing through security screening.

(a) At airports where ASI's are normally assigned, they should continue to obtain and wear that airport's identification badge.

(b) At airports where ASI's are not normally assigned, Form 110A authorizes them to be in secured areas; however, access through physical barriers will require that ASI's seek local assistance for entry through locked doors and gates.

c. Encountering Security Personnel. Use of the following procedures will assist an ASI in resolving issues which might otherwise prohibit or delay performing official duties. These procedures will also help depersonalize the dialogue between the ASI and the airline or the ASI and security personnel. By following this guidance, an ASI will demonstrate adherence to established procedures and will avoid having to interact with the airline and security personnel on a subjective and sometimes adversarial level.

(1) When entering a SIDA, an ASI must adhere to the following general procedures:

- An ASI should properly identify themselves to the questioning airline or security person by presenting the FAA credential (Form 110A).

- If further resolution is necessary, an ASI should request that the airline's and/or TSA security employee's supervisor be contacted. Once the supervisor arrives, the ASI should present the FAA credential.
- If the issue is not resolved at the supervisor level, request that the TSA Assistant Federal Security Director (AFSD) (for checkpoint screening issues) or Ground Security Coordinator (GSC) (for all other issues) for that particular concourse be contacted. The GSC or AFSD should be intimately familiar with the Airport Security Plan and the Aircraft Operator's Standard Security Program and should recognize the authority signified by the inspector's FAA credential.
- If the issue is not resolved at the GSC/AFSD level, the ASI should contact the TSA Federal Security Director (FSD) assigned to that airport. Explain the situation to the FSD and ask for assistance in gaining access to the sterile/secure area.
- If the issue cannot be resolved by the FSD, the ASI should call the FAA Regional Operations Center (Table 1) for the region of their assigned office and ask for specific guidance.

TABLE 1. FAA REGIONAL OPERATIONS CENTERS

Region	Telephone Number
HQ	202-267-3333
AAL	907-954-5936
ACE	816-426-4600
AEA	718-238-7001
AGL	847-294-8400
ANE	781-238-7001
ANM	425-227-2000
ASO	404-305-5180
ASW	817-222-5006
AWP	310-725-3303

- Document the facts involving the incident in as much detail as possible, and include that information in a Program Tracking and Reporting Subsystem (PTRS) entry in accordance with paragraph 5 of this notice.

NOTE: If an ASI is unable to follow the procedures above, it is best that the ASI follow the requests of screening personnel. However, the inspector should collect sufficient information to reconstruct events for reporting and future resolution.

(2) While working within an SIDA, an ASI should be aware of the following:

- An ASI is not required to be prescreened in accordance with the Aircraft Operator Standard Security Program.
- An ASI need not be subject to random screening at the gate and should be permitted to board the aircraft at any time, even if general passenger boarding has not commenced.
- An ASI must undergo passenger screening when accessing a sterile area via the passenger security-screening checkpoint.

(3) Any incidents of problems interacting with TSA or security personnel should be documented in the Program Tracking and Reporting Subsystem (PTRS) for each security issue.

(a) Use the Surveillance/Miscellaneous codes:

- Operations: 1891
- Airworthiness: 3891
- Avionics: 5891

(b) Enter TSAFS in the National Use field (no space, no punctuation).

(4) The Flight Standards Air Carrier Operations Branch, AFS-220, will coordinate resolution of specific security issues with TSA using the information contained in the PTRS documents.

12. PERSONAL CONDUCT. Inspectors or specialists, in the conduct of their assigned duties, will have frequent contact with operators, operator personnel, and the general public. Each inspector or specialist must continually bear in mind that in all contacts he or she is officially representing the Administrator. Accordingly, inspectors must use good judgement while maintaining a professional demeanor, reflect FAA policies and practices, and refrain from any action that could embarrass the FAA. In this regard, inspectors should be familiar with, and at all times be guided in their performance by, the applicable conduct and discipline policy guidelines and procedures.

13. INFORMATION CURRENCY. Any deficiencies found, clarifications needed, or improvements to be suggested regarding the content of this Order should be forwarded to the Organizational Resources and Program Management Division, Technical Information and Communications Programs Branch, AFS-140, Attention: Directives Management Officer, for consideration. Your assistance is welcome. FAA Form 1320-19, Directives Feedback Information, is included at the end of this order for your convenience. If an interpretation is urgently needed, you may call AFS-110 at (202) 267-8441 for guidance. However, you should also use FAA Form 1320-19 as a followup to the conversation.

/s/ Steven W. Douglas
for James J. Ballough
Director, Flight Standards Service



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

Directive Feedback Information

Please submit any written comments or recommendations for improving this directive, or suggest new items or subjects to be added to it. Also, if you find an error, please tell us about it,

Subject: Order _____

To: Directive Management Officer, _____

(Please check all appropriate line items)

- An error (procedural or typographical) has been noted in paragraph _____ on page _____.
- Recommend paragraph _____ on page _____ be changed as follows: *(attach separate sheet if necessary)*

In a future change to this directive, please include coverage on the following subject *(briefly describe what you want added)*:

Other comments:

I would like to discuss the above. Please contact me.

Submitted by: _____

Date: _____

FTS Telephone Number: _____

Routing Symbol: _____