

# NATIONAL TRANSPORTATION SAFETY BOARD

Office of Aviation Safety Washington, D.C. 20594

February 21, 2015

Attachment 18 – FAA Order 8800.1A

# **OPERATIONAL FACTORS**

DCA15MA019



National Policy

Effective Date: 4/7/14

# SUBJ: Commercial Space Transportation Safety Inspector Credential Program

**1. Purpose of This Order.** This order provides guidance, agency policy, and criteria for the issuance, use, and control of Federal Aviation Administration (FAA) Form 8800-2, Commercial Space Transportation (AST) credentials. Inspectors will use these credentials during the conduct of audits, safety inspections, and evaluations of FAA regulatory compliance at Federal Aviation Administration (FAA), Department of Defense (DOD), FAA licensee and permittee facilities, and those of their contractors and subcontractors.

**2.** Audience. This order applies to credentialed employees within the Office of Commercial Space Transportation.

**3. Where Can I Find This Order?** This order can be found on the Directives Management System (DMS) website <a href="https://employees.faa.gov/tools\_resources/orders\_notices/">https://employees.faa.gov/tools\_resources/orders\_notices/</a>

**4. Explanation of Policy Changes.** Commercial Space Transportation Safety Inspectors (CSTSI) inspect FAA licensee and permittee compliance with the regulatory requirements of 51 U.S.C. Subtitle V, 509, and orders, rules, regulations, and authorizations issued under this authority. Oversight inspections are conducted in accordance with the policy and guidance referenced in AST Internal Procedure P008, Safety Inspection Process and Procedures.

**5. FAA Commercial Space Transportation Safety Inspector Credential**. Under the provisions of 51 U.S.C. 50907, a CSTSI on official duty must carry his/her credential and is authorized to perform inspections, evaluations, and audits to determine compliance with applicable FAA Orders. In the performance of official duties, a CSTSI may present his or her credential to access FAA licensee/permittee facilities, records, data and restricted areas governed by 14 C.F.R. Ch. III. Once the CSTSI credential has been issued, CSTSIs must follow the basic guidance on the use of credentials referenced in Order 1600.25, Federal Aviation Administration (FAA) Official Credentials.

6. Eligibility Criteria for Receiving a CSTSI Credential. The eligibility criteria for issuing and renewing FAA Form 8800-2, CSTSI Credential, are provided within this order. In addition to meeting those requirements, CSTSIs must satisfactorily complete the training requirements listed below, prior to being designated a CSTSI and prior to the renewal of credentials. Also, see FAA/AST Safety Inspector Training & Certification Program Training Courses.

**a.** Initial Training Requirements. The following initial CSTSI training requirements must be completed as directed before credentials are issued:

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(1) FAA/AST Safety Inspection Training & Certification Program requirements;

(2) AST Qualification Matrix (QM) technical training; and

(3) FAA/ARP Airport Sponsor Assurances and Obligating Documents Compliance Training and Review of AST/ARP Letter of Agreement.

**b.** Recurrent Training Requirements. The following recurrent CSTSI training must be completed as directed every 12 calendar months as noted:

(1) Review of previous audits, investigations, inspections, results, recommendations, and documentation prior to each inspection of a similar launch or reentry;

(2) Review of Safety Inspection Processes and Procedures, P008, prior to each inspection or every 12-calendar months, whichever occurs first;

(3) Review AST Safety Inspection Training & Certification Program, P008A, Section 11, Decertification, Recertification, and Currency, every 12-calendar months;

(4) Satisfactory completion of all additional training requirements within established timelines as directed by the Associate Administrator for Commercial Space Transportation or the Safety Inspection Division Manager;

(5) Review of FAA/ARP Airport Sponsor Assurances and Obligating Documents Compliance Training and Review of AST/ARP Letter of Agreement; and

(6) Review this directive.

**7. Application Procedures.** The Office of Security and Hazardous Materials Safety (ASH) issues CSTSI credentials. The Safety Inspection Division Manager must approve all CSTSI credential requests. ASH will follow basic guidance for issuing new or replacement credentials referenced in Order 1600.25, Federal Aviation Administration (FAA) Official Credentials.

The following application process must be used to request a CSTSI credential:

a. Complete the DOT F. 1681 Identification Card / Credential Application;

**b.** The applicant's manager or supervisor must verify that the applicant has completed all applicable training requirements, and provide documentation to ASH justifying the need for and requesting approval of a new or replacement credential;

**c.** Upon approval, ASH will then coordinate with AST-400 to verify the applicant's position qualifications;

**d.** AST-400 will be the authorized sponsor for the applicant and DOT F. 1681, Identification Card / Credential Application, must identify AST-400 as the sponsor;

**e.** ASH will determine whether or not the applicant has been previously approved for and issued a Personal Identity Verification (PIV) card by the FAA or an FAA ID card. If the employee is not in possession of a PIV or FAA ID card, ASH will deny approval for a CSTSI credential to the applicant;

**f.** ASH will complete the application process if all requirements described in this order are fulfilled.

8. Roles and Responsibilities. ASH manages and issues FAA Form 8800-2, CSTSI Credentials.

a. ASH Responsibilities. ASH will:

(1) Establish standards and procedures for issuing, renewing, and safeguarding credentials, forms, and materials used in support of the credentials program;

(2) Maintain a record of all applications and transactions concerning credentials;

(3) Approve and validate existing credential programs;

(4) Ensure that procedures exist for the immediate return of credentials when the bearer no longer has an operational need for them or no longer has authority to perform investigative activities;

(5) ASH will determine if investigation is required upon report of a lost or stolen credential; and

(6) Maintain the FAA Credential Verification System for the purpose of providing a trusted mechanism for regulated entities to use for authenticating the identification of FAA credential-holders.

**b. AST Responsibilities.** The AST Standardization & Evaluation (Stand/Eval) Officer initially verifies CSTSI certification and currency and administers the AST safety inspection training and certification program independently to those personnel selected for safety inspection activities. Administration includes maintaining training documentation, credentialing records, and the loss or theft of credentials. This ensures consistent, standardized procedures to ensure public safety. During licensed and permitted flight activities, AST may inspect, observe, capture and evaluate safety related data. Licensee/permittee compliance results will be analyzed for trends and or hazards as a means to ensure public safety.

(1) Training Records Management. The AST Stand/Eval Officer is responsible for ensuring the completion of CSTSI training and qualification (see paragraph 6), credential requests, and internal AST documentation and records of current and qualified AST CSTSIs. The AST Stand/Eval Officer is responsible for coordinating the overall AST training and qualification program (see paragraph 6).

(2) AST Database. The Safety Inspection Division Manager will maintain a database of AST credential holders. AST will record the CSTSI name, credential number, date of issuance, and expiration date on the list of FAA/AST Safety Inspector credentials.

(3) List of CSTSIs. AST will forward the most current listing of authorized CSTSI credential holders to ASH for inclusion in the FAA Credential Verification System. The list will be updated appropriately.

(4) AST will conduct an annual inventory of all credentials and provide results to ASH. AST as well will report lost or stolen credentials to ASH.

(5) Records. These records include AST credential files, receipts, listings, etc. and will be stored in a GSA approved secured file cabinet or in a locked room and maintained in accordance with Order 1350.15C, Records Organization, Transfer, and Destruction Standards, Chapter 4, General Management and Administration and Series 1600.9 Credentials Files; Identification credentials and related papers; and FAA Order 1600.25, Federal Aviation Administration (FAA) Official Credentials.

#### c. Individual CSTSI Responsibilities.

(1) CSTSIs can only use their credentials for official duties. An inspector's manager or supervisor authorizes these duties. CSTSIs shall use their credentials in accordance with requirements of this order, their respective safety inspector guidance, and in accordance with the instructions of their respective manger or supervisor.

(2) Become familiar with this document and AST policy and guidance concerning the authorization and conduct of inspections, audits and evaluations.

(3) Complete required CSTSI training referenced in Paragraph 6.

(4) Verify that FAA Form 8800-2, CSTSI credential, issued contains the correct information and ensure a copy of the credential has been provided to the AST Stand/Eval Officer.

**9. Issuance and Control.** ASH is responsible for the overall management and control of the Commercial Space Transportation Credential Program. All CSTSI credentials will be identified and uploaded into the FAA's Credential Verification System, which is owned and operated by ASH.

a. ASH receives and reviews DOT F. 1681 (Appendix D) applications for approval.

**b.** Following a successful review, ASH will process the application and send the credential to the inspector's requesting office via AST-400.

c. The inspector will then read and sign the "Responsibilities and Procedures for Receipt of Commercial Space Transportation Safety Inspector Credentials," document located in Appendix B and the "Acknowledgement Letter for Possession of FAA 8800-2 Credentials," located in Appendix C. A signature indicates the CSTSI understands the responsibilities associated with possessing the credentials. Signed copies will be returned to AST-400 and furnished to AIN-600 upon request.

d. ASH and AST-400 will maintain records identifying all CSTSI credentials issued.

**e.** All CSTSI credentials will be identified and logged in the FAA Credential Verification System. The system will be used by any Commercial Space Transportation regulated entity for the purpose of validating the identity of a CSTSI.

**10. Reissuance of CSTSI Credentials.** The issuance of replacement credentials requires the same application process required for an original issuance.

**a.** ASH will issue replacement credentials once AIN-600 receives the incident report describing a loss or theft and approval for the reissuance is granted.

**b.** Upon approval by ASH, credentials may be reissued when any of the following circumstances exist:

(1) Name change of the holder;

(2) Mutilation or excessive wear of credentials;

(3) Dramatic change in CSTSI's personal appearance;

(4) Lost or stolen credentials; or

(5) Expiration.

**c.** If ASH approves the reissuance of CSTSI credentials for subparagraphs b(1), b(2), b(3), and/or b(5) above, the inspector's old credentials must be returned to ASH before the new credentials are issued.

# 11. Surrender of CSTSI Credentials.

**a**. Holders of CSTSI credentials shall surrender their credentials for return to ASH for destruction under the following conditions in accordance with FAA Order 3370.5, Employee Clearance Procedures:

(1) Upon termination of employment, including resignation, retirement, expiration of temporary appointment, etc;

(2) Upon expiration of the credential;

(3) Upon reassignment to a position which does not meet the eligibility requirements contained in paragraph 7; or

(4) Upon the request of the holder's manager or supervisor.

**b.** In the case of a deceased CSTSI, the CSTSI's manager will make a reasonable effort to recover the credentials for return to ASH for cancellation.

c. Retiree credentials can be returned to AST for presentation in an award, plaque, etc.

**12.** Loss or Theft. If the CSTSI Credential is lost or stolen, the CSTSI must immediately notify the Safety Inspection Division Manager or the AST Stand/Eval Officer, AST-400. The safety inspector must file a Facility Security Incident Report, referenced in FAA Order 1600.69, with the local FAA Servicing Security Element (SSE) describing the incident. The Facility Security Incident Report must be sent to AIN-100.

**a.** The report should address the type of incident (i.e., lost, stolen, damaged credentials) and include a detailed explanation of the circumstances, any police reports, and any other pertinent information surrounding the credentials. AST must maintain a record of all CSTSI credential incidents. If a CSTSI is suspected of negligence or misconduct in the loss, theft, or destruction of a CSTSI credential, the Safety Inspection Division Manager will take appropriate action in accordance with FAA Human Resources Policy Manual, Standards of Conduct (ER-4.1) and FAA Order 3750.7, Ethical Conduct and Financial Disclosure.

**b.** If ASH notices a loss of more than 10 percent of CSTSI credentials, or if an audit of the AST Credential Program reveals that AST cannot account for more than 10 percent, AST will redesign and ASH will reissue all CSTSI credentials. AST shall bear all expenses associated with the reissuance.

**13.** Exceptions. AST may request exceptions to specific requirements of this order by submitting in writing, justification for the proposed exception and a description of the time frame for which it would apply. Requests will be approved or denied by the Office of Security and Hazardous Materials Safety. The approval of any request for exception to the provisions of this order will be based on the acceptance of suitable compensatory measures that mitigate or exceed the established policy guidance of the FAA Credential program. Any exception granted to AST by ASH is subject to review and may be revoked if conditions change and it no longer provides an adequate alternative to this order. ASH and AST shall maintain copies of all exception approvals.

#### 14. Negligence and Misconduct.

**a.** Individuals entrusted with CSTSI credentials must protect them from falling into the possession of unauthorized parties. The failure to control these credentials may cause them to be used to commit a criminal or terrorist act. If an administrative inquiry indicates that a loss or theft was due, in part or full, to the credential-holder's negligence or misconduct, the individual may face disciplinary action in accordance with the FAA Human Resources Policy Manual, Volume 4: Employee Relations (ER-4.1), Standards of Conduct and FAA Order 3750.7, Ethical Conduct and Financial Disclosure.

**b.** The FAA may elect not to issue a replacement credential to an individual whose credential was lost or stolen due to the employee's negligence. To obtain a replacement CSTSI credential lost or missing due to the bearer's negligence or misconduct, a formal request must be submitted to ASH. An administrative inquiry shall be conducted to determine whether the bearer was at fault for losing the credential or if reasonable efforts were made to control the item. ASH will review the administrative inquiry to determine final disposition of the matter.

**15. Information Currency.** The provisions contained in this order will be reviewed and updated three years after its date of inception. When deficiencies are found, more clarification is needed, or when there are recommended improvements to be made regarding the content of this policy, written comments should be forwarded to ASH for consideration. FAA Form 1320-19, the Directives Feedback Information form, Appendix E of this order provides options to address procedural or typographical errors, recommended paragraph changes or additions and other comments. However, as a follow-up to any conversations, FAA Form 1320-19 must be submitted to document the conversation and the request for interpretation.

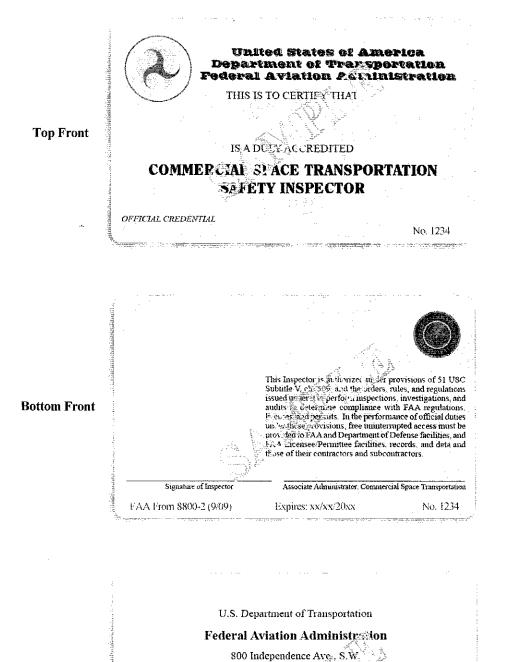
**16. Background.** Authority to inspect FAA licensed and permitted activities is granted in the compliance monitoring sections of 14 CFR 417.23, 14 CFR 431.83, 14 CFR 420.49, and 14 CFR 437.93 under 51 U.S.C. § 50907. On 18 December 2007, the AST Program Lead for Safety Inspections recommended and AST-1 adopted a proposal based on approval by the Office of Security, for all Commercial Space Transportation Safety Inspectors (CSTSI) to carry official credentials in the performance of official safety inspection duties.

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**17. Distribution.** This document is distributed to the Associate Administrator for Commercial Space Transportation (AST-1); to the AST Safety Inspection Division Manager; to the AST Stand/Eval Officer; and to the division level in the Office of Security and Hazardous Materials Safety (ASH).

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Dr. George C. Nield Associate Administrator for Commercial Space Transportation



#### APPENDIX A – Commercial Space Transportation Safety Inspector Credential



POST: 44S ER Reun to: ASSOCIATE ADMINISTRATION OC MEDICIAL SPACE TRANSPORTATION FEDERAL AVENTION ADMINISTRATION MASSING TON, D.C. 20591

Washington, D.C. 20591

IF FOUND-Drop in any U.S. Mailbox, as unauthorized possession or use makes offender liable to severe benalties. Title 18, U.S.C. Sec. 499.

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# Appendix B. Responsibilities and Procedures for Receipt of Commercial Space Transportation Safety Inspector Credentials

Subject: Responsibilities and procedures for receipt of Commercial Space Transportation Safety Inspector Credentials

Employee name

Routing Symbol

Credential No.

#### (Please include name, routing symbol and credential number)

I hereby acknowledge receipt of the Commercial Space Transportation Safety Inspector credentials (FAA Form 8800-2) and agree to comply with the procedures specified below:

- I assume responsibility for safeguarding the issued credentials that are considered accountable Government property. When not in use credentials will be protected, to the best of my ability, against loss or theft. Because credentials are to be used as official identification and for official purposes only, I will not loan, give, or otherwise allow any other person to use my credentials for any purpose.
- If lost or stolen, 1 will notify the regional FAA Security Office and the FAA Office of Security, AIN-1, within 24 hours. New credentials will be reissued in accordance with the applicable provisions noted in FAA Order 8800.1.
- If I am negligent in meeting the prescribed security requirements, I understand that I will be held accountable and subject to administrative or disciplinary action.

Surrender of Commercial Space Transportation Aviation Safety Inspector credentials:

- I understand that I am responsible for turning in my credentials to my immediate supervisor or manager upon expiration, or if I retire or terminate FAA employment, or if I am reassigned to a position that does not meet the eligibility requirements for possessing credentials as determined by FAA management.
- I understand that FAA management may deny a request for reissuance of a lost/stolen credential if an
  administrative inquiry indicates that its loss or theft was due, in part or in full, to my negligence or
  misconduct. I understand that I could face disciplinary action in accordance with the FAA's Human
  Resources Policy Manual, Standards of Conduct (ER-4.1) and FAA Order 3750.7, Ethical Conduct and
  Financial Disclosure.
- I understand that if I surrender my credentials, they must be returned to my manager or immediate supervisor. The Program Lead for Safety Inspections will then notify the Office of Security, AIN-1, on the inspector's status. Deviating from either prescribed method could result in disciplinary action.

Credentials Receipt Signature

Date Signed

Please fax this form to: AST-400, 202-267-3686, within 5 days of receipt of credentials.

# Appendix C. Acknowledgement Letter for Possession of FAA Form 8800-2 Credentials

#### (Please complete)

Name	Credential No.	Badge No.
		N/A

#### Possession of FAA Form 8800-2 Credentials

- I have read and understand FAA Order 1600.25, Federal Aviation Administration (FAA) Official Credentials.
- I understand that the issued FAA Form 8800-2 credentials are used only to conduct official business in support of the FAA mission.

#### Penalties for Misuse of FAA Form 8800-2 Credentials

- Penalties for Misuse of Credentials. FAA management may request the FAA Form 8800-2 credentials, if
  an administrative inquiry indicates improper use, abuse, intentional misrepresentation or misconduct of
  official credentials. Failure to fully comply with the provisions of this order or related laws and regulations
  may result in corrective action, including temporary suspension, reassignment, or employee's removal, in
  accordance with the FAA's Human Resources Policy Manual, Standards of Conduct (ER-4.1) and FAA
  Order 3750.7, Ethical Conduct and Financial Disclosure.
- Reporting Misuses. Report any actual or alleged misuse of FAA Form 8800-2 credentials to the immediate supervisor, and then to the Regional Servicing Security Element (SSE) within 24 hours from receipt of the information.
- Employees are responsible for seeking advice and guidance through their supervisory chain of command concerning their responsibilities under this and other policies governing employee conduct.
- · Penalties may be imposed pursuant to law for the improper use of official identification, including:

(1) 19 United States Code (U.S.C.) 499 which states that "Whoever falsely makes, forges, counterfeits, alters or tampers with any official pass or permit, used by or under the authority of the United States; or with the intent to defraud uses or possesses any such pass or permit, or personates or falsely represents himself to be or not to be a person to whom such pass or permit has been duly issued or willfully allows any other person to have or use any such pass or permit, issued for his use alone, shall be fined not more than \$2,000 or imprisoned not more than five years, or both.

(2) 18 U.S.C. 1028, which establishes penalties for fraud and related activity in connection with identification documents.

#### Surrender of Credentials

 Upon request, FAA Form 8800-2 credentials must be returned to the immediate supervisor for return to ASH.

By signing this letter, I hereby acknowledge that I have read the information and agree to comply with applicable Orders, laws, and regulations:

Signature

Date Signed

Please fax this form to: AST-400, 202-267-3686, within 5 days of receipt of credentials.

#### Appendix D. Identification Card / Credential Application (DOT F 1681)

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# Identification Card / Credential Application

#### **Privacy Act Notice:**

The information on this form is requested under authority of Titles 5 and 40, USC; Title 32, CFR; and Title 40 USC 486c. Submission of all data is mandatory in order to receive DOT identification media. The purpose is to provide a ready concentration of employee personal data to facilitate issuance, accountability, and recovery of required identification/credential card(s) which are issued to employee or contractors. The information provided will be used to issue such identification/credential card(s) as may be required to enable the employee or contractor to properly conduct assigned duties. Failure to provide all or any part of the requested data will result in your inability to be properly identified and, therefore, be unable to properly perform all aspects of your assigned official duties.

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U.S. Department	
of Transportation Federal Aviation	
Administration	
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FAA Form 1320-19 (8-89)	

# Appendix E. Directive Feedback Information Form