AOPA's Guide to TSA's Alien Flight Training/Citizenship Validation Rule

For aircraft weighing less than 12,500 pounds, these requirements apply only to flight training for a recreational pilot, sport pilot, private pilot, instrument rating, or multiengine rating.

Use the links and information on this page to learn how TSA's alien flight training/citizenship validation rule affects you. Whether you are a pilot or flight instructor, U.S. citizen, or alien, this page is designed to allow you access to the information you need to know. As you read down the page, you will find information relevant to the rule including TSA clarifications and questions and answers.

Below, you will also find a series of links, which are customized to the various scenarios present in the rule. Selecting the link that fits your scenario will allow you to view the information in the rule relevant to your situation.

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Flight Schools: Help your students learn more about this rule and where to obtain the latest information. Download AOPA's "TSA Rule" poster, suitable to display in your flight school lobby. **CFIs:** Download AOPA's pocket-size "CFI Flight Training Validation Rule Checklist," handy to carry with you at all times.

Outline of the TSA Rule

On September 21, 2004, the Transportation Security Administration (TSA) issued an "interim final rule" on flight training for aliens and other designated individuals. When the interim rule was first issued, it required

every person to prove his or her citizenship status (including U.S. citizens) prior to undertaking flight training in an aircraft weighing 12,500 pounds or less. Additionally, all foreign flight students were required to complete a background check process with TSA. Not only did the rule apply to flight training, but also to recurrent training under Part 61. This meant that pilots would have to prove citizenship, and aliens submit background checks, for flight reviews, instrument proficiency checks, and aircraft checkouts.

AOPA's successful efforts to mitigate the effects of the rule led to several clarifications later issued by TSA. One of them removed "recurrent training" (flight reviews, aircraft checkouts, etc.) from the requirements of the rule. The other redefined "flight training" as training only for the issuance of a recreational pilot, sport pilot, private pilot certificate, multiengine rating (at any level), or instrument rating.

This rule also initially required flight schools and flight instructors to provide security awareness training to each ground and flight instructor and any other employee who has a direct contact with a flight school student (regardless of citizenship or nationality) and to issue and maintain records of this training.

Once again, AOPA's efforts successfully led to TSA clarification of the applicability of the initial and recurrent security awareness training. Ground instructors and administrative personnel who come into direct contact with flight students are still required to complete this training requirement, but with regard to flight instructors, only active instructors must take the training. Inactive instructors are not required to take the training, but it is recommended.

AOPA was, and remains, the industry leader in monitoring the effects of the TSA rule on general aviation. AOPA's goal is to ensure that general aviation pilots are able to comply with the rule with less burden and fewer complications.

Significant Provisions/Clarifications

TSA Clarifies Previous Exemption for Flight Training Prior to October 20, 2004
TSA issued a clarification that a previously issued exemption for flight students enrolled in flight training prior to October 20, 2004, is no longer in effect. The intent was to exempt flight students who were actively enrolled, training, and near completion of their respective flight training prior to October 20, 2004.

TSA Recurrent Security Awareness Training Module
Active flight instructors, ground instructors, and flight school employees now have a means available to complete the TSA's recurrent security awareness training. TSA offers an online training module, "Recurrent Flight School Security Awareness Training," which can be used to fulfill the recurrent training requirements or to develop an alternate training program.

Recurrent Security Awareness Training Exemption
TSA issued an exemption that the required recurrent security awareness training occurs in the same month as the initial security awareness training. Under this exemption, flight schools and independent instructors are allowed to complete their first recurrent security awareness training within 18 months of their initial security awareness training.

TSA Clarification of "Flight Training"
TSA has provided clarification on the definition of "flight training" for aircraft with an MTOW of 12,500 pounds or less; it now only includes flight training for a recreational pilot, sport pilot, or private pilot certificate; multiengine rating (at any level); or instrument rating.

TSA Defines "Recurrent Training"
TSA interprets the definition of "recurrent training" to NOT include any flight review, proficiency check, or other check whose purpose is to review rules, maneuvers, or procedures or to demonstrate a pilot's existing skills.

Security Awareness Training — Applicability
TSA has clarified the applicability of the Security Awareness Training. Current and active instructors are required to have taken the training by January 18, 2005. Those who failed to meet this deadline should comply with this requirement as soon as possible. Current and inactive instructors are not required to take the training, but it is recommended. Expired instructors are not required to complete the training.

- **Security Awareness Training Certificates**
  Many people have been unable to print the Flight School Security Awareness (FSSA) training completion certificate at the end of the training module. Therefore, the following forms have been provided for individuals to be able to document their completion of the TSA required FSSA training. The documentation requirements are slightly different, depending on whether you are an independent CFI [PDF document] or a CFI/employee of a flight school [PDF document]. For those who are still unable to print a certificate using this method, an endorsement may be made in that person's logbook or other record to show compliance with the training. It is imperative that the same wording provided on these certificates is used when making this endorsement.
- **Enforcement of Security Awareness Training Compliance**
  According to the TSA rule, flight school employees (and flight instructors) not in compliance may be subject to civil penalties under federal regulations. TSA may also deal with violators by issuing verbal warnings and/or written notices. TSA considers each day a person operates in violation to the requirements of the rule an additional occurrence subject to penalty.

Airship, Balloon, and Glider Exemption
TSA has determined that airships, balloons, and gliders pose a minimal threat to aviation and national security and has granted an exemption for those schools that provide, and individuals who apply for, instruction in the operation of airships, balloons, or gliders. This exemption also

exempts schools that only provide instruction in airships, balloons, and gliders from the security awareness training requirement.

International Fingerprinting Locations
Certain international locations are equipped to process fingerprints for alien candidates as part of an expanded partnership with NATA Compliance Services. A list of participating airports is available at www.tsc-csc.com/printoffices/.

Definitions

Alien. Any person not a citizen or national of the United States. This also refers to resident aliens (green-card holders) and visa holders in the United States.

Aircraft Simulator. A flight simulator or flight training device as defined by 14 CFR 61.1.

Candidate. An alien or other individual designated by TSA who applies for flight training. It does not include an individual endorsed by the Department of Defense for flight training.

Flight School. Any pilot, flight training center, air carrier flight training facility, or flight instructor certificated under 14 CFR Part 61, 121, 135, 141, or 142; or any other person or entity that provides instruction under 49 U.S.C. Subtitle VII, Part A, in the operation of any aircraft or aircraft flight simulator. This also includes any individual or entity located outside the United States that provides such instruction. For example, a flight school located in Canada that provides instruction in the operation of an aircraft or aircraft simulator that would enable an individual to receive a U.S. airman certificate is subject to this rule.

Flight Training. The TSA rule initially defined "flight training" as instruction received from a flight school in an aircraft or aircraft simulator that a candidate could use toward a new airman certificate or type rating. On January 5, 2005, TSA clarified the definition to include only three types of training that substantially enhance piloting skills. The first is training that a candidate could use toward a recreational, sport, or private pilot certificate because such training provides a candidate with basic piloting skills. The second is training that a candidate could use toward a multiengine rating because such training provides a pilot access to larger, faster aircraft. The third is training that a candidate could use toward an instrument rating because such training enhances a pilot's abilities to pilot an aircraft in bad weather and enables a pilot to better understand the instruments and physiological experiences of flying without reference to visual cues outside the aircraft. Recurrent training, such as flight reviews and instrument proficiency checks, are exempt from the rule, as well as flight training listed under 14 CFR 61.31.

Flight Schools and Flight Instructors

Whether providing flight training to U.S. citizens or aliens, all active flight instructors must complete the TSA Initial Security Awareness Training prior to giving any further flight or ground instruction. Ground instructors and administrative personnel who come into direct contact with flight students must also complete this training. CFIs who have current certificates but are not actively involved in teaching, and CFIs

whose certificates have expired, are encouraged to take the free training but not required.

Additionally, active flight instructors, ground instructors, and flight school employees now have a means available to complete the TSA's recurrent security awareness training. TSA posted an online training module, which can be used to fulfill the recurrent training requirements or to develop an alternate training program.

- Security Awareness Training
- U.S. Citizens Receiving Flight Training
- Aliens Receiving Flight Training
- Flight School Record-Keeping Requirements

U.S. Citizens

1. Determine Applicability. The requirements for determining citizenship status for any student, whether U.S. or alien, applies only to flight training toward a recreational pilot, sport pilot, or private pilot certificate; instrument rating; or multiengine rating.
2. Proof of Citizenship. Evidence of U.S. citizenship must be shown by one of the following:
    a. Valid, unexpired U.S. passport.
    b. Original birth certificate of the United States, American Samoa, or Swains Island, and government-issued picture ID.
    c. Original certification of birth abroad with raised seal (Form FS-545 or DS-1350) and government-issued picture ID.
    d. Original certificate of U.S. citizenship with raised seal (Form N-560 or N-561), or a Certificate of Repatriation (Form N-581), and government-issued picture ID.
    e. Original U.S. Naturalization Certificate with raised seal (Form N-550 or N-570) and a government issued picture ID.
3. Logbook or Record-keeping Requirements. An instructor must keep a copy of the documents for five years that are used to prove citizenship or make an endorsement in both the instructor's logbook, or other record used by the instructor to record flight student endorsements, and the student's logbook with the following:

    "I certify that [insert student's name] has presented me a [insert type of document presented, such as a U.S. birth certificate or U.S. passport, and the relevant control or sequential number on the document, if any] establishing that [he or she] is a U.S. citizen or national in accordance with 49 CFR 1552.3(h). [Insert date and instructor's signature and CFI number.]"

Aliens

This applies to aliens who are receiving flight training inside or outside the United States for an U.S. airman certificate.

Visa notice: Taking flight training without an appropriate visa could be a violation of your immigration status and could result in your arrest and

removal from the United States; therefore, it is important that you have a visa that permits you to take flight training in the United States. If you do not possess the correct visa, or if you have questions pertaining to your visa status or the appropriate visas for flight training, please contact your local Bureau of Citizenship and Immigration Services at 800/375-5283 or www.uscis.gov or the State Department Consular Affairs Office for assistance. The AFSP will deny flight training requests from candidates who are present in the United States illegally or who do not have an appropriate visa for flight training. *Fees paid for denied applications are not refundable*.

1. **Candidate Notifies Flight School.** The flight training candidate should provide advanced notice to the flight school that he or she intends to start flight training.
2. **Flight School Registers.** After the candidate notifies the flight school of their intent to start flight training, the flight school needs to register online with TSA at https://www.flightschoolcandidates.gov/fsindex.html. After accessing the AFSP provider Web page, scroll down the page to select "new account." After registering, for flight schools in the United States, a user ID will be immediately provided and a password will be sent later via e-mail. For flight schools outside the United States, follow the instructions provided at the provider registration Web page.
3. **Candidate Creates Login.** The candidate is required to create a login account at https://www.flightschoolcandidates.gov. A user ID is provided immediately after submitting the required information, and a password is sent via e-mail. (Time may vary on receiving the password — possibly 24 to 48 hours.)
4. **Candidate Applies for Training.** After receiving his or her password, the candidate will be instructed to change it. The candidate then logs into the TSA student registration page at https://www.flightschoolcandidates.gov and continues the application process.

   The candidate will be required to submit the following information:

   o **Background Information.** Full name, gender, current address and five-year address history, date and country of birth, and citizenship information.
   o **TSA Identification Number.** The TSA identification number is not given to the candidate. Rather, it is an internal designator only seen by TSA.
   o **Passport and Visa Information.** Foreign applicants are required to have a passport. A candidate may either scan his or her complete passport and submit it to TSA electronically, or copy his or her complete passport and fax it to TSA using the fax number provided on the AFSP Web site.
   o **Training Details.** Basic information including the name of the school, course name, course description and ID number, type of aircraft, pilot certificate or rating sought, and the start and end dates for the flight training. If the flight school is already registered with TSA, it might be helpful if the candidate brings his or visa and passport and registers at the flight school. This will allow the flight school to upload the

required documents to TSA and also to make copies for the flight school's record-keeping requirements. Upon completion of the application, the candidate will be prompted to click on the "validate and submit" icon. If any errors appear in the application, the candidate will be instructed to make any necessary corrections or complete any missing information. After making any changes, the candidate clicks on "submit application." Furthermore, after submitting the application, and for the application to proceed further, the candidate must select "I agree" or "I disagree" after reviewing important information regarding his or her application. The candidate training request status is available on the AFSP candidate home page at https://www.flightschoolcandidates.gov. Each training request the candidate has entered into the system is listed in the Current Flight Training Applications section of the AFSP home page after login.

○ **Fingerprints.** Free fingerprinting forms are available by calling the American Association of Airport Executives at 703/797-2550. (AAAE has reported that it is not issuing fingerprinting forms to candidates, only flight schools and instructors.) Flight schools may opt to receive the fingerprinting forms via express or overnight mail for a charge. Additionally, a prepaid return envelope for returning the forms to AAAE may also be provided for a charge.

A candidate's fingerprints must be collected by or under the supervision of one of the following:

- ○ **A U.S. federal, state, or local law enforcement agency.**
- ○ **U.S. government personnel at a U.S. embassy or consulate that possesses appropriate fingerprint collection equipment and personnel certified to capture fingerprints.**
- ○ **Another entity approved by the Federal Bureau of Investigation (FBI) or TSA, including airports that possess appropriate fingerprint collection equipment and personnel certified to capture fingerprints.**

A list of domestic and international fingerprinting locations is available at www.tsc-csc.com/printoffices/. The prints can be taken either electronically or by the provided forms. After they are completed, the prints are sent back to AAAE (an address is provided on the fingerprinting forms), who then forwards a copy to TSA. Additional instructions can be found on TSA's Web site at https://www.flightschoolcandidates.gov/fp_instr.html. **Note:** Any candidate who has previously submitted fingerprints and received confirmation of fingerprint receipt for a prior AFSP training request is not required to resubmit fingerprints. If possible, TSA will use the fingerprints on file for that candidate.

Note: Aliens are exempt from resubmitting fingerprints for taking additional flight training. Fingerprints will continue to be

transferred to new flight training requests but *only* if the alien uses the same account (pin) number that was used for the initial flight training request.

- $130 **Application Processing Fee.** The fee must be paid by credit card on the TSA's Web site. (Candidates now have a maximum of 10 attempts at paying the processing fee. After the tenth failure, the training request is canceled by TSA's system, and the candidate must submit a new training request. Please verify that your credit card is valid before attempting to pay the processing fee).
- **Photo.** The student should have his or her photo taken by the flight school when he or she arrives at the flight school for the first day of flight training. The flight school will be required to upload this same photo, not one copied from the candidate's passport or other identification, to TSA's Web site or have it faxed to TSA at 571/227-4532 or 571/227-4534. For guidance on taking and uploading the photo of the candidate, please see the frequently asked questions section below.

The following are descriptions of each status type:

- **Draft** — Candidate has started to enter request, but it has not yet been submitted. Next step: Candidate (or provider for Category 4) selects the "Validate and Submit Application" icon and corrects errors prior to submitting the request.
- **Submitted** — The request has been fully submitted. Next step (Category 1-3): Provider logs into Web site to validate or deny the request.
- **Provider Accepted** — Provider accepted the candidate's request. Next step: Candidate pays the $130 AFSP fee online. Once the fee has been received by TSA, an authorized agent fingerprints the candidate.
- **Provider Rejected** — Provider rejected the candidate's request. Next step: Candidate contacts the provider to inquire about denial of request.
- **Preliminary Approval Granted** — Preliminary approval has been granted to the candidate.
- **Fingerprints Received** — TSA has received the candidate's fingerprints. Next step: Category 1 candidates — up to 30 calendar days to receive approval; Category 2 candidates — up to five business days to receive approval; Category 3 and 4 candidates will not receive this status.
- **Final Approval Granted** — Candidate has been granted final approval for the training request. Next step: Training must commence within 180 days of final approval.
- **Final Approval Rejected** — Candidate has been denied training.
- **Insufficient Information** — Candidate has submitted a training request with incomplete or inaccurate information. Candidates should then carefully follow the e-mail instructions given to edit and resubmit the training request.
- **Illegible Passport/Security Document Received** — Candidate's passport or airman certificate has either not

been received by the AFSP or the copy sent was unreadable. Candidate should resend the documents via e-mail to AFSP.help@dhs.gov or fax them to 571/227-4532 or 571/227-4534. Be sure to include the training request ID number with the resubmission to ensure proper filing.

For Category 2 Candidates: If an "Illegible/Unreceived Security Document" e-mail is received, please follow the instructions in the e-mail carefully. This may indicate that the candidate either sent in an illegible security document, the document has not been received, or that the candidate may not be eligible for Category 2 and should follow the e-mail instructions given.

Further questions about the status of your flight training request should be directed to TSA by e-mail to AFSP.Help@dhs.gov or by calling 571/227-4544.

5. **Flight School Acknowledges Training Request.** The flight school will be sent an e-mail from TSA requesting confirmation of the candidate's training request after the candidate's request has been submitted.
6. **Candidate Instructed to Pay Fee.** Once the flight school confirms the candidate's request, the candidate will be e-mailed instructions to pay the $130 processing fee (credit card only). Candidates now have a maximum of 10 attempts at paying the processing fee. After the tenth failure, the training request is canceled by TSA's system, and the candidate must submit a new training request. Please verify that your credit card is valid before attempting to pay the processing fee.
7. **Flight School and Candidate Receive Preliminary TSA Decision.** Upon receiving the payment, TSA e-mails both the candidate and the flight school an e-mail with the subject "Preliminary Approval." THIS DOES NOT GRANT YOU PERMISSION TO RECEIVE TRAINING. This e-mail confirms the application and fee have been received by TSA, but they still need to receive the candidate's fingerprints. If the preliminary decision is not received within seven business days, contact the TSA Help Desk at 571/227-4544.
8. **Candidate Instructed to Submit Fingerprints.** If the preliminary decision is favorable, candidates will receive an e-mail from AFSP with a subject "Fingerprint Instructions" when a successful payment has been verified. Although you may receive a notification from Pay.Gov for a successful payment, your training request will not be processed by AFSP until the payment is verified by TSA and you have been sent the "Fingerprint Instructions" e-mail. If the decision is not favorable, the candidate will be provided details regarding any information that may be missing from their registration. For more details on how to get fingerprints taken, click here.

   Note: Aliens are exempt from resubmitting fingerprints for taking additional flight training. Fingerprints will continue to be transferred to new flight training requests but *only* if the alien uses the same account (pin) number that was used for the initial flight training request.

Notice: Effective April 17, 2006, if a candidate submits/submitted fingerprints **prior** to paying for his/her training request and receiving the official Alien Flight Student Program (AFSP) fingerprinting instructions, the fingerprints are invalid, and the associated training request(s) will be canceled. The fingerprints will **NOT** be applied to any current or future training request. Both the candidate and the provider will receive an e-mail notifying them that the fingerprints are invalid, the training request(s) is/are canceled, and what steps need to be taken to resolve the problem to complete processing through the AFSP.

9. **Flight School and Candidate Receive TSA Confirmation.** Prior to beginning any flight training, both the candidate and the flight training provider will receive an e-mail with the subject "Permission to Initiate Training/Fingerprint Receipt" when all of the required information has been received and verified by TSA. This e-mail needs to be received by the candidate before training is started.

10. **Flight School Takes Photo.** The flight school takes a photo of the candidate when he or she arrives for the first day of flight training. The flight school will be required to upload this same photo, not one copied from the candidate's passport or other identification, to TSA's Web site or have it faxed to TSA at 571/227-4532 or 571/227-4534. For guidance on taking and uploading the photo of the candidate, please see the FAQ section below.

11. **Final Determination Is Made by TSA.** TSA will make a final determination as to the candidate's eligibility to receive flight training (training may have already started) and will notify the flight school and candidate of its decision.

Flight School Record-Keeping Requirements

The flight training provider must keep a record of the following for five years for each alien candidate:

- The photograph of the candidate.
- A copy of the approval sent by the TSA confirming the candidate's eligibility for flight training. (This approval is the final determination sent to the candidate and flight training provider via e-mail after the candidate has applied for flight training with the TSA, paid the $130 fee, and submitted passport and fingerprints.)
- Candidate's full name, gender, and date of birth.
- Candidate's ID number created by the TSA.
- Copy of candidate's valid, unexpired passport and visa (including all information listed in Step 4 of the AFSP Candidate Help Page.
- Copy of all previous passports and visas held by the candidate and all the information necessary to obtain a passport and visa.
- Candidate's country of birth, current country or countries of citizenship, and each previous country of citizenship, if any.
- Candidate's requested dates, type, and location of training (for more details, see Part 2 of the AFSP Candidate Help Page).
- Candidate's current U.S. pilot certificate and certificate number (if any).
- Candidate's current address and phone number and each address

for the previous five years.
- Copy of receipt confirming that the $130 was paid (printable from TSA Web site after candidate makes payment).
- For DoD endorsees, a copy of the required written statement and picture ID.

Flight School Security Awareness Training

Initial security awareness training
A flight school may use either the initial security awareness training program offered by TSA or an alternative initial training program offered by a third party or designed by the flight school itself. TSA's initial security awareness training program is available online at http://download.tsa.dhs.gov/fssa/training/.

For information on alternative initial security awareness training, please refer to Subpart B of the TSA rule.

IMPORTANT! While conducting flight school inspections, TSA inspectors are finding that documents being issued for completion of security awareness training are not completed properly or missing required information. According to the TSA rule, the document issued for security awareness training must include the following:

- Employee and/or instructor's name.
- Distinct identification number for the employee or instructor to enable both the flight school and TSA inspectors to track the security awareness training.
- Date on which the employee or instructor received or completed the training.
- Name of the instructor who conducted the training, if an instructor conducted the training.
- A statement certifying that the flight school employee or instructor received or completed the security awareness training.
- The type of training received or completed, whether initial or recurrent.
- Signatures from the flight school employee and an authorized official of the flight school (independent instructors may not have an authorized official available to sign the document).
- If an alternative training program is used, a statement certifying that it meets the criteria in 49 CFR 1552.23(c).

Recurrent security awareness training
According to the TSA rule, each flight school employee or independent instructor must receive recurrent security awareness training every 12 months from the month of their initial training. A recent TSA exemption from 49 CFR 1552.23(d)(1) allows all flight training providers (flight schools and independent CFIs) to receive their recurrent security awareness training up to 1 calendar month before and 1 calendar month after the month that the individual's recurrent security awareness training course is due. This exemption applies only to the requirements for recurrent security awareness training, not the initial security awareness training.

The purpose of the TSA recurrent security awareness training is to make flight schools, instructors, and flight school employees aware of security-related incidents, measures, and procedures that affect their local airport and flight school. This means they should be aware of any new security measures or procedures, new threats posed by or incidents involving general aviation aircraft, and any new guidelines or recommendations concerning the security of general aviation aircraft, airports, or flight schools.

TSA provides a [Recurrent Security Awareness Training module](#) online that can be used to meet the requirements for recurrent security awareness training.

Even though filling in blanks or answering multiple choice questions is not a part of this training module, completion of the recurrent security training typically requires more than only reviewing the training module and completing the certificate of completion. In most cases, physically visiting with your airport or flight school manager to discuss these measures and/or looking for security measures is an integral part of completing the recurrent security awareness training.

For flight schools that decide to develop their own recurrent security awareness training, please refer to the requirements [stated here](#).

IMPORTANT! While conducting flight school inspections, TSA inspectors are finding that documents being issued for completion of security awareness training are not completed properly or missing required information. According to the TSA rule, the document issued for security awareness training must include the following:

- Employee and/or instructor's name.
- Distinct identification number for the employee or instructor to enable both the flight school and TSA inspectors to track the security awareness training.
- Date on which the employee or instructor received or completed the training.
- Name of the instructor who conducted the training, if an instructor conducted the training.
- A statement certifying that the flight school employee or instructor received or completed the security awareness training.
- The type of training received or completed, whether initial or recurrent.
- Signatures from the flight school employee and an authorized official of the flight school (independent instructors may not have an authorized official available to sign the document).
- If an alternative training program is used, a statement certifying that it meets the criteria in 49 CFR 1552.23(c).

Record keeping
This rule also requires a flight school to establish and maintain the following records for one year after an individual no longer is a flight school employee: (1) a copy of the document issued to the employee when he or she received initial training and each time he or she received recurrent training; (2) a copy of the alternative initial security awareness

training program, if the flight school used in the past or currently uses an alternative program instead of the TSA program.

Inspection requirements
This rule requires a flight school to allow officials authorized by TSA and the FAA to inspect the records required under this section. TSA officials will be conducting inspections of flight schools to ensure that they are complying with this rule. Flight schools that are not in compliance may be subject to civil penalties under 49 U.S.C. 46301 and 49 CFR Part 1503.

To help prepare for a TSA inspection, refer to AOPA's Flight School Checklist for TSA Inspections.

Frequently Asked Questions

General

Are introductory or "discovery" flights exempt from the requirements of the TSA rule?
Yes. TSA has stated through correspondence with AOPA that introductory or "discovery" flights are exempt from the requirements of the TSA rule.

What is the definition of flight training as it pertains to this rule for the purposes of needing to undergo citizenship verification?
The TSA has further interpreted the definition of "flight training" for aircraft with a maximum certificated takeoff weight of 12,500 pounds or less to only apply to training for a recreational pilot, sport pilot, or private pilot certificate; multiengine rating (at any certificate level — i.e., does not apply to MEI); or instrument rating (does not include recurrent training).

Do the requirements for citizenship verification apply for flight reviews, aircraft checkouts, or instrument proficiency checks?
No, TSA has interpreted the definition of "recurrent training" to NOT include any flight review, proficiency check, or other check required by 14 CFR § 61.57 or § 61.58 whose purpose is to review rules, maneuvers, or procedures, or to demonstrate a pilot's existing skills. The TSA has further interpreted the definition of "flight training" for aircraft with a maximum certificated takeoff weight of 12,500 pounds or less to only apply to training for a recreational pilot, sport pilot, or private pilot certificate; multiengine rating (at any certificate level — i.e., does not apply to MEI); or instrument rating (does not include recurrent training).

Do the requirements for citizenship verification apply to flight training in airships, balloons, or gliders?
No, TSA has granted an exemption for those schools that provide, and individuals who apply for, instruction in the operation of airships, balloons, or gliders. This exemption also exempts schools that only provide instruction in airships, balloons, and gliders from the security awareness training requirement.

I was approved by the Department of Justice (DOJ) Flight

Training Candidate Checks Program (FTCCP); do I have to go through the TSA background check?
The AFSP (Alien Flight Student Program) requires candidates to submit a request for each instance of flight training. Although some candidates have received final approval in the past through the DOJ's Flight Training Candidate Checks Program (FTCCP), they must submit a request for approval of new training through the AFSP Web site.

Please note that any user ID and password that was created for the FTCCP Web site will work on the AFSP Web site; you do not need to create a new account if you already have one from the FTCCP.

Flight Schools and Instructors

How do I submit an application for Category 4 (aliens who hold a pilot certificate from a foreign country and would like to get an unrestricted U.S. pilot certificate)?
Category 4 training requests for applicants are submitted by the provider through the form on the provider Web site. Flight school providers should click on the "Category 4 Menu" folder and the "Submit New Category 4" link within the flight school provider Web site. There is no processing fee for Category 4 requests.

Are flight instructors in the United States required to visit their local FSDO in order to validate their TSA registration and personal identification prior to training aliens?
No, flight instructors in the United States are not required to visit their FSDO for this. Once the flight instructor submits his/her registration to TSA, a user name will be provided immediately, and a password will later be sent from TSA via e-mail.

Are flight schools and flight instructors located outside the United States affected by this rule?
Yes. The rule applies to any flight school or flight instructor certificated under 14 CFR that provides instruction in the operation of any aircraft or aircraft simulator toward the issuance of a U.S. airman certificate. This includes any flight school or instructor located outside the United States that provides such instruction.

I am an active flight instructor and an alien. Am I required to do anything different than instructors who are U.S. citizens?
No, nothing special is required. The requirements of the rule for flight schools and flight instructors still apply to you. This requires registering with TSA if you are giving flight instruction to other aliens, verifying citizenship for U.S. citizens, and completing initial and recurrent TSA security awareness training.

How do flight training providers outside the United States verify their registration with TSA?
For providers outside the United States, you will need to validate with an international FSDO office (IFO). There are IFOs in New York, New York; San Francisco, California; and Miami, Florida. Please contact the nearest IFO to you and inquire whether that office can process your request for a provider account on AFSP. If you use the New York IFO, please select

the New York IFO (EA29) as your FSDO option and "New York" for your state location. If you use the San Francisco IFO, please select the San Francisco IFO (WP03) as your FSDO option and "California" for your state location. If you use the Miami IFO, please select the Miami IFO (SO23) as your FSDO option and "Florida" for your state location. Once the IFO validates your request, you will be sent a password via e-mail.

How do I upload and submit a candidate photograph?
Candidate photographs must be taken when a candidate arrives for the first day of flight training. The provider, through the "Photograph Upload" link, should upload these photographs through the AFSP Web site. The following TSA guidelines for taking photographs are provided on the photograph upload page within the AFSP Web site.

TSA guidelines for flight candidate photographs:

1. Proper Lighting Arrangement — Position light sources on both sides of the subject to avoid shadows on face. Use a light source to illuminate the background behind the subject to avoid shadows in background. Diffuse sources of light, such as umbrella lights, are preferable to point sources.
2. Camera/Subject Position — Place the camera approximately 4 feet from the subject. Position the camera at the subject's eye level. Position the subject so that he faces the camera. Photograph the subject against a plain white or off-white background and center the subject's head within the frame.
3. Photograph Print Properties — Produce a 2 inch x 2 inch color or black and white photo on thin paper or stock. Ensure the print is clear and has a continuous tone quality. Do not retouch or otherwise enhance or soften the photo.
4. Resolution Quality — High-resolution photography and printing are highly recommended. The entire face and all fine facial features should be in focus.

For uploading photographs, TSA accepts the following file extensions: BMP, DOC, GIF, HTML, JPEG, JPG, PDF, and TIF. In addition, the file name may only contain English characters.

What is a provider admin? What is a provider agent?
A *provider admin* is the administrator of a flight training provider account. Only one provider admin is allowed per flight training provider. The administrator user ID has access to all of the same screens and functionality as the provider agent but is also able to change flight training provider information, such as the telephone number of the school. Each school MUST have one provider admin.

A *provider agent* is the standard flight training provider account. This type of account allows the user to validate candidate requests, submit and review Category 4 candidate information, upload candidate photographs, and mark candidate training requests as completed. The provider agent account does not have access to change school information. A school may have any number of provider agents, including zero.

I am registered with a Part 141 (Part 142) school as a provider agent but teach part-time as a CFI (Part 61) provider. Do I register as a provider admin or agent?

Flight instructors who are registered with a Part 141 or Part 142 school should be registered as a provider agent for that school. The schools may have only one provider admin, which is generally an administrator at the school. By registering as a provider agent to the Part 141 or 142 school, flight instructors may validate candidate requests for their students at the school.

CFIs or Part 61 providers who do not have FAA school certification numbers must sign up as individual flight training providers. In this case, each instructor would sign up as a provider admin. For instructors who teach within a Part 141 (Part 142) school and also teach separately as a CFI (Part 61) provider, the instructor should sign up as a provider agent within the Part 141 or 142 school AND as a provider admin for instruction on a CFI (Part 61) basis. The instructor will validate candidate requests for the Part 141 (142) school separately from the CFI (Part 61) instruction.

What is the flight training provider's responsibility if a candidate is denied?

The flight training provider may not provide training to a candidate who has been denied by the AFSP. If the flight training provider has already initiated training for a candidate, and TSA notifies the flight training provider that the candidate poses a threat to aviation or national security, the flight training provider must stop the training immediately. TSA will contact the flight training provider both electronically (e-mail) and by telephone and provide further instructions.

U.S. Citizens

It is my understanding that the logbook endorsement requirement for U.S. citizens should be done anytime an instructor/flight school is presented with a new student who received a logbook endorsement from a different school and/or location. But for students who remain at one flight school throughout their training, and are known by all the instructors, a recurring endorsement is not necessary. Is this correct?

Yes, this is a correct interpretation. Think of the endorsement as a replacement of the copy of the proof of citizenship. If you had a copy of my birth certificate from private training, and now I want to do an instrument rating, no need to run a new Xerox copy just because I'm doing a new rating.

Aliens

I presently hold a pilot certificate from a foreign country and would like to get an unrestricted U.S. pilot certificate that is *not* based on my foreign certificate. Does this require registering with TSA?

The key to knowing whether or not to register with TSA for flight training is determining if you actually need flight training to get your U.S. unrestricted, or "stand alone," certificate. Some pilots might only need a

few hours for practical test preparation, which TSA does not consider as flight training. On the other hand, a pilot who needs more than a few hours of checkride preparation (to meet additional aeronautical experience requirements) needs to register with TSA as a Category 4 candidate. The provider — through the form on the provider Web site — submits Category 4 training requests for applicants. Flight school providers should click on the "Category 4 Menu" folder and the "Submit New Category 4" link within the flight school provider Web site. There is no processing fee for Category 4 requests. Category 4 candidates may commence training after receiving the "Request for Training Application Received" e-mail, which TSA issues upon receiving all of the required information.

Am I required to resubmit fingerprints for taking additional flight training?
No. Any additional flight training does not require resubmitting additional fingerprints. However, you must use the same account (pin) number that you used for your initial flight training request in order for this exemption to apply.

I am pursuing a U.S. pilot certificate at a flight school located outside the United States. Do I need to comply with this rule?
Yes. The rule applies to the issuance of a U.S. airman certificate at any flight school located in or outside the United States that is providing flight training under 14 CFR.

I am pursuing a U.S. pilot certificate based on my foreign license. Am I required to comply with the TSA rule?
No, TSA has clarified that getting a U.S. certificate based on a foreign license does not apply to the requirements of the rule.

Can an alien candidate register without a passport?
You are generally required to have a passport, but there are some people with very special circumstances who cannot obtain a passport. TSA will handle these situations on a case-by-case basis.

Does the TSA have any international locations for processing fingerprints?
In March 2005, TSA announced that certain international locations have been selected to process fingerprints for alien candidates. A list of participating airports is available at www.tsc-csc.com/printoffices/.

How long will it take to get an answer on my training request?
There are factors that affect the amount of time between training request submission and response, including:

1. Response time of your flight training provider.
2. Accuracy and completeness of your training request.
3. Nature of the request.
4. Category of the candidate.

Once my flight training request has been approved and training has begun, how long can I train before my approval expires?
The flight training approval expires 545 days from the date of original

submission to the AFSP. Extensions of training will not be granted under this policy. Candidates must submit a new training request at this time, regardless if the training is toward the same certificate or type rating.

What can I do if my request was returned for insufficient information?

If your training request contains insufficient information required to make a determination on your request, you will receive an e-mail notification. You may return to this Web site, select the training request for which you received the e-mail notification, and review the information you provided for its accuracy and completeness. Make any changes needed, and resubmit your training request. On a resubmission, the flight training provider DOES NOT need to validate your request again, and you DO NOT have to pay another $130 USD processing fee.

What if I need to cancel my flight training request?

You may now cancel a training request that is in the Draft status by going to Step 7 of the request, clicking on the Edit link for that request, and clicking the "Delete Training Request" button.

Security Awareness Training

Where can I go to get the Recurrent Security Awareness Training?

Active flight instructors, ground instructors, and flight school employees now have a means available to complete the Transportation Security Administration's (TSA's) recurrent security awareness training. TSA posted an online training module, "Recurrent Flight School Security Awareness Training," which can be used to fulfill the recurrent training requirements or to develop an alternate training program.

I am having a problem printing TSA's security awareness training certificate after I completed their online course; what should I do?

You may obtain a certificate from AOPA [independent CFI (Word document | PDF document); CFI/employee of a flight school (Word document | PDF document)] and keep this for proof of complying with the security awareness training requirement. You may also elect to endorse your logbook or other permanent records with the wording provided on the certificate that applies to you.

Is a flight instructor who is not actively instructing required to take the initial security awareness training, and then continually undertake the recurrent training if they remain inactive?

TSA has clarified the applicability of the security awareness training. Current and active instructors must take the training. However, current and inactive instructors are not required to take the training, but it is recommended. Expired instructors are not required to complete the training. The deadline for TSA's security awareness training was January 18, 2005. Compliance is still required for active instructors who have yet to complete this training.

TSA's security awareness training document is required to have a distinct identification number and also indicate whether or not

the training is initial or recurrent. Neither of these is provided on the TSA security awareness training certificate. What should I do?

- After rechecking the rule and with our Chief Counsel's Office, here's what we have regarding the identification number:
- Under 1552.25(a), a flight school must issue a document to each flight school employee each time the employee receives training (initial and recurrent). Paragraph (a)(1) requires the document to contain the employee's name and a distinct identification number.
- The purpose is for TSA auditors to be able to better track/identify employees who have received the training. TSA does not provide the identification number. The flight school should make up a numbering system for employees or use any employee numbering system that the school already uses to identify employees.
- The school is also free to note initial or recurrent training on the certificate for their record-keeping purposes.

With regards to the security awareness training, can you please tell me if the TSA's online training can be used again for recurrent training?
It is not the intent of TSA for the initial training to be used repeatedly. The requirements for recurrent training differ greatly from initial (they are much less centered on the awareness portion, and more on actual security events or changes to procedures at the airport or facility), as laid out in 49 CFR 1552.23. There is nothing to prevent a training provider from using the initial program as part of recurrent, but completing that only would not fulfill the requirements for recurrent training under 1552.23 because of the difference in content requirements for initial and recurrent. TSA has issued a recurrent security awareness training module that can be used by flight schools and independent instructors.

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