

Security and Hazardous Materials Safety (ASH)

Office of Personnel Security-Contractors Division (AXP)

Contractors Division: Vendor Training

Presented to: FAA Contract Vendors
By: Personnel Security-Contractors Division
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**Federal Aviation
Administration**

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Training Overview

- ✈ **Policy**
- ✈ **Roles and Responsibilities**
 - Contract Company (Vendor)
 - Contractor Applicant
- ✈ **Vendor Applicant Portal(VAP)**
 - Functions (*Add, Remove, Reports*)
 - Requesting a VAP POC account
 - Vendor responsibilities
- ✈ **Contractor Applicant Requirements**
 - Fingerprint Cards
 - eApp standard forms
- ✈ **Investigation Results**
 - Interim Suitability Determination
- ✈ **Obtaining an FAA PIV Card**



Why are contractor background investigations required?

Investigations are completed to determine the contractor's suitability to work on a federal contract in order to authorize access to our facilities, systems, or to Sensitive Unclassified Information (SUI). To accomplish our mission the following Directive and Orders have been implemented:

Homeland Security Presidential Directive 12: Policy for a Common Identification Standard for Federal Employees and Contractors.

FAA Order 1600.1F: establishes the Contractor and Industrial Security Program for the FAA and prescribes related policies, standards, criteria, and guidelines for security screening of contractor employees

FAA Order 1600.78: Federal Aviation Administration delegated responsibility for issuing specific ID cards used FAA-wide to Implement Homeland Security Presidential Directive -12, dated May 10, 2010.



Roles and Responsibilities

CONTRACT COMPANY POINT OF CONTACT

- As the designated point of contact for the FAA's Vendor Applicant Portal (VAP), responsibility includes submitting contract employees for investigations and removing contractors when applicable **and timely**.
- Assisting contractor applicants through background investigation process.
- Remaining in communication with the FAA Security Office via the Vendor Application Program (VAP) to maintain contractor's work status for the duration of contract/task order.
- Notifying FAA CO/COR (within 24 hours) when a contractor completes work obligations or leaves the contract and **return FAA PIV cards** within 5 business days.

CONTRACTOR APPLICANT

- Complete the required investigation forms. Forms that may be required include DOT 1631 Credit release, e-App, and work history/resume.
- Comply with Requests to obtain (2) sets of fingerprint cards.
- Responding to all email/phone calls for data clarification in a timely manner.



Investigation Processing

Consistent with FAA Order 1600.1F, AXP must approve designated risk levels for the positions under the contract, to be determined by the FAA Operating Office (the organization with the requirement) in coordination with the COR, using the OPM Position Designation Automated Tool (PD Tool).

AMS Security Clause- 3.14-2 Contractor Personnel Suitability Requirements





VAP POC submits Contractor Applicant

- The contract company's Vendor Applicant Portal (VAP) POC submits a request in VAP to begin on-boarding process for a new contract award/task order.
- Recommended to add contractors into VAP at least 30 days prior to start work date.
- Personnel Security Contract Profile (PSCP) will need to be created before VAP requests can be processed.



VAP Request Assigned to PSS

- VAP request is assigned to an AXP-300 Personnel Security Specialist to begin background investigation process and suitability determination. VAP requests are assigned in order received – first in, first out.

3-4 Weeks (Dependent upon case volumes; goal is 2 weeks)



PSS Sends Request for Fingerprints

- PSS contacts contract applicant via email with fingerprinting instructions/locations. Generally, within 1 business day.

1 Day



Applicant Completes Fingerprinting

- Applicant given 15 days to complete fingerprinting – *applicant controls this step of the timeline.*

15 Days – Applicant controls this step of the timeline



PSS Reviews Paperwork

- PSS completes review of forms/results and makes an (ISD) interim suitability determination.
- If forms submitted with missing information, they are rejected to applicant to provide clarifying information (*this delays investigation processing*).
- For derogatory issues, a Letter of Inquiry (LOI) sent to applicant with 7-days to respond.

1-8 Days

Applicant Completes eAPP

- Applicant given up to 15 days to complete investigation forms/e-APP – *applicant controls this step of the timeline.*

15 Days – Applicant controls this step of the timeline

1 Day

PSS Sends eAPP Instructions

- Once PSS receives fingerprints, a second email is sent to contractor applicant with instructions to complete investigation forms/e-APP. Generally, within 1 business day.

PSS Adjudication of Background Investigation and Final Suitability Determination

- Adjudication timeliness goal is 60 days, FAA Personnel Security average adjudication time is 10 days.



Investigation Complete

DCSA Processes Investigation

- DCSA conducts the background investigation. *DCSA, an outside agency, controls this step of the timeline.*
- Contractor Applicant must respond to any inquiries throughout the investigation.

15-90 Days



Contractor can begin work/EOD

PSS Notifies POCs of Interim Suitability Determination (ISD)

- Favorable ISD allows applicant to onboard and can obtain a PIV Card.
- ISD is sent to FAA Contract POC and VAP POC .
- PSS releases security paperwork to Defense Counterintelligence and Security Agency (DCSA).



Vendor Applicant Portal (VAP 2.0)



Vendor Applicant Portal (VAP 2.0)

- The VAP system is for ADDING NEW contractors, REMOVING contractors and REQUESTING REPORTS. **The VAP system is NOT to be used for PIV card renewal requests.**
- It is very important that you use the VAP, as it is a secure website that will help protect the Personally Identifiable Information (PII) of everyone involved. You should never send us PII via email.
- You will need to ensure that the contract/task order number your employee will be working under is entered into the VAP. An investigation will not be conducted otherwise.
- The Contract Vendor (Prime) should be identified as the company. If the contractor applicant is working for a sub-contracted company the awarded Vendor (Prime) must be identified.
- It is your responsibility to ensure that your employees complete this process in the time frame assigned to them. They will not be authorized unescorted access to any FAA facilities without FAA Security approval.

The FAA requires a background investigation for contractors when access is needed to FAA facilities, systems, or to Sensitive Unclassified Information (SUI).



VAP -Add (requesting an investigation)

Adding a Contractor:

- The *Add Contractor* has several fields to fill in on the ADD option screen. Most fields are mandatory. It is critical that all data, especially the Social Security Number (SSN), is entered correctly.
- It is important for the vendor to get the contractor applicant's email address correct because an email will be sent to the contractor by a Personnel Security Specialist (PSS).
- **Even when a contractor currently holds an FAA PIV card they must still be entered into the VAP for each contract/task order award; each contractor employee's individual security record should reflect all FAA requirements that they support.**

DATA VALIDATION is imperative: Ensure contractor information that is entered into the VAP is correct. Information provided (legal "full" names, DOB, SSN, etc.) should be verified prior to entry. This information then should be consistent with all of the contractor applicant's investigation forms.

Incorrect information delays the contractor's ability to start work, hinders their ability to complete investigative requirements and to receive a PIV card.



VAP -Add continued...

Adding a Contractor:

- Contractor applicants must respond to the investigation invitation and instructions within the designated time frame. Contractor applicants will be made “inactive” for non-compliance and could be restricted from being authorized a new VAP *add* for a designated period after non-compliance.
- The VAP remarks section should be used to provide any additional information that may be important (ex. contractor transferring from another contract, identify SPONSOR if different from the CO/COR).
- Once all the data is entered, click the submit button to prepare data to be sent to our Investigative Tracking System (ITS).
- No investigative actions will be taken on behalf of a contractor applicant until a VAP submission has been received.
- **Position Titles** entered into the VAP *add* must be **consistent** with the approved labor categories in the established **Personnel Security Contract Profile**.

Labor Category/Position Title	Risk Level	Investigation
Position 1	Low	T1
Position 2	Moderate	T2



VAP –Removal

Removing a Contractor:

- The *Remove Contractor* module allows the vendor POC to inform the PSS of those contractors no longer working on a specific FAA contract/task order. The removal request form is easy to fill in, again with most fields being mandatory. NOTE: The new VAP 2.0 allows for Removes to be completed with no SSN (although you should use the SSN if you have it). Therefore, it is crucial that the full legal name is entered and is spelled correctly.
- A VAP removal action should be submitted if any contractor no longer supports the FAA contract/task order.

Note: It is important to use the “remarks” section especially if the contractor has been terminated under derogatory circumstances.

- Provide employee Date of Separation (DOS)
 - Identify if employee is eligible for rehire
 - Identify if employee left under favorable or unfavorable conditions
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- ✓ A VAP removal is required **within twenty-four (24) hours** after any contractor employee resigns, is terminated, transferred, or otherwise removed from the contract.
 - ✓ If the FAA issued the contract employee a PIV card, or other ID card, the contractor must collect the card within twenty-four hours, and return it to AXP no later than **five (5) business-days** of the employee's termination or transfer as identified in AMS security clause 3.14-2 Contractor Personnel Suitability Requirements



VAP-Reports

Requesting a Report:

- The vendor POC enters the contract/task order number, and a report will be emailed to the vendor. The purpose is to allow the vendor to reconcile their list of employees with the report.

This report is the *roster** and should identify the contractor employee status in as close to real time as possible (as applicable to FAA access needs).

- **Pending**-identifies that the contractor applicant is still in the investigation processing and is not yet authorized to work.
- **Current**- the contractor is actively working with a current need for FAA access.
- **Inactive**- identifies that the contractor requires FAA access but did not complete the investigation requirements within the designated time and therefore are no longer in processing.
- **Former**- no longer needing **FAA access** but does not mean they are not working for the Vendor but working in a capacity in which there is not a current FAA access requirement.

- ✓ You may need to sort the roster by contractor name as the system may indicate a contractor more than once, i.e. *pending* with a second line item identifying *former* (as a *former* status will be recorded for an individual and populate on the report, if there is a 2nd status identified other than *former*, defer to that as the most recent status).

* A roster is required to be generated by the Vendor quarterly and reviewed for accuracy as identified in AMS security clause 3.14-2 Contractor Personnel Suitability Requirements.



VAP-POC account set-up

VAP Requirement:

- Companies are required to provide one to three (1-3) contacts to be a VAP user. Larger companies may designate up to five (5) contacts.
- VAP POC responsible for **data integrity**. Contract information entered into the VAP must be accurate and include contract number, contract expiration date, FAA contract point of contact.
- The identified VAP POC(s) do not require an investigation, therefore should not be entered into the VAP unless they are supporting a requirement with identified FAA access.

***Incorrect** and or **incomplete** information may delay contractor investigations being initiated by the FAA Security POC.

Making a VAP account request for the VENDOR VAP POC:

Requests to add a Vendor VAP POC must be sent to the Contracting Officer Representatives (COR)designee/Contracting Officer (CO) and/or for coordination with our Contract Management Team to 9-ASH-Security-Contract-Customer-Service@faa.gov.

A request must include:

1. Name (Full Legal Name)
2. Telephone Number
3. Email address
4. Company Name



VAP application- system upgrade *coming soon*

Personnel Security is currently working hard to upgrade the **Vendor Applicant Portal (VAP)**. We are excited to announce several new features and improvements to assist the VAP POC with more efficient contractor management entry, oversight and reporting capabilities.



Improved Functions include:

- **Personnel Security Contract Profile-** imported into the portal that identifies contract/task order award number, the approved labor categories/position titles for the contract/task order award, and associated FAA Points of Contact (POC).
- **VAP *add***- when requesting FAA *access* for the contractor employee the *add* application will be submitted to the Contracting Officer Representative (COR) for approval. This action will authorize Personnel Security to proceed with the investigation processing for the applicant.
- **VAP *removals***- more efficient capabilities to *remove* contractors from the contract/task order award when contractors complete their work obligations.
- **VAP *reports***- improved reporting ability to ensure that the Vendor's roster for contractor employees is in real time status that includes with improved identification of sub-contractor personnel.



Contract Company/Vendor/VAP POC Responsibilities



Vendor POC responsibilities

Best practice is for the Contract Company/Vendor to identify **1-3 Vendor POCs** as well as an established POC for any of the **sub-contract company(ies)**, when applicable.

Contract Award

- Request access to the Vendor Applicant Portal (VAP 2.0).
- To maintain the Vendor VAP POC account in VAP active status, **log-in is required every 30 days**.
- Submit contract employees to the FAA by entering them into the VAP (*approximately 30 days before their work obligations begin on the contract*); required for any contractor that needs physical (unescorted access to FAA facilities/controlled space), logical (computer/network), and/or access to Sensitive Unclassified Information (SUI).
- Contractors must be submitted into the VAP for each award obligation in which they support. FAA's contractor employee oversight is at the **task order level**; therefore, the contractor employee may have multiple contracts/task orders that they support simultaneously.

Contract Close-Out

- Complete VAP contractor removal process for all contractors related to the FAA contract.
- Collection of FAA PIV Card & return to FAA CO/COR or ID Media Office (PIV credential may be returned by mailing to the address identified on the back of the card).
- Verification of continued contract obligations for contractors to maintain FAA issued PIV card.



Vendor POC responsibilities continued...

Throughout the contract life

- Submit contract employees, update contractor's work status as needed and remove contractors when they are no longer working on the FAA contract via the VAP.
- Assist contractor applicants with completion of the investigative forms as needed.
- Assist contractor with identifying and scheduling a fingerprint enrollment session. Fingerprint sessions may have a nominal fee which are the responsibility of the contractor.
- Ensure that contractor applicants are completing the investigation form requirements and meeting the 15-calendar day processing time frame.
- Confirm that contractors have received the appropriate favorable interim suitability determination prior to starting work.
- Update contractor information via a new VAP entry as information changes (*ex. contractor working a new contract number, contractor name and/or duty location changes*).
- Provide current contract employee roster as requested. A roster report completed through VAP is required on a quarterly basis to ensure the roster is accurate. Any discrepancies must be corrected immediately.
- The prime contractor is responsible for the accuracy of their subcontractors' rosters as well.



The Contractor Applicant



Contractor Applicant

From the date that FAA initiates the investigation invite, contractors have 15 calendar days to complete all packet requirements.

You should be aware of these items during this investigation phase:

- Contractor investigation and FAA PIV card needs are specific to the contractor applicants FAA work obligation.
- Applicants will complete the online standard forms (eApp), provide two (2) fingerprint cards, an Authorization to Obtain Credit Report (DOT1631 *when required*), and work history/resume (*when required*).
- Contractors must respond promptly to all FAA inquiries for clarification on application.
- When an investigation determination is made, the Vendor POC(s) and FAA CO/COR will be notified by email.
- **Contractor applicants must respond to the investigation invitation and instructions within the designated time frame.** Contractor applicants will be made “inactive” for non-compliance and could be restricted from being authorized a new VAP *add* for a designated period after non-compliance.
- After a favorable investigation decision, contractors must comply with requirements to be issued the FAA PIV card. The FAA PIV card will take 7-10 days to receive from initial requirements and must be activated immediately.



Contractor Applicant Responsibilities

When a Background Investigation is initiated the Contractor Applicant will be notified via the email and will be requested to complete the following:

- Contractor applicant is sent an email notification to obtain two (2) sets of fingerprint cards, to review the Privacy Statement and, when applicable, the DOT 1631 form.

Note: The Vendor POC and the FAA Official are copied on this initial correspondence.

- This email identifies the FAA Security Point of Contact (POC) for the contractor's investigation.
- Contractor must return forms and fingerprints to the Security Point of Contact at address identified in the investigation requirements email notification.
- Depending on the investigation requirement the contractor applicant may also be required to complete the eApp standard forms via the eApp portal. A registration code and instructions for the eApp standard form will be included in an email notification when this is required.



Investigative Form Requirements



Fingerprint Cards

Obtaining the Fingerprint Card:

- Respond to any request for fingerprint Submission. When requested, two (2) sets of fingerprint cards are required. The acceptable Fingerprint Card forms are the SF- 87 or FD-258.
- Fingerprints may be completed by a local police department, a professional fingerprinting service (*these options may have a nominal fee that are the responsibility of the contractor*) or at an FAA ID Media Office if available.

*FAA ID Media fingerprint services are available in limited areas. For a list of locations go to: https://www.faa.gov/about/office_org/headquarters_offices/ash/ash_programs/piv/fingerprint_locations/

- It is recommended to schedule a fingerprint appointment as soon as the investigative need is identified for the contractor applicant. For some locations it may take a couple weeks to schedule a time.
- All identifying information must be completed. PRINT LEGIBLY and ENSURE ACCURACY. Failure to complete all required information may result in the fingerprint card being rejected.
- Person taking the fingerprints must be trained and authorized to officially take fingerprints. Official taking fingerprints must date, sign and identify their title and address.
- Applicant may not take own fingerprints.



Fingerprint Cards continued...

Fingerprint transmissions should be sent to our SOI/SON – TD04

Send fingerprint cards to our centralized mailing address via FEDEX or UPS only:

Federal Aviation Administration
ATTN: PSS Name, AXP-Branch Number (330, 340, or 350)
Security Command Center, Bldg. 230, Rm 110
6500 S. MacArthur Blvd
Oklahoma City, OK 73169



eApp standard forms

To access the eApp standard forms go to [NBIS eApp & NBIS Agency \(dcsa.mil\)](https://dcsa.mil)

NBIS eApp (electronic application) and NBIS Agency are the new entry points for background investigation applications and are replacing eQIP as the system for initiating investigations. eApp contains the investigative Standard Forms (SF) federal applicants and employees use to input information required process their personnel background investigation.

As a single-page solution, based on modern, simple design elements, eApp makes the application process more intuitive and easier to use for applicants initiating a background investigation.

Introduction to NBIS eApp: [DVIDS - Video - eAPP \(dvidshub.net\)](https://dvidshub.net)



Investigative Results

Interim or Final Suitability Determinations



When may the contractor start work?

The Interim or Final Suitability Determination

- When the contractor has completed all investigation requirements to an accepted standard and a determination has been made, the FAA Security POC will email the notification. This notification is identified as an Interim Suitability Determination (ISD).
- If the contractor applicant has previously completed a background investigation with the federal government, then reciprocity may be granted and a Final Suitability Notification letter is sent. *Reciprocity is the acceptance of another agency's security assessment of the contractor applicant.*
- ISD notice is emailed to the FAA Official(s) with a copy to the VAP POC(s).
- When an Interim notification is provided, the contractor applicant's investigation may be identified as still in process until a final determination is made. The contractor is **required** to respond timely to any additional inquiries during this time. Failure to respond will result in a reversal of the initial ISD finding and the contractor will be denied the ability to continue work on the FAA contract.
- If a contractor is denied after "due process" then the VAP POC should complete a VAP removal action.
- Failure to complete the security process in a timely manner may result in an Interim Suitability being denied and the contractor applicant's removal from the process
- When the interim suitability is denied, the FAA Contracting Officer Representative (COR) may request that the Contractor Applicant still be considered by requesting that the background investigation be completed.



ISD/FSD Notification Types

1. A preliminary review has been completed and **interim suitability has been GRANTED**. The applicant may begin work. This does not constitute a security clearance and the applicant is not eligible for access to classified national security information. If there are no issues with the applicant's investigation, this interim suitability will serve as Final Suitability.
[] SAC ONLY. Subject CANNOT perform escort duties.
2. The applicant meets the investigative requirements for the position and has been **granted a Final Suitability** determination. Subject can begin work under this contract. This does not constitute a security clearance and the applicant is not eligible for access to classified national security information.
[] SAC ONLY. Subject CANNOT perform escort duties.
3. A preliminary review has been completed and **interim suitability has been DENIED**. The applicant cannot begin working on the FAA contract. Please advise this office whether you wish to still consider the applicant and continue with the background investigation.
4. The FAA has verified an investigation on file that **meets eligibility requirements**. The applicant may begin work on the classified contract.
 - a. **[] Interim investigation**/DD-254 Position Sensitivity Level **[Position Sensitivity Level]**
 - b. **[] Final investigation**/DD-254 Position Sensitivity Level **[Position Sensitivity Level]**
5. The contractor applicant **may NOT begin work on the classified contract**. The applicant does not have the required eligibility investigation on file.
6. The **applicant failed to complete the application** and/or submit the investigative forms, or requested information, within the prescribed time frame. **This applicant is no longer being considered.**
7. Due to **not meeting the 3-year residency requirement**, the request for interim suitability is being **denied**. The applicant can re-apply once residency requirements have been met.
8. **The applicant is authorized to work in the US until [date]**. It is the responsibility of the contract company to re-verify the employee's employment authorization no later than the date employment authorization expires. If the employee fails to provide valid authorization, they must be immediately removed from the contract.



Obtaining a FAA PIV Card



FAA PIV Card

Before obtaining an FAA PIV card a favorable Initial Suitability Determination must be received:

- Upon favorable investigative determination notification, the Contract Company POC should facilitate the completion of the identification Card Application (DOT 1681) with the contractor applicant using the automated system located at <https://idms.faa.gov/1681>. **The application must be completed by the contractor applicant within the FAA firewall and approved by their Sponsor (ex. CO, COR, Facility Mgr).**
 - ❑ The Contract Company POC will be notified via email when the identification card application has been approved. An appointment should be made at this time for PIV card enrollment.
 - ❑ The contractor applicant must attend the appointment and have a photo taken. Two (2) pieces of valid government-issued identification are required at the time of appointment (an Acceptable identification attachment is available).
 - ❑ The contractor will receive instructions when the FAA PIV card is ready for pick-up. An appointment needs to be made to activate the card

FAA Card Types	Access Need
Orange	Only issued to individuals restricted to a specific area within a FAA Facility; Expiration date cannot exceed one year from date of issue.
Yellow	Individuals that are not required to be entered into a physical access system and that do not need logical access (snow removal, landscaping, vendors, etc.); may be issued to other agency employees who are working at an FAA facility (e.g. GSA, NOAA, Military Liaison, etc.); may be issued to FAA employees and contractors waiting for their PIV Card.
PIV Card	Individuals that require routine facility access, access to systems, or to Sensitive Unclassified Information (SUI).



FAA PIV Card

- **FAA PIV Card National Support Desk.** For PIV Card related issues, you may contact the FAA National PIV Support Desk at 1-888-584-8334 or submit your question via email at 9-NATL-PIV@faa.gov.
- **Cards lost, stolen, damaged or compromised** cards should be reported within three (3) days. To report, contact the FAA National PIV Support Desk at 1-888-584-8334 or submit notification to 9-NATL-PIV@faa.gov.
- **PIV Card Service Locations.** An accredited PIV Card Issuer (PCI) can only issue PIV cards. FAA accredited PCI enrollment issuance locations and ASH security service centers can be found at the following site: <https://piv.faa.gov/ServiceCenterHours.htm>.
- **Acceptable Applicant Identification.** All applicants shall present two (2) forms of unexpired identity source documents in their original form. Acceptable identity source documents may be requested by contacting your FAA Security POC.
- **Identification Card Renewal.** Cardholders are responsible for ensuring their identification card does not expire. The cardholder must initiate the renewal process at least 15 business days prior to expiration by completing the online Form 1681 located at <https://idms.faa.gov/1681/>.



Best Practices

Common Reasons for Determination Delays:

- Incorrect names and transposed SSNs submitted
- Contractor Applicant not completing fingerprint card requirement
- Contractor Applicants fail to complete the online e-App standard form
- Contractor Applicant not addressing eApp rejections

Recommendations:

- Contract Company should identify responsible POC to track progress and assist applicants through the FAA investigative process.
 - *POC can reach out to the FAA Personnel Security to ensure they understand the process to assist their employees and sub-contractors*
- The Contract Company should submit the contractor applicant to the Vendor Application Program (VAP) approximately 30 business days before the contractor applicant needs to start work.
- Contract Company should request applicant status if a contractor states that they have completed all packet requirements and more than (5) business days have passed without an investigation determination notice.
- Upon favorable investigative determination, the Contract Company should contact the FAA CO/COR to request the FAA PIV card request.



Personnel Security-Contractors Division

- All Vendor Applicant Portal (VAP) and Contractor related inquiries should be sent to:

9-ASH-Security-Contract-Customer-Service@faa.gov

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