

Exemptions from Training and Qualification Requirements

1. What exemptions has the FAA granted regarding training and qualification in consideration of the COVID-19 outbreak?

As of March 25, 2020, the FAA has issued four exemptions granting relief from certain training and qualification requirements in part 121 and part 135. These exemptions include:

- Exemption 18511 – Provides limited relief from part 121 regulations pertaining to the timeframes for completing recurrent training and qualification requirements for ground personnel, crewmembers (includes pilots, flight attendants, flight engineers, check pilots, check flight engineers, and part 121 flight instructors), and aircraft dispatchers.
- Exemption 18510 – Provides limited relief from part 135 regulations pertaining to the timeframes for completing recurrent training and qualification requirements for ground personnel and crewmembers (includes pilots, flight attendants, check pilots, and part 135 flight instructors).
- Exemption 18512 – Provides limited relief from part 121 regulations to allow certificate holders to use alternative methods to conduct certain required crewmember emergency procedures during recurrent and upgrade training, checking, and evaluation.
- Exemption 18509 - Provides limited relief from part 135 regulations to allow certificate holders to use alternative methods to conduct certain required crewmember emergency procedures during recurrent and upgrade training, testing, and checking.

2. The FAA granted exemptions providing limited relief in consideration of the COVID-19 outbreak to Airlines for America (A4A) and the National Air Transportation Association (NATA). Can a POI authorize a certificate holder that is not a member of these associations to use the exemptions?

These exemptions are not limited to A4A and NATA members. POIs may authorize these exemptions for other part 119 certificate holders who submit a Letter of Intent in the form and manner described in the exemption.

3. What about part 135 air carriers/operators who conduct training and qualification in accordance with part 121?

A POI should authorize any part 135 air carrier/operator, which is required or authorized to conduct training and qualification in accordance with part 121, under Exemptions 18511 and 18512.

4. What about part 119 certificate holders that conduct training and evaluation in accordance with an Advanced Qualification Program (AQP)?

Exemption 18511 includes relief from § 121.903(e) regarding the grace month for training and evaluation under an AQP. Additionally, the relief provided in Exemption 18512 applies to a certificate holder using an AQP as long as the certificate holder follows the content for emergency drills and procedures as specified in part 121 subparts N and O.

A part 119 certificate holder training under an AQP should carefully review Exemptions 18511 and 18512 and, in consultation with the FAA-assigned Extended Review Team, determine if using one or both exemptions is appropriate or if a revision to its approved AQP Curriculum (as allowed under §§ 121.901(c) and 121.909) is appropriate.

For any other requested relief not addressed in Exemptions 18511 and 18512, please follow the process described in the March 20, 2020 memo from the Air Transportation Division titled “Certificate Holder’s Requesting Relief (COVID-19).”

5. Do exemptions 18510 and 18511 apply to line checks, check pilot observations, and § 135.293(a) testing?

Yes, see footnote 2 in exemption 18510 and footnote 3 in exemption 18511 for a complete list of training, testing, evaluation, checking, observation, and recency requirements addressed by each exemption.

6. What about flight attendant training?

These exemptions also cover flight attendant recurrent training.

7. Does the relief provided by these exemptions apply to check pilots and check flight engineers?

Yes, check pilots and check flight engineers are considered crewmembers and are included in the relief provided by this exemption.

8. Do these exemptions apply to part 142 flight instructors and training center evaluators? Do these exemptions apply to persons completing a part 142 curriculum?

No, these exemptions only apply to part 121 and part 135 personnel and curriculums. The Air Transportation Division has issued a separate memo authorizing training center program managers to issue a part 142 deviation for certain required crewmember emergency procedures.

9. What months do the grace month exemptions apply to?

Exemptions 18510 and 18511 apply for recurrent training and qualification due through May 31, 2020. For example, if a check pilot observation was due in February 2020, the original grace month is March. The exemption provides two additional grace months, allowing the observation to occur in April or May. The observation is still considered to have been completed in the month it was due (February), which means the next observation is due in February 2022.

10. How should a certificate holder submit its Letter of Intent?

Each certificate holder seeking to use an exemption listed above should submit a Letter of Intent stating its intention to exercise the relief granted in the exemption and to act consistently with the conditions and limitations. This applies to both members and non-members of the associations granted the exemption (A4A or NATA).

A certificate holder should submit its Letter of Intent to the email address listed in the exemption (9-AVS-AFS200-COVID-EXEMPTIONS@faa.gov). If a certificate holder seeks to use multiple exemptions, they may use one Letter of Intent to cover multiple exemptions; the letter should clearly indicate the exemptions the certificate holder intends to use by exemption number. Once a certificate holder submits its Letter of Intent through email, no response from the Air Transportation Division is necessary. The Air Transportation Division will ensure that the Letters of Intent are posted to the public dockets for the exemptions.

The Letter of Intent may be in the form of an email and should include the sender's name and position with the certificate holder.

11. Is there any review or approval necessary above the POI level to authorize a certificate holder's use of these exemptions?

Once a POI confirms that a certificate holder meets the Conditions and Limitations listed in the exemption, the POI authorizes use of the exemption (by number) in OpSpec A005. No further review is required.

12. What happens if relief is still necessary after the exemptions expire?

Exemptions 18510 and 18511 apply only to crewmembers, aircraft dispatchers, or ground personnel who are required to complete recurrent training, testing, checking, evaluation, recency, or observation through May 31, 2020. These two exemptions terminate on August 31, 2020. The FAA would have to take action to extend the relief beyond these dates and is prepared to assess the circumstances at that time, if necessary.

Frequently Asked Questions Regarding COVID-19 Exemptions (Revision 1, 03/30/2020)

Exemptions 18509 and 18512 apply only to crewmembers who are required to complete recurrent training, testing, and checking through May 31, 2020 and to pilots completing upgrade training or checking through May 31, 2020. These two exemptions terminate on May 31, 2020. The FAA would have to take action to extend the relief beyond these dates and is prepared to assess the circumstances at that time, if necessary.

Please contact the Air Transportation Division at the following email address with any questions concerning these exemptions:

9-AVS-AFS200-COVID-Exemptions@faa.gov

Exemptions from Medical Requirements

1. What relief has the FAA granted regarding medical certificate requirements in consideration of the COVID-19 outbreak?

Domestic Operations – All pilots and flight engineers

On March 26, 2020, the FAA issued an Enforcement Policy for Expired Airman Medical Certificates stating that, until June 30, 2020, due to extraordinary circumstances related to the COVID-19 public health emergency, the FAA will not take legal enforcement action against any person serving as a required pilot flight crewmember or flight engineer based on noncompliance with medical certificate duration standards when expiration of the required medical certificate occurs from March 31, 2020 through June 30, 2020. The policy applies only to holders of an FAA-issued medical certificate serving as a required pilot flight crewmember or flight engineer within the United States.

International Operations – Parts 121 and 135 only

As of March 30, 2020, the FAA has issued two exemptions granting relief from certain requirements in part 61 and part 63 pertaining to the validity of medical certificates required for pilots and flight engineers conducting part 121 or part 135 operations outside the United States.

- Exemption 18516 – Provides limited relief from part 61 and part 63 regulations pertaining to the validity of medical certificates required for pilots and flight engineers conducting part 121 operations outside the United States.
- Exemption 18515 – Provides limited relief from part 61 regulations pertaining to the validity of medical certificates required for pilots conducting part 135 operations outside the United States.

2. The FAA granted exemptions providing limited relief in consideration of the COVID-19 outbreak to Airlines for America (A4A) and the National Air Transportation Association (NATA). Can a POI authorize a certificate holder that is not a member of these associations to use the exemptions?

These exemptions are not limited to A4A and NATA members. POIs may authorize these exemptions for other part 119 certificate holders who submit a Letter of Intent in the form and manner described in the exemption.

3. How do these exemptions extend the validity period of certain medical certificates?

These exemptions apply only to pilots and flight engineers who conduct part 121 or part 135 operations outside the United States. In addition, these individuals must be employed by a part 119 certificate holder authorized to use the exemption in OpSpec A005. If the

validity of an individual's medical certificate expires between March 31, 2020, and May 31, 2020, the exemption extends the validity until June 30, 2020.

For example, a person over 40 years of age must have a part 67 medical examination every six months to remain qualified to serve as pilot-in-command in part 121 operations. After six months, if the pilot has failed to obtain a new first-class medical examination, the medical certificate remains valid for other operations, including an operation in which the pilot would be exercising only commercial pilot privileges. This exemption extends the validity of a medical certificate to enable the pilot to continue to serve in his or her assigned duty position in part 121 operations outside the United States.

4. Why are these exemptions limited to pilots and flight engineers that operate outside of the United States?

Pilots and flight engineers who conduct part 121 or 135 operations domestically do not need the relief provided by these exemptions due to the Enforcement Policy for Expired Airman Medical Certificates that the FAA issued on March 26, 2020.

The Enforcement Policy states that, until June 30, 2020, due to extraordinary circumstances related to the COVID-19 public health emergency, the FAA will not take legal enforcement action against any person serving as a required pilot flight crewmember or flight engineer based on noncompliance with medical certificate duration standards when expiration of the required medical certificate occurs from March 31, 2020 through June 30, 2020. The Enforcement Policy affirms the FAA's intention not to take legal enforcement action, but it does not extend the validity period of the medical certificates. The extended validity is necessary for pilots and flight engineers operating outside of the United States where the FAA does not have this discretion.

5. How should a part 119 certificate holder submit its Letter of Intent?

Each part 119 certificate holder seeking to use exemption 18515 or 18516 should submit a Letter of Intent containing a comprehensive list of each pilot and flight engineer who will exercise the relief, by name and airman certificate number. Prior to including an individual on the list, the certificate holder must confirm with each individual that the individual agrees with the certificate holder seeking relief on the individual's behalf and that each individual affirms the intention to act consistently with the exemption's conditions and limitations. This applies to both members and non-members of the associations granted the exemption (A4A or NATA).

A certificate holder should submit its Letter of Intent to the email address listed in the exemption (9-AVS-AFS200-COVID-EXEMPTIONS@faa.gov). Once a certificate holder submits its Letter of Intent through email, no response from the Air Transportation Division is necessary. The Air Transportation Division will ensure that the Letters of Intent are posted to the public dockets for the exemptions.

The Letter of Intent may be in the form of an email and should include the sender's name and position with the certificate holder.

6. Why must part 119 certificate holders provide a list of pilots and flight engineers who will use the exemption? What about personally identifiable information?

This list is necessary to ensure the FAA knows which individuals are exercising the relief granted in the exemption, to conduct appropriate oversight of such individuals, to foster accountability of those covered by the exemption, and to prevent non-authorized individuals from exercising the privileges granted through the exemption. The FAA will redact any personally identifiable information before posting the list to the public docket.

7. Is there any review or approval necessary above the POI level to authorize a certificate holder's use of these exemptions?

Once a POI confirms that a certificate holder meets the Conditions and Limitations listed in the exemption, the POI authorizes use of the exemption (by number) in OpSpec A005. No further review is required.

8. What happens if relief is still necessary after the exemptions expire?

Exemptions 18515 and 18516 extend the validity of an individual's medical certificate, if it expires between March 31, 2020, and May 31, 2020, until June 30, 2020. These two exemptions terminate on June 30, 2020. The FAA would have to take action to extend the relief beyond these dates and is prepared to assess the circumstances at that time, if necessary.

Please contact the Air Transportation Division at the following email address with any questions concerning these exemptions:

9-AVS-AFS200-COVID-Exemptions@faa.gov