



FAA

Aviation Safety

Memorandum

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To: All Air Carrier Safety Assurance Division Manager
All Air Carrier Safety Assurance Office Managers

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Subject: Special Guidance for 14 CFR Part 65 Aircraft Dispatcher Certification Courses, Regarding Training Interruptions Related to Coronavirus (COVID-19)

BACKGROUND.

The Novel Coronavirus (COVID-19) pandemic has been declared a Public Health Emergency of International Concern (PHEIC) by the World Health Organization (WHO). The impact of this virus has caused multiple states and cities within the United States (U.S.) to take action by reducing or limiting public gatherings, which includes the closure of schools, colleges and universities in most locations. These closures may impact student learning and schedules at Title 14 Code of Federal Regulations (14 CFR), Part 65, Aircraft Dispatcher Certification Course facilities.

The Air Transportation Division, AFS-200, is providing the following temporary guidance to assist currently enrolled Part 65 Aircraft Dispatcher Certification Course students.

GUIDANCE.

This guidance is temporary in nature and may not be used to enroll new students or to be applied as standard procedure. The standard procedures for approving an Aircraft Dispatcher Certification Course, including a course revision, are located in Order 8900.1,

Volume 3, Chapter 63, Section 3, FAA-Approved Aircraft Dispatcher Certification Courses, Course Approval and Management. Certificate Management Offices (CMO) with oversight responsibilities for Aircraft Dispatcher Certification Courses may use the guidance contained in this memorandum, to allow for flexibility in course curriculum delivery. CMOs and Dispatch Course Program Managers (DCPM) should discuss these options with the affected course operator and provide the appropriate support based on the option selected by the operator.

The FAA recognizes that no one solution will fit every situation or course operator's capabilities. CMOs and DCPMs should not require a course operator to choose any specific option. It is the responsibility of the course operator to determine the appropriate course of action. Each Aircraft Dispatcher Certification Course operator must remain in compliance with the requirements of 14 CFR Part 65, subpart C.

Below are recommended options to assist CMOs, DCPMs, and course operators with determining an appropriate path forward.

RECOMMENDED OPTIONS.

1. Approve Expansion of the amount of Distance Computer Based Training (D-CBT) currently approved.
2. Approve the use of a temporary D-CBT program.
3. Course operators can suspend course administration for a period of time.
4. Other short-term deviations to Order 8900.1.
5. Exemptions to 14 CFR Part 65.

1. Allow Expansion of the amount of D- CBT currently approved. This option only applies to a course which is already in the process of being administered, and has been interrupted due to classroom facility closure. The purpose of this provision, which is deviation from current policy, is to allow students who are currently attending the course, and have already accomplished some classroom training, to complete the amount of required instruction. A CMO may not approve this option to allow an Aircraft Dispatcher Certification Course operator to enroll new students with the intent of using the expanded D-CBT. The following conditions apply:

- a. The course operator may request the CMO approve the expansion of the amount of approved D-CBT to allow continuation of a course that is already in progress.
- b. The CMO may approve an Aircraft Dispatcher Certification Course operator to use the additional D- CBT, provided all of the "Standards for Computer-Based Training Provided Outside Of The Classroom Environment" contained in Order 8900.1, Volume 3,

Chapter 63, Section 3, Paragraph 3-5038, subparagraphs A through F and Paragraph 3-5038 subparagraph H are met.

c. The affected students must have completed some classroom training.

d. The DCPM will enter a PTRS record using activity code 1378-Evaluate a Course Revision. The DCPM will state in the comments that the revision allowing the course operator to use additional D-CBT is approved for the purpose of allowing students to complete the course already in progress. The DCPM will enter "COVID19" in the National Use field.

2. Approve the Temporary Use of D-CBT. This option only applies to a course which is already in the process of being administered, and has been interrupted due to classroom facility closure. The purpose of this provision, which is deviation from current policy, is to allow students who are currently attending the course, and have completed some classroom training, to complete the amount of required instruction. A CMO may not approve this option to allow an Aircraft Dispatcher Certification Course operator to enroll new students with the intent of using the temporary D-CBT.

a. The course operator may request the CMO approve the temporary use of D-CBT to allow continuation of a course that is already in progress.

b. The CMO may approve an Aircraft Dispatcher Certification Course operator to use a temporary D-CBT program, provided all of the "Standards for Computer-Based Training Provided Outside Of The Classroom Environment" contained in Order 8900.1, Volume 3, Chapter 63, Section 3, Paragraph 3-5038, including all of the subparagraphs contained therein, are met, with limited exception, as described in paragraph c. below.

c. This memorandum does provide a limited and temporary deviation to the requirements set forth in following subparagraphs of Order 8900.1 Volume 3, Chapter 63, section 3:

i. 3-5038 B.;

ii. 3-5038 F.1);

iii. 3-5038 F.4);

iv. 3-5038 G and

v. 3-5038 I.1).

d. The following conditions and limitations apply.

i. The affected students must have completed some classroom training.

ii. The CMO may approve an Aircraft Dispatcher Certification Course operator to temporarily use D-CBT, provided there is no change to the approved Training Course Outline (TCO), or course content, with the exception of the delivery method. The approving CMO should support requests to conduct appropriate instruction using the temporary D-CBT program for a limited timeframe, based solely on course facility closures due to COVID-19. The following requirements must be met in order to approve the temporary use of D-CBT.

iii. The responsible DCPM will review the temporary D-CBT program to ensure it adequately describes how students will be administered course content.

iv. The Aircraft Dispatcher Certification Course operator must maintain the security of all checking and testing. Test results must be provided to each student in a timely manner.

v. Each Aircraft Dispatcher Certification Course operator must have a defined timeframe for using the temporary D-CBT program. The operator's temporary D-CBT procedures must specify that the timeframe only applies during the time the training facilities are closed due to the COVID-19 outbreak.

vi. The DCPM will enter a PTRS record using activity code 1378-Evaluate a Course Revision. The DCPM will state in the comments that the revision is approved to allow the course operator to use a temporary D-CBT program for currently enrolled students only. The DCPM will enter "COVID19" in the National Use field.

3. Suspend Part 65 Aircraft Dispatcher Certification Course Operations for a period of time. Part 65 Aircraft Dispatcher Certification Course operators may choose to suspend operations for a period of time depending on local authority's requirements. If the course operator elects to use this option, the operator must provide a written notification to the approving CMO, and include the timeframe of the expected suspension. The Aircraft Dispatcher Certification Course operator should also notify the CMO of when it plans to resume operations.

a. The DCPM will enter a PTRS record using activity code 1378. The DCPM will state in the comments that the course operator has suspended operations due to mandated facility closures resulting from COVID-19. The DCPM will enter "COVID19" in the National Use field.

4. Other short-term deviations to Order 8900.1. Aircraft Dispatcher Certification Course operators may submit alternate proposals to the approving CMO to address course operation under circumstances related to COVID-19. When proposals require deviation from FAA Order 8900.1 not discussed in this memorandum, the approving CMO should submit a request for a deviation from policy to the Air Transportation Division, in accordance with FAA Order 8900.1, Volume 1, Chapter 1, Section 1, General Order Information. Requests can be sent via email to the correspondence inbox: 9-AFS-200-Correspondence@faa.gov

- a. The request for deviation must include the following information:
 - i. The name and address of the Aircraft Dispatcher Certification Course operator.
 - ii. The specific Volume, Chapter, Section and paragraph(s) for which deviation is being requested.
 - iii. A detailed description of the alternative method being proposed by the course operator. The method must provide for an equivalent level of instruction.
 - iv. The approving CMO's justification for agreeing with the alternative method.
 - v. The quantity of students affected. The school must maintain a list of those students who were affected by the deviation.
- b. The Air Transportation Division will review the request and, if in agreement, will issue a letter to the approving CMO authorizing the deviation.

5. Exemptions to 14 CFR Part 65. A Part 65 Aircraft Dispatcher Certification Course Operator may request an exemption from applicable requirements under 14 CFR Part 65. Exemptions requests must be submitted in accordance with the requirements set forth in 14 CFR Part 11. A Part 65 Aircraft Dispatcher Certification Course Operator should be advised that petitions for exemption may take substantially longer compared to deviations to FAA policy and the outcome may vary.

This special guidance contained in this memorandum will remain in effect until further notice. The Air Transportation Division will continue to monitor the evolving situation and determine when this guidance is no longer required. When that determination is made, a memorandum will be sent to the addressees on this memorandum, alerting them that this guidance is terminated.

If you have any questions regarding this memorandum, please contact the Air Transportation Division, Air Carrier Operations Branch at (202) 267-8166.