



FAA

Aviation Safety

Memorandum

Date: November 30, 2020

To: General Aviation Safety Assurance Offices
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AFC-MIA-SO-FL-CMO-29

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Subject: Extension to COVID-19 Deviation for 14 CFR Part 142 Training Center
Certificate Holders

This memorandum extends authority to Training Center Program Managers (TCPM) to issue or reissue a deviation to 14 CFR Part 142 certificate holders (training centers) pertaining to certain required crewmember emergency procedures during recurrent and upgrade training, testing and checking. The Air Transportation Division, AFS-200, initiated this deviation following discussions with Safety Assurance staff on behalf of Part 142 training centers regarding potential health concerns over the COVID-19 outbreak. The Air Transportation Division issued the original deviation memo on March 27, 2020 to provide relief allowing training centers that submit an application (in the form and manner described below) to use alternate methods to conduct certain crewmember emergency procedures during recurrent and upgrade training, testing and checking.¹ The relief also applies to Part 142 instructor and evaluator recurrent training and checking curriculums that include the emergency procedures described herein. The Air Transportation Division extended this relief through memos issued June 16, 2020 and August 28, 2020.

¹ For the purpose of this memorandum, the term “crewmember” means pilots, flight engineers and flight attendants undergoing training, testing, or checking in part 142 curriculums. In this memo, we refer to crewmembers and part 142 instructors and evaluators collectively as “trainees.”

The FAA has determined that the justification for this deviation remains valid and is in the public interest. Because the COVID-19 public health emergency continues to evolve, and the duration and nature of its ongoing effects are uncertain, we are reissuing this deviation authority to allow training centers to use alternate methods to conduct certain required emergency procedures during recurrent and upgrade training, testing and checking through March 31, 2021.²

Relief may be provided from the following regulation:

Section 142.65(d) states, in pertinent part, that a training center may not graduate a student from a course unless the student has satisfactorily completed the curriculum requirements of that course. This relief provides a temporary deviation from the requirement for trainees to don or use emergency equipment that must be placed on or over the head.

The FAA's Decision:

In consideration of the foregoing, the FAA finds the issuance or reissuance of this temporary deviation will not adversely affect the quality of instruction or evaluation. Therefore, pursuant to the authority contained in section 142.9, TCPMs may authorize training centers to deviate from section 142.65(d), subject to the Conditions and Limitations listed below.

Conditions and Limitations:

1. This deviation applies only to training centers that have submitted an application for deviation to their TCPM. The application must state the training center's intention to exercise the relief provided by this deviation and affirm its intention to comply with the conditions and limitations of the deviation. A training center that submitted an application prior to November 30, 2020, in accordance with an earlier issuance of this deviation, has met the requirement of this Condition and Limitation and does not need to reapply except when one of the following applies:
 - a. If the TCPM identifies issues or items within the plan that need to be resolved. If the TCPM finds a previously submitted plan remains acceptable, the training center does not need to submit a revision.
 - b. If the training center made changes to the originally submitted plan.
2. The deviation applies only to training centers whose TCPMs have issued them an authorization in training specification (TSpec) A005.
3. This deviation applies only to trainees who are completing recurrent or upgrade training, testing, or checking under an approved Part 142 curriculum. This deviation does not apply to initial or transition training, testing, or checking. This deviation is not applicable to any Part 121 or Part 135 training program.

² The relief granted through this deviation is consistent with the relief granted to Part 135 certificate holders through exemption 18509, as amended.

4. The training center must provide recordkeeping procedures that document when a trainee has completed emergency procedures using an alternate method. The training center must provide a copy of these records to the trainee at the completion of the curriculum.
5. A trainee that performs emergency procedures using an alternate method must complete those procedures using the normal procedures during that person's next required training, testing, or checking event in that type aircraft.
6. A training center requesting issuance of this deviation must provide a plan to its TCPM containing the following information:
 - a. For training centers with an accepted SMS, a safety risk assessment.
 - b. For training centers without an accepted SMS, a safety analysis and corresponding risk mitigations to be implemented by the training center.
 - c. The alternate method(s) the training center will use to accomplish training, testing, and checking under this deviation.
 - d. The method(s) the training center will use to ensure the deviation will not adversely affect the quality of instruction or evaluation, and that will ensure that each trainee will remain adequately trained and currently proficient for each assigned aircraft, duty position, and type of operation.

In order for a TCPM to extend the use of this deviation beyond November 2020, the TCPM must update the training center's TSpec A005 with the revised Conditions and Limitations contained in this memo.

If you have any questions, please contact the Air Transportation Division at (202) 267-8166.

Training Specification - A005 Issuance/Reissuance

The TCPM may issue or amend TSpec A005 for any training center requesting this deviation provided the foregoing Conditions and Limitations have been satisfied. The TCPM must include the following information in TSpec A005, Table c., Deviations:

- Deviation Authority: select "142.9(a)"
- Deviation From: select "142.65(d)"
- Description: select "COVID-19 NO-TOUCH. Temporary deviation to certain emergency procedures during some training, testing, and checking events due to COVID-19 and in accordance with the AFS-200 memo dated 11/30/2020."
- Conditions and Limitations: insert the following text *verbatim*:
 - This deviation applies only to trainees under Part 142 and training center instructors and evaluators who are required to complete recurrent or upgrade training, testing, or checking through March 31, 2021. This deviation does not apply to initial or transition training, testing, or checking. This deviation is not applicable to any Part 121 or Part 135 training program.

- During recurrent or upgrade training, testing or checking involving emergency procedures that require the donning or use of emergency equipment that must be placed on or over the head, the training center may use alternate methods to conduct the training, testing, and checking.
- The training center must provide recordkeeping procedures that document when a trainee, instructor, or evaluator has completed emergency procedures using an alternate method in an approved curriculum. The training center must provide these records to the trainee, instructor, or evaluator at the completion of the curriculum.
- A trainee that performs emergency procedures using an alternate method must complete those procedures using the normal procedures during that person's next required training, testing, or checking event in that type aircraft.
- The training center may only use the alternate method(s) submitted with its request for deviation if the FAA training center program manager has accepted those method(s).
- This deviation expires 03/31/2021 unless sooner superseded or rescinded.

Note: TCPMs may not amend TSpec paragraph A005, Table b. Exemptions under the authority provided by this memorandum.