



FAA

Aviation Safety

Memorandum

Date:

To: All Flight Standards Safety Assurance Division Managers
All Flight Standards Safety Assurance Office Managers
THRU: Wes Mooty, Acting Director, Air Carrier Safety Assurance, AFC-1,
Robert Ruiz, Acting Director, General Aviation Safety Assurance, AFG-1

From: Thomas F. Malone, Manager, Air Transportation Division, AFS-200

Prepared by: Air Carrier Training Systems and Voluntary Safety Programs Branch, AFS-280

Subject: Certificate Holder's Requesting Relief (COVID-19)

This messaging speaks to Safety Assurance (SA) Offices who have oversight of 14 CFR 121 or 135 Certificate Holders (CH)

The FAA has provided a link to the Centers for Disease Control and Prevention (CDC) information on COVID-19. One recommendation from the CDC is to clean and disinfect frequently touched surfaces; they offer representative examples of tables, light switches, phones, etc. The potential for exposure to the COVID-19 virus may exist in a Certificate Holder's (CH) training media and equipment.

Over the last week, the Air Transportation Division (AFS-200) has received inquiries from SA regarding methods to reduce possible exposure to COVID-19 in the air carrier training and operational environment. These requests include, but are not limited to:

- Extending recurrent training events and extending CQ evaluation periods
- Suspending the requirement for pilots to don crew oxygen masks in the training environment;
- Suspending the requirement for flight attendants to don oxygen masks in the training environment;
- Suspending the recommendation for pilots to use a headset with a boom microphone in the training environment;

- Modifying the procedure for actually donning of a PBE in training to stop at the point before it is actually placed over the person's head/nose/mouth,
- Modifying the procedure for actual donning of some inflatable life vests in training that pull over a person's head;
- Modifying the extent to which a training dummy is used during CPR training.

The ask for AQP Programs:

If an AQP CH requests any change in an AQP curriculum in order to limit or eliminate potential exposure to COVID-19, please immediately contact the assigned AFS-280 ASI who is part of the Extended Review Team (ERT) working with the SA Certificate Management Team/Unit/Office. Also, please email the request with supporting documentation and a summary of the CMO's review to: 9-AVS-AQP-Doc-Review@faa.gov.

A request must be reviewed immediately and all due flexibility allowed under AQP considered. All approvals for changes driven by COVID-19 concerns require **joint approval with signatures from AFS-200 and the SA POI or their designee. This is required even for CH in Phase V approval of their AQP.**

The AQP CH must submit justification for the request, including an evaluation of the initial risk mitigation strategy, and the operator's proposed methodology to revert to their current level of approvals when appropriate. A request must include a proposed date to return to the previous state. As it pertains to requests to extend CQ evaluation periods, at this time we will consider a maximum of 60 days extension with continued grace-month provision applicability.

14 CFR Part 121 Subpart Y requires that all departures from traditional regulatory requirements be documented and based upon an approved continuing data collection process sufficient to establish at least an equivalent level of safety. Some changes may require the CH to update the Regulatory Variance/Comparison Chart/Document which is part of the Qualifications Standards Documents that are approved for a CH training under AQP.

For AQP, you have any questions, please immediately contact your assigned AFS-280 ERT assigned ASI or in their absence, Ellen Tom, AFS-280 at 513-604-6433 for pilot training or Sharon Tkach, AFS-280 at 412-512-0461 for flight attendant training.

For traditional 121 (N&O) training programs and training programs approved under part 135, we are developing additional regulatory relief with specifics and guidance to be published next week.

The Office of Safety Standards is also publishing guidance for designees in the very near future.