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## Aviation Safety

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### Memorandum

Date: June 19, 2020

To: All Flight Standards Service Divisions

From: Everette C. Rochon, Jr., Manager (Acting), General Aviation and Commercial Division, AFS-800

Subject: Deviation to FAA Order 8900.1 Events Based Currency (EBC) and Annual Proficiency Check Requirements

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This memorandum provides a deviation to FAA Order 8900.1, Volume 1, Chapter 3, Section 6, *Operations Inspector Qualifications and Currency Overview*. Paragraph 1-262 requires Aviation Safety Inspectors – Operations (ASI) to meet the AFS Participant Flight Operations Manual (FOM) details related to qualification and currency requirements to conduct specified job functions in an aircraft. To help cope with travel and training restrictions caused by the Coronavirus Disease 2019 (COVID-19) pandemic, this deviation will allow Flight Standards Service (FS) personnel to meet Events Based Currency (EBC) Program requirements and specific annual proficiency check requirements.

#### **EBC Program Deviation**

*Applicability.* This deviation allows an ASI to continue to meet EBC Program requirements as long as the ASI has completed the required EBC tasks within the previous 8 calendar months for the same category, class, and or type of aircraft in which the specified job function will take place. This will give an ASI a total of 9 months of currency in which the ASI should be able to complete the required EBC tasks. Once an ASI has completed the required EBC tasks, the ASI may no longer use this deviation. Refer to the *8-Calendar-Month EBC Lookback Table* in Appendix A of this memo to determine when EBC Program currency expires using this deviation.

*Risk Assessment and Mitigation.* To maintain an equivalent level of safety, FS personnel must comply with the following risk mitigations before exercising the relief provided by this deviation, and the mitigations must be reviewed and affirmed no lower than the Officer Manager level before the ASI is authorized to start the job function:

1. The ASI must complete the Ground School Quarterly Safety Briefing Webinar for the quarter in which the job function will take place.
  - a. The ASI must document completion of this webinar using the Online Ground School Verification Form located on the Aviation Safety Training Group's SharePoint Ground School page, <https://avssp.faa.gov/avs/ajw32/Surveys/SitePages/Ground%20School.aspx>
  - b. If this process is not available, email a request to the Workforce Development Division at [9-AFB500-Flight-Program-Customer-Service@faa.gov](mailto:9-AFB500-Flight-Program-Customer-Service@faa.gov) asking to document completion of this training.
2. Use this deviation only if the ASI cannot complete or current policy does not allow the ASI to complete the pilot evaluating, testing, and/or checking (certification) job function from an observer seat, from a place in the cabin from which the ASI can adequately observe the pilot(s), or utilizing Video and Communication Technology (VCT), as appropriate. As a reminder, the ASI should apply critical thinking and interdependence to foster consistent decisions for the proper use of VCT.
3. Determine if the pilot evaluating, testing, and/or checking (certification) job function is needed or even required given current exemptions for part 121 and 135 certificate holders and SFAR No. 118 relief.
4. Coordinate with other FS offices to use ASIs who are EBC Program current without using this deviation. This includes reviewing the use of the Flight Standards Inspector Resource Program (FSIRP) to request a current and qualified ASI.
5. If an ASI has to complete an Operational Risk Matrix (ORM) in accordance with FAA Order 8900.1, Volume 1, Chapter 3, Section 9, *Flight Standards Safety Inspector (Operations) Risk Management*, Paragraph 1-300A, add an appropriate risk value to Block 11, Uncalculated Risk Value. Using the *Additional Risk Value for Operational Risk Matrix Table* in Appendix B, choose the risk value that corresponds to the number of days since completing the required EBC tasks. The risk value added to Block 11 is in addition to the required risk value of "4" in Block 10, EBC Currency, for not completing required EBC tasks for more than 90 days.
6. FS personnel must always identify the hazards associated with the flight and mitigate the risks associated with those hazards to an acceptable level, regardless of whether or not the ASI has to complete an ORM for the flight.

## **Annual Proficiency Check Deviation**

*Applicability.* This deviation allows an ASI to continue to meet the requirement of having a documented annual proficiency check in the same category and class of aircraft to be flown for the specified job function assigned. If an ASI has completed the EBC tasks required for the same category and class of aircraft the job function will be conducted in and these EBC tasks were completed at the AFW Service Center within the previous 12 calendar months, the ASI does not have to meet this annual proficiency check requirement. Once an ASI has completed the required annual proficiency check, the ASI may no longer use this deviation. All other requirements and provisions in the FOM related to an annual proficiency check still apply.

Note: This deviation provides no relief to formal flight training. Relief for those requirements will be outlined in a separate deviation.

*Risk Assessment and Mitigation.* The Office of Safety Standards and Foundational Business has determined there is some inherent risk associated with deviating from the normal annual proficiency check requirements. This risk has been determined to be acceptable, on a temporary basis, due to the processes at the AFW Service Center which provide independent assurance that the performance demonstrated while completing an EBC task (a training event) is equivalent to the performance expected during an annual proficiency check.

## **Duration of Deviation**

This deviation will remain in effect through November 30, 2020. For questions regarding general aviation operations ASI currency requirements, please contact the General Aviation and Commercial Division at [9-AFS-800-Correspondence@faa.gov](mailto:9-AFS-800-Correspondence@faa.gov). For questions regarding air carrier operations ASI currency requirements, please contact the Air Transportation Division at [9-AFS-200-Correspondence@faa.gov](mailto:9-AFS-200-Correspondence@faa.gov). For questions regarding flight currency scheduling, please contact Workforce Development Division at [9-AFB500-Flight-Program-Customer-Service@faa.gov](mailto:9-AFB500-Flight-Program-Customer-Service@faa.gov).

### Appendix A: 8-Calendar-Month EBC Lookback Table

Oct 2019	Nov 2019	Dec 2019	Jan 2020	Feb 2020	Mar 2020	Apr 2020	May 2020	June 2020	July 2020	Aug 2020	Sep 2020	Oct 2020	Nov 2020	Dec 2020
					Completed Tasks	+2	+3	Currency Normally Expires	+5	+6	+7	+8	+9	No longer current
				Completed Tasks	+2	+3	+4	Currency Normally Expires	+6	+7	+8	+9	No longer current	
			Completed Tasks	+2	+3	+4	+5	Currency Normally Expires	+7	+8	+9	No longer current		
		Completed Tasks	+2	+3	Currency Normally Expires	+5	+6	+7	+8	+9	No longer current			
	Completed Tasks	+2	+3	+4	Currency Normally Expires	+6	+7	+8	+9	No longer current				
Completed Tasks	+2	+3	+4	+5	Currency Normally Expires	+7	+8	+9	No longer current					

The EBC Program deviation allows an ASI to continue to meet EBC Program requirements as long as the ASI has completed the required EBC tasks within the previous 8 calendar months for the same category and class of aircraft in which the specified job function will take place. This will give an ASI a total of 9 months of currency in which the ASI should be able to complete the required EBC tasks. Once an ASI has completed the required EBC tasks, the ASI may no longer use this deviation.

For example, if an ASI completed the required EBC tasks on February 21, 2020, this ASI's currency would normally have ended on June 30, 2020. Looking at this table, this ASI will now be current through October 31, 2020, a total of 9 calendar months of currency. However, if this same ASI were able to complete the required EBC tasks on August 20, 2020, then the ASI would no longer use this deviation, but instead, would comply with current EBC Program requirements in the FOM.

## Appendix B: Additional Risk Value for Operational Risk Matrix Table

Risk Value	Days Since Completing Required EBC Tasks
0	0 days through 120 days
2	121 days through 150 days
4	151 days through 180 days
7	181 days through 210 days
10	210 days through 240 days
13	241 days through 270 days
17	Greater than 270 days

If an ASI has to complete an Operational Risk Matrix (ORM) in accordance with FAA Order 8900.1, Volume 1, Chapter 3, Section 9, *Flight Standards Safety Inspector (Operations) Risk Management*, Paragraph 1-300A, add an appropriate risk value to Block 11, Uncalculated Risk Value. Use this table to choose the risk value that corresponds to the number of days since completing the required EBC tasks. The risk value added to Block 11 is in addition to the required risk value of "4" in Block 10, EBC Currency, for not completing required EBC tasks for more than 90 days.

For example, if it has been 156 days since an ASI last completed the required EBC tasks, then the ASI would enter a risk value of 4 to Block 11, Uncalculated Risk Value. Since this value is in addition to the required risk value of "4" in Block 10, the total risk value for not being EBC Program current would be 8.