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## Aviation Safety

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### Memorandum

Date:

To: All Flight Standards District Offices

From: Jackie L. Black, Aviation Safety, Manager, Aircraft Maintenance Division

Subject: **Revised:** Special Guidance for part 147 AMTS Regarding Training Interruptions Related to Coronavirus (COVID-19) and Applicable Deviations to Order 8900.1.

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M330-8000.1-G-2003-0718

This memorandum supersedes memorandum M350-8000.1-G-2003-0716 dated 3/12/2020.

#### Summary of Revision:

- Removed limitations for enrolling new students.
- Added information regarding sharing memo with AMTS.
- Added note regarding returning students to standard procedures following termination of this deviations.
- Added Avionics PTRS tracking codes.
- Added clarifying sentence regarding missed time.
- Added note regarding maximum allowable hours of absence.
- Added paragraph stating the memo will remain in effect until terminated.

The Novel Coronavirus (COVID-19) outbreak 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 US to take action by reducing or limiting public gatherings which includes the closure of schools in some locations. These closures may impact student learning and schedules of some part 147 Aviation Maintenance Technician Schools (AMTS). The actions taken have caused concerns among Flight Standards District Offices (FSDO) with oversight responsibilities of AMTS requesting flexibility to minimize interruptions to student learning. The Aircraft Maintenance Division has reviewed these concerns and provides the following guidance to assist the AMTS community.

The guidance is temporary in nature and should not be applied as standard procedure. The standard procedures are located in FAA Order 8900.1, Volume 2, Chapter 12, and Volume 6 Chapter 10. Flight Standards offices with AMTS oversight responsibilities may use this guidance to authorize options or flexibility for AMTS curriculum delivery and student attendance within the current requirements of part 147. FAA offices or inspectors should discuss these options with the affected AMTS and provide the appropriate support based on the option selected by the schools. This deviation provides guidance to FAA offices/inspectors, however, it may be shared with an AMTS as a part of the discussions to determine a viable course of action in response to the COVID-19 outbreak.

The FAA recognizes that no one solution will fit every situation or school's capabilities. FAA inspectors should not require a school to choose any specific option. It's the AMTS responsibility to determine its appropriate course of action. The AMTS must remain in compliance with the requirements of part 147. Below are recommended options to assist FAA inspectors and AMTS with determining an appropriate path forward. FSDOs or AMTS experiencing circumstances where this guidance may not be applicable should contact the General Aviation Branch.

### **Recommended Options**

1. Expansion of a currently approved Distance Learning program.
2. Authorize initial use of a temporary Distance Learning program.
3. Temporary Revision of a school's allowable hours of absence.
4. Suspend AMTS operations for a period of time.
5. Other short term deviations to Order 8900.1.
6. Exemptions to 14 CFR part 147.

**NOTE:** AMTS that implement procedures using deviations in this memo should develop a process to return all affected students to the AMTS standard curriculum or program, within 30 days after the termination of this deviation.

#### **1. Expansion of a currently approved Distance Learning program.**

AMTS currently authorized to conduct distance learning have been issued OpSpec A026, Authorizations/ Limitations. The OpSpec lists each eligible curriculum subject/topic areas, the teaching level, and any provisions, conditions, or limitations related to each area.

- a. Responsible Flight Standards offices should be prepared to add learning areas to the OpSpec A026 when those areas meet the AMTSs FAA-approved Distance Learning Program requirements, based on an AMTS request.
- b. However, schools may request that certain subject/topics be authorized for distance learning using an alternate method from what is currently described in its approved Distance Learning Program.
- c. The school may also request an alternate examination and testing procedure, when it can show that it will be using an established testing system such as one used by a college or university associated with the AMTS, or a testing procedure that otherwise ensures the integrity of the testing process. If needed, testing can be postponed until students can return to the classroom.

- d. The following guidelines authorize a deviation from FAA Order 8900.1, Volume 2, Chapter 12, Section 1, paragraph 2-1417(C), Section 2, paragraph 2-1450, and Section 3, paragraph 2-1487(C):
  - i. The AMTS must develop procedures describing how it will administer the alternate method of distance learning to include:
    - 1. A description of the how course content will be delivered and how instructors and students will communicate as needed (i.e. technology).
    - 2. Procedures for tracking student attendance under each subject/topic using the alternate method. The school must maintain a list of those students who were taught under the alternate method.
    - 3. If the AMTS requests alternate testing procedures, it must submit procedures describing the testing process.
  - ii. The AMTS must establish a timeframe for alternate content delivery. The timeframe should align with program semester/defined end dates. Due to the uncertainty of the situation, extensions to the timeframe could be considered at a future date.
- e. The responsible office will complete the following:
  - i. Review the AMTS submission. If alternate testing procedures are submitted, they must ensure the integrity of testing.
  - ii. List the added eligible subjects/topics on OpSpec A026. The following additional information must be listed in the “Provisions, Conditions and Limitations” block for each area:
    - 1. Reference to the AMTS procedures describing the alternate method of distance learning.
    - 2. The expiration date for teaching the content. Future extensions to the timeframe will require a revision to OpSpec A026.
  - iii. Enter a PTRS record using activity code 3316/5316 with the following information. This information will be used by the Aircraft Maintenance Division to track deviations to current 8900.1 for which schools are authorized an alternate method of distance learning in addition to their current authorization.
    - 1. Enter “147” in the 14 CFR block.
    - 2. Enter the school's designator in the “Designator” block
    - 3. Enter *DLALTCVI9* in the “National Use Block”.
    - 4. Enter any other appropriate information in the comment field.

2. **Authorize initial use of a temporary Distance Learning Program.**

The FAA recognizes that approval to use a Distance Learning Program can be a time consuming process. This is to ensure that an AMTS using distance learning will provide students with an equivalent level of instruction as a traditional classroom.

- a. Schools may request to use a temporary distance learning program and be authorized distance learning content via OpSpec A026. The responsible Flight Standards office should support requests to conduct appropriate instruction using the temporary distance learning program for a limited timeframe.

- b. The school may also request a temporary examination and testing procedure, when it can show that it will be using an established testing system such as one used by a college or university associated with the AMTS, or a testing procedure that otherwise ensures the integrity of the testing process. If needed, testing can be postponed until students can return to the classroom.
- c. The following guidelines authorize a deviation from FAA Order 8900.1, Volume 2, Chapter 12, Section 1, paragraph 2-1417(C), Section 2, paragraph 2-1450, and Section 3, paragraph 2-1487(C):
  - i. The AMTS must develop procedures describing the following:
    - 1. How the distance learning program will be administered, to include:
      - a. A description of the how course content will be delivered and how instructors and students will communicate as needed.
      - b. If requested, temporary testing procedures describing the testing process.
    - ii. Procedures to ensure distance learning course records are kept in compliance with the approved curriculum, to include:
      - 1. Procedures for tracking student attendance under each subject/topic. The school must maintain a list of those students who were taught under the temporary method.
    - iii. A description of the technology to be utilized.
    - iv. The AMTS must establish a timeframe for alternate content delivery. The timeframe should align with program semester/defined end dates. Due to the uncertainty of the situation, extensions to the timeframe could be considered at a future date.
  - d. The responsible office will complete the following:
    - i. Review the AMTS temporary distance learning program to ensure it adequately describes how students will be taught course content. If temporary testing procedures are submitted, they must ensure the integrity of testing.
    - ii. List the added eligible subjects/topics on OpSpec A026. The following additional information must be listed in the “Provisions, Conditions and Limitations” block for each area:
      - 1. Reference to the AMTS procedures describing the temporary distance learning program.
      - 2. The expiration date for teaching the content. Future extensions to the timeframe will require a revision to the OpSpec A026.
    - iii. Enter a PTRS record using activity code 3316/5316 with the following information. This information will be used by the Aircraft Maintenance Division to track deviations to current 8900.1 for which schools are authorized a temporary method of distance learning using OpSpec A026.
      - 1. Enter “147” in the 14 CFR block.
      - 2. Enter the school's designator in the “Designator” block
      - 3. Enter *DLTMPCV19* in the “National Use Block”.
      - 4. Enter any other appropriate information in the comment field.

e. Below are some examples of ways to implement a temporary distance learning program.

**EXAMPLE 1:** The AMTS could communicate to students through one of several types of technology, e.g. email, teleconference, video conference, instant messaging. Instructors should initiate substantive communication with their students, either individually or collectively, on a regular basis. In other words, an instructor could use email to provide instructional materials to students enrolled in his or her class, use chat features to communicate with students, set up conference calls to facilitate group conversations, engage in email exchanges or require students to submit work electronically that the instructor will evaluate.

**EXAMPLE 2:** An AMTS may work out an agreement with another AMTS for their students to receive instruction using another AMTS FAA-Approved distance learning platform and courses.

### 3. **Temporary Revision of a Schools Allowable Hours of Absence.**

14 CFR 147.31(e) requires an AMTS to use an approved system for determining final course grades and for recording student attendance. The system must show hours of absence allowed and show how the missed material will be made available to the students.

- a. Students missing allowable hours of absence must be provided the missed material by the school. Students are not required to make up missed time, only missed material, except when the student has missed time beyond the approved allowable hours of absence defined by the school. Students missing more than the allowable hours of absence must make up missed-time beyond the defined allowable, or repeat the course, in order to meet curriculum requirements for issuance of a graduation certificate.
- b. The following guidelines authorize a deviation from FAA Order 8900.1, Volume 2, Chapter 12, Section 2, paragraph 2-1449(G):
  - i. Schools may submit a temporary revision of their approved system, with respect to allowable hours of absence and procedures for how missed material will be made available to the students. Flight Standards offices are authorized to allow up to 80 hours of allowable absence.
 

**Note:** The deviation authorizes a total of 80 hours of allowable absence.
  - ii. The AMTS must submit written procedures for approval. The document need only address those areas that are different from its currently approved system. The document should include:
    1. Defined allowable absence.
    2. Procedures for making missed material available to the student.
    3. Procedures for annotating the student record to show how the student was authorized the hours of absence based on this temporary approval. The school must maintain a list of those

students who used the temporary increase in allowable hours of absence.

4. A defined timeframe for using the temporary approval. The procedures must specify that the system is only to be used for absence associated with the COVID-19 outbreak.

**Note:** The temporary approval for an increase in allowable absence does not authorize any other change to the school's curriculum or procedures, including testing requirements.

c. The responsible Flight Standards office will complete the following:

- i. Review the AMTS system to ensure it adequately describes program requirements listed above.
- ii. Approve the document by stamping or signing and dating. The inspector will provide a letter to the school stating the expiration date. Extension will require issuance of a new letter.
- iii. Enter a PTRS record using activity code 3372/5372 with the following information. This information will be used by the Aircraft Maintenance Division to track deviations to current 8900.1 for which schools are authorized a temporary increase to their allowable hours of absence.
  1. Enter "147" in the 14 CFR block.
  2. Enter the school's designator in the "Designator" block.
  3. Enter *ABSENCV19* in the "National Use Block".
  4. Enter any other appropriate information in the comment field.

#### 4. **Suspend AMTS operations for a period of time.**

AMTS may choose to suspend operations for a period of time depending on local authority's requirements. The AMTS should provide a written notification of the timeframe it expects for suspension. The AMTS should notify the responsible Flight Standards office of when it plans to resume operations. The school should submit its plan for suspension and resumption of operations to the responsible office for their awareness.

- i. Enter a PTRS record using activity code 3250/5250 with the following information. This information will be used by the Aircraft Maintenance Division to track schools that suspend operations as a result of COVID-19.
  1. Enter "147" in the 14 CFR block.
  2. Enter the school's designator in the "Designator" block
  3. Enter *SUSPCV19* in the "National Use Block".
  4. Enter any other appropriate information in the comment field.

#### 5. **Other short term deviations to Order 8900.1.**

Schools may submit alternate proposals to the responsible Flight Standards office to address learning under circumstances related to COVID-19. When proposals require deviation from FAA Order 8900.1 not discussed above, the responsible Flight Standards office should submit a request for a deviation to guidance to the Aircraft Maintenance Division, General Aviation Branch.

- a. Requests can be sent via email to the correspondence inbox **9-AWA-AFS-300-Correspondence@faa.gov**.

- b. The request must include the following information:
  - i. The school name and certificate number for which the request for deviation applies.
  - ii. The specific Volume, Chapter, Section and paragraph(s) for which deviation is being requested.
  - iii. The alternate method being used to comply and the responsible flight Standards offices justification for agreeing to the alternate.
  - iv. The quantity of students affected. The school must maintain a list of those students who were affected by the deviation.
- c. The General Aviation Branch will review the request and, if in agreement, will issue a letter to the responsible office authorizing the deviation.

6. **Exemptions to 14 CFR part 147.**

An AMTS may request an exemption from applicable requirements under 14 CFR part 147. Exemptions requests must be submitted in accordance with the requirements under 14 CFR part 11. An AMTS should be advised that petitions for exemption may take substantially longer compared to deviations to FAA guidance, and the outcome may vary.

The deviation is effective until superseded or terminated. The Aircraft Maintenance Division will notify all responsible Flight Standards offices of revisions or the termination of this deviation.

We appreciate the opportunity to assist you. If you have any additional questions regarding this memorandum, please contact the Aircraft Maintenance Division, General Aviation Branch at (202) 267-1675.