



FAA

Aviation Safety

Memorandum

Date: April 1, 2020

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.

JACKIE L. BLACK JR
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Date: 2020.04.01 13:51:20 -05'

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 *DLALTCV19* 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.



04/10/2020

Mr. Bill Moore,

Mr. Mark Auclair

**Proposal from the Aviation Technology Program Coordinator
Nashua Community College (NSUT025K)**

Good day, as this Coronavirus crisis evolves, I am proposing the following modifications to our program to minimize interruptions to student learning. First, I request approval as a temporary distance learning program. Second, I request a temporary revision authorizing a total of 80 hours of allowable absence from the program. I developed this plan based on the guidelines provided by the FAA in its memorandum dated 4/1/2020.

Authorize initial use of a temporary Distance Learning Program

1. How will the distance learning program be administered? Additional details are below.

Due to the Coronavirus (COVID 19), the new Social Distancing Protocols, a Stay at Home order by the Governor of New Hampshire and the need to get our course information/materials to our students, I am proposing the use of a temporary distance learning program to move forward with our course work. FAA code (*DLTMPCV19*)

a. A description of the how course content will be delivered and how instructors and students will communicate as needed.

Lectures will be conducted via weekly Zoom meetings and Canvas discussion forum, similar to Blackboard.

b. If requested, temporary testing procedures describing the testing process.

Testing will be accomplished as a timed, open-book test; the college will be using Zoom as a tool to proctor final exams.

2. What procedures will be employed to ensure distance learning course records are kept in compliance with the approved curriculum? Additional details are below.

All distance learning course records and curriculum material are tracked via Canvas

a. 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.

Each student has to log into canvas to participate in Zoom lectures or take part in a discussion board posts and responses.

b. A description of the technology to be utilized.

As noted above, instructors will deliver lectures and other course content via Canvas – the college’s online learning management system. In addition, instructors will use Zoom as a tool to provide synchronous learning experiences.

c. A description of the timeframe for alternate content delivery.

This period start date is March 27th and will run to May 4th 2020. I am proposing the use of this period, for our lectures. At this time, the plan is to return to campus after May 4th, 2020. I have modified our lab schedule to get our students the required time needed to complete the semester. Attached please find the modified lab schedules for both the Senior and Freshman classes. The senior students will need 108 hours and the freshman students will need 66 hours of labs to complete this semester. This semester’s original end date is May 1st, 2020, that gives us two weeks to meet their requirements.

If we are unable to return to campus on May 4th, the plan for each class is described below.

Senior Class Plan

The plan is to extend the spring semester as necessary into the summer so seniors would be able to complete their graduation requirements.

Freshman Class Plan

Freshmen would complete their spring labs during the first eight weeks of the fall term. The summer term would be postponed until the second eight weeks of the fall term. The fall 2020 term would be moved to spring 2021 and students would complete their final term in summer 2021. Due to the unusual circumstances, students would still be able to walk at graduation in May 2021 prior to completing their coursework over the summer.

Suspension of Incoming Freshman Class for Fall 2020

To focus on the educational needs of our current students, I recommend suspending the admission of new students into the program for fall 2020.

Temporary Revision of a Schools Allowable Hours of Absence

In addition to online learning modifications, I am requesting a total of 80 hours of allowable absence from the program for the senior students as a result of the COVID-19 crisis. As required, additional details are below.

1. Defined allowable absence.

The senior class will be lacking 108 hours of labs, the 80 hours allowable absence, will relieve the senior students of the burden of fulfilling their remaining lab hours with little or no disruption to their lives, allowing them to graduate at the end of the summer session. The increase in allowable hours gives us flexibility scheduling labs.

The freshman students Spring labs will be moved to the 2020 fall semester first 8 weeks.

2. Procedures for making missed material available to the student.

There should be no need to provide missed material to students since all program content for spring will be presented to students through online lectures. Senior students will return in the summer to finish out the remaining lab time.

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.

Canvas keeps attendance records along with student's grades on file. With the FAA's approval, the graduating seniors and freshman class will use the code for the allowable absence (**ABSENCV19**).

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.

This system will be used only for this time of COVID 19 outbreak. Upon return to campus with full use of our facilities, the Aviation Technology Program will resume face to face instructional.

Patrick Geoffroy

Professor/Program Coordinator

Signed April 10th, 2020



04/10/2020

Mr. Bill Moore,

Mr. Mark Auclair

Proposal from the Aviation Technology Program Coordinator

Nashua Community College (NSUT025K)

Good day. As this Coronavirus crisis evolves, I am proposing the following modifications to our program to minimize interruptions to student learning. First, I request approval as a temporary distance learning program. Second, I request a temporary revision authorizing a total of 80 hours of allowable absence from the program. I developed this plan based on the guidelines provided by the FAA in its memorandum dated 4/1/2020. I have composed this letter to specifically address each of the items in the memorandum.

Request 1: Authorize initial use of a temporary Distance Learning Program

1. How will the distance learning program be administered?

Due to the Coronavirus (COVID 19), the new Social Distancing Protocols, a Stay at Home order by the Governor of New Hampshire and the need to get our course information/materials to our students, I am proposing the use of a temporary distance learning program to move forward with our course work. FAA code **(DLTMPCV19)**.

Instruction will take place using the learning management system Canvas.

a. A description of the how course content will be delivered and how instructors and students will communicate as needed.

Students will be kept up-to-date with their lectures by delivering their learning materials online using Canvas. Canvas is the learning management system approved by the Community College System of New Hampshire (CCSNH) and it has been in place for the past three school years. Lectures will be conducted via weekly Zoom meetings and Canvas discussion forums. Instructors will maintain regular communication with students via Zoom meetings, Canvas messaging, and student email.

b. If requested, temporary testing procedures describing the testing process.

Testing will be accomplished as a timed, open-book test; the college will be using Zoom as a tool to proctor final exams.

2. What procedures will be employed to ensure distance learning course records are kept in compliance with the approved curriculum? Additional details are below.

All distance learning course records and curriculum material are tracked via Canvas.

a. 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.

Each student has to log into Canvas to participate in Zoom lectures or take part in a discussion board posts and responses. The Canvas learning platform maintains a continual record of student attendance and participation.

b. A description of the technology to be utilized.

As noted above, instructors will deliver lectures and other course content via Canvas – the college’s online learning management system. In addition, instructors will use Zoom as a tool to provide synchronous learning experiences.

c. A description of the timeframe for alternate content delivery.

The delivery of our online lectures began on March 27th, 2020 and will run until May 4th 2020. I am proposing the use of this period, for our lectures. At this point, the plan is to return to campus after May 4th, 2020. I have modified our lab schedule to get our students the required time needed to complete the semester. Attached please find the modified lab schedules for both the Senior and Freshman classes. The senior students

will need 108 hours and the freshman students will need 66 hours of labs to complete this semester. If we are able to return to campus on May 4th, then we will have two weeks to meet these requirements.

If we are unable to return to campus on May 4th, the plan for each class is described below.

Senior Class Plan

The plan is to extend the spring semester as necessary into the summer so seniors would be able to complete their required lab work and meet graduation requirements.

Freshman Class Plan

Freshmen would complete their spring labs during the first eight weeks of the fall term. The summer term would be postponed until the second eight weeks of the fall term. The fall 2020 term would be moved to spring 2021 and students would complete their final term in summer 2021. Due to the unusual circumstances, students would still be able to walk at graduation in May 2021 prior to completing their coursework over the summer.

Suspension of Incoming Freshman Class for Fall 2020

To focus on the educational needs of our current students, I recommend suspending the admission of new students into the program for fall 2020.

Request 2: Temporary Revision of a Schools Allowable Hours of Absence

In addition to online learning modifications, I am requesting a total of 80 hours of allowable absence from the program for the senior students as a result of the COVID-19 crisis.

At this point, senior students have already demonstrated competency in the required student learning outcomes. As a result, much of the remaining lab time focuses on reinforcing established skills. I am asking to increase the number of hours of allowable absence for seniors to 80 hours. This would allow additional flexibility to schedule remaining lab hours should the Governor's stay at home order be extended beyond May 4th. As required, additional details are below.

1. Defined allowable absence.

The senior class currently lacks 108 hours of lab time. The allowance of 80 hours absences, will greatly reduce the number of hours that seniors will need to spend when they are allowed to return to campus. This will relieve the senior students of the burden of fulfilling all of their remaining lab hours and allow them to graduate at the end of the summer session. In addition, the increase in allowable absence hours gives us flexibility scheduling labs during these unusual circumstances.

The freshman students Spring labs will be moved to the 2020 fall semester first 8 weeks.

2. Procedures for making missed material available to the student.

Since seniors have already met their program competencies and much of the remaining lab time focuses on practicing established skills, there should be no need to provide missed material to students. The program faculty keep accurate records on student progress and can verify that all program competencies have been met.

All program content for the remainder of spring semester will be presented to students through online lectures. Senior students will return in the summer to finish out the remaining lab time.

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.

Canvas keeps attendance records along with student's grades on file. With the FAA's approval, the graduating seniors and freshman class will use the code for the allowable absence (**ABSENCV19**).

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.

This system will be used only for this time of COVID 19 outbreak. Upon return to campus with full use of our facilities, the Aviation Technology Program will resume face-to-face instruction.

Patrick Geoffroy

Professor/Program Coordinator

Signed April 10th, 2020



03/23/2020

Mr. Bill Moore,

Mr. Mark Auclair

Proposal from the Aviation Technology Program Coordinator

Nashua Community College (NSUT025K)

Good day gentlemen, as this crisis evolves, my program is in need of guidance from the FAA. The situation as I'm composing this e-mail is very fluid at best and the State and Federal Governments are not forthcoming with any concrete information for the disposal of our labs with regards to time/hours and facilities/Lab space. What we are getting from our leadership at the Community College System of New Hampshire (CCSNH) is our students are to maintain the Social Distancing Protocol of 6 foot spacing between students while attending their labs with a maximum of 10 people in any one lab.

Our leadership is proposing we split our lab classes into two 2-hour lab classes in order to maintain the SD protocol. As you know, our facility are not located at the local airport and we are a bit cramped for space. My proposal is to split the class into two equal parts, one-half goes to the airport to work with Bob Donadio who owns a Cesena 414 and a Cesena 313 airplane and the other half comes in to the college to perform their lab work. All together, the students are working on their lectured competencies.

On another front, my senior students have 6 weeks remaining until graduation from this program, 4 of the senior students are currently working in the industry. Is it possible to wave the remaining 6 weeks of the program for the senior students?