



FAA

Aviation Safety

Memorandum

Date:

To: All Flight Standard Offices

From: Kawehi W. Lum, Acting Manager, Aircraft Maintenance Division

Subject: Methods of Inspection Authorization Renewals for Calendar Year 2021 due to the COVID-19 Pandemic

Background: 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 United States to take action by reducing or limiting public gatherings, which includes the closure of multiple aviation facilities in various locations. These closures have affected some IA activities for renewals and FAA offices that provide IA seminars and other renewal activities.

During the pandemic, the FAA published a Special Federal Aviation Regulation (SFAR) -118, providing temporary relief to persons who have been unable to meet certain requirements during the national emergency concerning COVID-19. The FAA stated, that without this final rule, certain individuals will not be able to continue exercising privileges in support of essential operations due to their inability to satisfy certain training, recent experience, testing, and checking requirements. Additionally, other individuals may – to the extent possible given closures – attempt to satisfy requirements through means contrary to the national social distancing guidelines in order to avoid economic burdens resulting from non-compliance with FAA regulations.

The SFAR is effective through March 31, 2021, which is the longest duration of relief under this rule, provided to airman who hold inspection authorizations under part 65. The FAA advises, however, that this date does not reflect the duration for every provision in the SFAR. Each person exercising relief provided by this SFAR should understand the conditions and duration of such relief. *Refer to SFAR-118 [Docket No.: FAA-2020-0446]*

Additionally, under the extraordinary circumstances of the COVID-19 outbreak, the FAA is extending the relief granted by SFAR 100-2 by an additional three calendar months for eligible persons who returned to the U.S. from deployment in October 2019 through March 2020. This relief will enable those persons to complete the requirements of paragraph 2.(c) within nine calendar months after returning to the United States. If a person returns from deployment after March 2020, that person must comply with SFAR-100-2.

Recommended Action: In Response to COVID-19 pandemic, CDC recommendations, and Flight Standards office closures or reduced staffing, Flight Standards has provided the following options in support of the Inspection Authorization (IA) renewals for calendar year 2021. Deviations from the current guidance are authorized as applicable to the renewal options mentioned below.

Note: This year, renewal letters may be issued. The renewal letter and the expired FAA Form 8310-5 establishes the renewal for an IA holder until the next renewal year of 2023 or until your FAA Form 8310-5 is endorsed and dated as prescribed in 14 CFR 65.95. The IA holder is required to have this letter available while exercising the privileges and limitations of an Inspection Authorization. Additionally, IA holders may select any of the available options to submit their IA renewal application to the FAA.

1. In Office Renewal by Appointment.

FAA offices that are currently open and have the appropriate personnel available (AW ASIs, Avionics ASI, or AST) to perform IA renewals may elect to utilize the existing renewal process in FAA Order 8900.1, Vol 5, Ch 5, Sec 8.

Note: Record the IA renewal activity in Safety Assurance System (SAS) and the enhanced Vital Information Database (eVID). SAS has replaced the PTRS recording requirements. Additionally, update the office files and send a copy of the IA renewal file to the Airman Certification Branch, AFB-720.

2. Renewal by Mail.

FAA offices may process IA renewal applications received by mail in conjunction with FAA Order 8900.1, Vol 5, Ch 5, Sec 8. Applications received by mail must include the evidence required to establish the IA holder's renewal eligibility. The IA holder is not required to include their FAA Form 8310-5 with their renewal package. However, if included the ASI/AST may endorse, date and mail the form back to the IA holder. If the form is not included then the ASI/AST must mail/email a completed IA renewal letter to the IA holder after renewal.

Note: Record the IA renewal activity in SAS and eVID. Additionally, update the office files and send a copy of the IA renewal file to the Airman Certification Branch, AFB-720.

3. Renewal by Electronic Mail (email).

FAA offices may process IA renewal applications received through e-mail in conjunction with FAA Order 8900.1, Vol 5, Ch 5, Sec 8. The emailed application and attachments (evidence for renewal) may be scanned, photo images, or PDF with a digitized signature. The IA holder is not required to include a copy or mail their FAA Form 8310-5 to the FAA office. ASI/AST must mail/email a completed IA renewal letter to the IA holder after renewal.

Note: A digitized signature is an electronic graphical representation of an actual handwritten signature. When the image of a handwritten signature is created, it is saved using various methods such as using a signature pad, scanning a handwritten signature, or using digital photography. The digitized signature is comprised of the visible image only. The signature is “captured” in real time (i.e., at the time the user signs the document) or a previously saved image is applied. By itself, the digitized signature does not constitute the effect of an electronic signature. When a digitized signature is attached with the consent and knowledge of the signer to act as the individual’s signature, then it can be legally accepted. Note that a digital signature is not the same as a digitized signature. (*ref. FAA Order 1370.121A*)

Note: Record the IA renewal activity in SAS and eVID. Additionally, update the office files and send a copy of the IA renewal file to the Airman Certification Branch, AFB-720.

4. Renewal by Integrated Airman Certification and Rating Application (IACRA).

FAA offices may process IA renewal applications received through the IACRA platform in conjunction with FAA Order 8900.1, Vol 5, Ch 5, Sec 8. IA renewals are new to the IACRA platform and is currently limited to renewals only. To use IACRA both the IA and the ASI/AST must have an IACRA account. To open an IACRA account the requestor (IA, ASI/AST) must log on to <https://iacra.faa.gov/IACRA/Default.aspx> and select register, then follow the on-screen steps.

Note: ASI/AST authorized to perform IA renewals using IACRA must perform periodic checks of the system for IA renewal applications. IACRA does not send email notifications to the office when or if an application is waiting in cue.

Training and Familiarization

FAA personnel unfamiliar with the IACRA automation can follow the steps in the **FAA IACRA User Guide** to initiate an account, retrieve/review a submitted IA application (and associated documents), and sign or return the application.

Note: IAs, who are unfamiliar with the IACRA automation, may follow the steps found in the **IA IACRA Familiarization User Guide** to initiate an

account, submit an IA application for renewal and retrieve the system generated renewal letter.

The IACRA platform contains a training site that is available to all IACRA users. The training site is located on the IACRA Homepage under “Training and Documentation. It provides the user with all the needed information, including "fictitious" logins, to practice completing most types of applications. Training users can create applications, as well as perform the duties of applicants and certifying officials.

<https://iacra.faa.gov/IACRA/TrainingAndDocs.aspx>

When an ASI/AST approves/signs an IA renewal in IACRA, the system will auto-generate a completed PTRS record for the renewal event and send it directly to SAS. At this time, the ASI/AST conducting the renewal will still need to access eVID separately and update the IA’s information.

5. Renewal by Oral Test (virtual).

FAA offices may process IA renewal applications based on an oral test in conjunction with FAA Order 8900.1, Vol 5, Ch 5, Sec 8. The oral test may be administered virtually using the information in the “*Use of Video and Communication Technology (VCT) Memorandum distributed April 22, 2020*”. If an oral test has been selected as a renewal option, then an ASI must conduct this test.

Note: It is the responsibility of the ASI conducting the oral test for renewal to establish the positive identification of the applicant. The use of live visual electronic methodology (i.e. Zoom, MS Teams, etc.) is an acceptable means to establish positive identification. At successful completion of the virtual oral testing for renewal, the ASI must issue a renewal letter electronically or by mail authorizing the IA to exercise the privileges of their authorization until the next renewal cycle. Record the IA renewal activity in SAS and eVID. Additionally, update the office files and send a copy of the IA renewal file to the Airman Certification Branch, AFB-720.

Key Elements for Success.

- The ASI may use the attached renewal letter as an acceptable alternative instead of endorsing FAA Form 8310-5. This letter and the expired FAA Form 8310-5 establishes the renewal for an IA holder until the next renewal year of 2023 or until your FAA Form 8310-5 is endorsed and dated as prescribed in 14 CFR 65.95. The IA holder is required to have this letter available while exercising the privileges and limitations of an Inspection Authorization.
- FAA Office managers or delegate must ensure the ASI/AST using IACRA are authorized to perform IA renewals.
- ASI/AST authorized to perform IA renewals using IACRA must perform periodic checks of the system for IA renewal applications. IACRA does not send email notifications to the office when or if an application is waiting in cue.

- IACRA contains its own training site and a familiarization guide specific to IA renewals is published with this guidance. It follows the same procedures as FAA Order 8900.1, Vol 5, Ch 5, Sec 8. All actions on this platform are performed electronically.
- IACRA automatically updates SAS, however, the ASI/AST must manually update eVID.
- In cases where the IA holder's FAA Form 8310-5 is damaged or unreadable, the ASI/AST may issue a replacement.

We appreciate the opportunity to assist you. If you have any additional questions regarding this memorandum, please contact the Aircraft Maintenance Division, AFS-300, at (202) 267-1675.