

ADVISORY CIRCULAR

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SUBJECT: GUIDELINES FOR LAR 147 ATOs ON MANAGING CHANGES CAUSED BY THE COVID-19 PANDEMIC, WITH THE CORRESPONDING RISK ASSESSMENT AND MITIGATION

1. PURPOSE

This advisory circular (AC) provides information and guidance on the measures that may be adopted by an aviation training organization (ATO) - LAR 147 for the training of aircraft maintenance mechanics in order to address the changes caused by the COVID-19 pandemic that impact their theoretical and practical training activities.

2. SCOPE

2.1 This AC is intended for LAR 147 ATOs requesting temporary exemptions regarding:

- a) the extension of the expiration date of the ATO certificate issued by the Civil Aviation Authority (CAA) or of the continued validity of the certificate when the ATO has not been inspected/audited within a maximum period of 24 months by the certifying CAA;
- b) the training programme approved by the CAA for the training of aeronautical personnel; and
- c) the procedures to comply with LAR 147 requirements, as established in the ATO's training and procedures manual (TPM).

Note. – The extension of the validity of certificates or deviations from compliance with LAR 147 requirements within the context of COVID-19 are considered to be exemptions.

3. APPLICABILITY

3.1 This guidance material is not of a mandatory or regulatory nature. It describes acceptable, but not the only means that the ATO can adopt to address the changes caused by COVID-19, in relation to the request for easing measures as temporary exemptions related to requirements established in LAR 147 and procedures accepted by the CAA in the TPM.

3.2 The temporary exemptions described in this AC shall not be used by those ATOs that have been suspended or partially suspended in the last two (2) years since the start of suspension of activities due to social isolation measures issued by the States

4. ANNEXES AND REGULATIONS RELATED TO THE AC

- a) Annex 1 - Personnel Licensing, Appendix 2, Amendment 176.
- b) LAR 147 – Civil aviation training centres for aircraft maintenance mechanic training, Amendment 6, February 2019.

5. RELATED DOCUMENTS

- a) Recommendation 3 of safety-related measures of the ICAO Council COVID-19 aviation recovery task force (CART) report, June 2020.
- b) Document 10144 – ICAO Handbook for CAAs on the management of aviation safety risks related to COVID-19, First edition, May 2020.

- c) SAM Strategic Framework, Activity 10 – Safety risk map.
- d) Official Record Series 4, United Kingdom Civil Aviation Authority, General Exemption E 5024, March 2020.

6. INTRODUCTION

- 6.1 Due to physical distancing restrictions, closure of workplaces, and other preventive measures adopted by the States to prevent or reduce the spread of the coronavirus, the International Civil Aviation Organization (ICAO), in order to facilitate safe operations during the COVID-19 pandemic, through letter AN 11/55-20/50 dated 3 April 2020, encouraged States to be flexible in their approaches, while adhering to their obligations under the *Convention on International Civil Aviation* (Doc 7300, Chicago Convention).
- 6.2 Following ICAO guidelines, States have adopted various measures to maintain the validity of certificates, licences and other approvals of service providers and aviation personnel during the COVID-19 pandemic. These measures, which may include temporary deferral of national regulatory requirements, also known as extensions, reliefs or easing of measures, and which are necessary to maintain aviation operations during the COVID-19 pandemic, constitute temporary exemptions or deviations and thus, must be reported as differences in accordance with Article 38 of the Chicago Convention. See paragraph 1.2.5 of ICAO Doc 10050 on temporary or short-term differences.
- 6.3 Although 147 ATOs are not required to have a safety management system (SMS) because they do not conduct air operations that are exposed to safety risk, as set forth in Annex 19 to the Convention on International Civil Aviation, the training they provide is subject to organisational hazards and risks as a result of the COVID-19 pandemic, which shall be assessed within their quality assurance system due to the impact that this pandemic has on the social, economic and health aspects of the country, which generates changes in their environment that they must manage, as described in the following section.

7. MANAGEMENT OF CHANGE

- 7.1 Restrictions resulting from COVID-19 have caused dynamic changes in the provision of services, aircraft operations, and civil aviation systems of States.
- 7.2 Within this context, 147 ATOs will have to identify the element(s) triggering these changes, which may be of various types, such as:
 - a) introduction of new training technologies;
 - b) changes in the operating environment;
 - c) changes in key personnel;
 - d) significant changes in staffing levels and number of students;
 - e) requirements or restrictions established by State authorities other than the aviation authority;
 - f) impairment of the productive and economic capacity of the State;
 - g) significant restructuring of the organisation; and
 - h) physical changes (new facilities) or changes in the general layout of the organisation, among others.
- 7.3 Based on these triggers, the ATO will identify new hazards and risks introduced into its organisation by COVID-19, in order to adopt the corresponding mitigation measures to reduce risks in the provision of its training services.
- 7.4 147 ATOs will also take into account the impact of change on their personnel. This could have an impact on the way in which the affected individuals accept change. Early communication and participation will usually improve the way in which changes are perceived and implemented.

- 7.5 For 147 ATOs to be able to provide their services during the COVID-19 pandemic, they must obtain from the CAA that granted the certificate the corresponding authorisation to operate with extended certificates or without being subject to an inspection/audit within a maximum period of 24 months in the case of ATOs with certificates that have no expiration date, as established in LAR 147.
- 7.6 They can also ask for easing measures through exemptions to other LAR 147 requirements that, as a result of COVID-19, would be impossible to meet due to certain restrictions established by the State.
- 7.7 For the cases described in paragraphs 7.5 and 7.6, which are regulatory requirements covered by procedures set forth in the TPM (approved by the accountable manager and accepted by the certifying CAA), the ATO shall submit to the CAA a request for a temporary exemption for the duration of the COVID-19 pandemic.

8. EXEMPTION ACCEPTANCE PROCESS

8.1 Initial analysis of risks resulting from changes caused by the COVID-19 pandemic

- a) The existing systematic hazard identification processes of 147 ATOs will permit a proper initial risk analysis (hazard identification, risk assessment and mitigation) of the changes caused by COVID-19.
- b) Given the dynamic changes in theoretical and practical (workshops) training caused by the pandemic, the ATOs will continuously update or amend their risk management processes, especially when moving from restricted operations during the pandemic to normal unrestricted operations, given the drastic change to be experienced by the civil aviation system.
- c) It is important that training organization provide a description of their systems, with their interfaces and interactions, so that the personnel may know and fulfil their safety management duties and responsibilities within the context of training provided to aeronautical personnel. The following are the phases that have been identified in relation to the management of risk and exemptions during and after the pandemic:
 - i) **during the pandemic:** period that includes training provided while exemptions to regulatory requirements are in force, the renewal of which will depend on the evolution of the COVID-19 pandemic, physical restrictions in place, whether full or moderate, and health protocols for controlling the spread of the virus. This stage is directly dependant upon the evolution of the pandemic and the adoption of measures to curb its spread.
 - ii) **before starting normal operations:** period in which it is foreseen that physical and sanitary restrictions will be eliminated to resume normal operations.
 - iii) **during the first months of normal operations:** period in which all exemptions will be eliminated and the effectiveness or validity of certificates, licences, authorisations, ratings and other approvals that had been subject to an exemption will be restored. During normal operations, the ATOs will operate without any physical or sanitary restrictions.

Figura 1 - Fases relacionadas a la gestión de riesgos y exenciones durante y después de la pandemia



8.2 Applying for an exemption to LAR 147 requirements that involves a temporary revision of the TPM

- a) Once the ATOs identify the hazards and their possible consequences, they will develop the risk and extension management matrix, showing possible mitigations and operational conditions to be implemented during the pandemic, before starting normal operations and during the initial months of normal operations.
- b) Next, the ATOs will submit to the certifying CAA the corresponding request for exemption on the extended currency or continuing validity of the certificate, as well as on those LAR 147 requirements that, due to COVID-19, cannot be complied with, in the form and manner established in the national regulations. **Appendix C** describes the documentation to apply to the CAA for the corresponding exemption.
- c) As attachments to the request, the ATOs will submit the risk analyses of the new hazards identified as a result of changes brought about by COVID-19 and the temporary amendments to the TPM.
- d) The mitigations established in the risk analyses and the operational considerations will be the barriers that will substantiate the requested exemptions.
- e) Only when the CAA has authorised the requested exemptions, the ATOs will be able to operate according to the authorisation granted.

8.3 Acceptance of the request for exemption

When submitting the request, the ATO will also attach, in addition to the risk analyses, the revised TPM containing the training programmes for its personnel. So as not to modify the order of the TPM and facilitate their removal when starting normal operations, these modifications must be contained in an additional chapter or appendix.

It is important to note that the CAA will assess these exemptions resulting from COVID-19 as promptly as possible, and may even generate new procedures, in order to eliminate any bureaucratic difficulties that may hinder the resumption of partial activities by the ATO during the pandemic.

8.4 Training of ATO personnel in the amendments made to the TPM, in accordance with the amended training programme

Once the requested exemption has been granted and TPM amendments have been accepted, the head of the ATO training department will be responsible for training the staff of instructors and examiners in the revised and amended procedures to ensure their proper implementation. It is important that training be provided to the personnel so that they may adapt to the assigned tasks and responsibilities.

8.5 Training records

According to TPM record control procedures, detailed physical or electronic records shall be kept to demonstrate that the staff has received proper training in the revised TPM.

9. EXAMPLES OF EXEMPTIONS, IN THE FORM OF EASING MEASURES, FOR A 147 ATO DURING THE COVID-19 PANDEMIC

9.1 Extension of the date of expiration or continued validity of the ATO certificate when the ATO has not been inspected/audited during the preceding 24-month cycle

- a) This extension will be granted provided the ATO demonstrates effective implementation of the corrective action set out in the corrective action plan (CAP) corresponding to the last oversight audit conducted by the CAA, within the 24-month cycle established in paragraph (b) of Section 147.120.

- b) Likewise, they shall have implemented a quality assurance system, in accordance with ICAO Doc 9841 – Manual on the approval of training organizations, Appendix B, Section 5, which includes an on-going analysis of organisational risks, which is an inventory of identified hazards and risks that entail a probable risk of non-compliance with training performance requirements, focusing on “quality threats”, based on which the corresponding risks will be analysed and mitigated. This assessment must be documented and accepted by the CAA.
- c) Likewise, in the revised TPM, the ATO shall include procedures to ensure the planning, control and performance measurement of the training it offers, as a result of the changes brought about by COVID-19.

9.2 Virtual theoretical courses

- a) ATOs may request an exemption in order to provide theoretical courses in a virtual format, for which they can apply the criteria set forth in Appendix 18 to LAR 141, in a percentage greater than that established by subject matter, as long as they follow all the guidelines established in said appendix.

Note. - The distance learning option is not regulated in LAR 147.

- b) The ATO shall ensure that partial and final evaluations on each subject matter follow a procedure that ensures remote monitoring of each student by the instructor, and that there is evidence thereof for the CAA, always following the principles of reliability, truthfulness, authenticity and objectivity when conducting such evaluations.
- c) Courses should be recorded in a registry so that the CAA may inspect them when deemed appropriate.
- d) Remote attendance/participation of students in these courses must be recorded. The ATO will demonstrate, through established means agreed with the CAA, that all students meet the attendance requirements, and their active participation in class shall be assessed.
- e) To supplement virtual courses, it would be advisable to conduct virtual workshops or forums to clarify any doubts about thematic contents before conducting knowledge checks.
- f) To this end, each ATO will submit the revised training programme for the courses it has been authorised, to be carried out in virtual format, in accordance with the requirements contained in Appendix 18 to LAR 141.

9.3 Internal audits of the quality assurance system

The ATO may request an exemption to the performance of audits to its quality assurance system as required in Section 147.225, by submitting a revision of its 2020 internal audit plan, providing a new schedule, and requesting authorisation to conduct partial desktop audits, self-assessments, or questionnaires instead of on-site audits while isolation measures are in force and the pandemic persists. To this end, it will submit the procedures on how they will be carried out and the way in which findings will be followed up, for the acceptance by the CAA.

9.4 Extension of the currency of the designated maintenance examiners

- a) In accordance with Section 147.245, in order to perform the functions of designated maintenance examiner in a 147 ATO, the holder of the authorisation must have a proficiency check every 12 months in the workshop in which he/she will carry out the evaluation of the students, who require the granting of the corresponding licence and/or rating.
- b) If these checks cannot be carried out by the CAA on the specified dates because of the measures established by the State as a result of COVID-19, the ATO could request an exemption for

extending the currency of such checks, by presenting a risk analysis and the corresponding mitigation measures to be applied during the pandemic and before resuming normal service.

10. MANAGEMENT OF EXEMPTIONS

10.1 Implementation of mitigations

Once easing is authorised by the CAA, the ATOs will implement the mitigation measures that have been established as a result of the risk analysis.

10.2 Operational and health considerations during the pandemic

a) Operational

- i) Operational considerations during the pandemic will enable the ATO to verify if mitigation measures were appropriate and identify new potential hazards. Likewise, the implementation of barriers and training quality performance measurements will ensure the efficiency of risk controls applied during the pandemic.
- ii) All the results obtained shall be documented as part of training quality risk management (hazards, consequences, risk assessments, and all the mitigation measures adopted to control such risks), preferably in digital format.
- iii) The documentation will be a basic source of knowledge about training efficacy and may be used as a reference for decision-making regarding the improvement of the training process of aeronautical personnel to apply for an aircraft maintenance mechanic licence.
- iv) Another important aspect is that all this information will provide material for trend analysis and will allow ATOs to make data-driven decisions.
- v) In order to determine if a ATO is capable of complying with all the ratings authorised by the CAA in its training specifications (ESIN), it will conduct a risk analysis, and if it is determined that any rating (training course) can generate a risk that cannot be mitigated, it shall cease such activity and inform the CAA. In case of self-suspension, the ATO will not need to request an amendment of the training specifications.
- vi) It should be noted that the critical processes carried out by the ATO during this period can change depending on the evolution of the pandemic (resurgence).

b) Health

- i) Health considerations applied during the pandemic and before starting normal operations must be those established by the State Health Authority for organisations providing theoretical and practical training, based on the phase of the pandemic in the State.

10.3 Considerations before starting normal operations

- a) Once the CAA has set the date in which normal activities can be resumed, the ATOs will develop a **recovery plan** defining all the activities required to restore the temporary exemptions granted and resume normal operations in an orderly and safe manner. This plan will be submitted to the CAA for acceptance and oversight.
- b) Among their main activities, ATOs will immediately start reviewing the TPM to identify what procedures could be removed or what procedures can be improved. Once this task has been completed, they shall hold virtual meetings with the ATO main inspector to properly address the issues that will be modified in the manual in order to ensure acceptance of the TMP by the CAA.
- c) Once the TPM has been accepted, the ATO will immediately train all its personnel to ensure that they are aware of, and understand, the changes.
- d) The **recovery plan** will contain a sequential task schedule, indicating the time to be devoted to each of the different tasks and activities over a given period of time, specifying the different

exemptions and the activities to be carried out to resume normal operations in accordance with the corresponding requirements. Accordingly, it is recommended that a Gantt chart be developed and attached to the recovery plan. **Appendix D** contains an example of a Gantt chart.

- e) In order to ensure that the **recovery plan** covers all the activities required for a smooth restart of normal operations by the ATO, the training organization will conduct a self-assessment to determine its status, especially concerning those processes affected by the exemptions granted due to COVID-19, as may be the case of the hands-on phase in maintenance workshops.

10.4 Considerations upon restart of normal operations

- a) When starting normal operations, the ATO will implement the **recovery plan** to roll back the exemptions granted, in an orderly and safe manner. The plan will be implemented in accordance with the established timetable accepted by the CAA.
- b) Once normal activities are resumed, the ATO shall not maintain the temporary exemptions related to COVID-19. In the event that temporary exemptions are maintained after the pandemic, the CAA will notify ICAO of the corresponding differences through the regular EFOD system.
- c) Once normal activities are resumed, the ATO will conduct a new self-assessment of the processes, in order to determine if certification standards continue to be met.

11. RECOVERY PLAN

11.1 Content

- a) The recovery plan will be a document to be submitted by the ATO, signed by the accountable manager, that defines how the training organization will resume normal activities. This document must be aligned with the recovery of the processes required for normal operation of the ATO; therefore, it will include all the operational aspects involved in the reestablishment of said processes.
- b) The recovery plan must describe its objective, scope, the requirements that were subject to exemption, recovery activities, responsible parties, safety risk management, taking into account the transition to normal operations, control and monitoring processes, and estimated duration.
- c) Likewise, the recovery plan will include criteria to determine if a safety issue cannot be solved through the normal procedures, due to the reduced ability of the training organization to execute essential processes.

11.2 Format

The ATO is expected to develop a recovery plan that contains at least the following sections:

- a) introduction;
- b) objective;
- c) scope;
- d) description of the requirements that were the object of exemption;
- e) description of recovery activities, with start and end dates;
- f) responsible parties;
- g) resources required;

- h) safety risk management;
- i) control and monitoring;
- j) ATO capabilities under conditions of non-normal procedures; and
- k) Gantt chart (appendix).

Note: Items (e) and (f) must be part of an implementation plan (Gantt), with estimated dates and signed by the accountable manager. Whenever a deadline is not met, the plan must be revised and updated, and signed by the accountable manager for acceptance by the principal inspector of the ATO.

12. BACK TO NORMAL

- 12.1 Once training activities are stabilised following the COVID-19 pandemic, the quality system will assess the risk associated with the use of the exemptions granted, with particular attention to the risks associated to the staff of instructors and examiners who have been out of work for an extended period of time due to the reduction of ATO training activities, or any other possible impact of the COVID-19 crisis on human factors, including students receiving training.
- 12.2 It is expected that temporary exemptions or extensions will be valid until 31 March 2021 or until ATO operations go back to normal, whichever occurs first.

13. EXAMPLES OF MATRICES AND TABLES FOR MANAGING RISKS AND EXTENSIONS GRANTED

- 13.1 **Appendix A** contains examples of matrices for managing risks and extensions granted, so that ATOs can have a reference in developing their own risk analyses and in establishing the operational considerations that should be observed in each identified phase. The risk analyses will be submitted to the CAA, along with the application for exemption, in accordance with CAA regulatory requirements.
- 13.2 **Appendix B** shows examples of likelihood and severity tables and safety risk assessment matrices, in accordance with the sample tables and matrices contained in Doc 9859, Fourth edition. However, the CAA will provide guidance to its service providers on the use of the risk assessment methodology adopted by the State.
- 13.3 **Appendix C** describes the documentation to apply to the CAA for exemptions to the expiration date of the certificate or to the continuing validity of the ATO certificate, as well as to certain requirements of LAR 147.
- 13.4 **Appendix D** contains an example of a Gantt chart of the recovery plan.

APPENDIX A

Example of matrix for managing risks and exemptions granted to LAR 147 ATOs as a result of changes brought about by COVID-19

Process	Examples of hazards	Examples of possible consequences	Examples of risk index	Examples of possible mitigations	Operational considerations during the pandemic	Considerations before resuming normal service	Operational considerations during the first months of normal service
Management of change	Non-compliance with quality assurance system audits scheduled for 2020.	<p>Impaired quality of processes and procedures carried out by the ATO.</p> <p>Lack of feedback.</p> <p>Lack of implementation of the Improvement Plan.</p> <p>Deterioration of the quality of training</p> <p>Absence of a root cause analysis and of timely resolution of issues identified during audits conducted by the CAA.</p>	Example 4C	<ul style="list-style-type: none"> - Maintain remote audits according to available capacity. - Review of key training processes. - Review of the audit plan, adapting its application to the most critical processes. 	<ul style="list-style-type: none"> - Through the quality assurance system (QAS) diagnose possible changes in processes and/or procedures during the pandemic. - Consider remote training, with new quality indicators for analysis and control. - Maintain the competencies of the staff in charge of QMS processes. - Modify management indicators and objectives initially set. 	<ul style="list-style-type: none"> - Monitor the processes that could not be maintained due to the cessation of activities, and develop the recovery plan with key ATO staff, for its gradual implementation. - Rescheduling of audits according to the activities to be resumed. 	<p>Implement the recovery plan in terms of:</p> <ul style="list-style-type: none"> - Reactivate audits. - Monitor the quality levels of the service provided. - Rigorous measurement of teaching quality. - Consider a training support programme, in cases of post-COVID-19 personal or learning difficulties.
Management of change	Abrupt interruption of the training programme for the instruction of aircraft maintenance mechanics.	<ul style="list-style-type: none"> - Forgetting concepts and theories discussed in the classroom. - Reduction of the level of expertise in maintenance tasks achieved in the practical phase. - Demotivation and/or stress associated with the pandemic situation. 	Example (4C)	<ul style="list-style-type: none"> - Develop training programme remotely, with the appropriate platforms and systems. - Develop interactive methodologies to improve the interest and understanding of the subject matters taught and their application in maintenance tasks previously performed by the students. - Implementing talks with specialists for the 	<ul style="list-style-type: none"> - Maintain contact with the trained students. - Give remote classes to ATO students, developing this methodology in the TPM, applying the requirements set forth in Appendix 18 to LAR 141, for its approval by the CAA. - Develop safety webinars for students of different programmes related to aircraft maintenance. - Plan the restart of the practical phase, when the situation allows it, with 	<p>Develop the recovery plan, which involves:</p> <ul style="list-style-type: none"> - Rescheduling the interrupted training process. - Diagnosis and levelling of students' knowledge. - Review of maintenance tasks. - Continue with the protection, cleaning and disinfection measures resulting from COVID-19 in workshops where the 	<p>Implement the recovery plan, taking into account:</p> <ul style="list-style-type: none"> - The establishment of flexible study schedules. - A gradual return to the classrooms and consideration of classes with less daily time load. - A reinforcement plan for students with theoretical and practical knowledge deficits.

Process	Examples of hazards	Examples of possible consequences	Examples of risk index	Examples of possible mitigations	Operational considerations during the pandemic	Considerations before resuming normal service	Operational considerations during the first months of normal service
				management of stress and motivation of students.	reduced groups and in different schedules, giving priority to the students in the final phase of the course. - Comply with sanitary measures, ensuring students and instructors wear personal protection equipment. - Comply with the requirements of cleaning and disinfection of workshop environments and specific equipment to be used in the practical phase, specifically for COVID-19. - Remote student attendance/participation must be recorded using the method accepted by the CAA. The ATO must be able to demonstrate that all students meet the attendance requirements.	practical phase is carried out.	- Monitoring of students with motivation or stress problems after COVID-19.

Appendix B

Examples of likelihood and severity tables and risk assessment matrices

Figure 1: Example of training programme quality risk likelihood table

Likelihood	Meaning	Value
Frequent	Likely to occur many times (has occurred frequently)	5
Occasional	Likely to occur sometimes (has occurred infrequently)	4
Remote	Unlikely to occur, but possible (has occurred rarely)	3
Improbable	Very unlikely to occur (not known to have occurred)	2
Extremely improbable	Almost inconceivable that the event will occur	1

Note. – This table is only an example. The level of detail and complexity of the tables and matrices must be tailored to the particular needs and complexities of each ATO. It must also be taken into account that ATOs may include both qualitative and quantitative criteria.

Figure 2: Example of training programme quality risk severity table

Severity	Meaning	Value
Catastrophic	The quality of the training programme has deteriorated during COVID-19, to a degree that affects student overall proficiency and can lead to unsatisfactory results on knowledge exams and proficiency tests before the CAA.	A
Hazardous	The quality of the training programme has deteriorated during COVID-19, to a degree that partially affects student proficiency and can lead to unsatisfactory results on knowledge exams and proficiency tests before the CAA.	B
Major	The quality of the training programme has deteriorated during COVID-19, to a degree that affects student proficiency on some subject areas and practical tasks, which could cause some difficulties in passing the knowledge exams and practical tests before the CAA.	C
Minor	The quality of the training programme has deteriorated during COVID-19, at a level that minimally affects student proficiency and the results on knowledge exams and practical tests before the CAA.	D
Negligible	The quality of the training programme has deteriorated during COVID-19, in immaterial aspects that do not affect student proficiency or the results on knowledge exams and practical tests before the CAA.	E

Figure 3: Example of risk matrix

Probability of risk	Severity of risk				
	Catastrophic A	Hazardous B	Major C	Minor D	Negligible E
Frequent 5	5A	5B	5C	5D	5E
Occasional 4	4A	4B	4C	4D	4E
Remote 3	3A	3B	3C	3D	3E
Improbable 2	2A	2B	2C	2D	2E
Extremely improbable 1	1A	1B	1C	1D	1E

Table 4. Example of risk tolerability table

Safety risk index range	Description of risk	Recommended action
5A, 5B, 5C, 4A, 4B, 3A	INTOLERABLE	Take immediate action to mitigate risk or cease activity. Perform priority quality risk mitigation to ensure that additional or enhanced preventive controls are in place to reduce the risk index to the tolerable range.
5D, 5E, 4C, 4D 4E, 3B, 3C, 3D, 2A, 2B, 2C, 1A	TOLERABLE	May be tolerated based on the mitigation of training quality risk. May require a management decision to accept the risk.
3E, 2D, 2E, 1B, 1C, 1D, 1E	ACCEPTABLE	Acceptable as is. No further risk mitigation required.

Appendix C

Documentation to apply to the CAA for exemptions due to changes generated by the COVID-19 pandemic from the CAA

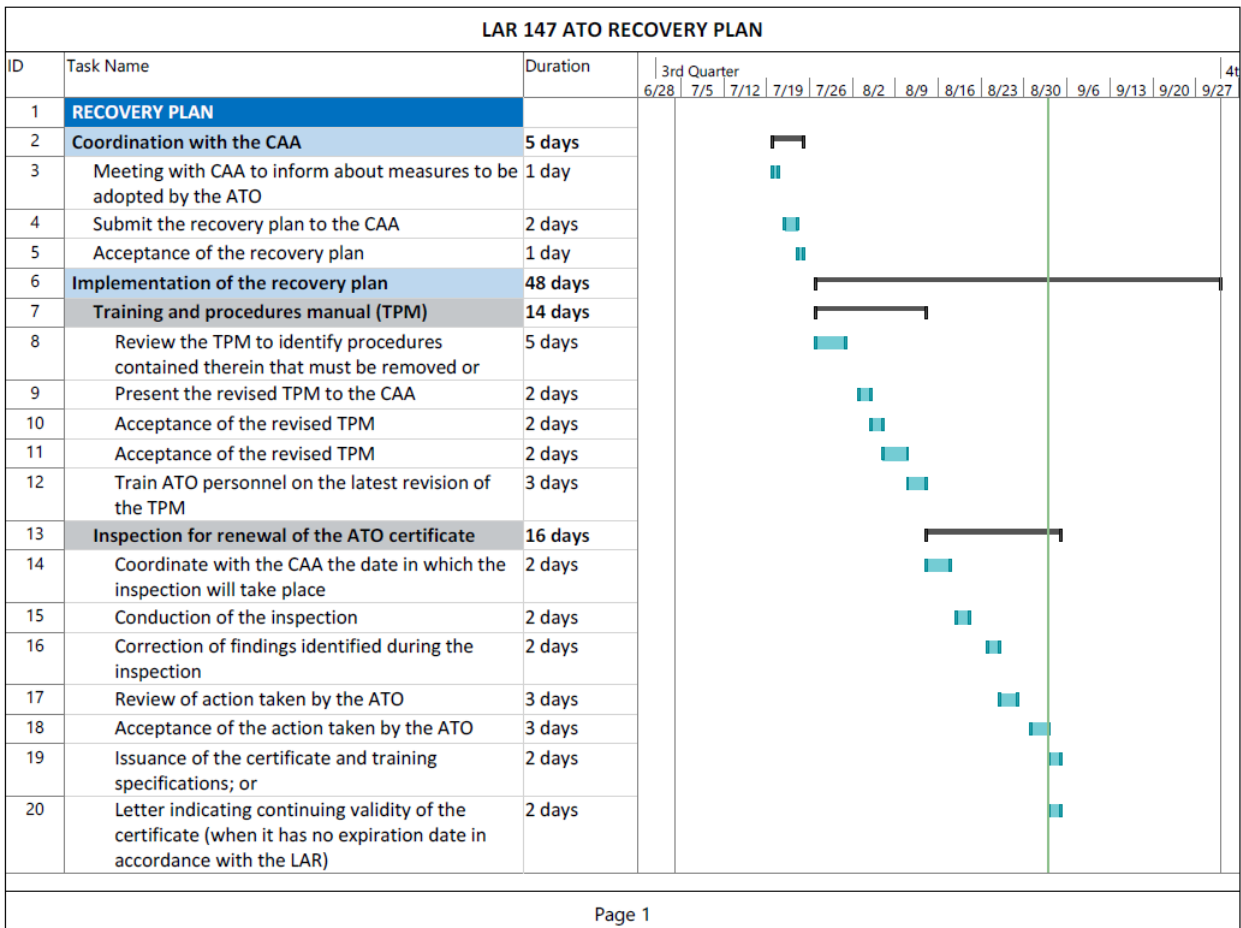
The ATO shall submit, in the form established by the CAA, the following:

1. Letter addressed to the CAA, signed by the ATO accountable manager, requesting a temporary exemption for the extension of the date of expiration of the certificate or of the continuing validity of the certificate when the LAR 147 ATO has not been inspected/audited in a maximum period of 24 months and/or on the requirements of LAR 147.
2. Risk analysis with the corresponding mitigations and operational considerations proposed by the ATO, to support the request for exemption to be submitted to the CAA, which will allow the ATO to continue offering the training services indicated in its training specifications.

***Note.** – The applicant shall take into account that the granting of exemptions from the requirements of LAR 147 will be conditioned on the risk analysis related to the management of change resulting from the impact of the pandemic and possible mitigations presented by the ATO.*

3. A statement from the ATO indicating that, before starting normal operations, it will coordinate and submit for approval by the authority the **recovery plan**, in which it will describe all activities and deadlines for revoking the authorised exemptions.

APPENDIX D Example of a Gantt chart for the recovery plan



LAR 147 ATO RECOVERY PLAN																	
ID	Task Name	Duration	3rd Quarter														
			6/28	7/5	7/12	7/19	7/26	8/2	8/9	8/16	8/23	8/30	9/6	9/13	9/20	9/27	
21	ATO quality system	10 days															
22	Update of the audit plan	3 days															
23	Conduction of internal audit	3 days															
24	Conduction of audits to external providers	4 days															
25	Annual maintenance examiner proficiency checks	7 days															
26	Programming of evaluations with the CAA	4 days															
27	Renewal of competencies and certificates	3 days															
28																	