



# FAA

## Aviation Safety

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### Memorandum

Date: March 31, 2020

To: All Manufacturing Inspection Offices  
All Manufacturing Inspection District Offices  
All Certificate Management Offices

From: Charles Huber, Manager Operational Oversight Policy Branch, AIR-6D0

Subject: Deviation to FAA Order 8120.23A, *Certificate Management of Production Approval Holders*, in Response to the COVID-19 Pandemic

Memo No: AIR600-20-6D0-DM134

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This memorandum authorizes a deviation to FAA Order 8120.23A for FAA offices and FAA personnel responsible for on-site certificate management (CM) oversight of production approval holders' (PAH) manufacturing facilities. This memo addresses requirements that cannot be met due to federal, state, and local government and Centers for Disease Control and Prevention (CDC) precautions taken to limit the spread of COVID-19.

The Aircraft Certification Service (AIR) System Oversight Division, AIR-800, with the support of the Policy and Innovation Division, AIR-600, intends to implement a CM oversight recovery plan that is expected to be completed by June 30, 2020. The plan may include mitigation strategies such as the FAA policy statement for the use of remote technology, virtual assessments of PAHs, and third party performance data, as determined by AIR-800. The ability to use remote technologies and performance data will be incorporated into the next revision to Order 8120.23.

This deviation memo extends all on-site CM oversight activities, including quality system audits (QSA), principal inspector audits, and supplier control audits required by FAA Order 8120.23A, Table 3-1, from September 30, 2020 to December 31, 2020.

This deviation memo also extends the hand-off procedures required in paragraph 3-16(a), from May 1, 2020 to August 31, 2020. This deviation memo does not apply to the yearly risk assessments due by March 31, 2020, as identified in FAA Order 8120.23A, paragraph 3-5. Additionally, the QSA team leader and member currency that is set to expire on September 30, 2020, in accordance with Order 8120.23A, paragraph 3-23, is renewed to September 30, 2021.

A copy of this deviation memo will be posted to the Regulatory and Guidance Library.

If you have any questions, please contact Steven Roomes, Manager, Surveillance and Oversight Policy Section, AIR-6D2, at (202) 267-1648 or at [steven.roomes@faa.gov](mailto:steven.roomes@faa.gov).