



December 13, 2024



Susan A. Northrup, M.D., MPH
Federal Air Surgeon
Office of Aerospace Medicine
Federal Aviation Administration
Washington, DC 20591



Dear Dr. Northrup,



The undersigned associations and unions represent commercial and general aviation pilots and airmen throughout the aviation industry. We write to request a stay in the implementation and consideration of the withdrawal of the Federal Aviation Administration's (FAA) recently announced change in policy affecting the handling of medical certificate applications.



As briefed to the industry, beginning January 1, 2025, the FAA is significantly altering the policy for the processing of medical certificates that require additional information for an FAA decision, with the FAA now initially denying rather than requesting additional information following deferral of the application. According to briefings provided to Aviation Medical Examiners (AMEs) and pilot advocacy groups, this change is driven by the FAA's interpretation of Section 801 in the FAA Reauthorization Act of 2024 (Public Law 118-63).



The FAA's use of denials, in lieu of the currently used deferral, as a routine part of the medical application process will significantly increase unneeded confusion for applicants and introduce unintended consequences for those under initial denial.



These initial denials will also be reportable on future medical applications and other applications the industry uses, such as employment applications, which ask whether a pilot has had a previous medical denial. The ramifications of an increase in airmen receiving and reporting medical denials on these applications and the need to educate hiring managers about this change are significant and will take considerable time.



The FAA's Office of Aerospace Medicine, under your leadership, has demonstrated a recent record of accomplishment grounded in progressive thinking and industry collaboration that has led to significant enhancements benefitting both the FAA and the pilot community. This includes changes to medication usage, cardiac conditions, and the collaborative Mental Health & Aviation Medical Clearances Aviation Rulemaking Committee. This change by the FAA of issuing letters of denial early in the process seems contrary to your goal of "getting to yes."



We support your office's desire to promote the submission of complete information at the time of initial medical application. In addition to reducing application time, it dramatically reduces the administrative burden on your staff and allows them to focus on evaluating submitted data. In addition, we look forward to the recommendations of the Aeromedical Working Group required by Congress in the most recent FAA Reauthorization. No doubt, system modernization as well as process improvements to include transparency for the applicant and his/her AME are key to success. These changes and your authorization to bring on more AMEs and medical specialists will go a long way to helping the FAA and the pilots the agency serves. We are very willing to help bring these improvements to reality.



The industry remains committed to working with the FAA on this issue in the collaborative environment that you have fostered and again, we urge the FAA to stay the implementation of this medical certificate policy change.

Regards,

Aircraft Owners and Pilots Association
Air Line Pilots Association
Allied Pilots Association
Coalition of Airline Pilots Associations
Experimental Aircraft Association
Flight School Association of North America
Independent Pilots Association
International Brotherhood of Teamsters, Airline Division
National Air Transportation Association
National Business Aviation Association
National Flight Training Alliance
NetJets Association of Shared Aircraft Pilots
Southwest Airlines Pilots Association
Vertical Aviation International