

	<p>REPUBLIC OF SOUTH AFRICA</p> <p>CIVIL AVIATION AUTHORITY</p> <p>GENERAL NOTICE # PEL-2020/003 Revision 2</p>	<p>SACAA Private Bag X 73 Halfway House 1685</p>
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## COVID-19 RESUMPTION OF TRAINING AND e-LEARNING

### 1. Applicability

This notice is applicable to all Aviation Training Organisations (ATO) approved in terms of the Civil Aviation Regulations, 2011 (As amended).

This notice replaces the GENERAL NOTICE # PEL-2020/003 Revision 1 dated 6 May 2020.

### 2. Purpose of this General Notice

This General Notice serves to address training conducted by all aviation training organisations approved in terms of the Civil Aviation Regulations, 2011 (As amended).

### 3. Background

On 15 March 2020, the President of the Republic of South Africa declared a national state of disaster regarding the COVID-19 outbreak. In this regard, the President also put in place several measures with the intention of limiting exposure and the potential spread of the virus. On 23 March 2020, in furtherance of the management of the state of disaster, the President declared a 21-day national lockdown effective 26 March 2020 at midnight. On 9 April the President further announced an extension of the lockdown up to 30 April 2020.

Furthermore, on 23 April 2020, the President announced the easing of restrictions of the lockdown to Level 4 from 01 May 2020, which would allow businesses to open the workplaces for a limited number of employees to return to work. The objectives under Level 4 means taking “extreme precautions to limit community transmissions and outbreaks, while allowing some activity to resume”. To this effect, the office of the Presidency published a summary of the alert levels linked to the different phases and this will be made available on the SACAA website. The phases stipulate the objectives for each phase and the sectors permitted to operate under each phase.

Applicants have made reference to the Proposal for Phased Economic Recovery dated 22nd April 2020 in order to commence training at Level 4 and have conducted a risk assessment in mitigation of their appeal.

#### **4. “Virtual platform” as published in Government Gazette 43271**

The Minister of Transport has taken the regulations promulgated by the Minister of Corporate Governance and Traditional Affairs published on 30 April 2020 and formulated his own regulation wrt the transport sector. This has resulted in the publication of new regulations in the Government Gazette 43271 dated 4 May 2020.

Paragraph 8 of Government Gazette 43271 refers to “virtual platform” training which is not defined. Clarity has been requested and received on the meaning of “virtual platform” as published. Virtual platform in terms of Government Gazette 43271 is in relation to learning conducted on e-Learning and webinar platforms only. FSTDs are excluded.

#### **5. Current situation with respect to training under level 4**

A number of ATOs made representation to commence training again and/or to train on-line, but not in the way envisaged by the impending e-Learning regulations.

Arguments have been given by ATOs on the urgency or the need to conduct training for other licensing issues by offering a form of e-Learning.

The SACAA has granted a general 90-day exemption which expires end of July 2020 for all licences and ratings required by an individual to operate. This would include aspects such as CRM, DG and SEPT etc.

#### **6. Resumption of training**

ATOs who already have an approval to conduct e-Learning may continue to do so. Interim approval has been granted to some ATOs to conduct training via webinar platforms and are adhering to the guidelines for e-Learning published later in this notice.

Please note that the SACAA is unable to predict at which stage of the lockdown levels that clearance will be granted to conduct normal training operations as this will be solely at the discretion of Minister of Transport.

Take Note that the SACAA grants approvals in terms of the Civil Aviation Regulations. The Director of Civil Aviation may in terms of Part 11 of the Civil Aviation Regulations grant exemptions to the regulations.

The regulations published by the Minister of Transport in the Government Gazette 43271 dated 4 May 2020 are interim regulations aimed at the combatting of the spread of the COVID 19 virus. These regulations are not Civil Aviation Regulations and consequently no person at the SACAA can grant an exemption, deviance or alternate means of compliance from them.

#### **7. e-Learning and virtual training**

ATOs seeking to conduct e-Learning training during the lockdown phases of COVID-19 are required to make normal application, together with payment and applicable TPM amendments via electronic

submission of documents to [PEL.Training@caa.co.za](mailto:PEL.Training@caa.co.za). Please note that no other form of document will be accepted other than those submitted via email. Please adhere to the Personnel Licensing communication protocol as published on the CAA website and do not send documents directly to the manager training or the training inspectors.

A complete replacement of Part 141 of the regulations and Technical Standards have been proposed by the SACAA and have been workshopped extensively with industry over the past two years. Participants in the working groups gave their approval on 3 March 2020 for the CAA to recommend the proposed amendment to CARCOM for ratification by the Minister.

The SACAA has in the past year used the attached proposal, with reference to Subpart 7 e-Learning, in the absence of regulations or standards, to grant interim approval to ATOs to provide e-Learning. The SACAA has faith that these regulations will be published in the near future, so the SACAA will not grant approval that fall outside of these proposals. No exams were to be written, if not on an approved e-Learning platform. This meant training can take place, but assessment according to the risk matrix in CATS 141 shall take place.

During the past month, interim approval was granted to some ATOs to conduct limited distance learning using the internet and whatever platform they have available. These interim approvals will automatically fall away once government approval is granted to commence training as the interim requests probably do not comply with current regulations wrt to facility requirements and the current approval of their curriculum.

Where an ATO does not have the capability to deliver training via an approved e-Learning platform, then the SACAA grants interim approval to conduct distance learning through virtual platforms such as Zoom and Microsoft Teams. ATOs shall submit a letter to [PEL.Trainin@caa.co.za](mailto:PEL.Trainin@caa.co.za) notifying the authority that they are deviating from their approved TPMs during the COVID 19 crisis in order to conduct virtual platform training. ATOs shall state that they will resume normal training operations once the Minister of Transports allows normal operations to continue.

It is the intention of the SACAA to develop regulations and guidelines for the conduct of virtual platform training as the SACAA recognises a cost benefit for ATOs. Proposals for the development of virtual platform training regulations and guidelines can be submitted to the Manager Training at [vorsterb@caa.co.za](mailto:vorsterb@caa.co.za).

## **GUIDELINE FOR E-LEARNING**

1. An ATO must be approved by the director before e-Learning can be endorsed.
2. An e-learning course, course material and assessments must be approved by the Director.
3. An Aircraft maintenance type, distance learning course, for aircraft above 5700 kg shall not be facilitated through e-Learning. Blended learning is acceptable for courses that also require a practical component
4. All e-Learning courses appearing on the ATO's Operations Specification (OpSpec) shall have a Skills/Knowledge test as applicable to the e-Learning matrix contained in this notice and this test shall be completed in a Controlled Environment.
5. The system should be of high integrity to minimize fraud and as a minimum meet the criteria set out in following guidance paragraphs.
6. Online Digital learning systems shall comply with the following general requirements as a minimum -

- (a) the programme shall have an acceptable identification system and password as a minimum-security feature in alignment with the risk matrix;
- (b) when conducting an evaluation or knowledge test under risk category 3 to 5 of the risk matrix, then the programme shall take a minimum of 15 random identifiable photos, or a continuous video, or invigilator monitoring the student during the evaluation or knowledge test;
- (c) exam records shall be maintained and shall not be able to be deleted or manipulated;
- (d) where applicable, an acceptable form of moderation must be demonstrated; if after moderation it is found the question was defective or not clear and the student is awarded the marks then a record from the moderator showing the student mark awarded must be kept with the results, however the marks on the system cannot be manipulated;
- (e) whenever a question is revised it shall be blocked from the random questions available to the student but, should remain in the system for audit purposes;
- (f) the programme information should have either a backup or be stored in different servers, in case of any eventualities happening;
- (g) a register of course revisions and/or changes should be kept in a safe manner preferably with an additional backup;
- (h) the programme shall assess the student when the exam/skills test time has lapsed regardless of the number of questions answered;
- (i) with the exception of timed modules trainees must be given adequate time to complete the training;
- (j) in the case where a minimum tutorial time applies, the programme shall not permit the student to write the accompanying knowledge test until those minimum tutorial course hours have been met and the course modules have been completed;
- (k) programme shall be built in a way not to allow fast forwarding to the knowledge test and any self-assessment must be completed;
- (l) the programme must regulate interaction during learning every 2 min and 30 seconds or logout the student automatically;
- (m) during exam/knowledge test, any disturbance/logout is regarded as a fail;
- (n) an instructor or a subject matter expert shall be available to assist the learner, who is using the programme;
- (o) the programme shall incorporate well-organized courseware with menus, modules and instructions;
- (p) the flow of information shall build and develop knowledge, skills and abilities in a logical order;
- (q) the usability of computer-based training systems in addressing software, human-computer interaction, and hardware factors shall be a primary consideration;
- (r) the programme should include audio and visual instructions;
- (s) where applicable, the e-Learning online system shall be designed to administer formative and/or summative tests to make a judgment on learner achievement;
- (t) the pass mark for the knowledge tests and exams shall be no less than the regulated / prescribed pass mark;
- (u) a learner is allowed a maximum of two re-writes then after, should redo the course for readmission to the exam;
- (v) a candidate shall receive their results after they have completed the exam and where the candidate is declared competent, the system must remediate to 100%;

- (w) the training programme and the system shall be approved by the Director; as per the risk matrix;
- (x) identity management and authentication shall be built into the system;
- (y) the system shall be hosted within the Republic of South Africa and have information protection mechanisms; and
- (z) all information shall be kept for a minimum period of five (5) years.

### E-LEARNING RISK CATEGORY MATRIX

Item	Risk Cat 1	Risk Cat 2	Risk Cat 3	Risk Cat 4	Risk Cat 5
Definition	Self declaration	Development and enrichment training. Not regulated but can be audited	Mandatory / Regulated theory exam with practical component	Mandatory / Regulated training with a knowledge test	Initial Licenses / Ratings
Authentication	Self declaration	Logon via Unique password	Theory - Logon via Unique password and signature of forms, Practical - instructor signature and license no on forms	Knowledge Test - Logon via Unique password, Rigorous/undeniable identification (biometrics / proxy controlled / controlled exam environment) record taken before / during assessment, Examiner signature	SACAA Authorised exam center, proof of ID on entry
Standards	Internally defined (Policy / TPM)	Internally defined and potentially approved by SACAA	As per regulations	As per regulations	As per regulations
Record keeping	Self declaration / Attendance	Audit trail	All data kept for 5 years	All data kept for 5 years	All data kept for 5 years
Moderation	None	Internal	Internal moderation and SACAA auditing	Internal moderation and SACAA auditing	Internal moderation and SACAA auditing

### E-LEARNING RISK CATEGORY MATRIX

Item	Risk Cat 1	Risk Cat 2	Risk Cat 3	Risk Cat 4	Risk Cat 5
Assessment	None	Online knowledge test, random questions from master list	Online knowledge test, random questions from master list; Instructor verification of knowledge during practical testing prior to completion of forms	Online knowledge test, random questions and answers from master list	As per regulations
Remediation	None	Any incorrect answers immediately remediated as per online database	Any incorrect answers immediately remediated as per online database for online or verbal discussion with learner	Any incorrect answers immediately remediated	As per regulations
Security Features	Can match signature if warranted by audit	Internal annual audit to database access and internal audit trail of results	Secure database of questions, annual audit of access to database theory: Online verification	Secure database of questions, annual audit of access to database	As per standard operating procedures
Examples	Flight experience	Lithium Battery, Thunderstorm avoidance	Welding, RNAV	Flight test, Dangerous Goods	Flight test

**Issued by the South African Civil Aviation Authority (SACAA)**

	<b>JOHAN NIEMAND</b>	<b>07 May 2020</b>
<b>SENIOR MANAGER: PERSONNEL LICENSING</b>	<b>NAME IN BLOCK LETTERS</b>	<b>DATE</b>