



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

800 Independence Ave., S.W.  
Washington, D.C. 20591

APR 17 2017

Mr. Rafael A. Robles  
General Counsel, Civil Air Patrol  
105 S Hansell St., Building 714  
Maxwell AFB, AL 36112-5937

Dear Mr. Robles:

This letter is in response to your request for clarification posted to [www.regulations.gov](http://www.regulations.gov) on March 29, 2017. In your letter, you ask for confirmation regarding which documents need to be maintained by the Civil Air Patrol (CAP) for CAP pilots operating under BasicMed in conjunction with exemption No. 11037A. You proposed that you would have to maintain copies of the covered pilot's potentially expired medical certificate, valid driver's license, BasicMed education course certificate and Comprehensive Medical Exam Checklist (CMEC).

As you surmised, pilots exercising pilot in command (PIC) privileges under this exemption may operate under BasicMed, as the conditions and limitations for exemption No. 11037A do not specifically require the PIC to hold a valid medical certificate.

For the purposes of demonstrating compliance with BasicMed, the FAA expects airman operating under Basic Med to produce a valid driver's license, and upon request, the course completion certificate from a FAA authorized BasicMed training course. Because there is no obligation for an airman to retain a medical certificate that has expired, the FAA will not routinely request such documentation. Because of the private medical information contained on the CMEC, the FAA will not routinely request this document unless it is necessary for the purposes of an investigation or potential enforcement action. Furthermore, in order to be eligible to receive a course completion certificate, the airman must provide the course provider with the name and license number of the physician as well as the date of examination. As such, the FAA considers the course completion certificate to be sufficient evidence that the airman has completed the comprehensive medical exam. While the CAP does not need to retain a copy of the pilot's CMEC in order exercise the privileges of this

exemption, the airman must still maintain the CMEC in his or her logbook in accordance with Title 14 of the Code of Federal Regulations (14 CFR) §61.113(i)(3)(i) .

For the purposes of complying with Condition and Limitation 13(c) of exemption No. 11037A, the FAA considers a facsimile of the pilot's driver's license and course completion certificate from a FAA authorized BasicMed training course to be sufficient documentation retention.

If you have any questions, please contact the General Aviation and Commercial Division at (202) 267-1100.

Sincerely,

A handwritten signature in cursive script that reads "James A. Viola".

*for* James A. Viola  
Manager, General Aviation and Commercial Division  
Flight Standards Service