



ANAC & FAA Validation Work Plan Job Aid

Revision History

Revision Date	Description of Changes
September 18, 2025	Initial Release

Table of Contents

Introduction	3
Work Plan Usage	3
Work Plan Types	4
Section 0 – Cover Page	4
Section 1 – Record of Changes	5
Section 2 – Description of the Project	5
Section 3 – Certification Basis	6
Section 4 – VA Involvement	6
4.1 Team Members	7
4.2 Involvement Areas	7
4.3 Familiarization	8
4.4 Issue Papers and Ficha de Controle de Assunto Relevante	10
4.5 Compliance Review	11
Section 5 – Reference Material	13

Introduction

Bilateral agreements facilitate the reciprocal airworthiness certification of civil aeronautical products imported / exported between two signatory countries. The Implementation Procedures for Airworthiness and Environmental Certification (IPA) provides for airworthiness technical cooperation between the Federal Aviation Administration (FAA) and Agência Nacional de Aviação Civil (ANAC) of Brazil.

The intent of this job aid is to standardize the way FAA and ANAC record that technical cooperation via validation work plans, and not to supersede requirements of any orders, policy, regulations, or bilateral agreements. This job aid is used in conjunction with ANAC and FAA orders, policy, regulations, and bilateral agreements.

This job aid assists ANAC program certification manager (PCMs) and FAA program/project managers (PMs) responsible for drafting the work plans in accordance with the IPA.

Work Plan Usage

The validating authority (VA) creates a work plan for all Non-Basic validations except those that require zero VA technical familiarization and zero VA compliance review. Per IPA Revision 2:

3.5.9.1(b): An initial work plan is created by the VA at the beginning of the validation program, based on VA review of the Non-Basic application package...

3.5.9.1(e): The VA may choose to have no further level of involvement beyond review of the application package, in which case no work plan is required...

Best Practice: To comply with the “at the beginning of the validation program” requirement above, the PCM/PM should aim to have an initial issuance of the validation work plan released within 3 months of an acceptable application package. It is understood that the initial issuance may have some TBD entries but that is acceptable. Note that an “acceptable application package” does not have to be a complete application package, especially on concurrent validations (ref. IPA 2, paragraph 3.5.5.1), and does not include any familiarization documents, meetings, or compliance review; it’s solely the list of application documents in IPA 2, paragraph 3.5.5.1.

Best Practice: For projects where the VA is still deciding its level of involvement during technical familiarization, that decision should be finalized via a revision to the work plan no later than a month after the conclusion of all familiarization activities (general and technical familiarization is complete). This does not necessitate a revision at this time if no changes need to be recorded.

Metrics: Note that this sets two metrics for work plans – that a first issuance is expected within 3 months of an acceptable application, and a completed LOI strategy within 1 month of familiarization completing.

Work Plan Types

The ANAC & FAA Validation Work Plan Template detailed in the following sections of this job aid will replace all other existing work plan styles and templates currently in use between ANAC and the FAA. Revisions to previously-approved work plans may continue to use an old format, but all new work plans will use this agreed style as of October 20, 2025.

Section 0 – Cover Page

The work plan template cover page consists of three parts: the header, the descriptor box, and the manager signature.

Work Plan Header

In the header of the first page, “ANAC & FAA Validation Work Plan Template” should be replaced with just the VA’s name and “Work Plan”, followed by a unique reference number for the work plan. Both FAA and ANAC logos remain in the header.

Descriptor Box

The descriptor box contains basic identifying information about the validation project and the work plan document:

- The ANAC and FAA project numbers
 - Include both ANAC’s and the FAA’s project numbers, with a “/” or other divider between
 - The CA project number location may reflect the CA approval number (such as the STC number) or an applicant’s project ID number instead, if desired
- The applicant, a project title, and the applicable products
 - This listing of applicable products does not need to be precise if it becomes cumbersome and may use general groupings and unofficial terminology
- The ANAC PCM and FAA PM
- The revision and date of the work plan

Manager Signature

The manager signature box may only be signed by managers, including the immediate supervisor of the PCM/PM if they are not officially a manager. Per the IPA, work plans are signed by management at the initial issuance and at revisions that expand VA involvement. (See 3.5.9.1(f) and 3.5.9.2(d)(7)) Work plans therefore do not get signed by PMs/PCMs unless no VA involvement is being added. The FAA does not plan to implement this allowance and will have all work plans signed by management.

In all cases, the signature line should reflect the signer’s typed name, title, organization within the VA, and a digital or ink signature. If the signer’s typed name is included in a digital signature, it does not need to be repeated on the signature line.

Section 1 – Record of Changes

The Record of Changes section provides a table for showing revisions. Changes may be summarized in the table, or instructions provided in the table on how to identify changes within the body of the document, such as “~~strike-thru for removals~~ and *italics for additions*” or “changes for this revision are shown in **red**” or “See underlined changes on pages 2, 5, and 8.”

Work plans do not need to be revised to reduce involvement or to record the completion of involvement, but when a work plan is revised for other reasons, these should be updated. Work plans always need to be revised to show increased compliance review or to add VA IP/FCARs or accept CA IP/FCARs. Work plan revisions need to be signed by management.

Best Practice: Count the revision level via numbers or letters, as opposed to date-only revision tracking.

Section 2 – Description of the Project

This section includes two elements: the design/change description and, optionally, the status of the application.

Design/Change Description

Provide a brief description of the design or design change in this section. It may be copied from the applicant’s or CA’s documentation but does not need to be as detailed as many applicant descriptions are. Include enough detail for management reviewers to understand the areas needing an issue paper (IP), ficha de controle de assunto relevante (FCAR), or any compliance review in particular. (IPA 2, 3.5.9.2(d)(1))

Best Practice:

- Reference the applicant or CA document (and its revision) that was used as the basis for the preparation of the work plan.
- Avoid describing a project solely as validating “STC 12345.” Instead, the project validates the installation of a winglet, or allows a performance modification, or validates a model.
- Mention any prerequisite modifications or installations and whether they’re yet validated by the VA
- For STCs, note the revision or amendment date on it, if any, and what changed since its last validation, if applicable;
- Expected completion date for the validation project.

Status of the Application

Optional: Consider including the status of the application package. If all elements of the package have been received, state that the application package is complete. If not all elements have been received, state that the application package is complete enough and list what’s still required. It is common for manuals to not yet be submitted for concurrent projects, so the work plan would state that the application package is complete enough but flight and maintenance manuals are still required to

complete the application. Do not mention non-application documents here, such as compliance documents or familiarization requests.

Section 3 – Certification Basis

Define the VA certification basis (IPA 2, 3.5.9.2(d)(3)) or reference another VA document such as a TCDS or a certification basis IP/FCAR; it is acceptable to mention an IP/FCAR that hasn't yet been started or is in work. Pointing to a CA or applicant document is discouraged but not prohibited. The date used to set the certification basis of the original CA certification project is the date used to set the certification basis for the VA's project as well. (IPA 2, 3.5.11(a))

List all exemptions, equivalent levels of safety (ELOS), and special conditions (SC) that are changed or added by the design. (IPA 2, 3.5.9.2(d)(3)(ii)) When referencing an outside document for the certification basis, consider listing these IP/FCARs here anyway. If the IP/FCAR listing in the involvement section (see section 4.4 below) will include some of these, there could be a reference to that section rather than repeating the list. An IP/FCAR that is being newly applied to a model by the project in question counts as "changed or added" even when the document itself isn't changing. This section of the work plan is for *listing* the IPs/FCARs impacting the certification basis. Use the IP portion of the involvement section (see section 4.4 below) of the work plan for the VA action of *accepting* foreign IP/FCAR. Method of compliance IPs/FCAR do not get mentioned here. They are not part of the certification basis and go in the involvement section instead.

State whether this is an acoustical and/or emissions change and identify the applicable regulations.

Section 4 – VA Involvement

The involvement section is the most important part of the work plan, and therefore is the most detailed. It defines the VA's level of involvement for the validation by identifying and distinguishing between VA familiarization activities and VA compliance review. Because familiarization and compliance review have different obligations and limitations for the VA, they should be treated separately and distinctly in a work plan. This shows the applicant, the CA, and the VA itself that the VA is carefully implementing the IPA and thus creating a level playing field.

There are five subsections to the VA Involvement portion of the work plan: team members, involvement areas, familiarization, IPs/FCARs, and compliance review. Four of these have defined tables described below that the VA will use.

Note: "Level of Involvement" has three categories: General familiarization, technical familiarization, and compliance review which has two subcategories (information and verification). "LOI" is also used to discuss the VA's overall combination of these for a given validation.

4.1 Team Members

Start off the involvement section with the PCM/PM, project manager (if different from the PCM/PM), and other VA team members. (IPA 2, 3.5.9.2(d)(6)) Only individuals on the project team need to be mentioned – not all personnel who reviewed a project summary and then declined involvement. Management and bilateral oversight individuals also do not need to be mentioned. It's acceptable to list expected disciplines without names or just list that the team is still being determined; the team list should be updated with each work plan revision but a team list update does not require a revision by itself.

Best Practice: Include the team members' titles and/or disciplines along with their names.

Reminder: This list is for CA awareness and is not authorization for the CA or applicant to directly contact any team members. All communications should maintain PCM/PM in the loop.

4.2 Involvement Areas

State what areas made the project Non-Basic using the table below. This would include but is not limited to impacted SEIs, new/novel items, issue papers, being significant, etc. The CA should have provided a complete list in their transmittal letter, including the specific SEIs. If the VA is adding any involvement areas that the CA did not identify, be sure to distinguish those from the ones the CA did identify. If the VA chooses not to be involved in an area despite it being one of the Non-Basic criteria, still identify it but indicate "No Involvement." Additional details about each involvement area's familiarization or compliance review will be in the work plan's following sections.

Include each involvement area's respective, high-level, level of involvement (i.e. no involvement, familiarization, compliance review) here as well. The below sections then detail what that involvement means - a meeting, a compliance document being sent to the VA, etc. – not this section.

When the impacted Non-Basic criteria include "(a) New TCs" or "(b)(3) Significant," the other specific applicable Non-Basic criteria that are impacted still need to be identified. Although these two are project-level Non-Basic decisions, the topic-level areas of VA involvement still need to be limited to only areas of differences between FAA and ANAC.

Recording Involvement Areas

The below table (based on IPA 2, paragraph 3.5.3.2) records what areas made the project Non-Basic (IPA 2, 3.5.9.2(d)(4)) and the VA's high-level involvement. Example entries are included.

Criteria	Applicable to Project? (Y/N)	Specific Topic	Level of Involvement (No Involvement, Familiarization, or Compliance Review)	Comments
(a) New TCs	N			
(b)(1) SEI	Y	Glass Panels	Familiarization	Glass panel SEI was added by the FAA
	Y	Mini-suites	No Involvement	Applicable SC and MoC already part of the VTCDS

Criteria	Applicable to Project? (Y/N)	Specific Topic	Level of Involvement (No Involvement, Familiarization, or Compliance Review)	Comments
(b)(2) Exemption, SC, ELOS	Y	SC 25-844-SC for UPS system based on supercapacitor technology	Familiarization	Existing SC needs amendment
(b)(3) Significant	N			-
(b)(4) AD	N			
(b)(5) New MOC	N			
(b)(6) New technology	N			
(b)(7) Novel application	N			
(b)(8) Acoustical or emissions change	N			
(b)(9) Any other designated by CA	N			
Engine or propeller project	N			<i>(Note, this row is only applicable when ANAC is the VA. Brazilian SoD engines, propellers, and their STCs are not eligible for FAA validation)</i>
Helicopter project	N			<i>(Note, this row is usually only applicable when ANAC is the VA. Helicopter TCs and STCs are usually not eligible for FAA validation and no SEI list is yet published)</i>

Unused rows of the table may be deleted from the work plan.

4.3 Familiarization

List the VA's familiarization activities and requirements using the below table.

Familiarization is activities to learn more about the design to aid PCMs, PMs, and specialists in:

- Developing the VA certification basis,
- Determining the VA level of involvement,
- Writing the work plan, and
- Staying aware of fleet changes to support the VA's continued airworthiness obligations.

It is not about confirming compliance but does include learning more about the design and methods used by the applicant. For design changes, familiarization should not be used to investigate certification data of the baseline product or other areas outside the scope of the design change. This does not preclude familiarization of baseline data during full TC validations. To determine the “baseline” for a validation, everything on the baseline product needs to already be validated or else it’s part of the design change.

Familiarization has two types: General and Technical.

General Familiarization

General familiarization is not defined in the IPA, but terminology was needed to capture the work done to understand a project scope, such as processing the application. General familiarization is limited to understanding the elements of the product (for TCs) or the design change (for others) only and may be conducted on any major aspect of a project, not just the Non-Basic areas. Reviewing application documents is considered general familiarization, as are administrative necessities such as publication of an FAA ELOS memo. General familiarization beyond these, such as meetings with the CA or applicant to discuss project scope, should be unnecessary in most cases. Although the IPA does not require general familiarization to be recorded in the work plan, recording large general familiarization events, like a kick-off “gen fam” meeting, is a best practice. This large, kick-off gen fam should not be necessary on most projects.

Technical Familiarization

Technical familiarization is about gaining an understanding of “the general compliance methodologies used or to be used by the applicant, including assumptions, boundary conditions and critical parameters of that methodology to verify the Non-Basic criteria that are impacted, to determine if IPs/FCARs are necessary, and to update the work plan” (IPA 2, paragraph 3.5.10.1(c)). It may only be conducted on the Non-Basic areas of a project. Thus, for all technical familiarization activities, the work plan must identify the Non-Basic area that allows the VA involvement. (IPA 2, 3.5.9.2(d)(4))

The IPA now categorizes all flights and simulator sessions by the VA as “familiarization flights,” which fall under the technical familiarization category. (IPA 2, 3.5.10.1(e)&(f))

Technical familiarization does *not* include any review of any compliance document including test reports, test plans, and analysis reports, nor any test witnessing, test participation, requests for re-testing, or requiring changes to manuals. These all belong to “compliance review” and are explained in the next section. The distinction between technical familiarization and compliance review has historically been hard to determine. New guidance has made it clearer: Although not explicitly stated in the IPA, there is no such thing as reviewing a compliance document for familiarization. Per 3.5.10.2(c), “review of *any* compliance document” constitutes compliance review, *even when* that review is in pursuit of allowed familiarization topics, such as boundary conditions. Boundary conditions can be understood without compliance documents, so a VA requiring a compliance document to learn more about boundary conditions is still “compliance review.” Which VA involvement activity is being conducted is based entirely on the content being reviewed – not the thoroughness of the review. If it is a compliance document or a test, it is compliance review and belongs in the next table. Compliance

review is deferred until that depth of review is justified, included in the work plan, and approved by VA management. (IPA 2, 3.5.10.1(c))

Recording Familiarization

The below table records general and technical familiarization activities, plus the Non-Basic element that permitted any technical familiarization. Example entries are included.

Familiarization Artifact or Activity	Subject + Non-Basic Area	Date	Details (duration, type of interaction)
Kick-off meeting	General Familiarization. Non-Basic area: N/A	May 2, 2024	1 day – Webex
Tech Fam for avionics	Catastrophic failures modes Non-Basic area: Exemption related to 29.1309	June 24-27, 2024	3.5 days on site visit
Fam Flights	SEI on 29.143, low speed controllability	Anticipated: Fall 2024	5 days in simulators
Tech Fam for batteries	Detailed Design Standards (DDS) IP S-01, Rechargeable Lithium Batteries Non-Basic area: SEI #18 = Using Amd 23-64, SEI #48 = rechargeable lithium batteries	At applicant convenience	Presentation of IP/FCAR approach or policy data

For the “Subject + Non-Basic Area” column, provide the topic of discussion and, for technical familiarization, the Non-Basic area that permits the discussion. Sometimes these are the same thing.

4.4 Issue Papers and Ficha de Controle de Assunto Relevante

Identify any IPs or FCARs that the VA will raise and any that the VA will rely on or directly accept from the CA in the table below. (IPA 2, 3.5.10.3(b) and (d)) This includes ones associated with SCs and ELOSs, as well as method of compliance ones where applicable. Unchanged IPs/FCARs that are being newly applied to a product get re-reviewed for acceptance by the VA as though they were new or being amended.

Recording IPs/FCARs

IP/FCAR Number & Type	Subject + Non-Basic Area	VA Decision / Status

All IPs/FCARs should be listed with their number, type, subject matter, the Non-Basic area that permits VA involvement (if there will be VA involvement), and a VA decision / status. For CA IPs/FCARs that the VA is considering being involved in, decisions or statuses could be “under review,” “VA version in work” or, if the VA has already agreed to adopt it, “accepted.” For VA IPs/FCARs, statuses should not be so specific as to identify which part of the VA is working it; “VA position in work” or “applicant’s position under review” or “in route to public comment” is sufficient. The VA does not need to revise the work

plan when the status changes, but if the work plan will be the method of accepting a CA IP/FCAR, or the VA adds an IP/FCAR to the project, a revision is required to reflect that.

4.5 Compliance Review

Compliance review is the VA's highest level of involvement. For this section of the work plan, the VA uses the below table to list their compliance review requests, including the requested compliance document, test, or manual change, the relevant Non-Basic element that permits the involvement, which involvement type is being conducted, and the justification for the involvement. (IPA 2, 3.5.10.2(c)). Compliance review may only be conducted on Non-Basic areas that have additional justification for why the added VA review of the CA's work is necessary. Compliance review must be documented in the work plan before it is conducted.

Note on Terminology: IPA 2 uses "review of compliance data" when discussing the VA's highest level of involvement and uses "verify/determine" for both CA and VA actions. ANAC divides this compliance review in two further categories: information (no VA compliance findings) and verification. FAA Order 8110.52B uses "verification" exclusively for VA compliance findings. This job aid and the work plan template will use "compliance review" to indicate the broader VA action of involvement in compliance showings.

Definition

Compliance review is the VA's review of any compliance showing, including but not limited to:

- Review of any compliance document, including test plans, test reports, and analyses
- Participation in, attendance at, or witnessing any testing (other than familiarization flights and simulators – see Technical Familiarization). This includes requiring re-testing.
- Requiring changes to, or retaining approval of, manuals, tests, or compliance documents; and
- Any auditing that is required to be conducted before design approval.

Approving documents and making a VA compliance finding is always in this involvement category, including just approving a portion of the document, such as a limitations section. Approval and VA findings should not be necessary in most validations, nor in most regulations of a validation.

Compliance review is limited to the applicable Non-Basic areas, and only those that have additional justification per IPA Revision 2, paragraph 3.5.10.2(c). This means that compliance review is not automatically allowed for all Non-Basic areas – only when there's sufficient justification beyond that. The IPA "normally" allows only two justifications: when a Non-Basic criteria is a new issue that requires judgement, and when the topic represents "sensitive issues" on similar products (see paragraph 3.5.10.2(c)). This means other rationales are occasionally permitted but must still be sufficient.

Exceptions for Manuals

Flight manuals and ICAs, as application documents (IPA 2, 3.5.5.1(m) and (p)), get VA review prior to any determination of level of involvement. If that review converts to “compliance review” (through a desire for changes or retaining approval), the VA updates the work plan to reflect that new involvement level, with justification. This happens no later than when the retention is conveyed to the CA or the requested changes are relayed, as applicable. Requested changes must be related to the Non-Basic areas, just like other compliance review, but they do not have to meet as high a bar as the justifications provided in IPA Revision 2, 3.5.10.2(c): sensitive issues or new issues requiring judgement.

What Compliance Review is Not

Compliance review does not include reviewing required application documents (IPA 2, 3.5.5.1 documents only). Additionally, reviewing, writing, or publishing an IP/FCAR is familiarization, not compliance review, and may be general or technical familiarization. Compliance review would be when the VA compares a completed IP/FCAR to the data, not when the VA sets its expectations for the data via the IP/FCAR.

Documenting Requests for Compliance Review

The below table records compliance review activities, the Non-Basic element that permitted the activity, which involvement type is being conducted, and the appropriate justification for the increased involvement beyond technical familiarization. Example entries are included.

Compliance Data, Artifact, or Activity	Subject + Non-Basic Area	Involvement	Justification
1302 Analysis Report No. ABC-123	Human factors SEI	Information	VA awareness
Test of escape slide inflation	25.810 evacuation SEI	Verification	New issue that requires judgement (3.5.10.2.(c)(1))
Flammability report	Non-metallic firewall SEI	Verification	Sensitive issue (3.5.10.2.(c)(2))

Instructions for Table

- **Compliance Data, Artifact, or Activity:** Specify the particular document or test that the VA proposes to review, approve, require changes to, or otherwise be involved in.
- **Subject + Non-Basic Area:** Provide the subject matter under review and the Non-Basic area that permits the review. For example, the subject may be “human factors” and the Non-Basic area that permits human factors involvement is the SEIs. Sometimes these are the same thing.
- **Involvement:** “Verification” means the VA will review the requested document in order to check compliance with the applicable requirements. Once the VA is satisfied, it will notify the CA of its acceptance. “Information” means ANAC will review the requested documents in order to have better understanding of the project and compliance approach. ANAC will rely on the FAA for the findings of compliance. No VA acceptance statement is needed in this case.
- **Justification:** A justification or rationale is required for all compliance review activities. State one of the allowed justification reasons per the IPA (3.5.10.2.(c)) or describe alternate justifications.

Best Practice: At the end of the compliance review section, state this commitment: “We will provide comments or notify you in writing when we have found the compliance documents acceptable.” Although IPA Revision 2, paragraph 3.5.10.2(h)(1), requires the VA to provide a written statement when a reviewed compliance document has been found acceptable, the commitment to do it is not required in the work plan. It is a good practice to remind all parties. It is not required for non-document compliance review activities nor for ANAC’s “for information” involvement.

Section 5 – Reference Material

Identify the IPA revision and SEI list revision used for the project. For both documents, the applicable revision is the one in effect on the date the CA sends the application to the VA. A newer revision may be used if all parties agree.

Identify the product along with the SEI revision.