

Removal of Expiration Date on a Flight Instructor Certificate Final Rule:
Clarification of § 61.199 Reinstatement by FIRC for Certificates that Expired Shortly Before the Final Rule
01/01/2025

The General Aviation and Commercial Division has received inquiries asking if a flight instructor certificate that expired shortly before the final rule [[Docket No. FAA-2023-0825](#)] is eligible to reinstate privileges by satisfactorily completing a flight instructor refresher course (FIRC) after the effective date of the final rule. This statement provides clarification concerning this question.

Clarification Statement: As amended by the final rule, Title 14 of the Code of Federal Regulations (14 CFR) [§ 61.199](#)(a)(1) provides a new reinstatement method that allows a person holding a flight instructor certificate that has recently expired to reinstate their flight instructor privileges by completing a FIRC. Consequently, the holder of a flight instructor certificate that expired shortly before the effective date of the final rule may reinstate their certificate after December 1, 2024, in accordance with the new FIRC reinstatement requirements.

Section 61.199(a)(1) states:

If 3 calendar months or less have passed since the last month of the flight instructor's recent experience period, the flight instructor may successfully complete an approved flight instructor refresher course consisting of ground training or flight training, or a combination of both, or satisfy one of the requirements specified in paragraph (a)(2) of this section.

If more than 3 calendar months have passed since the last month of the flight instructor's recent experience period, the flight instructor must satisfactorily complete one of the reinstatement requirements specified by § 61.199(a)(2).

As of the time of this writing, holders of a flight instructor certificate that expired shortly before the effective date of the final rule may also reinstate their certificate after December 1, 2024, in accordance with the new FIRC reinstatement option. For example, the holder of a flight instructor certificate that expired on October 31 or November 30, 2024, may reinstate their flight instructor privileges by completing a FIRC after the effective date of the final rule. However, under the final rule, the new option to reinstate flight instructor privileges by completing a FIRC only applies when the applicant's certificate has expired by no more than three calendar months. So, if the flight instructor certificate expired on October 31, 2024, then the holder could reinstate their privileges by FIRC only from January 1 to January 31, 2025, which would be no more than three calendar months after the flight instructor certificate expired. However, a certificate that expired on September 30, 2024, or before would not be eligible under this new FIRC reinstatement option because January 1 through January 31, 2025, would be the fourth calendar month or more after the certificate expired. In other words, the window for reinstating flight instructor recent experience after the effective date of the final rule under the new FIRC reinstatement option is no more than three calendar months after the flight instructor certificate has expired (with expiration date) or privileges has lapsed (certificate without expiration).

Notably, a flight instructor's reinstated recent experience period begins when the applicant has successfully completed one of the reinstatement requirements specified by § 61.199 and files a completed and signed application with the FAA. After a flight instructor reinstates their certificate with an expiration, that person will receive by mail their permanent certificate without an expiration date.