

**January 25, 2021**

**Interim CDC Responses to Aviation Industry Questions on the Testing Requirement for Arriving International Air Passengers**

The document below contains answers to many of the questions CDC has received from aviation industry partners via the Federal Aviation Administration. Please note, CDC regularly updates the frequently asked questions (FAQs) on the Requirement for Proof of Negative COVID-19 Test or Recovery from COVID-19 for All Air Passengers Arriving in the United States webpage. Please check that site for answers to your questions about the CDC Order that are not answered below.

**What types of air crew are exempt from the requirements of the Order?**

**What types of travel by crew are exempt from the requirements of the Order?**

Crew members on official duty assigned by the air carrier or operator that involves operation of aircraft, or the positioning of crew not operating the aircraft (i.e., on “deadhead” status), are exempt from the requirements of the Order provided their assignment is under an air carrier’s or operator’s occupational health and safety program. For the exemption to apply, the occupational health and safety program must follow industry standard protocols for the prevention of COVID-19 as set forth in relevant Safety Alerts for Operators (SAFOs) issued jointly by the Federal Aviation Administration (FAA) and CDC. Other persons, such as maintenance personnel or contractors, may also be exempted if:

A. Their travel is for the purpose of operating the aircraft or ensuring the safety of flight operations; AND

B. The air carrier or operator extends its occupational health and safety program to cover these individuals and ensures these persons follow the protocols contained in SAFO and CDC guidance; AND

C. The travel cannot be planned with sufficient time to enable the employee to take a COVID-19 test and obtain the results before the operational travel.

Air carriers or operators who assign their crew to travel in an official duty status (i.e., position or deadhead) on another air carrier should coordinate with that air carrier regarding their crew member’s eligibility for an exemption from testing. The air carrier should provide the crew member with any required documentation in addition to the crew member’s identification. Crew members traveling for training, commuting to or from work, or for business reasons not associated with the operation of the aircraft are not exempt from the testing requirement. Nor are crew traveling for personal reasons, such as leisure travel.

Operators of aircraft that are not operating under an air carrier’s or operator’s occupational health and safety program as described above are not exempt from the requirements of the Order.

**Why does the Order specify 3 days rather than 72 hours? What is considered 3 days?**

The 3-day period is the 3 days before the date of the flight's departure. The Order uses a 3-day timeframe instead of 72 hours to provide more flexibility to the traveler. By using a 3-day window, test validity does not depend on the time of the flight or the time of day that the test was administered.

For example, if a passenger's flight is at 1pm on a Friday, the passenger could board with a negative test that was taken any time on the prior Tuesday or after.

**Can a test taken before departure from the US be used to return within the 3-day timeframe? How will testing requirements be handled for short trips?**

If an international trip is shorter than 3 days, a viral test taken in the United States can be used to fulfill the requirements of the Order as long as the specimen was taken no more than three days before the return flight to the US departs. If the return travel is delayed longer than 3 days after the test, the passenger will need to be retested before the return flight.

Travelers considering this option should additionally consider the availability of appropriate testing capacity at their destinations, and the time frame needed to obtain results, as a contingency when making plans for travel.

**What types of SARS-CoV-2 tests are acceptable under the Order?**

Passengers must be tested with a viral test that could be either an antigen test or a nucleic acid amplification test (NAAT), such as reverse transcription polymerase chain reaction (RT-PCR), reverse transcription loop-mediated isothermal amplification (RT-LAMP), and transcription-mediated amplification (TMA). The test used must be authorized for use by the relevant national authority for the detection of SARS-CoV-2 in the country where the test is administered.

**Does a negative test result or documentation of recovery need to be in English?**

Airlines and other aircraft operators must be able to confirm the test result and review other required information and should determine when translation is necessary for these purposes. Passengers whose documents are in a language other than English should check with their airline or aircraft operator before travel.

**Will CDC provide information about international testing locations/availability and what tests are approved by relevant international authorities?**

CDC defers to the local authorities for information about location, availability, and authorization of testing in other countries. US travelers may also obtain COVID-19 Country Specific Information provided by the U.S. Department of State about testing locations and availability for the country where they are located. Aircraft operators may provide this information to passengers if they have it available.

**When will email/telephone support be available?**

CDC is working to establish a support center for issues related to its Order as soon as possible. At this time, please continue to visit the frequently asked questions (FAQs) on the Requirement for Proof of Negative COVID-19 Test or Recovery from COVID-19 for All Air Passengers Arriving in the United States webpage for the most update information regarding this Order.

**Is flight departure scheduled departure time or actual departure time?**

CDC understands that certain events may result in operational delays. If an individual's test becomes more than 3 days old because of a delay in departure, the individual will be required to obtain another negative Qualifying Test to meet the terms of the CDC Order.

**Should passengers retain proof of a negative test or documentation of recovery?**

Yes, passengers must still retain a paper or electronic copy of the necessary documentation as federal public health officials may request to see these documents at the port of entry and state, territorial, tribal and/or local health departments in the United States may request them under their own public health authorities.

**Can air carriers and operators keep a list of passengers who have provided an attestation instead of copies of the individual forms?**

Air carriers and operators must retain a copy of the attestation in full for each passenger, not just a list of individuals who provided them.

**Can air carriers and operators create electronic/digital versions of the attestation? If electronic forms are used, what constitutes 'signing'?**

Air carriers and operators must ensure that the attestation is submitted by each passenger or an authorized representative before the flight's departure. Boarding processes must incorporate a process by which either a physical signature, an authenticated digital signature, or an electronic system that uses unique identifiers to ensure the person filling out the electronic attestation form is the passenger or an authorized representative. For example, similar methods to those used to verify the identity of a passenger using a pre-boarding kiosk or an air carrier's or operator's website or app to obtain a boarding pass could be used to ensure that the passenger or authorized representative is the individual completing the attestation.

Alternatively, the air carrier or operator can use authenticated digital signatures (e.g., DocuSign) or an electronic version of an attestation that ensures only the individual passenger, or their authorized representative, has access to the data entry process (e.g., after keying in username/password or other identifying and/or itinerary-specific information as part of the pre-boarding or check in process).

Either method is acceptable if the air carrier or operator can be reasonably certain that the individual, or their authorized representative, is the only person that has access to the data entry process required to submit the attestation.

**Will the U.S. Government release the passenger attestation form in other languages?**

CDC is working to address this concern. Air carriers and operators may also use a third party to provide translations of the attestation. However, the air carrier or operator has the sole legal responsibility to ensure the accuracy of any translation.

**Can air carriers and operators use an attestation only in a foreign language (rather than an English translation), so that the only version retained for two years would be in a foreign language?**

Yes, air carriers and operators may use and retain an attestation only in a foreign language.

**The attestation may be difficult for our passengers to understand. Can the US Government or air carriers/operators provide a simpler version?**

Air carriers and operators may not alter the language of the passenger attestation. CDC is currently assessing the need to provide the attestation in a simpler format.

**Does the passenger also need to have a copy of their attestation as well as the air carrier/operator retaining it?**

Passengers are only required to retain a paper or electronic copy of their negative test result or documentation of recovery and present it to the air carrier or operator, or to public health officials at destination upon request. They need not retain a copy of the signed attestation.

**Who qualifies for the Department of Defense (DOD) “competent orders” exemption?**

DOD personnel, including military personnel and civilian employees, dependents, and contractors are exempt from the application of CDC’s testing order provided that such individuals are traveling under competent military orders meaning traveling on official travel orders and observing DOD precautions to prevent the transmission of COVID-19 as set forth in the Department of Defense’s December 29, 2020 Force Protection Guidance including its testing guidance. US Government employees traveling under US Government Agency orders are also exempt while traveling on DOD assets and observing DOD precautions to prevent the transmission of COVID-19

DOD whole aircraft contract charter operators are similarly exempt from the requirements of CDC’s order when transporting DOD personnel including military personnel and civilian employees, dependents, other US Government employees, and contractors traveling under competent orders and observing DOD precautions.

CDC recommends that DOD personnel traveling on non-DOD aircraft carry their official orders with them to present to air carrier/operator or public health authorities if needed. DOD personnel including associated personnel who are traveling on non-DOD aircraft and not on official orders remain subject to CDC’s testing order.

**Are federal law enforcement personnel exempt from the requirements of this Order?**

Federal law enforcement personnel on official orders who are traveling for the purpose of carrying out a law enforcement function are exempt from the requirements of this Order,

provided they are covered under an occupational health and safety program in accordance with CDC guidance. Those traveling for training or other business purposes remain subject to the requirements of the order.

**Do the requirements of this Order apply to diplomats and other special visa holders?**

Diplomats and other special visa holders are not exempt from this Order. For additional information about the requirements of this Order please visit the frequently asked questions (FAQs) on the Requirement for Proof of Negative COVID-19 Test or Recovery from COVID-19 for All Air Passengers Arriving in the United States webpage.

**Will there be an exemption for persons who have been vaccinated?**

CDC has not yet issued guidance on management of vaccinated people during travel, and there are no established international standards for vaccines or documentation of vaccination currently. CDC will update the Order and the Requirement for Negative Pre-Departure Covid-19 Test Result or Documentation of Recovery from COVID-19 for all Airline or other Aircraft Passengers Arriving into the United States from any Foreign Country webpage as needed once the necessary guidance and standards are available. Until then, all air passengers traveling to the US, regardless of vaccination or antibody status, are required to provide a negative COVID-19 test result or documentation of recovery.

**What if someone is stuck in a place today that doesn't have testing for them before tomorrow's implementation date?**

Passengers should contact the airline regarding options for changing their departure date to allow time for a test, whether the airline has identified options for testing, or if there are options available for changing their flights to transit through a location where they can get tested before boarding their final flight to the United States.

Douglas CARR  
Vice President, Regulatory & International Affairs

NBAA  
[1200 G Street NW](#)  
[Suite 1100](#)  
[Washington, DC 20005](#)