MANUAL
for conducting
CHARITABLE MEDICAL FLIGHTS

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1.0 ***WINGS OF MERCY*** (*WOM*) a non-profit, faith-based, 501c3 Volunteer Pilot Organization (**VPO**) matching people in need of a Charitable Medical Flight (**CMF**) with qualified pilots and aircraft willing to help by *Giving Wings to those in need.*

1.01 PILOT REGISTRATION: To register with *WOM*, pilots must meet the minimum PIC or SIC requirements defined in this document. License, Medical, Training, Flight Experience and Calendar Currency are all recorded in *WOM's* Pilot Profile. These elements are validated each time a pilot volunteers for a CMF.

1.02 CMF REQUIREMENTS: to volunteer for a flight, pilots must be registered with a current Pilot Profile in *WOM's* system. When accepting a CMF, pilots document their understanding of FAR and *WOM* flight requirements. When requesting fuel and fee reimbursements, pilots document additional Exemption requirements. A complete copy of Exemption 23553A is attached as **[EXHIBIT C]**. Pilot Guide sections are referenced in [RED] identifying compliance to Exemption 23553A requirements.

1.03 CMF RECIPIENTS: Individuals on *WOM* arranged flights are qualified for both medical and economic need. These are document with a recipient's application as part of the qualification process. The following are on file for each qualified recipient*:*

- signed application indicating their understanding that **"*….the flight is for charitable medical purposes and is not under the same FAA requirements as a commercial airline or charter flight*"**.
- Wavier of Liability signed by each person on the flight.
- Doctors certificate acknowledging patient's suitability to fly in a GA aircraft and noting limitations or special needs.

1.04 FAA EXEMPTION: #23553A granted March 14, 2025, allows pilots who are registered with *WOM* and meet the added Exemption requirements, to accept reimbursement for fuel and airport fees. Most Exemption items are already *WOM* requirements. Pilots must meet and document six additional items to request fuel and fee reimbursements.

1.05 VOLUNTEER OPTIONS: (two methods of conducting a CMF)

- **DONATE**: (allowed by FAA Reauthorization Act of 2024, Sec 830.b.2.A) [**EXHIBIT B**]
  - Pilot meets *WOM* core qualifications & flight experience.
  - Flight is arranged by *WOM*, a recognized VPO.
  - Pilot accepts no reimbursements.
- **FUEL & FEE REIMBURSEMENT:** (per Act of 2012 & Exemption #23553A) [**EXHIBITs A&C**]
  - Pilot meets *WOM* core qualifications & flight experience.
  - Flight is arranged by *WOM*, a recognized VPO.
  - Pilot meets additional requirements of FAA Exemption 23553A.
  - *WOM* reimburses for actual fuel expense and airport fees.

1.1 PILOT QUALIFICATIONS

Initial qualifications and calendar currency items are documented in the Pilot's Profile, recorded and stored with CMF history when accepting a flight.

1.10 DOCUMENTATION (required for all flights, donated or fuel reimbursement)

- Pilot Profile record complete with contact information and experience.
- Wavier of Liability on file.
- Medical date & certificate image on file.
- Flight Review (or equivalent) date & logbook image on file.
- AOPA course date & certificate image on file.
- *WOM* training date & certificate image on file.

1.11 CERTIFICATES & RATINGS (required for all flights, donated or fuel reimbursement)

- Private, Comm or ATP certificate.
- Instrument Rating.
- Aviation Medical Certificate.

1.12 TRAINING (required for all flights, donated or fuel reimbursement)

- AOPA Volunteer Pilot course covering:
  - Conducting a Charitable Medical Flight.
  - Managing passenger needs and special equipment.
  - Aviation professionalism, communications and decision making.
- *WOM* Volunteer course covering:
  - Wings of Mercy policies and procedures.
  - Conducting a CMF arranged by *WOM.*
  - Wings of Mercy record keeping and reporting.

1.13 AERONAUTICAL EXPERIENCE (required for all flights, donated or fuel reimbursement)

1.13.1 PIC (to serve as Pilot-in-Command or as SIC if Required Crew)

- 500 hours total time – 400 hours as PIC
- 75 hours Instrument – 37.5 hours actual
- 25 hours Night
- 50 hours specific Make & Model of CMF aircraft being flown

1.13.2 SIC (to serve as Second Pilot – not required crew)

- 250 hours total time – 100 hours as PIC
- 30 hours Instrument – 15 hours actual
- 12 hours Night
- 15 hours same Category & Class as CMF aircraft

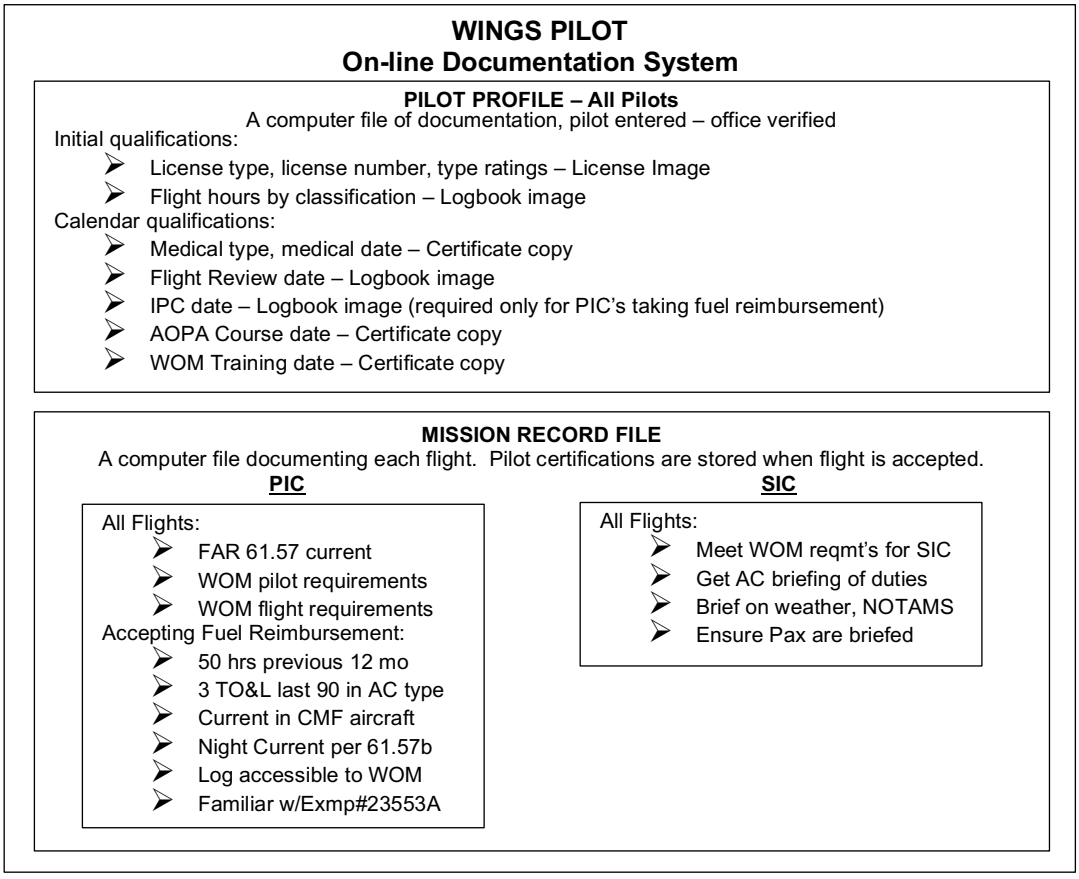
1.13.3 FUEL REIMBURSMENT (required when accepting fuel reimbursement)

- 2nd Class Medical – date and certificate current in Pilot Profile
- 50 hours logged in preceding 12 months (or 2hrs w/CFI in 3mo)
- 3 Take-Off & Landings logged (61.57(a) in specific CMF aircraft
- Night current logged (61.57(b) regardless of when CMF is conducted
- IPC completed in previous 12 months
- Familiar with Exemption #23553A **[EXHIBIT C]**

1.14 HEALTH & REST

- Health, Mental condition considered
- Maximum 12 hours Duty-Time within a 24 hour consecutive period (Duty time begins at airport arrival, ends after securing the aircraft on return)
- Maximum 8 hours flight time in a 24-hour consecutive period
- After a Duty-Day of any length, pilots must have 12 hours before accepting another CMF.

1.15 DOCUMENTATION GRAPHIC



1.2 AIRCRAFT QUALIFICATION

Certificates and annual currency are documented in the Aircraft Profile file.

1.20 AIRCRAFT must have Standard Airworthiness Certificate. Documented in Aircraft Profile by N-Number cross referenced to FAA Registry.

1.21 ANNUAL (or PROGRESSIVE) INSPECTION per 14 CFR part 91.E, 14 CFR part 43. Inspection Date and Logbook image of recent inspection documented in the Aircraft Profile record.

1.22 IFR CERT per 14 CFR 91.411 & 91.413 (pitot/static-transponder). Certification date and Logbook image of recent certification documented in the Aircraft Profile record.

1.23 INSURANCE: *WOM* does not assume liability for equipment, personnel, actions or omissions associated with a CMF. *WOM* does not provide insurance coverage for any aspect of a CMF.

1.3 FLIGHT REQUIREMENTS: (**RED** items apply only on patient-passenger occupied legs)

1.30 REQUIRED for all *WOM* arranged flights:

a. **TWO** *WOM* qualified pilots on all flights (for safety and passenger confidence).
b. **RISK-ASSESSMENT** to be submitted within 24 hours of CMF departure.
c. **PASSENGER BRIEF** conducted per checklist on *WOM's* Flight Manifest.
d. **IFR FLIGHT PLAN** activated for each flight leg, cancel only when airport is visual.
e. **No OVER-WATER** planned in singles (unless within gliding distance of a suitable airport).
f. **No NIGHT-OPERATIONS** planned in single engine aircraft.

1.31 ADDITIONAL FLIGHT REQUIREMENTS when accepting fuel reimbursement.

a. **WGT & BAL** calculations are documented by image uploaded on Mission report.
b. **RUNWAY LENGTH** - Add 50% to POH runway performance of the CMF aircraft.
c. **WEATHER REPORTING** – No approach started w/o weather reporting available.
d. **APPROACH** with VERTICAL GUIDANCE required under IMC conditions.
e. **APPROACH / CIRCLING** - No circling approaches at night or in IMC conditions.
f. **ALTERNATE AIRPORT** must have an approach with VERTICAL GUIDANCE.
g. **RAISE MINIMUMS** – Add 100 feet and ½ mile to published approach minimums
h. **IFR DEPARTURES** - weather must meet the RAISED MINIMUMS in **g.** above
i. **USA ONLY** – flight must be within 48 contiguous, DC, territories, Alaska & Hawaii. The flight may not cross international airspace enroute to US destinations.

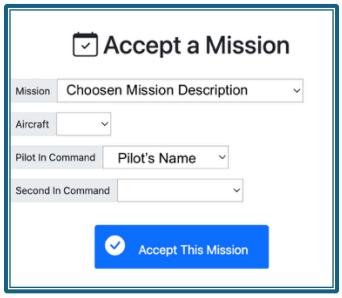
1.32 VOLUNTEER: PIC's can volunteer for a *WOM* arranged CMF….

- from a **Mission Request** email, click Volunteer Now… link of the selected mission. Each mission identifies: date-route-patient/passengers-weights-limitations & special instructions. PIC's use this information to determine if their equipment and individual capabilities are suitable to accept the mission.

…**OR**…

- from the **On-Line Schedule Calendar** click a mission description starting with Need Crew TO (patient…… on the specific calendar day.

Either of these choices link to **Accept-a-Mission** screen in *WOM's* app:



NOTE: if technology is not immediately available a pilot may phone Flight Coordinator who will initiate the flight in *WOM's* system. Email link is then sent for pilot to complete the qualification and currency checklists.

1.33 DOCUMENT PILOT QUALIFICATIONS: On the **Accept-a-Mission** screen:

- Selected CMF is displayed in the Mission pull-down box.
- Aircraft pull-down box is used to select the mission aircraft.
- PIC name filled in, pull-down box can be used to change.
- SIC pull-down box is used to select a qualified second pilot.

Clicking **Accept-This-Mission** button will display PIC verification checklist:

PIC VERIFICATION CHECKLIST

☐ I meet all FAR 61.57 currency as it applies to this flight

☐ I meet all WOM's pilot requirements for this flight

☐ I understand WOM's additional flight requirements

DONATE FLIGHT | FUEL REIMBURSE

PIC must select each of the items to document their understanding of WOM requirements in accepting a CMF. After all three boxes have been checked, the **DONATE** and **FUEL REIMBURSE** buttons will activate.

If the **FUEL REIMBURSE** button is pressed, a second checklist is presented to document the PIC's recent qualifications to accept fuel reimbursement under FAA Exemption 23553A.

PIC FUEL REIMBURSEMENT CHECKLIST

- ☐ I have logged 50 hours as PIC in preceding 12 months (or 2 hours with CFI)
- ☐ I have logged 3 takeoff-landings, preceding 90 days per FAR 61.57a
- ☐ I have logged currency in the specific aircraft assigned this CMF
- ☐ I have logged night currency per FAR 61.57b in the Make/Model assigned this CMF
- ☐ My logbook is stored off-aircraft, accessible to WOM through my emergency contact

I AM FAMILIAR WITH EXEMPTION 2355A REQUIREMENTS

Pressing **I AM FAMILIAR WITH EXEMPTION 2355A REQUIREMENTS** button completes CMF acceptance.

1.34 VERIFY QUALIFICATIONS: After the DONATE FLIGHT (or the I AM FAMILIAR… when fuel reimbursement is chosen) is pressed, a **MISSION ACCEPTED** banner is displayed to indicate the flight offer was accepted. The completed Checklists are stored with the CMF record to document PIC's understanding and qualifications for the flight.

WOM's system will access profile records to validate:

a. PIC qualifications and annual currency
b. SIC qualifications and annual currency
c. Aircraft qualifications and annual currency
d. If Fuel Reimbursement was selected…PIC has IPC within 12 months.

FLIGHT COORDINATOR is notified a CMF was accepted. Any qualification or currency issues are identified in Flight Coordinator's email. Flight Coordinator will communicate with the pilots to update records when needed as the flight cannot be scheduled, or a Flight Manifest issued, until these records are current.

PIC is notified by email that the flight offer was accepted. Any qualification or currency issues are identified in PIC's email. PIC is responsible to update their pilot profile, or the aircraft profile, as necessary with current data. SIC issues are also identified, PIC should follow up with the second pilot to update their profile record.

SIC is notified by email they were named as second pilot. Any qualification or currency issues in their profile are noted. SIC is responsible to update their pilot profile as necessary with current information. This email contains a link for the Second Pilot to document their understanding and ability to perform the WOM requirements of SIC on this flight. The link brings up pilot's WOM login, then a SIC VERFICATION CHECKLIST:

SIC VERIFICATION CHECKLIST

- ☐ I meet all WOM SIC requirements for this flight.
- ☐ I will receive a briefing on the CMF aircraft.
- ☐ I will review; routing – weather – NOTAMS – FBO's - Flight Manifest for this flight.
- ☐ I will ensure a complete passenger briefing is given to passengers before departure

SIC-CERTIFY

SIC selects each of the four items to document their understanding in accepting a CMF. After all four boxes have been checked, the **SIC-CERTIFY** and button will activate, allowing the second pilot to acknowledge understanding. This checklist will be attached to the CMF file.

1.35 SCHEDULING:

With currency data correct, *WOM's* system will allow the flight to be scheduled.

- FLIGHT COORDINATOR reviews mission details of departure-destination, routing, patient-passenger, crew and aircraft for accuracy. Flight Coordinator schedules the CMF. This will:
  - update the calendar with; flight status, crew names and aircraft.
  - capture pilot and aircraft qualifications & and currency data.
- FLIGHT INFORMATION document sent to recipients. The document contains:
  - Passenger names, weights, baggage and mobility reported
  - Crew names & contact methods
  - Aircraft N-Number and description
  - Departure location – directions – phone numbers
  - Destination location – directions – phone numbers
  - Required "……not a commercial flight…." Notification
  - Flight tracking link for interested parties to watch progress
- FLIGHT MANIFEST is sent to the flight crew. The document contains:
  - Mission ID by name-date-destination
  - FBO's expected for departure and destination
  - Crew names, weights, baggage & contact numbers & email
  - Aircraft N-number with description
  - Passenger names, weights, baggage, mobility and contact information
  - Note of any special information or requirements
  - **BREIFING** checklist of elements required on each passenger leg
  - Risk Assessment link use to submit RA within 24 hours of departure
  - Mission Complete link used to record flight details after CMF completed
  - Mission Evaluation link used to help improve future flight

Flight Manifest

Flight Coordinator
24hr Cell (616) 901-6570

Mission ID: 1. Patient Smith on 10/172026 KEST to KRST
Flight Date: 10/16/2026
Route: KGRR-KRST
FBO's: KGRR: Avflight (616) 949-0790
KRST: Signature Flight Support (507) 282-1717
Crew – PIC: Bill Pilot cell: (231) 557-6000 email: pilotb@gmail.com
– SIC: Tom Copilot cell: (842) 260-3344 email: copilott@gmail.com
Aircraft: N6561C (Chancellor)

EXAMPLE

Information: **Patient Smith** cell: (616) 635-7477 email: psmith@yahoo.com
Age: 57 Mobility: Limited Wgt: 196 lbs Bags:10 lbs Carry On

Companion Smith cell: (616) 635-7478 email: csmith@yahoo.com
Age: 0 Mobility: Normal Wgt: 148 lbs Bags: 20 lbs Roller

Estimates: Distance = 310 nm Flt Time = 2.0 hrs Fuel = 75.9 gal

REQUIRED PASSENGER BRIEFING

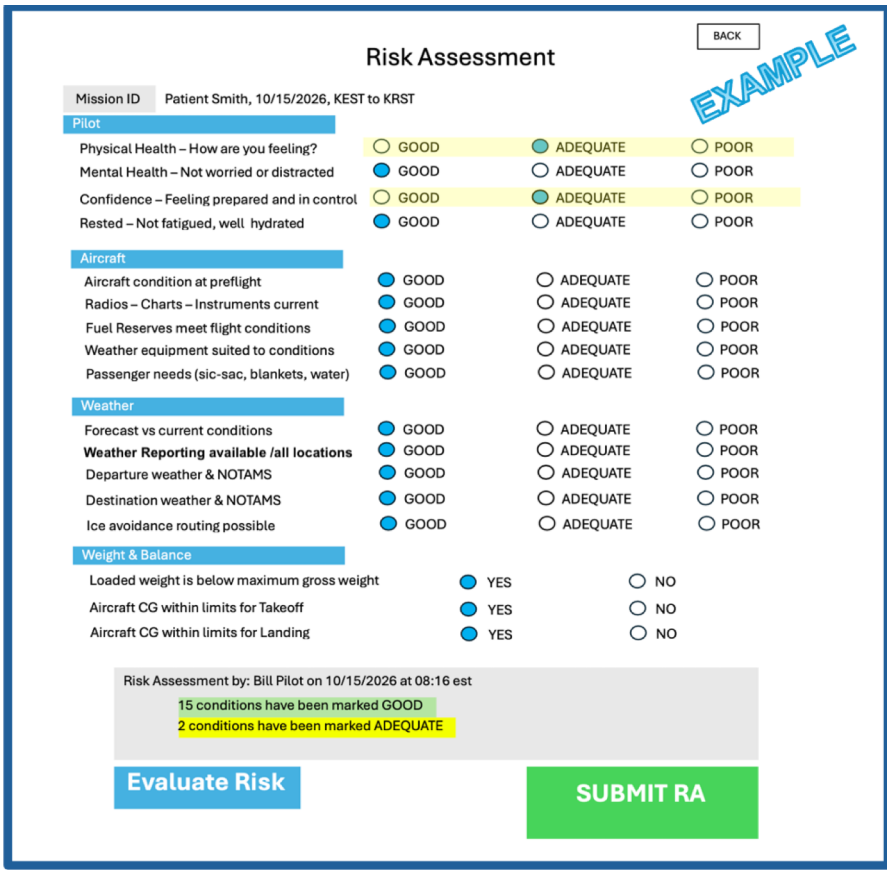
- This flight is permitted under an FAA exemption. Wings of Mercy is not a commercial operator
- No Smoking is allowed on this flight at any time.
- Seat Belts & Shoulder Harness are required for Takeoff & Landing or when indicated by crew.
- Seat backs upright and loose items secure for Takeoff & Landing.
- Normal EXIT operation. Emergency EXIT operation.
- Special Assistance method for mobility limited passengers in event of emergency.
- Survival equipment location and use.
- Oxygen location and use.
- Fire Extinguishers location and use.
- Sterile Cockpit at Takeoff & Landing. Communicate with crew after level off unless emergency.

RA: Risk Assessment. Within 24 hours of departure, use this link to complete or update the **RA**.

Mission Complete? Click to submit Mission Report Suggestions? Click to submit Mission Evaluation

1.36 FLIGHT PLANNING:

- PIC is responsible for flight planning. In collaboration with the SIC, consider all applicable flight requirements of FAR 91, in *WOM* document section 1.30, and *WOM* document section 1.31 if applicable.
- PASSENGER CONTACT: with information provided on the Flight Manifest, PIC communicates with patient/passenger to answer questions, provide weather information, confirm time and location. Review baggage, weights and equipment details with patient/passenger.
- WEIGHT & BALANCE: with information provided on the Flight Manifest, PIC calculates loading and CG for the flight. If fuel reimbursement is being requested, an image of the W&B calculations (for each passenger leg) must be uploaded with the completed Mission report.
- RISK ASSESSMENT: Within 24 hours of the scheduled departure, PIC uses Submit Risk Assessment link on the emailed Flight Manifest to complete mission specific RA. Completed form is stored with the CMF record.



1.37 FLYING the MISSION:

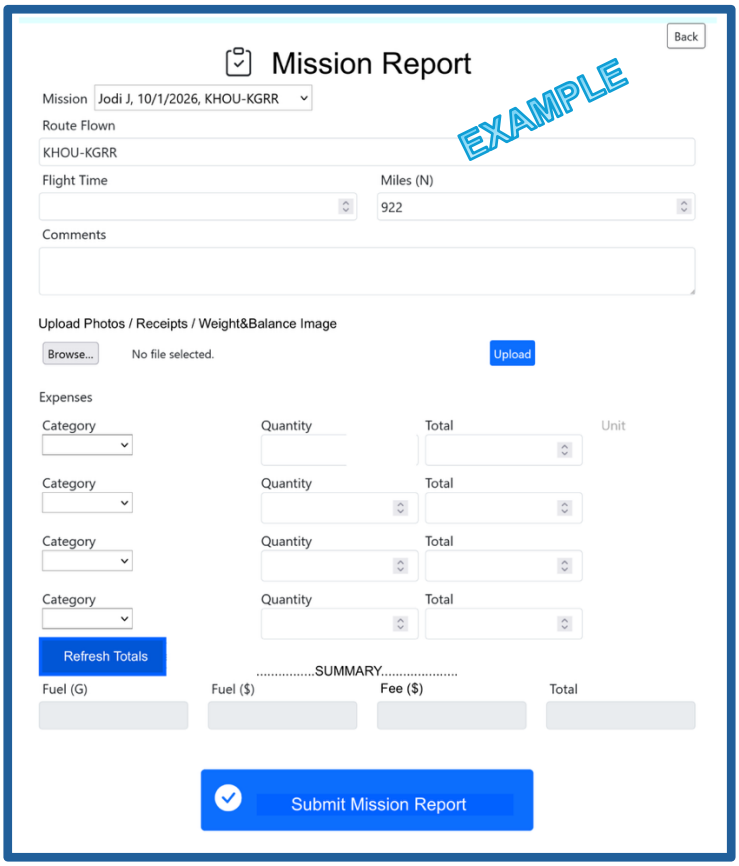
- DRESS: Pilots are encouraged to dress appropriately as representatives for *Wings of Mercy*. Apparel with a *WOM* logo is desirable.
- LOADING: Pilots are responsible for supervising aircraft loading. Passengers needing assistance boarding or deplaning must be accompanied by a companion able to provide appropriate assistance. Pilots must consider the patient's condition and their own safety if attempting to assist. Flight crew should not physically assist with passenger movement.
- CANCELLATIONS: Last minute cancellations can happen because of equipment, airport closures or un-forecast weather conditions. When these happen, pilots should contact Flight Coordinator to handle communications with the passengers if possible.
- PASSENGER BREIFING: A complete briefing is required for all passenger carrying legs of a CMF. The approved Passenger Briefing is printed on *WOM's* Flight Manifest which is required to be onboard each CMF.
  The briefing items are:
  - **This flight is permitted under FAA exemption. Wings is not a commercial operator.**
  - **No Smoking on this flight at any time.**
  - **Seat Belts & Shoulder Harness are required during Takeoff & Landings.**
  - **Seat backs upright and loose items secured during Takeoff & Landings.**
  - **Normal EXIT operation. Emergency EXIT operation.**
  - **Location of Sic-Sac's – how to use them.**
  - **Special Assistance methods for mobility limited passengers in an emergency.**
  - **Survival equipment location and use.**
  - **Oxygen location and use (if installed).**
  - **Fire Extinguishers location and use.**
  - **Sterile cockpit required at TO & Land. Talk with the crew after level-off.**
- FRAGILE – HANDLE with CARE: Many passengers on *WOM* arranged CMF's are fragile, both physically and emotionally. These people have been through a lot with their illness and companions with caregiving. Be aware that sites, sounds and feelings pilots take for granted can be fearful to those under long-term physical and emotional strain.
  - BEFORE FLIGHT talk about what to expect for ride, noises and flashing lights. Discuss heating and ventilation, how use the Wemac vents and where to get a blanket if they are chilled. Show where Sic-Sacs are stored with a non-threating "for your comfort" statement.
  - DURING FLIGHT keep passengers informed on weather ahead, bumps going through clouds, time to destination. Take the time to assure your passengers. Be careful with rapid climbs and descents and keep your banks shallow when possible.

1.4 MISSION RECORDS:

1.40 MISSION COMPLETE: Patient - Passengers have safely reached their destination. Your plane is back in the hanger and *WOM*'s Flight Coordinator is waiting to hear about another successful mission. PIC is responsible to complete the mission by:

a. PIC can use *WOM's* system App, choose COMPLETE MISSION and select the recent mission from a pull-down box:

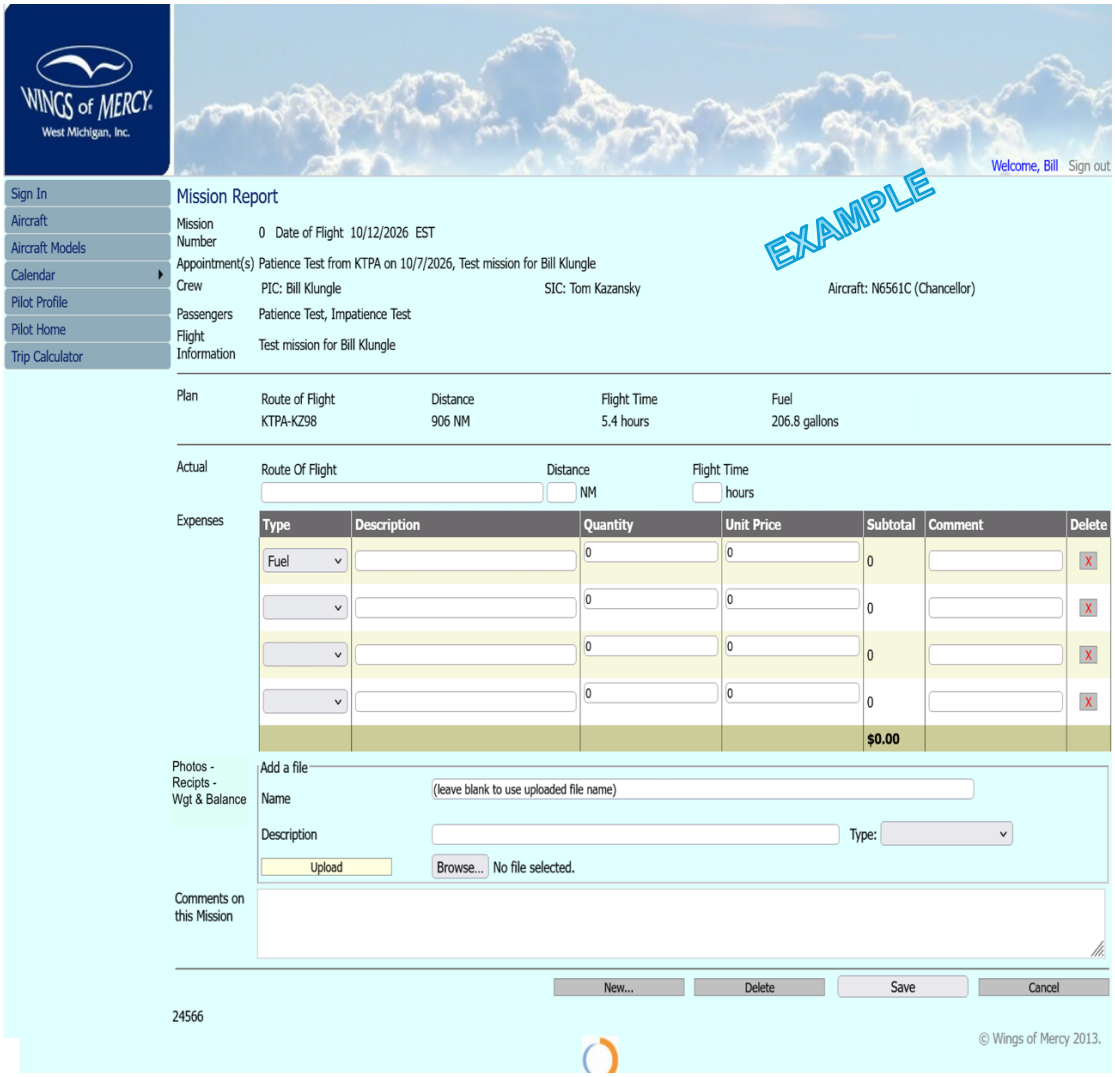
- Enter actual Route Flown (or accept the default)
- Enter actual Fight Time
- Enter actual Nautical Miles (or accept the default)
- Enter any Comments about the flight (optional)
- Upload any photos and (if reimbursement is requested, receipt copies with weight & balance images for passenger carrying legs)
- Enter the Fuel quantity used (even if reimbursement is not requested)
- Enter the Fuel and Fee cost (if reimbursement is requested)
- Press the **Refresh Totals** button to summarize the total.
- Press the **Submit Mission Report** to close the Mission and file a report.



…**OR**…

b. PIC can use a desktop computer to complete the mission by selecting Click to submit Mission Report link on emailed Flight Manifest. A larger, full-screen version of the Mission Report can be used to input complete mission details:

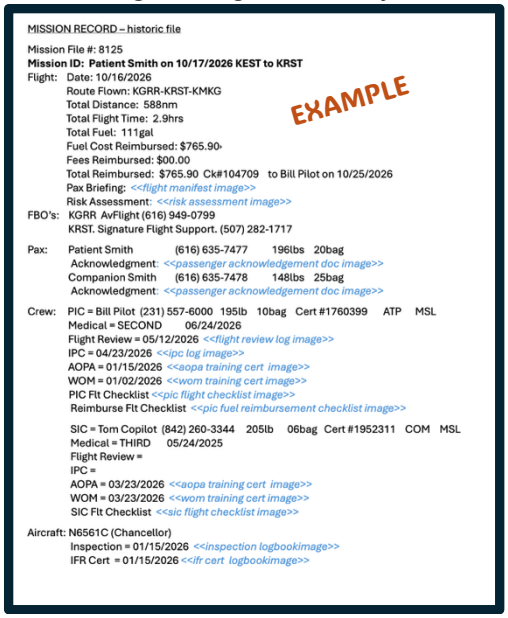
- *WOM* system estimates for the mission are presented for reference.
- Enter the actual Route of Flight
- Enter the actual Nautical Miles flown
- Enter the actual Flight Time
- Enter the Fuel quantity used (even if reimbursement is not requested)
- Enter the Fuel and Fee cost (if reimbursement is requested)
- Upload any photos and (if reimbursement is requested, receipt copies with weight & balance images for passenger carrying legs)
- Press **Save** button to complete the report



1.41 MISSION DOCUMENTS: The completed CMF records are kept in a cloud-based file system. Each complete CMF record includes:

- Flight identification key field
- Patient / Passenger names and contact information
- Pilot names, certificate numbers and contact information
- Pilot qualifications: ratings and flight experience
- Pilot calendar qualifications:
  - Medical type - date, certificate image
  - Flight Review – date, logbook image
  - IPC – date, logbook image
  - AOPA course – date, certificate image
  - WOM training – date, certificate image
- PIC documentation of recent experience at time CMF was accepted
- Risk Assessment document completed within 24 hours of departure
- Aircraft Identification:
  - N-Number w/Std Airworthy Certificate
  - Inspection date & log image
  - IFR certification date & log image
- Flight date, routing flown, FBO's used
- Flight times, distance flown, gallons fuel consumed
- If fuel or fees are reimbursed for this mission:
  - Amount of reimbursement to PIC
  - Weight & Balance documentation for each occupied leg

1.42 MISSION RECORDS RETAINED: for a minimum of 24 months. Computer records are accessible through Wings of Mercy's office staff.



MISSION RECORD – historic file

Mission File #: 8125
Mission ID: Patient Smith on 10/17/2026 KEST to KRST
Flight: Date: 10/16/2026
Route Flown: KGRR-KRST-KMKG
Total Distance: 588nm
Total Flight Time: 2.9hrs
Total Fuel: 111gal
Fuel Cost Reimbursed: $765.90
Fees Reimbursed: $00.00
Total Reimbursed: $765.90 Ck#104709 to Bill Pilot on 10/25/2026
Pax Briefing: <<flight manifest image>>
Risk Assessment: <<risk assessment image>>
FBO's: KGRR AvFlight (616) 949-0799
KRST. Signature Flight Support. (507) 282-1717

Pax: Patient Smith (616) 635-7477 196lbs 20bag
Acknowledgment: <<passenger acknowledgement doc image>>
Companion Smith (616) 635-7478 148lbs 25bag
Acknowledgment: <<passenger acknowledgement doc image>>

Crew: PIC = Bill Pilot (231) 557-6000 195lb 10bag Cert #1760399 ATP MSL
Medical = SECOND 06/24/2026
Flight Review = 05/12/2026 <<flight review log image>>
IPC = 04/23/2026 <<ipc log image>>
AOPA = 01/15/2026 <<aopa training cert image>>
WOM = 01/02/2026 <<wom training cert image>>
PIC Flt Checklist <<pic flight checklist image>>
Reimburse Flt Checklist <<pic fuel reimbursement checklist image>>

SIC = Tom Copilot (842) 260-3344 205lb 06bag Cert #1952311 COM MSL
Medical = THIRD 05/24/2025
Flight Review =
IPC =
AOPA = 03/23/2026 <<aopa training cert image>>
WOM = 03/23/2026 <<wom training cert image>>
SIC Flt Checklist <<sic flight checklist image>>

Aircraft: N6561C (Chancellor)
Inspection = 01/15/2026 <<inspection logbookimage>>
IFR Cert = 01/15/2026 <<ifr cert logbookimage>>

EXAMPLE

1.43 DISASTER PLAN: In the event of an accident or incident involving a *WOM* referred flight, Pilots are expected to follow this protocol:

- Inform *WOM's* President of the situation as soon as possible. If the President cannot be reached, contact *WOM's* Vice-President.
- Make no statements or have any discussion about either the flight or Individuals. Do not give out names, aircraft type, or destinations. Do not speculate about the cause to individuals or the media.
- Refer all inquiries and questions to *WOM's* President (or Vice-President), these are the official spokespersons for Wings of Mercy. All communications during an emergency situation must come through one of them.

EXHIBIT: A

FAA REAUTHORIZATION ACT OF 2012

SEC. 821. CLARIFICATION OF REQUIREMENTS FOR VOLUNTEER PILOTS OPERATING CHARITABLE MEDICAL FLIGHTS.

(a) REIMBURSEMENT OF FUEL COSTS.—Notwithstanding any other law or regulation, in administering section 61.113(c) of title 14, Code of Federal Regulations (or any successor regulation), the Administrator of the Federal Aviation Administration shall allow an aircraft owner or operator to accept reimbursement from a volunteer pilot organization for the fuel costs associated with a flight operation to provide transportation for an individual or organ for medical purposes (and for other associated individuals), if the aircraft owner or operator has—
(1) volunteered to provide such transportation; and
(2) notified any individual that will be on the flight, at the time of inquiry about the flight, that the flight operation is for charitable purposes and is not subject to the same requirements as a commercial flight.

(b) CONDITIONS TO ENSURE SAFETY.—The Administrator may impose minimum standards with respect to training and flight hours for single-engine, multi-engine, and turbine-engine operations conducted by an aircraft owner or operator that is being reimbursed for fuel costs by a volunteer pilot organization, including mandating that the pilot in command of such aircraft hold an instrument rating and be current and qualified for the aircraft being flown to ensure the safety of flight operations described in subsection (a). Definition. 49 USC 47141 note. Deadline.

(c) VOLUNTEER PILOT ORGANIZATION.—In this section, the term ‘‘volunteer pilot organization’’ means an organization that—
(1) is described in section 501(c)(3) of the Internal Revenue Code of 1986 and is exempt from taxation under section 501(a) of such Code; and
(2) is organized for the primary purpose of providing, arranging, or otherwise fostering charitable medical transportation.

EXHIBIT:B

FAA REAUTHORIZATION ACT OF 2024

SEC. 830. <<NOTE: 49 USC 40101 note.>> CHARITALE FLIGHT FUEL REIMBURSEMENT EXEMPTIONS.

(a) <<NOTE: Recissions.>> In General.—

(1) <<NOTE: Time period.>> Validity of exemption.—Execpt as otherwise provided in this subsection, an exemption from section 61.113c of title 14 Code of Federal Regulations, that is granted by the Admininstrator for the purpose of allowing a volunteer pilot to accept reimbursement from a volunteer pilot organization for the fuel cost and airport fees attributed to a flight operation to provide charitable transportation pursuant to section 821 of the FAA Modernization and Reform act of 2012 (49 U.S.C 40101 note) shall be valid for 5 years.

(2) Failing to adhere. –If the Administrator finds an exemption holder under paragraph (1) or a volunteer pilot fails to adhere to the conditions and limitations of the exemption described under such paragraph, the Administrator may recind or suspend the exemption.

(3) No longer qualifying.—If the Administrator finds that such exemption holder no longer qualifies as a volunteer pilot organization, the Administrator shall rescind such exemption.

(4) Forgoing exemption.—If such exemption holder informs the Administrator that such holder no longer plans to exercise the authority granted by such exemption, the Administrator may rescind such exemption.

(b) Additional Requirements.—

(1) In general.—A volunteer pilot organization may impose additional safety requirements on a volunteer pilot without –

(A) Being considered—

(i) An air carrier (as such term is defined in section 40102 of title 49, United States Code); or

(ii) A commercial operator (as such term is defined in section 1.1 of title 14 Code of Federal Regulations): or

(B) Constituting common carriage.

(2) Savings clause.—Nothing in this subsection may be construed to limit or otherwise affect the authority of the Administrator to regulate, as appropriate, a flight operaion associated with a volunteer pilot organization that constitutes a commercial operation or common carriage.

(c) Reissuance of Existing Exemptions.—In reissuing an expiring exemption described in subsection (a) that was originally issued prior to the date of enactment of this Act the Administrator shall ensure that the reissued exemption- -

(1) Accounts for the provisions of this section and section 821 of the FAAMondernization and Reform Act of 2012 (49 U.S.C 40101 note):and

(2) Is otherwise substantially similar to the previously issued exemption

(d) Stautory Construction.- -Nothing in this section shall be construed to- -

(1) Affect the authority of the Administrator to exempt a pilot (exercising the private pilot privileges) from any restriction on receiving reimbursement for the fuel cost and airport fees attributed to a flight operation to provide charitable transportation; or

(2) Impose or authorize the imposiion of any additional requirements by the Administrator on a flight that is arranged by a volunteer pilot organization in which the volunteer pilot- -

(A) Is not reimbursed the fuel costs and airport fees attributed to a flight operation to provide charitable flights; or

(B) Pays a pro rata share of expenses as described in section 61.113c of title 14, Code of Federal Regulations.

(e) Definitions.- - In this section:

(1) Volunteer pilot. - - The term ‘‘volunteer pilot’’ means a person who - -

(A) Act as pilot in commant of a flight operation to provide charitable transportation pursuant to section 821 of the FAA Mondernization and Reform Act of 2012 (49 U.S.C. 40101 note); and

(B) Holds a private pilot certificate, commercial pilot certificate, or airline transportation pilot certificate issued under parr 61 of title 14, Code of Federal Regulations.

(2) Volunteer pilot organization, - - The term ‘‘volunteer pilot organization’’ has the meaning given such term in section 821c of the FAA Mondernization and Reform Act of 2012 (49 U.S.C. 40101 note);

EXHIBIT: C

WINGS OF MERCY Pilot Guide compliance section reference in RED

U.S. Department of Transportation
Federal Aviation Administration

Aviation Safety

800 Independence Ave
Washington, DC 20591

March 14, 2025 / Revised June 1, 2026

Exemption No. 23553A /1/2026 REVISION
Regulatory Docket No. FAA-2024-2049

Mr. Fred Honore
Wings of Mercy, Inc.
100 South Pine Suite 393
Zeeland, MI 49464

Dear Mr. Honore:

This letter is to inform you that the Federal Aviation Administration (FAA) has granted your request for an exemption. This letter transmits the FAA's decision, explains the FAA's basis, and provides the conditions and limitations of the exemption, including the date it ends.

The Basis for the FAA's Decision

By letter received July 18, 2024, you petitioned the FAA on behalf of Wings of Mercy, Inc. (Wings of Mercy) for an exemption from §§ 61.113(a) and 61.113(c) of Title 14, Code of Federal Regulations (14 CFR) to the extent necessary to allow Wings of Mercy volunteer pilots acting as pilot in command of a flight operation to provide charitable transportation to accept and receive reimbursement for fuel costs and airport fees.

Section 830 of the FAA Reauthorization Act of 2024 (2024 Act) authorizes the FAA to issue exemptions from § 61.113(c) to allow volunteer pilots to accept reimbursement from a volunteer pilot organization for the fuel costs and airport fees attributed to a charitable medical transportation flight operation for a 5 year validity period.[1] Section 830 also sets forth required parameters for the reissuance of exemptions issued prior to the 2024 Act, stating that the Administrator shall ensure that the reissued exemption accounts for (1) the provisions of section 830(a) of the 2024 Act and section 821 of the FAA Modernization and Reform Act of 2012 (2012 Act)[2] and (2) substantial similarity to the previously issued exemptions. While the petitioner is not seeking reissuance of an expiring exemption, the FAA finds these factors to be instructive in the consideration of this exemption.

[1] Pub.L. 118-63, sec. 830 (May 16, 2024).
[2] Pub. L. 112-95 (Feb. 14, 2012).

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Section 821 of the 2012 Act required the FAA to allow an aircraft owner or operator to accept reimbursement from a volunteer pilot organization for the fuel costs associated with certain operations, subject to minimum standards imposed by the Administrator to ensure safety of flight. The FAA has historically facilitated such operations through exemptions prior to the 2012 Act[3] and continued such process in accordance with the 2012 Act. As previously stated, the 2024 Act expanded reimbursement of fees to include airport fees. Therefore, this exemption accounts for both the 2012 Act and 2024 Act by permitting a pilot operating under the conditions and limitations herein to accept and receive reimbursement for both fuel costs and airport fees. Additionally, adding airport fees would not adversely affect safety, as the petitioners and their pilots would still be required to comply with the conditions and limitations set forth herein, which the FAA has found in previous exemptions ensures a higher level of aviation safety for the flying public.

Additionally, the FAA has issued grants of exemption in circumstances similar in certain material respects to those presented in your petition (i.e., this exemption accounts for previously issued exemptions providing relief for reimbursement of fuel costs). Specifically, in Exemption Nos. 10019 and 12627 (copies enclosed), the FAA found that volunteer pilots can receive and accept reimbursement of fuel costs to provide charitable flights.

Having reviewed your reasons for requesting an exemption, I find that:

- The reissued exemption accounts for the provisions of section 830(a) of the 2024 Act and section 821 of the 2012 Act and previously issued exemptions;

- The reasons stated by the FAA for granting the enclosed Grant of Exemption Nos. 10019 and 12627 also apply to the situation presented in your petition; and

- A grant of exemption is in the public interest.

The FAA's Decision

The FAA has determined that good cause exists for not publishing a summary of the petition in the *Federal Register*. Specifically, § 11.87 provides a list of factors that may be considered in FAA's decision to not request comment; however, this list is not exhaustive. While the reimbursement of airport fees would set a precedent for future volunteer pilot exemptions, the FAA finds notice and comment to be unnecessary to meet the statutory language and intent of the 2012 and 2024 Acts. Accordingly, we have determined that additional delay to issuance of this exemption by seeking comments is not warranted and would adversely affect your ability to facilitate increased access to medical care to underserved individuals and families. In accordance with section 830(a) of the 2024 Act, this exemption shall be valid for five years.

The FAA has determined that relief provided historically in Exemption Nos. 10019 and 12627 was incomplete. Instead of only providing relief from § 61.113(a) and (c), the exemptions should

[3] E.g., Exemption No. 10009.

have also provided relief to 14 CFR part 119, specifically § 119.1. Section 119.1 outlines the applicability of the part 119 certification requirements for air carriers and commercial operators. To enable Wings of Mercy to conduct operations under part 91 rather than as a part 119 certificated commercial operator, the FAA is granting relief from § 119.1. The FAA notes that providing § 119.1 relief does not in and of itself substantively change the operating parameters for Wings of Mercy consistent with the historical conditions and limitations that applied.

The FAA has determined that the justification for the issuance of Exemption Nos. 10019 and 12627 remains valid and in the public interest. Therefore, under the authority contained in 49 U.S.C. §§ 106(f), 40113, and 44701 which the FAA Administrator has delegated to me, I hereby grant Wings of Mercy, Inc. an exemption from 14 CFR §§ 61.113(a), 61.113(c), and 119.1 to the extent necessary to allow Wings of Mercy volunteer pilots acting as pilot in command of a flight operation to provide charitable transportation to accept and receive reimbursement for fuel costs and airport fees, subject to the conditions and limitations described below.

Conditions and Limitations

1. The following definitions apply when these terms are used in this exemption:

[REF = 1.03] a. Charitable Medical Flight (CMF): A flight operation to provide transportation for an individual or organ for medical purposes (and for other associated individuals), if the aircraft owner or operator has volunteered to provide such transportation.

[REF = 1.0] b. Volunteer Pilot Organization (VPO): An organization:

i. Described in section 501(c)(3) of the Internal Revenue Code of 1986 and exempt from taxation under section 501(a) of such Code; and

ii. Organized for the primary purpose of providing, arranging, or otherwise fostering charitable medical transportation.

[REF = 1.0] 2. Before exercising the relief granted by this exemption, Wings of Mercy must ensure it meets the definition of a VPO and that the flight meets the definition of a CMF, as specified in Condition and Limitation No. 1.

[REF = 1.02] 3. This exemption may be exercised only for CMFs conducted by Wings of Mercy. A CMF includes flights that are intended to reposition the aircraft to the client pick-up location, as well as reposition the aircraft following the client drop-off. Any repositioning flight must be from the aircraft home base to and from the point of client pick-up/drop-off location by the most practical route.

[REF = 1.40] 4. Wings of Mercy must ensure the following items are available to any representative of the FAA Administrator, upon request:

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[REF = 1.1] [REF = 1.33] [REF = 1.34]

a. A detailed description of Wings of Mercy's process for verification of each pilot's qualification and training. This process must include a means to verify each pilot's qualifications to act as pilot-in-command (PIC) prior to each flight;

[REF = 1.1] [REF = 1.35]

b. Documentation showing all Wings of Mercy pilots' flight experience, airman certificate information, and currency of FAA medical certificates.

[REF = 1.33] [REF = 1.34]

c. Documentation from each pilot showing that at the time he/she accepts a CMF under this exemption, he/she meets all minimum standards and appropriate currency requirements established by Wings of Mercy, part 61, and all Conditions and Limitations of this exemption; and

[REF = 1.41]

d. Documentation of each flight and reimbursement containing the following information, at a minimum:

i. Name and pilot certificate number of the PIC;

ii. Name and identifier of the departure and arrival airports;

iii. Name of all occupants of the airplane excluding the PIC;

iv. Date and time of departure and arrival; and

v. Amount of the fuel reimbursement.

[REF = 1.42]

e. All the documentation required under Condition and Limitation No. 4 must be maintained by Wings of Mercy for a minimum of 24 calendar months.

5. All pilots operating under the terms of this exemption must possess the following certificates, qualifications, and aeronautical experience –

[REF = 1.11]

a. An instrument rating or Airline Transport Pilot (ATP) certificate that is appropriate to the aircraft being flown;

[REF = 1.13.1] [REF = 1.13.3]

b. A minimum total flight time of 500 hours, with no less than 400 hours as PIC, and a minimum of 50 hours in the specific make and model of the aircraft being flown;

[REF = 1.13.3]

c. A minimum 50 hours as PIC logged within the preceding 12 calendar months and current to carry passengers per FAR 61.57a&b.

[REF = 1.13.3]

d. In lieu of the requirements in (c.) above, a pilot may have logged 2 hours of flight training with a certificated flight instructor within the preceding 3 months.

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[REF = 1.13.3]

e. A second-class medical certificate (per §§ 61.2 and 61.23(a)(2)(ii));

[REF = 1.10]

f. A current flight review (per § 61.56(a)) in the same aircraft category, class, and type (if a type rating is required) being flown;

[REF = 1.13.3]

g. Within the preceding 12 calendar months, an instrument proficiency check (IPC) meeting the requirements of § 61.57(d). The IPC must be conducted in accordance with the Instrument Rating — Airplane Airman Certification Standards. This requirement can be substituted by an FAA practical test for an ATP certificate or instrument rating;

[REF = 1.13.3]

h. In addition to meeting the IPC requirement of § 61.57(d) as specified in Condition and Limitation No. 5(g), the pilot must meet the recent flight experience requirements of § 61.57(c), in the same aircraft category, class, and type (if a type rating is required) being flown; and

[REF = 1.13.3]

i. For all operations under this exemption, the pilot must meet the recent flight experience requirements for night operations (per § 61.57(b)) in an aircraft of the same category, class, and type (if a type rating is required).

6. All operations under this exemption must be in compliance with the following flight duty, rest, and flight time limitations (a duty day starts when the pilot arrives at the airport and begins preparation for the flight and terminates upon completion of the post-flight inspection of the aircraft):

[REF = 1.14]

a. No pilot may fly more than 8 hours of flight time (per § 61.1) within any 24-consecutive-hour duty day period;

[REF = 1.14]

b. No pilot may perform a duty day in excess of 12 consecutive hours; and

[REF = 1.14]

c. Once the pilot has performed 12 consecutive hours of duty, the pilot must rest a period of at least 12 hours before conducting any other CMF.

[REF = 1.35]

7. Prior to each takeoff, the PIC must ensure that all occupants have been orally briefed on the following:

FLIGHT MANIFEST REQ'D CK-LIST

a. The flight is being permitted under this grant of exemption and that the operator is not a certificated commercial operator;

b. When, where, and under what conditions smoking is allowed;

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FLIGHT MANIFEST REQ'D CK-LIST

c. Use of safety belts, shoulder harnesses, and child restraint systems: when, where, and under what conditions it is necessary to fasten passenger safety belts and, if installed, shoulder harnesses;

d. The placement of seat backs in an upright position before takeoff and landing;

e. Location and means for opening the passenger entry door and emergency exits;

f. Location of survival equipment;

g. Use of normal and emergency oxygen installed; and

h. Location and operation of fire extinguishers.

[REF: 1.35] – WOM Required Passenger Brief used on all Wings of Mercy passenger legs.

An FAA sample briefing document can be found in the July/August 2014 edition of the FAA Safety Briefing Magazine.[4]

[REF = 1.03]
[REF = 1.35] REQ'D CK-LIST

8. Wings of Mercy must implement procedures to notify the passengers (or their legal guardians) who will be on the flight, that the flight operations are for charitable purposes and are not subject to the same FAA requirements as a commercial flight. These procedures must allow for the notification to be given as early as possible to the passengers (or their legal guardian). Such notification must also be provided to any individual who inquires about receiving or scheduling a CMF.

[REF = 1.20] 9. Each aircraft operated under this exemption must have a standard airworthiness certificate.

[REF = 1.21] 10. The aircraft must be maintained and inspected in accordance with 14 CFR part 91 Subpart E, 14 CFR part 43, or other inspection programs approved by the FAA.

[REF = 1.3] 11. All pilots operating under this exemption must comply with the following requirements:

[REF = 1.30.d] a. All flights operating under this exemption must activate an Instrument Flight Rules (IFR) flight plan. The earliest the flight plan may be cancelled is upon visual contact with the destination airport;

[REF = 1.31.d-f] b. For flights in Instrument Meteorological (IFR) conditions, each pilot may only airports with a functioning published Instrument Approach Procedure. If an alternate airport is required (FAR 91.169 (c&i), the alternate must have a functioning approach with Vertical Guidance.

[4] Available at https://www.faa.gov/sites/faa.gov/files/2022-01/JulAug2014.pdf.

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[REF = 1.31.g] c. Each pilot must add 100 feet and ½ mile to all instrument approach minimums;

[REF = 1.31.b] d. Each pilot must add 50 percent to pilot operating handbook (POH) runway length performance for obstacle clearance on takeoff and landing under ambient conditions;

[REF = 1.31.h] e. For IMC takeoff minimums, the PIC must ensure that the weather meets approach landing minimums with additional margin noted in Condition and Limitation No. 11(c) (Example: If the Baltimore-Washington International Airport minimums are 200/1/2, then the takeoff minimums will be at least 300 feet and 1 statute-mile visibility);

[REF = 1.35] REQ'D CK-LIST f. Prior to each takeoff, the PIC must ensure that patients, who may need the assistance of another person to exit the aircraft if an emergency occurs, have received a briefing as to the procedures to be followed if an evacuation occurs; and

[REF = 1.35] REQ'D CK-LIST g. Each pilot will utilize and brief passengers about sterile cockpit procedures as defined in 14 CFR § 135.100.

[REF = 1.3] h. The requirements of Conditions and Limitations No.11 (a) through (g) apply only to flight legs with a chartable medical flight passenger (patient or caregiver) on board.

[REF = 1.36] RA Tool 12. Wings of Mercy must develop and implement a preflight risk assessment tool. The tool must be completed by the PIC before each flight and must be transmitted to Wings of Mercy prior to takeoff for any flight operated under this exemption. The completed tool must be retained by Wings of Mercy for a minimum of 30 days. Wings of Mercy must identify a maximum score flight value, or other appropriate measure, that is permissible for a flight to be initiated under this exemption. A sample risk assessment tool is available in the FAA Information for Operators (InFO) 07015[5].

[REF = 1.36] RA Tool Weather Section The FAA recognizes that any sample tool used to assess any potential safety risk during preflight planning should be modified to adequately address the risk for general aviation aircraft and Wings of Mercy's specific operation. As an example, the sample Flight Risk Assessment Tool as outlined in InFO 07015 scores icing as a risk value of five when it is moderate to severe. However, for most general aviation aircraft, known icing conditions of any value should be considered grounds for cancellation or postponement of a flight.

[REF = 1.12] 13. Wings of Mercy must develop and implement an initial pilot ground training program that includes the following:

[REF: WOM Course] a. Wings of Mercy operational policies and procedures;

[5] Available at https://www.faa.gov/sites/faa.gov/files/other_visit/aviation_industry/airline_operators/airline_safety/inFO07015.pdf.

[REF: WOM Course] b. Communicating accurate information for Weight & Balance and Runway Limitations calculations.

[REF: AOPA Course] c. Principles and methods of managing passenger needs and handling special equipment;

[REF: AOPA Course] d. Principles and methods of aviation professionalism, decision-making, risk management and mitigation, and determining personal minimums; and

[REF = 1.02] [REF = 1.04] e. Informing the pilot of where a copy of this exemption can be located and requiring the pilot to become familiar with the conditions and limitations.

[REF = 1.1] [REF = 1.12] 14. Recurrent training is required for all pilots operating under this exemption. The annual recurrent training program must include verification that each pilot is adequately trained, current, and proficient on all of the elements in the Wings of Mercy initial pilot training program described in Condition and Limitation No. 13.

15. Wings of Mercy may not exercise the relief granted by this exemption unless Wings of Mercy receives verification indicating acceptance of the Wings of Mercy risk assessment tool (Condition and Limitation No. 12) and the initial and recurrent pilot ground training program (Condition and Limitation Nos. 13 and 14) from the FAA General Aviation & Commercial Division (AFS-800). This document may be sent to the FAA Airman Certification and Training Branch, 800 Independence Ave., SW, Washington, DC 20591 or via e-mail to 9-AFS-800-Correspondence@faa.gov. Electronic submission is preferred.

[REF = 1.21] 16. Wings of Mercy must maintain a copy of the aircraft logbook entry for the most recent annual inspection of any aircraft used to conduct flights under this exemption.

17. The privileges of this exemption may be exercised only for flights within the District of Columbia, the 48 contiguous United States, its territories, and the states of Alaska and Hawaii. This exemption is not valid for operations in airspace outside of the United States, or in an intrastate operation that involves flight through international airspace.

[REF = 1.31.i]

[REF = 1.41] [REF = 1.42] 18. The FAA may, at any time or place, conduct inspections of the pilots, aircraft, and any records required to be kept in accordance with this exemption.

Failure to comply with any of the above conditions and limitations may result in the immediate suspension or rescission of this exemption.

The Effect of the FAA's Decision

This exemption terminates on March 31, 2030, unless sooner superseded or rescinded.

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To request an extension or amendment to this exemption, please submit your request by using the Regulatory Docket No. FAA-2024-2049 (*http://www.regulations.gov*). In addition, you should submit your request for extension or amendment no later than 120 days prior to the expiration listed above, or the date you need the amendment, respectively.

Any extension or amendment request must meet the requirements of 14 CFR § 11.81.

Sincerely,

/s/

Hugh J. Thomas
Deputy Executive Director, Flight Standards Service

Enclosure: Exemption Nos. 10019 and 12627

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EXHIBIT: F

RECORD OF REVISION

REVISION	DATE	SECTION REFERENCE	DESCRIPTION
.- -	08/01/25	All Sections	Rewrite of WINGS PILOT-REQMTS 2022
25.01	04/01/26	SIC requirements	Changed to 10 hrs actual IFR required
25.01	04/01/26	Ex-D: Flight Manifest	Updated with Current example
25.01	04/01/26	Ex-E: Risk Assessment	Updated with Current example
26.02	06/01/26	Multiple: Word corrections	Exemption wording & spelling corrections
26.10	10/10/26	Multiple: requirements	Alignment with Exemption – references