



An Aviator's Field Guide to **FAA Medical Certification**

Legal insights for obtaining and
keeping your FAA medical certificate

Anthony G. Ison, Christopher S. Ison,
and Alexander S. Ison

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Introduction

Whether you are a student pilot, a certified flight instructor (CFI), or an airline transport pilot (ATP), the thousands of dollars and hours of effort to obtain your certificates are reduced to nothing without your Federal Aviation Administration (FAA) medical certificate.

If you're reading this book, you probably already know that for most operations as a pilot, you need the correlating class of airman medical certificate for your desired type of operation. Additionally, you must keep your medical certificate current on a recurrent basis. However, getting and keeping a FAA medical certificate can be a bigger problem than some would think.

In our practice, we talk to people who never pursued their interests in aviation because they did not believe they could obtain a medical certificate or because their application was once denied (and they didn't know how to get the denial overturned). Others we encounter are career pilots whose livelihood is put on hold because of an intervening medical condition. We also speak to individuals who wish to fly their personal aircraft or fly for business purposes but are prevented from doing so—all because of a medical certificate issue.

It's tragic to see students accepted to collegiate aviation programs who learn right before orientation that they cannot get a medical certificate. It's also terrible when we see individuals who buy brand-new planes, only to realize their medical history will ground them (even before making the first payment). The good news is that with some preparation and understanding of the FAA medical certification process, *your* story doesn't have to be tragic.

In order to prevent such tragedies, you have to understand that FAA medical certification is not necessarily a clinical endeavor. What does that mean? There certainly is a clinical element to the process: If you are clinically unwell, and your treating physician believes you are unwell and incapable of operating an aircraft, you likely will not be successful in obtaining your FAA medical certificate. If you are not well clinically, you should not fly—and you probably do not want to fly, either. In such cases, you should focus on getting well.

But, even if you are doing great clinically, that is not a dispositive finding for the purposes of establishing your eligibility for airman medical certification. Instead, while clinicians use their own protocol for assessing whether someone is well or unwell in the real world, the FAA uses its own criteria to establish whether someone should be found eligible to hold a medical certificate. The criteria for FAA medical certification are codified in the Code of Federal Regulations (CFR), Title 14, Part 67. Utilizing the criteria identified in the regulations, the FAA judges the medical evidence you provide (e.g., evaluations from doctors, your medical records, and other supporting evidence) to assess whether your medical history presents any risk to aviation safety.

Now, when you hear the term *FAA medical certification*, having a lawyer involved in the process might not come to mind. Our perspective on medical certification, however, is that it is a legal process. Why? If it were not for the regulations or laws, there would be no standards for certification. The FAA would be able to accept your clinical status and not hold you to a higher medical standard. Furthermore, if it weren't for the regulations, there would be no procedural protocols which identify how applications are to be submitted, how medical evidence is supposed to be reviewed, and how denials are to be appealed. The whole medical certification process is an exercise of applying fact to law (in other words, assessing your medical evidence and determining if you meet the criteria identified in the regulations); we believe that it is more a study of legal theory and procedure than it is completely medical in nature.

Don't get us wrong! The FAA medical certification process certainly requires—or rather, demands—engagement with medical professionals. However, it is our opinion that reports from doctors, medical records, and the like only serve as the evidence required to support your eligibility to meet criteria for certification. Presentation of that evidence and how the application of fact from that evidence is applied to the law before the FAA, in our opinion, is the practice of law.

Therefore, the goal of this book is to help you, the aspiring or already seasoned pilot, leverage the legal nature of FAA medical certification. It is our wish that we can bestow upon you the lessons that we have learned in practice so that you can understand the FAA medical certification process both procedurally and substantively. If the evidence truly supports a finding that you present an acceptable risk to aviation safety, or that any risk can be effectively mitigated, we want you to be able to engage the process with confidence.

Chapter 1

Why FAA Medical Certification Matters to You

As a student pilot, you cannot solo without an FAA airman medical certificate. As an aircraft owner, you cannot legally act as pilot-in-command (PIC) without one. Commercial pilots cannot fly for compensation or hire without an FAA medical certificate, and air traffic control specialists cannot manage aircraft without it. No matter your role in aviation, one constant remains: To operate legally, you must obtain and maintain a valid medical certificate issued by the Federal Aviation Administration (FAA)—with very limited exceptions, such as maintaining BasicMed compliance, which will be discussed later.

Unlike airman certification (e.g., your Private Pilot Certificate), which requires limited interface with the FAA for one-time written, oral, and practical tests, the FAA demands regular examination and scrutiny of your eligibility for continued medical certification. Depending upon your age and the class of medical certificate desired, you might have to renew your FAA medical certificate as often as once every six months (e.g., applicants who are forty years or older at the time of their test and desire a First-Class Medical Certificate), ranging to as infrequently as once every five years (e.g., applicants who are under forty years of age at the time of their test and desire a Third-Class Medical Certificate).

The experience each time you renew your medical certificate, however, is just as important as your checkrides. Why? Medical certification is more than just routine paperwork; it is your gateway to the sky. Every examination offers an opportunity for the FAA to approve or deny your medical application, which means the possibility for you to be grounded. With every exam, too, the FAA scrutinizes your honesty regarding your medical history. If you are found to have been dishonest on your medical application, the consequence is that the FAA could revoke all your airman certificates for what the agency calls “intentional falsification.” This process is therefore more than just paperwork and formality; it implicates aviation safety, your health, your ability to be trusted by the FAA, your livelihood, and ultimately, your ability to operate. There is a lot riding on each exam.

Different Classes of Medical Certificates Explained

How often you have to undertake an exam depends on who you are and what you want to do. The type of medical certification required to be maintained for each type of flying is specified in Part 61 of the Code of Federal Regulations (CFR) and is generally as follows:¹

- **First-Class Medical Certificate**—Required if you are a pilot who holds an Airline Transport Pilot (ATP) Certificate and you fly for a Part 121 air carrier or, in some cases, a Part 135 charter operation.
- **Second-Class Medical Certificate**—Required if you work in any other commercial capacity (such as aerial photography, crop dusting, pipeline control, etc.).
- **Third-Class Medical Certificate**—Required for general aviation pilots and student pilots who only wish to fly for their own personal pleasure.

¹ 14 CFR Part 61, “Certification: Pilots, Flight Instructors, and Ground Instructors” (2026).

A pilot's ability to obtain and keep a current medical certificate can have significant career and lifestyle implications. FAA medical certification is not solely a clinical determination—it is a regulatory and legal process. *An Aviator's Field Guide to FAA Medical Certification* explains how the Federal Aviation Administration evaluates applications for airman medical certificates under 14 CFR Part 67 and why a favorable clinical assessment by a personal physician does not always result in medical certification. Written by a team with extensive aviation, legal, and medical experience, this guide walks airmen through MedXPress, the Aviation Medical Examiner (AME) examination, deferrals, Conditions AMEs Can Issue (CACI), Special Issuance Authorizations, denials, appeals, BasicMed, and more.

Designed for student pilots who are new to FAA medical certification as well as experienced aviators who have more to lose if there are unexpected issues, this book provides a clear, practical understanding of the process. Using the guidance contained here will help you properly prepare before applying, avoid common pitfalls, reduce the risk of a denial or deferral, and make well-informed decisions to protect your eligibility to fly.

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