

# NOTICE

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

N 8000.294

2/18/05

Cancellation  
Date: 2/18/06

**SUBJ: AIR CARRIER, AIR OPERATOR, AND FRACTIONAL OWNERSHIP  
PROGRAM TRAINING CONDUCTED BY 14 CFR PART 142 TRAINING  
CENTERS**

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**1. PURPOSE.** This notice provides guidance to principal operations inspectors (POI) who have authorized their respective air operator(s) or fractional ownership programs to enter into an arrangement with a Title 14 of the Code of Federal Regulations (14 CFR) part 142 training center to conduct portions of the operator's training, checking, and/or testing. It also clarifies existing terminology, provides guidance on the qualification requirements for training center instructors and evaluators who may be used in an operator's or fractional ownership program manager's training program, and discusses the coordination between POIs and Training Center Program Managers (TCPM).

**2. DISTRIBUTION.** This notice is distributed to the division level in the Flight Standards Service in Washington headquarters; to the branch level in the regional Flight Standards divisions; to the Flight Standards District Offices; and to the Regulatory Standards Division at the Mike Monroney Aeronautical Center. This notice is also distributed electronically to the division level in the Flight Standards Service in Washington headquarters and to all regional Flight Standards divisions and district offices. This information is also available on the Federal Aviation Administration's (FAA) Web site at:  
<http://www.faa.gov/avr/afs/notices/8000/N8000-294.doc>.

**3. CANCELLATION.** Handbook Bulletins Air Transportation (HBAT) 98-11, Title 14 CFR Part 135 Operators: Pilot Ground Training, Testing and Checking at Training Centers, and HBAT 99-01, Outsourced Flightcrew Training: Audit by Operators and Use of OpSpecs Paragraph A031, are hereby canceled.

**4. ORGANIZATION OF THIS NOTICE.** This notice has been divided into three main sections. The first, paragraphs 1 through 13, contains general information detailing basic policies and procedures for the management of an operator's or fractional ownership program manager's approved training program being conducted by a part 142 training center. The second, Appendix 1, is a series of scenarios followed by questions and answers that have been developed to respond to questions received from industry and our inspector group concerning the coordination between POIs and TCPMs. The third section, Appendixes 2 through 4, contain supporting information and sample forms that will be useful to POIs, TCPMs, and operators or fractional ownership program managers in the management of their respective roles.

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Distribution: A-W(FS)-2; A-X(FS)-3; A-FFS-7 (LTD); AMA-200 (80 cys)  
(Electronically: A-W(FS)-2; A-X(FS)-2; A-FFS-7)

Initiated By: AFS-840

## 5. BACKGROUND.

a. The implementation of part 142 established training center certification procedures allowed for the use of flight simulators and advanced flight training devices to accomplish airman certification and proficiency under 14 CFR parts 61 and 63, and provided guidance for the development of training center curricula in support of 14 CFR Chapter I (which includes parts 1–199) requirements. It also codified a process, subject to the POI’s approval, which enables an operator (see definition in paragraph 6a) to enter into an agreement with a part 142 training center to conduct portions of the operator’s required training program.

b. In addition to adopting part 142, the FAA also revised applicable sections of 14 CFR parts 61, 63, 91 subpart K, 121, 125, 135, and 141 to afford a means for crediting the training, testing, and checking accomplished in flight simulators toward the flight training requirements of those parts.

c. The adoption of part 142 enabled operators to pursue training alternatives not previously available under the regulations. Part 142 has made the use of training centers by operators more widely accepted as an alternative means of providing training to its employees.

**NOTE: “Alternative means” as used in part 142 has in some cases been misunderstood and has been interpreted to mean that compliance with a training center’s approved courses will meet the training requirements required by the appropriate operating rules for the operator. This is NOT the case. “Alternative means” permits an operator to arrange to have ITS approved training conducted by a third party. It does not mean that an operator has an “alternative means” to meet the training approval requirements governing its particular operation. Programs approved in accordance with part 142 may NOT be used as an alternative means of satisfying the requirements of the appropriate operating rules as approved by the operator’s POI. “Alternative means” indicates that simulator training is now available to the air carrier as opposed to conducting that training in the actual aircraft (as long as all other regulatory requirements are met).**

d. As the use of training centers continues to increase, the interrelationship between TCPMs and an operator’s POIs have become increasingly important. When an operator wishes to use the services of a part 142 training center, the most common operational issues that POIs and TCPMs must resolve are:

(1) Exactly what portion of the operator’s training, checking, or testing will the center accomplish?

(2) What qualification requirements are necessary for the training center flight instructors to conduct the requested training? (Ref: part 91, sections 91.1075, 91.1089, and 91.1093; part 121, sections 121.412 and 121.414; and part 135, sections 135.338 and 135.340.)

(3) How does the operator qualify training center evaluators (TCE) or other personnel to become check airmen? (Ref: part 91, section 91.1063; part 121, sections 121.411 and 121.413, and part 135, sections 135.337 and 135.339.)

(4) What documentation is required to ensure that the training completed at the center meets the appropriate POI-approved program, and who maintains this documentation?

e. A recent audit by the Systems Process Audit Program Staff, AFS-40, also highlighted some of these same issues, and it further emphasized the need to develop a better understanding of training center, operator, TCPM, POI roles and responsibilities, guidance and inspector training. In response to those concerns and recommendations, this notice has been developed and the following actions have been initiated:

(1) FAA Orders 8400.10, Air Transportation Operations Inspector's Handbook, and 8700.1, General Aviation Operations Inspector's Handbook, are being revised;

(2) Inspector recurrent training has been revised to incorporate a 4-hour training block on part 142; and

(3) The TCPM training program under development will include the topics appropriate to part 119 operator's training at part 142 training centers.

## 6. DEFINITIONS.

**a. Air Operator (Operator).** As used in this notice, the term "operator" applies to each person operating or intending to operate civil aircraft as an air carrier or commercial operator, in air commerce. This term also refers to any operator who receives an air carrier or operator certificate authorizing operations under parts 121, 125, and 135, and for the purpose of this notice also applies to fractional ownership program managers conducting flights under part 91 subpart K.

**b. Check Airman.** This term refers to an individual who is current and qualified in a particular operator's program and approved by the POI to conduct required evaluations on behalf of the administrator. (Ref: section 91.1089; section 121.411; section 125.295; and section 135.337.) For the purpose of this notice, this term is also used to mean check pilots under part 91 subpart K.

### **c. Core Curriculum.**

(1) A core curriculum is a training center-developed program that is approved by the Administrator (TCPM) for the purpose of meeting the training requirements of certification of airmen under parts 61 and/or 63. (Ref: section 142.3.)

(2) In order for a training program to be approved as a core curriculum it must:

(a) Meet the applicable requirements of part 142, subpart B;

(b) Contain all the events and meet the standards of the appropriate Practical Test Standards (PTS) for the issuance of the particular airman certificate for which it was designed;

(c) Meet the requirements of the Flight Standardization Board (FSB) report for that specific aircraft;

(d) Consist of training segments that identify training and testing requirements for the issuance of a particular certificate; and

(e) Follow guidance in Order 8400.10, vol. 3 to establish the ground and flight training minimum hours; and

(f) Include maneuvers descriptions, standard operating procedures, checklists, and other supporting courseware.

(3) Because part 142 training center core curricula are required to meet the certification requirements of parts 61 and/or 63, they typically do not meet the non-aircraft specific training requirements for an operator. Normally this occurs because the operating rules governing an operator include the requirement for specific modules or elements that deal with operator's specific training, which is not required of a part 142 training center when developing part 61 or part 63 training curricula. Order 8700.1, Volume 2, Chapter 150, Approve Training Program, Curricula, Courseware, and Flight Training Equipment for a Training Center, Figure 150-1, provides a sample part 142 core curriculum that meets the airman certification requirements of part 61. It is also important to understand that an operator may not use a training center's part 142-approved core or specialty curriculum without specific approval from its POI.

**d. Specialty Curriculum.** This term refers to courses that are designed to satisfy a particular requirement of 14 CFR Chapter I (includes parts 1–199), other than airman certification under parts 61 and 63. The Administrator (via the TCPM) approves specialty curricula for use by a training center and, if appropriate, associated satellite centers. (Ref: section 142.3.) Training centers often develop specialty curricula to meet the specific needs of a particular customer. Some examples of specialty curricula include, but are not limited to, long-range navigation, Category II/III authorization, equipment differences training, etc. Specialty curricula can vary widely in focus and subject matter and may be developed for personnel other than flight crewmembers. (Ref: section 142.81.) The approval of specialty programs or courses by a training center's TCPM does not enable that program or course to be used by an operator. The program or course must be approved by the operator's POI for it to be credited for use in the operator's approved training program.

**e. Training Center Evaluator (TCE).**

(1) A TCE is a person employed by a part 142-certificated training center who has been approved to conduct the checking and testing authorized by part 142 on behalf of the Administrator (TCPM) under the provisions of the center's training specifications. (Ref: section 142.3.)

(2) A TCE is an individual who has met the requirements of section 142.55 and may be designated by the TCPM as a TCE. A TCE may conduct the training, testing, and/or checking

required by part 61 or 63 for the certification or proficiency of an airman under the provisions of the training specifications issued to the training center. TCEs *are not permitted* to conduct the testing and/or checking required by an operator without first completing the appropriate portions of that operator's check airman training and being appointed as a *check airman*, in accordance with Order 8400.10, by the operator's POI.

**NOTE: The term “TrainCenter Evaluator – Air Carrier” (TCE-AC) has been discontinued. (Order 8400.10 is being revised to reflect the elimination of this term.)**

**7. ROLES, RESPONSIBILITIES, AND COORDINATION.** The safety, efficiency, and quality of training provided by training centers, through the use of structured programs and advanced simulation devices, has proven to be an effective and economical means to accomplish required training. Consequently, a number of operators have come to rely on part 142 training centers as a source of technical expertise and as their primary training provider. As the use of approved training centers continues to expand, it becomes increasingly important to understand the roles, responsibilities, and coordination activities required of each participant.

Paragraphs 7a(1)–(4) below are provided to emphasize the regulatory roles and responsibilities, as well as the coordination required between operators and training centers when an operator is using a training center to conduct a portion of the operator's training program.

Paragraphs 7a(1)–(4) do not focus on day-to-day activities associated with the surveillance of training centers or operators outside of the context and scope of this notice. It is presumed that these activities are being conducted in accordance with published guidance located elsewhere in FAA guidance and regulations.

**a. POI.**

(1) When an operator requests the use of a training center's facilities, training devices, curricula (core and/or specialty), flight instructors, TCEs, and/or other services, including recordkeeping, the POI is responsible for determining the operator's request conforms to the appropriate regulations.

**NOTE: The approval authority for an operator to conduct training at a training center resides with the operator's POI, not the training center's TCPM. It is important to note that the training program approval process outlined in Order 8400.10 vol. 3, ch. 2 shall be followed when authorizing an operator to use the services of a part 142 training center. If an operator wishes to use a training center's core and/or specialty curriculum(s) to meet a portion of its required training program, the POI must review and approve the center's curriculum for use in the operator's program. The training program approval procedures outlined in Order 8400.10 must be followed as if the operator had developed the subject curricula. If approved for the operator's use, these curricula now become a portion of the operator's approved training program, and the maintenance/currency of those curriculum(s) becomes the responsibility of the operator, not the training center.**

(2) Determine that all center flight instructors and TCEs are trained and qualified in accordance with the operator's approved program. For an operator to employ the services of a training center's TCE to conduct required testing and/or checking, the operator must accomplish the following in the order shown:

(a) Evaluate the TCE's credentials to ensure he/she meets company requirements to become a check airman;

(b) Determine the training required to qualify the individual as a company check airman; and

(c) Conduct and record appropriate check airman training; submit the individual's name, short resume, and training records to the operator's POI for review and approval in accordance with Order 8400.1, vol.3, chapter 3.

**NOTE: If the operator requests the approval of a center's TCE to act on its behalf as a check airman, it is vitally important that the qualifications and training of the requested TCE meet the operator's approved standards and training. To ensure the TCE meets the operator's check airman standards, the operator will need to review the TCE's training history and qualifications. The operator may find that some of the training provided by the center is equivalent to that required by its approved program. Others may warrant partial credit, and some may not be acceptable as equivalent. Based on the operator's evaluation of the TCE's training records and the POI's acceptance of same, the air operator must ensure "applicable" training is provided to the TCE. This may require training on company procedures, maneuvers, and standards. Following the completion of required training, the TCE (or other center personnel) may be submitted to the POI for review and approval.**

(3) Conduct training center surveillance to determine continued compliance with the operator's approved program.

**NOTE: POIs are encouraged to contact the center's TCPM to assist them in this review and approval process.**

(4) If the operator requests approvals of two or more centers, determine that all training, testing, and checking is conducted using the operator's approved curriculum. To ensure standardized training for all of the operator's crewmembers, it is essential that, prior to authorizing multiple sources of training, the operator and POI determine that the same curriculum will be used by each center providing training. Each training center's curriculum must be alike in content, training times, maneuvers descriptions, procedures, checklists, and training devices. **Crewmember training using two or more curricula for the same aircraft type is NOT acceptable.** If a training center is providing the same training program to two or more operators at the same center, it may be permissible to interchange crewmembers during the flight training phase. This may only be accomplished with the approval of the individual operators. In this example, two separate but identical programs would be accomplished

simultaneously. Individual operators may only have one approved training curriculum for each type of aircraft they operate.

(5) Determine that simulators or flight training devices are appropriate to, and representative of, the aircraft being operated by the air carrier. Flight training equipment must meet the operator's training requirements for the aircraft and must be specifically approved not only for the operator's use, but also for each maneuver, procedure, or crewmember function to be trained.

(6) List approved training centers in the operator's operations specifications (OpSpecs). (Paragraph A031 – Authorization to Make Arrangements with Training Center(s), Air Agencies, and/or Other Organization(s) for Certificate Holder Training)

(7) Review the operator's Instructor/Check Airman Standardization program.

**NOTE: A sample Instructor/Check Airman Standardization program has been included as Appendix 2.**

(8) Review the operator's training center audit program.

**NOTE 1: Audit program requirements are detailed in Appendix 4. This appendix supersedes HBAT 99-01 and shall be used when evaluating the suitability of the operator's audit procedures.**

**NOTE 2: Many of the training centers used by operators are located in areas apart from the operator's primary operations base and are often outside of the geographical area of its assigned POI. This makes routine surveillance of the training center difficult for POIs and increases the coordination necessary between the POI and the center's TCPM. Under these conditions, it is very important that the POI and TCPM work closely to ensure adequate surveillance of the operator's approved training facilities, equipment, and curricula.**

**b. TCPM.** From time to time, TCPMs may be called upon to assist a POI whose operator is using the services of a training center. The TCPM's firsthand knowledge of center personnel, facilities, equipment, and curricula is a valuable resource that POIs have come to rely on. This knowledge enables TCPMs to:

(1) Provide the POI information regarding the status and approval level of simulators, training devices, and the installed equipment used by center instructors and TCEs;

(2) Assist the POI by providing technical information regarding the center's curriculum, training devices, and facilities;

(3) Provide the POI with appropriate information to permit evaluation of the center for potential use by an operator. This information may also include sufficient details concerning the center's instructors and evaluators to permit the approval of its use by an operator;

(4) Assist the POI with the evaluation of TCEs or other training center personnel nominated by the operator to become check airmen or flight instructors. The procedures outlined in Order 8400.10, vol. 3, chapter 3, will be followed when evaluating potential check airman candidates, determining that:

(a) All required events and maneuvers were conducted properly;

(b) The check airman candidate's evaluation of the airman's performance was objective and accurate; and

(c) The check airman candidate's debriefing of the airman was thorough and constructive;

(5) Assist with required surveillance of approved instructors and check airmen qualified to train, test, and/or check in accordance with the operator's curriculum;\*

(6) Assist the POI in the oversight of the operator's training/checking.\*

\* In all cases, the TCPM's assistance is subject to workload requirements and available time.

c. **Air Operator.** POIs should be aware that the air operator's roles, responsibilities, and coordination activities are as follows:

(1) Ensure that all training, testing, and/or checking to be conducted by the training center has been approved by the POI before any training is accomplished.

(2) Ensure that all training center personnel selected to act as check airmen are appropriately trained in accordance with the operator's program, check airman procedures, and approved by the operator's POI. (Ref: sections 91.1089, 91.1093, 121.411, 121.413, 135.337, and 135.339.)

**NOTE: TCPMs are only required to verify that the center's TCEs receive annual training on the conduct of part 61 certification functions in accordance with part 142, subpart C, for those curricula that have been approved for the training center use. Consequently, if the nominated personnel have not completed an operator's check airman training program, TCEs may not act as a check airman for an operator. To determine TCEs are adequately trained in the operator's procedures, a careful comparison of the operator's approved curricula to those curricula approved for the training center must be made. If this comparison indicates that the operator's training programs are identical to those of the training center, no additional training for the center's personnel is required. Any differences noted in the curricula will require additional training for the center's personnel prior to the POI issuing check airman authority.**

(3) Operators must develop an Instructor/Check Airman Standardization Program that includes a training provider source checklist that clearly identifies those elements of the

operator's program that are to be completed by the training center and that are to be completed by the operator. This listing must identify each element to be completed with specific reference to the appropriate regulations.

**NOTE: A sample Instructor/Check Airman Standardization Program is included in Appendix 2. It is important to note that not every item covered in the attached sample may be applicable to every operator. The sample standardization program is intended to be comprehensive and include sufficient detail to ensure an accurate understanding of the operator's training requirements exists. It is suggested that each subject in the sample standardization program be reviewed with a potential training provider to ensure a complete understanding of each party's role.**

(4) If using center provided curricula, ensure the programs are submitted to the POI for review and approval before commencing training.

(5) Ensure all center flight instructors have been appropriately trained and tested in the programs that have been approved for instruction by the POI.

(6) Determine that the training center can provide a Simulator Inoperative Component Guide (SICG), or ensure that all simulator components are operational for the training and checking to be accomplished.

**NOTE: If the center is going to provide a simulator or use a simulator in the conduct of an operator's training program, the operator may wish to submit a SICG to its POI for approval. Training centers typically have SICGs for each of the simulators in its center(s). These guides permit training to be accomplished with certain simulator components inoperative, provided the particular component is not required for the training that is being conducted. If a SICG is not going to be used, all of the simulator components must be operable for each training session. Appendix 3 contains guidance for the development of simulator component inoperative guides.**

(7) Operators must perform oversight of center personnel engaged in the conduct of their training and associated evaluations. It is the responsibility of the operator to:

(a) Ensure center instructors are trained in accordance with the operator's (not the center's) approved program;

(b) Ensure, if applicable, center TCEs are trained in accordance with the operator's (not the center's) approved program;

(c) Authorize center personnel to perform such training;

(d) Obtain POI authorizations for check airman personnel; and

(e) Oversee center personnel in the conduct of that training, testing, and checking.

(8) If a training curriculum is approved to be conducted by two or more centers (either operated by the same or a different training provider), *each of the approved centers must train and evaluate crewmembers using exactly the same training curriculum (including maneuvers, procedures, and checklists)*. Additionally, each center must be specifically approved for use by the POI and listed in the operator's OpSpecs.

**NOTE: The use of two or more centers to provide the same curriculum is not recommended. If the centers are approved through the lead center process in accordance with Order 8700.1, Volume 2, Chapter 151, Standardizing Training Center Curricula and Related Syllabus at Multiple Centers of One Training Company, the POI may consider such arrangements. However, it is the responsibility of the operator to ensure that not only the same curriculum is being taught, but that the same courseware is being used when training is conducted at different centers. The use of two centers not participating in the lead center concept will not be authorized.**

d. **Training Center.** POIs should be aware that the training center's roles, responsibilities, and coordination activities are as follows:

(1) Participate in the operator's Instructor/Check Airman Standardization Program to ensure there is a clear understanding between the center and the operator of exactly what portions (by regulation) of the operator's approved program will be conducted by the center.

(2) Ensure that the operator's programs, which are to be conducted by the center, have been approved by the operator's POI.

(3) If an operator is going to use one or more of the center's curriculum(s), establish a naming convention that will enable operator-approved programs to be distinguished from center-approved programs. Operator programs are NOT to be referred to as core or specialty, as these terms are only appropriate for TCPM approved center programs.

**NOTE: Training centers are not required to list operator names or the operator programs in the center's training specifications. Only the center's TCPM-approved core or specialty programs are required to be listed in the center's training specifications.**

(4) Ensure that all center personnel used to instruct and/or check on behalf of the operator have been appropriately trained, evaluated, and authorized in accordance with the operator's approved program to conduct such activities. This must include, at a minimum, training in all portions of that program for which they are responsible for conducting training, checking, and/or testing.

(5) Ensure that sufficient instructors are qualified to support operator's training agreement and requirements.

(6) If the training agreement with an operator provides for the use of center personnel to act as check airman for the operator, the center must ensure the requested individuals:

- (a) Have completed the operator's approved check airman training program; and
- (b) Were appointed by the operator's POI as check airman for the operator.

**NOTE: The acronym TCE-AC has been discontinued. TCEs that are subsequently qualified and approved to act as an operator's check airmen will be referred to as (xxx operator's) check airmen.**

(7) Maintain simulators and flight training devices to the standards required by the operator's approved training program.

(8) If a simulator component inoperative guide (SCIG) has been developed for a particular simulator, and the training agreement with an operator includes simulator training, make sure the guide is submitted to the operator's POI for approval and incorporation into the operator's approved training program.

(9) Advise the operator whenever flight training equipment fails to meet required qualification standards and/or when maintenance problems will restrict training.

(10) Ensure the records required by the applicable regulation and as outlined in the Instructor/Check Airman Standardization Program are appropriately maintained.

## **8. DEVELOPMENT OF TRAINING CURRICULA.**

a. Part 142 training center programs (core and specialty) are approved solely for the center's use in accordance with the provisions of part 142. As previously stated, these programs may or may not meet the regulatory requirements of part 91 subpart K, 121, 125, or 135. As a business matter, many centers design the curriculum to meet the needs of a particular operator or customer. The center's expertise in program development and basic instructional system design (ISD) principles is a valuable tool that many operators find useful. As a result, some operators employ the services of training centers to develop training programs to meet their regulatory training requirements.

b. Regardless of by whom or how an operator's curriculum is developed, the operator remains responsible for its approval, oversight, and currency. Current regulations are very specific regarding an operator's requirement to have appropriate crewmember training programs in support of its particular operation. The regulations are also clear concerning the requirement to have these programs approved by the Administrator. In the case of the operator, this approval is delegated to the operator's POI. In similar fashion, the part 142 training center is also required to have its curricula approved by the Administrator. In the case of training centers, this approval authority is delegated to the TCPM.

c. The importance of understanding the approval process and being able to distinguish and separate the roles of those responsible for that process is vital to our understanding of the basic fundamentals surrounding the approval processes for operators vs. training centers. The following three examples typify the most common arrangements between training centers and air operators:

**Example 1: Training Center Developed Curriculum.** In this example, the training center's core or specialty curriculum is suitable for use by an operator. Before the operator can use the center's curriculum, the curriculum must be approved by the operator's POI. This is true even though the subject curriculum has already been approved by the center's TCPM. (Ref: special rules in sections 91.1079, 121.402, 125.295, and 135.324.)

**Comment:** One or more of the core and/or specialty curricula that a training center has listed in its training specifications may be suitable for use by part 119 operators. The operator, however, is responsible for submitting the subject curriculum to its POI for review, approval, and subsequent inclusion in its training program, before any training credits may be taken.

In this example the referenced curriculum(s) will have two separate and independent approvals: one as a training center core or specialty curriculum (TCPM-approved) and the second as a curriculum segment for the operator (POI-approved). There are now two independently approved curricula that mirror each other: 1) the training center's original, under the supervision of a TCPM, and 2) the operator's, under the supervision of a POI.

**NOTE: It must be understood that once a center's core or specialty curriculum is given to an operator and the operator's POI approves it for the operator's use, that curriculum then becomes part of the operator's program. In that context, it ceases to be a core or specialty program for the operator. However, the curriculum remains a core or specialty curriculum for the training center and may be provided to other customers.**

Approval of a particular item or function by more than one operator is not a unique function. For example: the National Simulator Program (NSP) qualifies a particular simulator for use by a specific operator. For that simulator to be used by another operator, it must be approved by that operator's POI. It is not uncommon for a single simulator to simultaneously hold multiple approvals issued by numerous POIs. The same may be true concerning a center's curriculum. The same curriculum may hold multiple approvals from different POIs and/or TCPMs.

**Example 2: Operator Developed Curriculum.** The operator develops its own training curriculum and arranges to have a training center to deliver all or a portion of that curriculum.

**Comment:** In this example, an operator develops all of the crewmember modules, curriculum segments, and elements of its training program. The operator may conduct its own training or it may arrange (with its POIs approval) to have the program conducted on its behalf by a training center. Also, in this example, the POI must make the determination that the center's facilities are adequate to conduct the training as specified in the training program. The center's TCPM is the POI's best source of information to enable him/her to make a determination concerning the center's facilities and equipment.

Operators who wish to accomplish aircraft-specific training under contract with a training center create special surveillance requirements for their POIs. POIs must be extremely vigilant in determining that all elements of the operator's program are being completed. POIs are encouraged to communicate regularly with the training center's TCPM and are encouraged to request assistance with on-scene surveillance. The TCPM's assistance will typically afford the POI greater flexibility and a higher level of surveillance than would normally be possible without the TCPM's assistance.

**NOTE: It is important to emphasize that the training center instructors and evaluators conducting activities for an operator are required to qualify as instructors and check airman in accordance with the operator's approved training program before conducting training or checking activities. (Ref. sections 91.1089, 91.1091, 135.337 – .340 and 121.411 – .413.)**

**Example 3: Dry-Lease.** A particular operator has an approved training program, sufficient instructors, check airmen, and elects to dry-lease training equipment and facilities from a training center.

**Comment:** This arrangement is the least complicated of the three. The training center simply acts as a host for the operator as in example 1 and 2. In this example the operator is responsible for ensuring that the center's equipment and facilities continue to meet standards required to accomplish its training. POIs are responsible for providing required surveillance to determine all contracted facilities and training devices continue to meet the provisions of its initial approval. In many instances, due to the center's location in relation to the POI's office the center's TCPM may be the POI's best resource in providing required surveillance.

**9. TRAINING SPECIFICATIONS.** Training specifications are issued to centers in much the same manner as OpSpecs are issued to operators. They are issued using the same form and format as OpSpecs but show the term "Training Specifications" on all pages. Training specifications prescribe a part 142 training center's training, checking, and testing authorizations and limitations that may apply.

**10. CHECK AIRMAN VITAL INFORMATION SUBSYSTEM (VIS) ENTRIES.** The current practice of TCPMs entering VIS data for training center employees who are also acting as check airmen for an operator will continue. This practice will eliminate the possibility of duplicate entries for check airman activities, while preserving the information required for statistical purposes. This means that the TCPM is responsible for entering VIS data for all center employees. (This includes TCEs who have been approved by an operator's POI to perform check airman duties for an operator). POIs will, however, continue to make required VIS entries for the operator's check airmen who are NOT working for a training center.

**11. CHECK AIRMAN AND INSTRUCTOR TRAINING RECORDS.** Regulations require that operators keep adequate training records for instructors and check airmen at their principal place of business or other locations as approved by their POIs. Training centers that are providing training on behalf of an operator are considered part of the operator's program and therefore are reasonable locations for an operator to maintain applicable training records. The

records, however, must be maintained in compliance with the operator's approved program and must be made available to the operator and/or the Administrator upon request.

**12. ACTION.** The POIs whose assigned operators are currently having portions of their training conducted by part 142 training center, shall advise those operators to conduct a special emphasis self-audit inspection that specifically addresses the information provided in this notice. POIs shall advise those who respond to this recommendation and complete a self-audit within 90 days of the date of this notice that they will be given the opportunity to take necessary appropriate corrective actions under HBA T 95-01A, Voluntary Self Disclosure. Only those operators who conduct this special emphasis self-audit will be covered under the provisions of this entitlement.

**13. DISPOSITION.** This notice will be incorporated into FAA Order 8700.1, General Aviation Operations Inspector's Handbook, and FAA Order 8400.10, Air Transportation Operations Inspector's Handbook. Any questions concerning this guidance as it relates to general aviation may be directed to the General Aviation and Commercial Division, AFS-800, at (202) 267-8212. Any questions concerning part 91 subpart K and air carrier operations may be directed to the Air Transportation Division, Training Branch, AFS-210, at (202) 267-8166.

**a.** The National Training Center Program is supported by an FAA Intranet Web site, which provides numerous documents that can provide additional information on the training conducted at training centers. For FAA inspectors, this can be found at:  
<http://intranet.faa.gov/avr/afs/PART142/INDEX.HTM>.

**b.** The public may access documentation on the FAA public Web site:  
<http://www.faa.gov/avr/afs/afs800/afs840/part142/index.cfm>.

/s/ James J. Ballough  
Director, Flight Standards Service

## APPENDIX 1. QUESTION AND ANSWER

The following information is presented in a question and answer format to respond to common questions that have been raised concerning the interaction between operators and training centers. When appropriate, scenarios have been used to provide a backdrop for real world situations and as a common basis for related questions. Questions that do not lend themselves to a common scenario are listed separately.

**SCENARIO 1.** The following scenario applies to questions 1.1 and 1.2.

- High Flight, an air operator, needs to locate suitable classroom facilities and wishes to include a flight simulator in its flight training program.
- XYZ training center has core and specialty curricula, a flight simulator, procedure trainers, and classroom facilities that will meet High Flight's needs.
- High Flight and XYZ training center enter into a training agreement whereby High Flight will provide an approved course and XYZ will provide:
  - ground instructors
  - facilities
  - simulator
  - procedure trainers

**Question 1.1.** Is the proposed arrangement consistent with current regulations?

**Answer.** Yes. Reference Title 14 of the Federal Code of Regulations (14 CFR) part 121, section 121.402(a), part 125, section 125.296, and part 135, section 135.324(a).

**Comment.** In order for High Flight to use any of the training center's facilities, personnel, training devices, or other services to satisfy its regulatory training requirements, it must first incorporate XYZ's facilities, simulator, and training devices into its training program and submit a proposal (in accordance with the CFR part under which it is certificated) to its principal operations inspector (POI) for review and approval. Until the POI approves High Flight's submission, none of the training conducted by the center may be credited toward the completion of High Flight's required training.

It is important to understand that the training center program manager's (TCPM) approval of the center's simulator or training devices and facilities DOES NOT authorize High Flight to conduct training at XYZ training center or to use XYZ training center facilities, simulators, or training devices. The TCPM's approval only ensures that the facilities, simulators, and training devices are approved to conduct the training, testing, and checking permitted under part 142.

Additionally, before High Flight may use any of the center's personnel to conduct its flight training, High Flight must ensure the instructors meet the training of part 135 or 121 and have all been trained in High Flight's approved curriculum, courseware, procedures, manuals, flows,

## APPENDIX 1. QUESTION AND ANSWER—Continued

checklists, callouts, etc. Adequate documentation of the instructor training must be maintained by High Flight and made available to its POI if requested.

**Question 1.2.** Does the center's training center evaluator (TCE) training qualify the TCE to be appointed by High Flight's POI as check airman for High Flight?

**Answer.** No.

**Comment.** To put this in perspective, the OPERATOR is responsible for determining the qualifications of center personnel to act as check airmen. TCPMs do not have the responsibility or authority to qualify TCEs as check airmen for an operator. Applicable regulations require that the operator have an approved check airman training program and ensure that each potential check airman submitted to the POI for approval is adequately trained.

Training centers do not train their personnel (instructors or TCEs) in operator-specific procedures. Center personnel are trained in the programs that are approved under part 142 for their specific center. If High Flight's program included XYZ training center's core and/or specialty curricula, the center's TCE would have received training in those portions of High Flight's check airman training that mirror XYZ's core and/or specialty curricula. Even if High Flight would have adopted the center's training curriculum in total, it is very likely that there would still be operator specific training that would have to be completed by the center's TCEs before they could be approved to act as High Flight's check airman. (This specifically applies to sections 135.293 (a) (1), and (4) through (8), and 121.413 (c) (1) through (5), 121.415 (a)(i), (ii), (iii), and (iv)(d); 121.419 (a)(1)(i), (vii); (a)(2)(vi)(A), (B) and (C); 121.419 (a) (2)(vi)(C), and (vii) thru (xi).)

In this scenario (scenario 1), no portion of High Flight's training program originated from one of XYZ training center's core or specialty curricula. Therefore, training center personnel would not have been trained, tested, and checked in High Flight's program.

**NOTE: It must be understood that the responsibility for ensuring all center instructors and check airmen are properly trained in the operator's programs rests with the operator. Additionally, it is important to note that a center may only evaluate those areas that are identified as the center's responsibility in the Instructor/Check Airman Standardization Program between the operator and the center. Simply stated, training center personnel cannot test or evaluate an operator's personnel on subjects in which the center does not provide training.**

**SCENARIO 2.** The following scenario applies to questions 2.1 through 2.4.

- XYZ training center has three core and six specialty curricula that have been approved by its TCPM and listed in its training specifications.
- High Flight, a 14 CFR part 119 air operator, has received approval from its POI to include one of the center's core and one specialty curriculum in its approved training program.

**APPENDIX 1. QUESTION AND ANSWER—Continued**

- High Flight has also been granted approval, by its POI, to use XYZ as its training provider.

**Question 2.1.** Must XYZ training center list High Flight in its training specifications?

**Answer.** No. Reference to 14 CFR part 142, sections 142.1(b) and 142.35.

**Comment.** Part 142 training specifications are issued to training centers outlining the centers' curriculum requirements, training, testing, and checking authorizations and limitations. Individual part 119 operators are NOT required to be listed in training specifications.

**Question 2.2.** Must High Flight's approved curriculum be listed in XYZ's training specification?

**Answer.** No. Reference part 142, subparts B and F.

**Comment.** In order for a curriculum to be listed in a training center's specification it must have been developed for that center's use, in accordance with part 142, subparts B or F. Technically speaking, part 119 operators' training programs are not approved under part 142, and consequently do not meet the test for inclusion in the training specifications as outlined in part 142. Although both the center and operator curricula are developed to meet the requirements of 14 CFR, only those curricula that have been developed in accordance with part 142, subparts B and F are to be listed in the center's training specifications. Those curricula approved by the POI for an operator's use are not to be included in the center's training specifications.

**Question 2.3.** When the training center conducts High Flight's training program, is the center required to keep the training records specified in part 142, subpart E?

**Answer.** No.

**Comment.** The training center is only required to maintain records in support of ITS (the training center's) approved programs. Part 142, subpart E, requires training centers to maintain records for trainees, instructors, and evaluators for courses, "...approved in accordance with subpart B of this part." In our example, High Flight's contract with the center may have included a provision wherein the center will maintain certain portions of High Flight's training records. However, the responsibility for the adequacy of such records remains with High Flight. The fact that High Flight's POI may have also approved the subject records to be physically kept at the training center does not generate a requirement for the center to keep a separate set of records to comply with part 142, subpart E. Part 142, subpart E only requires the center to keep records for training conducted in accordance with part 142. High Flight is not being trained in accordance with part 142. High Flight's crewmembers are being trained in accordance with the operating rules governing their operations. (Ref. part 121, 125, or 135.)

## APPENDIX 1. QUESTION AND ANSWER—Continued

**Question 2.4.** Who is responsible for maintaining High Flight's required training records?

**Answer.** High Flight. Reference sections 121.663 and 135.63(4).

**Comment.** Parts 121,125, and 135 are very clear on this point. The operator is responsible for maintaining adequate records in support of required training. The function may be delegated to a third party, however, the responsibility for the adequacy of the records remains with the operator and cannot be delegated. In this example, the training center has no responsibility under part 142 to maintain training records in support of the training accomplished through its contract with High Flight.

**SCENARIO 3.** The following scenario applies to questions 3.1 through 3.6.

- XYZ training center has an approved Gulf Stream IV core curriculum.
- High Flight, a part 119 operator, and Richman Inc., a 14 CFR part 91 operator, both fly Gulf Stream IV aircraft.
- High Flight has been approved by its POI to use XYZ training center to provide its aircraft specific training.
- Richman Inc. has also contracted with XYZ training center to provide its required training.
- Both Richman Inc. and High Flight are using XYZ training center's core curriculum.

**Question 3.1.** What training record is XYZ training center required to maintain in this scenario?

**Answer.** XYZ training center is only required to maintain the records required to support the training accomplished for Richman Inc. (Ref. sections 121.663 , 135.63(4) and part 142, subpart E.)

**Comment:** As mentioned in questions 2.3 and 2.4, training centers are only required by regulation to maintain the training records required by part 142, subpart E. High Flight's training is being accomplished under a different part. The referenced record requirements in part 142, subpart E only pertain to the training conducted in accordance with part 142.

**Question 3.2.** Is it appropriate for the training center to refer to High Flight's curricula as core or specialty?

**Answer.** No.

**Comment.** Training centers often submit programs for approval that are targeted for specific customers, including operators. However, these curricula must meet all of the part 142 requirements of subparts A through F. Part 142 specifically uses the terms "core" and "specialty" for those curricula developed for use by the training center in accordance with part 142, subparts B and F. Once approved by the TCPM, these curricula will be listed in the

**APPENDIX 1. QUESTION AND ANSWER—Continued**

center's training specifications as either core or specialty. When one of these programs is provided to a certificate holder and its POI approves it for use, it becomes part of the certificate holder's approved training program. At that time, it ceases to be either a core or specialty curriculum as it relates to that operator.

In this scenario (scenario 3), XYZ training center was contracted to provide one of its core curricula to High Flight. Since the subject program was approved by High Flight's POI, the center, when conducting training for High Flight, should refer to the subject curriculum by the name given to it by High Flight to avoid oversight and ownership questions. It is important to note that the training center should not refer to the operator's program as a specialty curriculum. Part 142 is clear on this point. Operator's programs are approved by its POI in accordance with the applicable part. Training center curricula, both core and specialty, are approved in accordance with part 142. Although curricula approved by the TCPM may meet certain training, testing, and checking requirements common to the requirements of airman certification (part 61) and the flight crewmember requirements of parts 121 and/or 135, the TCPM's approval does not enable an operator to use such curricula. It is the approval of its POI that allows these curricula to be used by the operator as a part of its training program.

**Question 3.3.** If XYZ training center instructors are to conduct flight training for High Flight, what training must they receive in addition to that which qualified them to be instructors in XYZ training center's Gulf Stream IV core curriculum?

**Answer.** Any differences that exist between the center's core curriculum and the aircraft-specific curriculum as approved by High Flight's POI. Reference sections 121.663 and 135.338.

**Comment.** It is the responsibility of the operator to ensure that the training center instructors are qualified and have received training appropriate to that portion of the operator's training program that the training center will be delivering. This can best be determined through the use of a thorough and proper standardization document during the drafting of the operator's agreement with the center to conduct training (see example, Appendix 2).

The training of center instructors on core and specialty curricula is approved and monitored by the TCPM. The TCPMs' involvement with the training center will enable them to respond to POIs' requests for information concerning center activities as well as requests for surveillance assistance from the POI.

**Question 3.4.** After a few months of training, High Flight wishes to make a change to its aircraft-specific training. Keeping in mind that its program is identical to XYZ training center's core curriculum, is it necessary for XYZ training center to change its core curriculum to accommodate High Flight?

**Answer.** No.

**Comment.** Changes to High Flight's curriculum do not affect any of XYZ training center's core or specialty program approvals. However, in our example, once a revision to High Flight's original training program is made and approved by the POI, that program is no longer a mirror of

## APPENDIX 1. QUESTION AND ANSWER—Continued

the core or specialty from which it was modeled. High Flight is responsible for ensuring that the XYZ training center's instructors and TCEs acting as High Flight's check airmen are trained in the new procedures (differences). Likewise, should XYZ training center make changes to its core or specialty curricula, XYZ should notify High Flight that its core curriculum has been revised and High Flight's program no longer mirrors the center's curriculum.

Operators must be especially vigilant to ensure that changes to the training center's original core or specialty curricula do not affect the training they receive.

**Question 3.5.** What items can the center's personnel, who have been approved to act as check airmen for High Flight, test or check?

**Answer.** Only those items that the center has taught.

**Comment.** TCEs who are trained and qualified to test or check training center curricula may also be approved by an operator's POI to act as check airmen for the operator. Since training center instructors and TCEs typically do not receive instruction in subjects that are operator specific, it is important to ensure they receive appropriate training, in accordance with the operator's program, before they are permitted to test or check individuals on those subjects.

In situations where operators request training in subjects that are not aircraft specific, the center must ensure that training center instructors and those TCEs approved as check airmen are adequately trained to accomplish all assigned tasks. Likewise, it must be understood that the responsibility for ensuring all center instructors are properly trained in the operator's programs rests with the operator.

**Question 3.6.** May High Flight use the training center's TCEs as check airmen and have them issue type ratings to qualified pilots?

**Answer.** Yes, if proper procedures are followed.

**Comment.** Current FAA policy permits a TCE who has been properly appointed as a check airman for a part 121 or 135 operator to simultaneously signoff a company initial pilot-in-command aircraft checkride and issue a type rating, providing the applicant meets the requirements of part 61, subpart G. In this situation, the check airman/TCE is acting on behalf of the operator as a check airman and also using his/her authority as a TCE for the training center.

**SCENARIO 4.** The following scenario applies to question 4.1 and 4.2.

- Flight Connector is approved for on-demand part 135 operations in a Lear 60.
- XYZ training center is qualified to conduct Lear 60 training in Level D simulators.
- Flight Connector's contracts are with XYZ training center to conduct its section 135.293 and 135.297 checks ONLY.

**APPENDIX 1. QUESTION AND ANSWER—Continued**

**Question 4.1.** Who is responsible for qualifying the center's personnel to evaluate Flight Connector's pilots and accomplishing the requested section 135.293 and 135.297 checks?

**Answer.** Flight Connector.

**Comment.** TCPMs will not determine the qualification of the TCEs for functions outside of their purview with respect to part 142. The qualification of a check airman is an operator function. The Instructor/Check Airman Standardization Program developed between the operator and training center must be sufficiently detailed to determine qualifications as well as responsibilities for accomplishing Flight Connector's checks. Selecting check airmen not only requires the operator to review individual qualifications and acquire POI approval, but it also requires the operator provide training, checking, and testing modules that will further qualify the TCE in the operator's program. Although approval of check airmen is strictly a POI function, TCPM's are a good source of information for POIs in their evaluation of a particular TCE as a potential check airman for an operator.

**Question 4.2.** Can the TCPM approve a training center program that fulfills Flight Connector's contract to conduct section 135.293 and 135.297 checks?

**Answer.** No. The TCPM cannot approve part 119 functions.

**Comment.** Only the POI can approve part 119 operator training programs, including the qualification of instructor and check airmen. Section 135.324 permits an operator to enter into an agreement with a part 142 training center to provide required training, however, all such training must be approved by the operator's POI. Flight Connector's check airman (who may only coincidentally be XYZ training center's TCE) must be trained in Flight Connector's training program before being appointed to perform check airman duties for the operator. The following briefly summarizes pertinent requirements and policies:

- ONLY the POI gives authority to TCEs to act as check airmen.
- Part 121 and 135 training and evaluations of crewmembers are conducted under the appropriate operating part, and as such, they cannot be approved as training center programs.
- TCEs may not be authorized as check airmen unless qualified by the operator and approved by the POI.
- TCEs cannot qualify to check part 119 crewmembers without being trained in the operator's program.

A TCPM is responsible for observing a center's TCE(s) conduct evaluations of airmen seeking certification under part 61. These observations are a valuable resource for POIs when considering a TCE's training, experience, knowledge, skills, and abilities as a potential check airman for an operator.

**APPENDIX 1. QUESTION AND ANSWER—Continued**

**SCENARIO 5.** The following scenario applies to question 5.1.

- Mid Flight and multiple others (3) on-demand part 135 operators use the same captain on a recurring basis (“Rent A Captain,” Captain Dan).
- Each of the four operators use XYZ training center’s core curriculum.
- All four operators’ POIs have approved XYZ’s core curriculum for their respective operator.

**Question 5.1.** Mid Flight contracts with XYZ training center to conduct Captain Dan’s sections 135.293 and 135.297 checks ONLY. Following these checks, may XYZ’s TCE, acting as Mid Flight’s check airman, make copies of the original signed form and provide these copies to the other POIs?

**Answer.** Yes, if the TCE has been approved by each of the other operator’s POI, and the POIs have agreed to accept copies of the check form.

**Comment.** For the most part, as long as original copies are maintained in a manner and location agreeable to the POIs, there is not a requirement that original signed copies be provided to each operator.

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**The following questions are listed separately and do not reflect any of the information contained in the previous scenarios.**

**Question 1.** Must FAA Form 8410-3, Airman Competency/Proficiency Check, be used to record the satisfactory completion of a required evaluation?

**Answer.** No. FAA Form 8410-3 was intended for use as an example only.

**Comment.** FAA Form 8410-3 was not designed to accommodate evaluations that are completed by two or more individuals. Training provided by a center is often completed in two or more settings. Aircraft specific items may be accomplished by the center with the operator specific items being completed at a different time and by a different person. Forms used by a center and/or operator should be designed to accommodate its particular checking requirements. With this thought in mind, a sample form has been provided that will enable required evaluations to be segregated and signed for by the individual responsible for the particular portion without the individual appearing to be signing for the complete evaluation. (See Appendix 2.)

**Question 2.** Must part 142 ground school instructors complete the initial and annual recurrent training and testing required in section 142.53(a)(1) and (2)?

**Answer.** No. Reference sections 142.39(d), 142.47(c), and Legal Interpretation dated August 27, 1999 (see Flight Standards Service (AFS) Intranet Web site: <http://www.faa.gov/avr/afs/>, part 142).

**APPENDIX 1. QUESTION AND ANSWER—Continued**

**Comment.** Parts 121, 135, and 142 do not specify requirements for ground instructor initial and recurrent training and testing. FAA legal interpretation supports this contention and has determined that part 142 ground instructors do not have to complete the 8 hours of ground training prior to initial designation as a training center ground instructor referenced in section 142.47(c). Additionally, the training center instructor training and testing requirements of section 142.53(a) and (b) apply to flight instruction only. Instructor training and testing requirements referenced in part 142 apply to flight instruction given in simulators and aircraft only.

**Question 3.** Are training centers required to keep an operator's check airmen records?

**Answer.** No.

**Comment.** Training centers that are providing training to an operator are considered, for all intents and purposes, to be a part of that operator's training program. In that context, FAA policy permits the center to be used as a suitable location for required records if approved by the operator's POI. Many training centers provide a large portion of an operator's training and in some cases are the sole provider of such training. This most often occurs when an operator approves the training center's core and specialty curricula for use.

Training centers must maintain the training records of their TCEs. When these individuals are also approved to act as an operator's check airman, it may make sense for the operator to have its check airmen records also maintained by the center. This may also be true for the operator's crewmember records. It is, however, the responsibility of the operator to ensure that all crewmember records are readily available for inspection as provided for in the regulations.

**Question 4.** When a TCE is administering a part 61 certification test, (airline transport pilot (ATP) or ATP and type rating) in accordance with an air carrier's approved training program, does the test have to include all portions of the appropriate practical test standard?

**Answer.** No. Reference sections 61.43(a), 61.157(b) and (c), and 121, appendix F.

**Comment.** The "exception" of section 61.157(b) allows for a part 119 or a part 91 subpart K employee applicant for an ATP, or an applicant concurrently seeking ATP and type rating, to substitute satisfactorily completed training of that operator's approved pilot-in-command training program for the part 61 requirements for training.



## **APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER**

The Instructor/Check Airman Standardization Program is a document developed in coordination between the operator and the training provider. This document will outline the policies and procedures that will be followed by the training center when providing training services to the operator, and will form the basis for the operator's audit procedures. In addition, the document will also outline the specific elements of training that the training center will be providing to the operator. (See the Training Provider Source Checklist on page 8 of this appendix.) In the case of Title 14 of the Code of Federal Regulations (14 CFR), part 119-certificated operators, this document must clearly define the regulatory items that the carrier's principal operations inspector (POI) has approved the training center to provide the operator. Items that have not been pre-approved by the respective POI will not be credited toward the completion of that operator's training requirements. If the training provider and the operator have joint responsibility for the satisfactory completion of a particular training module/element (e.g., adverse weather, weight and balance, etc.), the training event must be broken into sub-elements clearly showing which sub-elements will be provided by the training center.

The following document provides a sample of a standardization program between an operator and a 14 CFR part 142 training center. It is important to understand that the document was developed as an all-inclusive sample and it is understood that not every item shown in the sample may be appropriate for every operator. The document may be modified as necessary to meet the needs of a particular operator.

**APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM  
FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER—  
Continued**

**SKY HIGH AIRLINE AND XYZ TRAINING CENTER**

**INTRODUCTION.** This curriculum outlines the Instructor/Check Airman Standardization Program, which will be followed by Sky High Airlines, Inc., (hereafter referred to as Sky High and XYZ training center (XYZ)) for the purpose of ensuring standardization between its respective instructors and check airmen in its training and evaluating programs. This standardization program will assist Sky High and XYZ’s instructors and check airmen to achieve standardized application of Sky High’s training policies and procedures as well as serving to identify any differences that may exist between Sky High and XYZ’s training, evaluation, and/or the administration of Sky High programs.

**INDEX**

1. Standardization Program
2. Program Maintenance
3. Training Provider Source Checklist

**1. STANDARDIZATION PROGRAM.** Sky High and XYZ training center will convene a standardization program meeting to review the relevant topics covering each party’s responsibilities for the implementation of XYZ’s approved programs and the execution of training, evaluations, and administrative practices under those programs.

**A. Implementation of Approved Programs.** Duties, responsibilities, and authority.

ITEM	COMMENTS	REVIEWED
Reporting requirements		
Individual responsibilities relating to the implementation of appropriate training approvals		
Authority granted and limitations imposed by those approvals		
Completion of Training Provider Source Checklist form		

**APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM  
FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER—  
Continued**

**B. Training.** Policies pertaining to the conduct and content of classroom, simulator, and flight training modules.

1. Training Course Content:

ITEM	COMMENTS	REVIEWED
Approved programs		
Terminology		
Equipment differences		
Flight profiles and procedures		
Maneuvers		
Crew call-outs		
Crew duties		
Line-Oriented Flight Training (LOFT) issues		
CRM		
Special operations and restrictions		
Limitations as defined in Sky High' operations specifications or, its Crew Operations Manual (COM) and/or Aircraft Flight Manual (AFM)		

2. Classroom Training:

ITEM	COMMENTS	REVIEWED
Number of attendees		
Class complement		
Conduct		
Class liaison		
Equipment and publications		
Evaluations		
Attendance requirements		
Attire		

**APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM  
FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER—  
Continued**

Breaks		
Mixed companies		
Performance standards and Sky High's liaison		

3. Simulator/Flight Training:

ITEM	COMMENTS	REVIEWED
Crew complement		
Conduct		
Required flight equipment and publications		
Phase testing		
Reporting times and attendance		
Breaks		
Observers		
Additional training		
Failure to progress		
Pre-check evaluation		
Recommendation for any evaluations		
Violations of Sky High's policies or procedures		

4. XYZ Training Center Instructor/Check Airman Training. XYZ personnel responsible for the conduct of any training and/or checking under the provisions of this program will receive required Sky High specific training. The details of said training would be determined as a result of the review required by this document.

**C. Evaluation.** Policies pertaining to the conduct of ground school, orals, and simulator/flight evaluations.

1. Ground School:

ITEM	COMMENTS	REVIEWED
Test design		
General composition		
Question pooling		

**APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM  
FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER—  
Continued**

Conduct of testing		
Control of the test and recording of final examination results		
Establish procedures for the reporting of violations of Sky High policies		
CRM issues and open book testing options will be reviewed. Minimum passing grades will be established		

2. Orals:

ITEM	COMMENTS	REVIEWED
conduct of required orals		
Crew concept for recurrent evaluations versus one-on-one for all type ratings		
Content		
Location		
Emphasis on operationally structured evaluations		
What constitutes unsatisfactory performance		

3. Simulator/Flight Evaluations:

ITEM	COMMENTS	REVIEWED
Prerequisites to evaluation (training completion certificate, instructor endorsement, orals, etc.		

**APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM  
FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER—  
Continued**

Scheduling		
Reporting		
CRM evaluation (crew evaluations)		
Rules of conduct		
Evaluator intervention		
Observers		
Required maneuvers		
Description of maneuvers		
Acceptable performance standards and judgment criteria defined		
Prohibited maneuvers		
Required weather conditions (simulator/aircraft)		
Failure/completion reporting		

**D. Administration.** Establishes responsibility, policies, methods, and procedures for the annotation, maintenance, control of training, evaluation records, certificates, and documents.

1. Sky High records:

- a. Establish a common format and architecture for required records;
- b. Accurate reporting of student progress during ground simulator/flight training and subsequent disposition; and
- c. Establish procedures for formal reporting of completion, dismissal, failure of training and evaluations.

2. Instructor/check airman approvals:

- a. Establish procedures for the notification and subsequent approval of XYZ's instructor/check airman by Sky High's POI; and
- b. Establish policies regarding the maintenance, control, and review of required reporting procedures.

**APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM  
FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER—  
Continued**

3. Document Control. Establish procedures and policies for the control of records, their duplication, safe transmittal, archival storage, and disposition.

4. Sky High read files. Sky High will maintain standardization read files at all XYZ training locations used to conduct Sky High training to ensure the timely dissemination of any revisions to Sky High's policies, procedures, and/or operating environment. These read files will contain pertinent operational data, as well as any issues and topics that may require clarification to enable XYZ Training Center employees, instructors, and check airmen to comply with Sky High policies and procedures. These read files will be readily accessible and reviewed on an ongoing basis by XYZ instructors/check airmen who are authorized to conduct Sky High training and/or evaluations.

**2. PROGRAM MAINTENANCE.** To enable the continuance of an effective standards program, both Sky High and XYZ will establish policies to enhance and maintain communication among all concerned personnel through the following:

**A. Information Exchange.** XYZ training center will appoint a "Customer Liaison" who will maintain a close working relationship with the designated Sky High counterpart. This individual will be responsible for the resolution of minor issues concerning standardization and administration that may come up from time to time. Additionally, he/she will ensure timely recognition of potential problems while ensuring those areas requiring management resolution and/or program modification are brought to Sky High's attention in a timely manner.

**B. Standardization Meetings.** Periodic meetings and teleconferences will be scheduled to provide ongoing consistency and standardization within the programs. These meetings and teleconferences will involve all necessary personnel to enable timely dissemination and/or the implementation of any changes that may be made by Sky High to its respective training and evaluation curricula, or by XYZ to its organizational support structure as that structure relates to the training/evaluation of Sky High flight crewmembers.

**3. TRAINING PROVIDER SOURCE CHECKLIST.** In addition to accomplishing the coordination outlined in sections 1 and 2 of this guidance, each training center that is providing services to a certificated air carrier should prepare a written document that specifically details the portions of the air carrier's training program they have been approved to provide.

**NOTE: A sample checklist has been attached to this document as a reference guide only. It has been provided to illustrate one method of providing the air carrier and its POI with information detailing the center's understanding of the training that has been approved for them to provide the air carrier.**

The sample form is not meant to be all-inclusive or to cover all possible combinations and has been provided for reference only.

**APPENDIX 2. INSTRUCTOR/CHECK AIRMAN STANDARDIZATION PROGRAM  
FOR AN OPERATOR CONTRACTING WITH A PART 142 TRAINING CENTER—  
Continued**

**TRAINING PROVIDER SOURCE CHECK LIST**

**SKY HIGH AIRLINES ANDXYZ TRAINING CENTER**

Training Curriculum	Segment, Module or Elements	CFR Ref	Air Carrier	Trng Ctr	Both	Comments	Other (Name)
Initial - BI	Applicable 14 CFR parts	135.329 (a)(1)(ii)		X			
Initial - BI	Weight & Balance	135.345 (a)(2)		X			
Initial - BI	OpSpecs		X				
Initial - BI	Emergency Procedures and situations	135.331			X	XYZ - .331 (b) (1), (2) & (3) – (c) & (d) AC - .331 (b) (4)	
Initial - BI	Met	135.345 (a)(3)		X			
Initial - BI	Airspace & ATC Procedures	135.345 (a)(4)					ATC – Wash Ctr
Initial - Air Craft	Aircraft Syst.	135.345 (b)(6)		X			
Initial – BI	Prohibited Drugs	135.353		X			
Initial	HAZMAT	135.333		X		Recognition	
Initial	Security	135.125		X			

CFR Part: \_\_\_\_\_ Training Category: \_\_\_\_\_ Position: \_\_\_\_\_

Aircraft type: \_\_\_\_\_ Model/Series: \_\_\_\_\_ / \_\_\_\_\_

Air Carrier: \_\_\_\_\_ Date: \_\_\_\_\_

Training Center: \_\_\_\_\_ Date: \_\_\_\_\_

POI: \_\_\_\_\_ Date: \_\_\_\_\_

TCPM: \_\_\_\_\_ Date: \_\_\_\_\_

**APPENDIX 3. SAMPLE SIMULATOR MINIMUM EQUIPMENT LIST/COMPONENT INOPERATIVE GUIDE**

**[Sample Only]  
Simulator Component Inoperative Guide/Minimum Equipment List (MEL)**

XYZ training center operates certain flight simulators under the provisions granted in Title 14 of the Code of Federal Regulations (14 CFR) part 142, sections 142.11 and 142.53. Because of the strict tolerances and other approval requirements of the simulator(s), simulators can provide realistic training with certain nonessential items inoperative. Therefore, the following component inoperative guide/MEL has been approved for the operation of the flight simulators indicated.

1. The following chart addresses the major simulator systems and the specific level of training and checking available should a specific system be inoperative:

<b>Major Component Inoperative &amp; Resulting Level of Training, Checking, &amp; Certification Authorizations</b>							
<b>Flight Simulator Authorizations</b>			<b>Inoperative Major Component</b>				
Sim #	FAA No.	Level	Motion	Left side Visual	Center Visual	Right side Visual	Complete Visual System
XXXX	YYY-YY	D	FTD - 4	F/O	None	CA	FTD - 7
XXXX	YYY-YY	C	FTD - 4	F/O	None	CA	FTD - 7
XXXX	YYY-YY	B	FTD - 4	F/O	None	CA	FTD - 6

2. Refer to Airline Transport Pilot Practical Test Standards (FAA-S-8081), appendix 1, for specific flight simulation device levels required for 14 CFR parts 91, 125, and 135 training and checking authorizations. Part 121-certificated operators are governed by part 121, appendix F.

3. Instructor station functions may be inoperative if the specific function does not prevent accomplishment of maneuvers or procedures required during a specific training, checking, or certification session.

4. Training, checking, and certification on specific maneuvers and procedures may be accomplished if the specific function does not prevent accomplishment of maneuvers or procedures required during a specific training, checking, or certification session.

### **APPENDIX 3. SAMPLE SIMULATOR MINIMUM EQUIPMENT LIST/COMPONENT INOPERATIVE GUIDE—Continued**

#### **Federal Aviation Administration**

April 20, 1999

FSTD Guidance Bulletin 99-02  
Simulator Operators

The following information is provided as clarification of potential misunderstandings regarding regulatory requirements for utilization of simulator minimum equipment lists (MEL), or similar vehicles (sometimes referred to as Simulator Component Inoperative Guides), for operations of simulators meeting the requirements of 14 CFR part 121 or 14 CFR part 142.

14 CFR part 121, appendix H, and part 142, section 142.59 (d) contain language regarding operation of a simulator with inoperative components. Specific language can be interpreted as permissive in nature in that, as stated in appendix H “...Therefore, an operator **may** (emphasis added) operate its simulator under an MEL which has been approved by the Administrator...” and part 142.59 (d) “...**Unless otherwise authorized** (emphasis added) by the Administrator, each component on a qualified and approved flight simulator or flight training device used by a training center must be operative...”

During discussions with the Simulator Technical Issues Group, we agreed that development of a simulator MEL, if approached from the classic aircraft MEL approach, would be an extremely difficult if not impossible task. In July 1997, we took the commitment to develop a fundamental MEL or Component Inoperative Guide which could be adapted to any flight simulator or flight training device and, in our opinion, meet the regulatory requirement if a simulator were to be operated with any inoperative components. We later provided that informal document to members of the simulator community. It is our understanding many have utilized the approach we drafted and that it has been found acceptable during in-depth FAA operations inspections. For your information, I have attached a copy of that document.

If any anyone needs further information on this subject, do not hesitate to call or write.

Sincerely,

Paul A. Ray  
Manager, National Simulator Program

#### **APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES**

The information contained in this appendix updates and supersedes Handbook Bulletin Air Transportation (HBAT) 99-01, Outsourced Flightcrew Training: Audit by Operators and Use of OpSpecs Paragraph A031, and outlines the self-audit program that applies to any Title 14 of the Code of Federal Regulations (14 CFR) part 121, 125, or 135 air carrier arranging with a training provider named in section 121.402(a) or section 135.321(a)(1) to provide contract training for its crewmembers; such training arrangements are informally know as outsourced training.

**A. SELF-AUDIT AND SUMMARY REPORT: TWO-YEAR CYCLE.** Where outsourced flightcrew training is concerned, the self-audit and summary report cycle outlined in this notice shall be used as the plan to implement more effective operator-driven quality assurance. The cycle must be conducted at least every two years in accordance with operations specifications (OpSpec) paragraph A031 (Authorized to Make Arrangements with Training Center(s), Air Agencies, and/or Other Organization(s) for Certificate Holder Training) and should be conducted at any time when a major change affects the operator's outsourced flightcrew training.

**B. DEFINITIONS.** Two definitions have been developed to define the scope of the requirements relating: (1) to the operator's self-audit, and (2) to entries that must be made in OpSpecs paragraph A031. They are as follows:

**1. Outsourced Training.** Any training, testing, or checking activity that an air carrier certificate holder provides by way of a contract arrangement with another party.

**2. Major Contract Training.** Any flight training, flight testing, or flight checking leading to, and maintaining certification and qualification of, air carrier flightcrew members in accordance with 14 CFR part 61, 121, 125, 135, or SFAR 58, Advanced Qualification Program (AQP), as applicable.

**C. ACTION.** Principal operations inspectors (POI) are directed to notify their operators arranging with training providers to provide major contract training for their flightcrews, otherwise known as outsourced training, to undertake the following activities.

**1. Self-Audit: Training Program Components: Adherence to Approved Program.** The operator shall document that the training program delivered by the training provider is identical to the training program approved for the operator's use by the POI. The documentation shall address at least the following:

- (a) Manuals,
- (b) The format and content of curricula, curriculum segments, training modules, and documents depicting flight maneuvers and procedures,
- (c) Courseware,
- (d) Facilities, and
- (e) Qualifications of instructors and check airmen.

#### **APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

**2. Training Curricula: Adherence To Approved Program.** The operator shall audit curricula, as well as document that those curricula presented by the training provider adhere to the curricula contained in its FAA-approved training program. The documentation shall address at least the following, including ground training and flight training curriculum segments:

- (a) Initial new-hire training,
- (b) Upgrade training,
- (c) Transition training,
- (d) Recurrent training,
- (e) Refresher training (part 121 only),
- (f) Initial equipment training,
- (g) Requalification training, and
- (h) All other approved training such as differences, hazmat, security, and Crew Resource Management (CRM).

**3. Flight Testing: Adherence To Approved Program.** The operator shall observe the training provider's check airmen and designated examiners who are used by the operator. The operator shall document that regulations contained in sections 121.411 through 121.414, part 125, and sections 135.337 through 135.340 are being met and that approved standards are being maintained. Documentation shall address at least the following, as applicable:

- (a) Certification flight checks,
- (b) Proficiency and instrument proficiency checks (part 135 only),
- (c) Flight training in lieu of the proficiency check, including Line-Oriented Flight Training (LOFT),
- (d) Competency checks,
- (e) Maneuver validation (AQP), and
- (f) Line Operational Evaluations (LOE).

**4. Training Records: Completion of All Approved Training.** The operator shall review the training and testing records required by sections 121.683 and 135.63. This review shall cover all of the operator's flightcrew members, including pilots and flight engineers, who have received outsourced training since the last review cycle. The operator shall document that each crewmember has successfully completed all of the required components of training and checking comprised by its approved training program.

**APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

**D. SUMMARY REPORT (SAMPLE ATTACHED).** The operator shall prepare a report summarizing the findings of its self-audit. A sample report is attached to this appendix. A sample report is also shown in the guidance for OpSpecs paragraph A031 under the guidance category of “Worksheet,” in the new Operations Specifications Subsystem (OPSS). This report form may be used to compile self-audit findings and to submit findings to the POI as a summary report. Another form mutually acceptable to the operator and the POI may be used instead. The operator’s director of operations shall sign the summary report. In all instances in which discrepancies are found between the training program delivered by the training provider and that which is approved by the FAA, the operator shall propose effective remedies. Those remedies shall be included in the summary report and shall be addressed under the following categories:

1. Immediate corrective action:
  - (a) Action already taken, showing dates, and
  - (b) Action planned, showing target dates;
2. Long-term corrective action, showing target dates;
3. A strategy for ensuring continuing prevention of recurrence.

**E. OPSPECS PARAGRAPH A031 (BOILERPLATE ATTACHED).** All affected operators are required to be issued OpSpecs paragraph A031. Any training provider providing contract (flightcrew) training, within the meaning of this notice, must be approved by the POI and must be recorded in A031 of the operator’s OpSpecs.

**F. POI FOLLOW-UP.** Operator outsourcing major contract training shall address any training program discrepancy and undertake corrective action at once. When the operator’s own remedies are insufficient, the POI shall take additional steps as deemed necessary and appropriate, in accordance with applicable provisions of Title 49 of the United States Code (formerly the FAA Act of 1958), 14 CFR, Order 8400.10, Air Transportation Operations Inspector’s Handbook, and Order 2150.3A, Compliance and Enforcement Program.

**G. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) INPUT.****1. Implementation Phase.**

(a) POIs must notify all affected parts 121, 125, and 135 certificate holders that they are required to demonstrate regulatory compliance throughout their major outsourced flightcrew training programs. The operator is required to submit to the POI a list of all training providers conducting major contract training, as described in this appendix.

(b) Upon notifying the operator, a POI will open a PTRS transmittal using activity code 1380. Enter “CONTRACT” in the “National Use” field. The record will remain open until the contract listing is received from the operator. The record will be closed at this time.

#### **APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

(c) When the PTRS transmittal from item (2) is closed, the POI will open a new PTRS transmittal for Vital Information Subsystem (VIS) Data Collection using activity code 1885. Enter “CONTRACT” in the “National Use” field. Open the operator’s VIS record and update the information in VIS on page 4 of the air operator record in the field “CREWMEMBER TRAINING.” The VIS record field(s) should reflect the most appropriate choice. For example, the two pertinent options for CREWMEMBER TRAINING are:

- (1) Contracts Out Most/All TRNG, or
- (2) Contracts Out Moderate Amount.

After the POI updates the appropriate fields and determines that the listing of contractors is acceptable, the record will be closed. The POI will use the listing to prepare a revision to the OpSpecs. (See sample below for information concerning OpSpecs.)

(d) The POI will open a PTRS transmittal using activity code 1327 for issuance of revised OpSpecs. Enter “CONTRACT” in the “National Use” field. The PTRS transmittal will be opened when the record in item (3) is closed and will remain open until the completed OpSpecs have been signed and returned by the operator.

**2. Audit Phase.** POIs are directed to review all air carrier audit programs, consistent with guidance relating to Internal Evaluation Programs (IEP). Open a new PTRS transmittal when the review begins and close the transmittal when all associated activities are completed. Use the new PTRS activity code 1382. This code is for “Technical/Administration/Evaluate Internal Evaluation Programs.”

**NOTE: For guidance in accomplishing IEP evaluation, see Advisory Circular (AC) 120-59, Air Carrier Internal Evaluation Programs, and Order 8400.10, volume 3, chapter 8.**

**3. Ongoing Phase.** When approving new outsourced training arrangements use the regular recording procedures for the appropriate job function and enter “CONTRACT” in the “National Use” field.

**H. INFORMATION.** Flight Standards offices are currently in transition from the old to the new automated OPSS. Therefore the electronic boilerplate of OpSpec paragraph A031 referenced in this appendix will accompany its release for use in those offices where the new OPSS has not yet been implemented. An appropriate table of contents reflecting the addition of OpSpec A031 will need to be generated locally in those offices.

**APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

**► SAMPLE ◀**

**SELF-AUDIT and SUMMARY REPORT  
FOR [XYZ Airlines]  
CONCERNING OUTSOURCED FLIGHTCREW TRAINING**

[Date]

This report is submitted in accordance with the information specified in Notice 8000.294, Air Carrier, Air Operator, and Fractional Ownership Program Training Conducted by 14 CFR Part 142 Training Centers.

**TRAINING PROGRAM COMPONENTS.** XYZ Airlines has reviewed the following training program(s) or AQP equivalents, and training provider(s) and certifies that the training program(s) are identical to the training program(s) approved by the Federal Aviation Administration (FAA):

<u>Categories of Training</u>	<u>Date of Approval</u>
Initial New Hire	1/31/98
Initial Equipment	1/31/98
Transition	2/20/98
Upgrade	2/20/98
Recurrent	1/31/98
Requalification	1/31/98
AQP Qualification	3/15/98
AQP Continuing Qualification	9/15/98

<u>Training Provider(s)</u>	<u>Category of Training</u>	<u>Type</u>
ABC Airlines	Initial Equipment Requalification	Grnd Simulator
DEF Training Center	Recurrent	Simulator
AQP Airlines	Qualification	Grnd Grnd and Sim

**Training Components.**

<u>Manuals</u>	<u>Revision Date</u>
General Operations Manual	_____
Airplane Flight Manual	_____
Aircraft Operations Manual	_____
Aircraft Checklists	_____
Airport/Runway Analysis	_____
Minimum Equipment List	_____
Configuration Deviation List	_____

**APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

<u>Curriculum Segments</u>	<u>Review Date</u>
Basic Indoctrination	_____
Aircraft Ground Training	_____
Emergency Training	_____
Flight Training	_____
Special Curriculum Segment	_____
Hazardous Materials	_____
Differences	_____
Qualification Segment	
Flight Check	_____
Proficiency Check	_____
Competency Check	_____
Operating Experience	_____
Line Check	_____
Familiarization Flight	_____
AQP (other)	_____

**Training Equipment.** List each training device, mockup, system trainer, procedures trainer, simulator, and other training aids, which require FAA approval.

**Facilities.** A general description of facilities to include location if two or more training facilities by the same training provider are used.

**Qualification of Instructors and Check Airman.** A list of all ground and flight instructors by training provider and their position. Also a statement shall be included which states that, “XYZ Airlines has reviewed the qualifications of all check airmen and instructors utilized by XYZ Airlines and certifies that they meet regulatory requirements of Title 14 of the Code of Federal Regulations (14 CFR) part 121, 135, or both.

(Example)

Bob Smith	ABC Training Center	Ground Instructor
Nancy Jones	AQP Airlines	Ground Instructor
Frank Baker	XYZ Airlines	Check Airman

XYZ Airlines has reviewed the qualifications of all check airmen and instructors utilized by XYZ Airlines and certifies that they meet regulatory requirements of part(s) 121/135, as appropriate.

**TRAINING CURRICULA.** This section involves a side-by-side examination of the curriculum outline with the appropriate regulations, or with an approved AQP alternative means of compliance. This examination will ensure that training is provided in all required subjects and in-flight training maneuvers.

**APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

Available courseware (lesson plans, audiovisual programs, flight maneuvers, procedure documents, student handouts) shall be reviewed to ensure that courseware is consistent with each curriculum and curriculum segment.

This section shall address at least the following training programs, or its AQP equivalents, to include ground and flight training:

- Initial New Hire Training
- Initial Equipment Training
- Transition Training
- Upgrade Training
- Recurrent Training
- Requalification Training
- Any Other Approved Training (CRM, Security, Hazmat)
- AQP Qualification
- AQP Continuing Qualification

**FLIGHT TESTING.** This section involves the observation and certification of the training provider's check airman and designated examiners. The review shall be completed to ensure compliance with part 91 subpart K; sections 121.411, 121.412, 121.413, and 121.414; or 135.337, 135.338, 135.339, and 135.340, as appropriate. The report shall address at least the following, as appropriate:

- Certification Flight Checks
- Proficiency Checks
- Flight Training in lieu of the Proficiency Check
- Line-Oriented Flight Training (LOFT)
- Competency Checks
- Maneuver Validation (AQP)
- Line Operational Evaluations (LOE)

**TRAINING RECORDS.** This section requires that the operator review the training and testing records required by part 91 subpart K, section 121.683, or section 135.63, as appropriate. This review shall include all flightcrew members, including pilots and flight engineers, who have received outsourced training.

Also, a statement shall be included that ensures that each crewmember has successfully completed all of the required components of training and checking as required by the appropriate FAA-approved training program.

**APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

Example:

XYZ Airlines certifies that all flightcrew members, including pilots and flight engineers, have successfully completed all required components of training and checking as documented in our FAA-approved training programs.

\_\_\_\_\_

Date \_\_\_\_\_

Bob Jones, Director of Safety  
XYZ Airlines

**APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

**DISCREPANCIES.** Identify each discrepancy found between the training program delivered by the training provider and that approved by the FAA. Note each discrepancy by section, i.e., Training Program Components, Training Curricula, Training Records, and Flight Testing. Include with each discrepancy the corrective action taken or planned, and the timeframe for the remedy (immediate or long-term), showing calendar dates.

Any discrepancy or finding should include a strategy for ensuring a continuing prevention of recurrence.

Example:

Training Program Components

Manuals (Immediate)

General Operations Manual – Copy of manual at XYZ Airlines facility missing latest revision. Latest revision sent and posted. Director of Training will periodically ensure that revisions to company manuals are accomplished and certificated by training provider.

**SAMPLE OPSPEC A031, AUTHORIZED TO MAKE ARRANGEMENTS WITH TRAINING CENTERS, AIR AGENCIES, AND/OR OTHER ORGANIZATIONS FOR CERTIFICATE HOLDER TRAINING.**

**NOTE: This sample is in portrait view for the purposes of this notice. However, the actual OpSpecs boilerplate will be in landscape view.**

Provided the following conditions are met, the certificate holder is authorized to make arrangements with the training center(s), air agencies, and/or other organization(s) listed below to provide training, testing, and checking for the certificate holder.

a. The certificate holder shall ensure that all training, testing, and checking provided by each of the subject training organizations is performed in accordance with the certificate holder's approved training program(s).

b. The certificate holder shall ensure that each of the subject training organizations listed below has an adequate organizational structure, provide competent, qualified personnel, as well as adequate facilities, equipment, and approved training programs for the proper performance of training, testing, and checking in accordance with the certificate holder's approved training program.

c. The certificate holder shall ensure that each person employed by each subject training organization listed below is trained, qualified, and authorized to conduct the appropriate training, testing, and checking in accordance with the certificate holder's approved training program.

**APPENDIX 4. TRAINING CENTER – SELF AUDIT PROCEDURES—Continued**

d. The certificate holder shall have a program or method that detects, identifies, and provides timely corrective action for all deficiencies in the training program provided by each subject training organization listed below relative to the certificate holder’s approved training program.

e. The certificate holder shall ensure that each person who determines the adequacy of the training program and who is employed by each subject training organization listed below is fully informed about the procedures, requirements, and equipment in use with regard to the certificate holder’s approved training program.

f. The certificate holder shall ensure that all arrangements made with each subject training organization listed below are not contrary to these operations specifications, the certificate holder’s approved training program, or the Federal aviation regulations.

g. A review and audit by the certificate holder of each training agreement of each subject training organization listed below must be completed at least once every 2 years and presented to the principal inspector for acceptance. This audit shall include a review of the items listed in subparagraphs a – f above. The acceptance of the audit required by this OpSpec is considered completed in the month required if completed in the calendar-month before or after the month in which it is due.

h. The certificate holder is authorized to provide training, testing, and checking under agreement with the following subject training organization.

Training Center, Air Agency, or Training Facility	Street Address	City	State	ZIP	Certificate #	Course Title	Aircraft M/M/S

*Insert any nonstandard text here.*