

SECTION 17. TRAINING PROGRAM INSPECTIONS (PTRS CODE 1626)

437. GENERAL. This section contains direction and guidance to be used by operations inspectors for conducting training program inspections. The inspector's objective is to ensure that the operator's objective is to ensure that the operator's training program complies with regulatory requirements and that instructional methods are effective. Principal operations inspectors (POI's) and geographic program managers (GPM's) are required to schedule annual training program surveillance as part of a work program, in response to national program guidelines (NPG's), or when an operator's inspection reports, incidents, or accidents indicate deficiencies in crewmember or dispatcher skill or knowledge.

NOTE: As part of the approval process, inspectors must conduct training program inspections in phase four of the initial approval process of a training program (see volume 3, chapter 2, section 2, paragraph 335 of this handbook for more information).

A. Training Program Inspection Areas. Training program inspections involve much more than simply observing "training in progress." Flight Standards Service (FSS) has identified five primary inspection areas to be observed during training program inspections:

- Training curriculums
- Courseware
- Instructional delivery methods
- Testing and checking methods
- Specific topics (identified from Program Tracking and Reporting Subsystems (PTRS) data or other sources)

B. Annual Inspection Plan. POI's and aircrew program managers (APM's) in aircrew designated examiner (ADE) programs must develop annual inspection programs that are adapted to specific operators. Training programs vary in their complexity depending on the operator's size, aircraft fleet diversification, number of crewmembers and dispatchers, training locations, and scope of operation. POI's may find that a single annual inspection is sufficient

to verify the effectiveness of a simple operator's program. Inspection of a complex operator, however, requires a modular approach in which specific program components or locations are identified and inspected in progressive increments. The POI of a complex operator is responsible for coordinating the inspection process with appropriate GPM's who, in turn, supervise those inspections conducted in their areas of responsibility.

C. Special Inspections. A POI may determine that there is a need to initiate a "special emphasis" training program inspection. This type of inspection may be initiated for such reasons as incidents, accidents, or a series of deficiencies discovered through trend analysis of inspection data. "Special emphasis" training program inspections are relatively short in duration and usually focus on a limited area, such as training on the use of checklists or on windshear.

439. TRAINING PROGRAM INSPECTION PRACTICES AND PROCEDURES. Before beginning a training program inspection, inspectors must become thoroughly familiar with contents of volume 3, chapter 2 of this handbook. There are many methods of curriculum development and training methods that an operator may use. To obtain approval of a program, the operator must demonstrate that the program or program segment is in compliance with regulatory requirements and that it effectively prepares crewmembers and dispatchers to perform duties in revenue service. The guidance contained in volume 3, chapter 2 has been developed for this purpose. Inspectors should be aware of the competitive economic incentives operators have to improve the quality of, and to reduce the cost of, their training. Operators have great latitude in developing training programs tailored to their needs, and POI's have great latitude in approving individualized programs.

A. Preparation. Before conducting an inspection of a particular training program area, the inspector should first obtain a copy of the operator's approved training program outline from the POI and become familiar with it. The inspector should review the outline for regulatory compliance and for adequate subject coverage. Should the inspector discover a discrepancy that requires a modification of the outline, a report must be made to the POI by means of the PTRS. Should the inspector discover a serious

discrepancy, the inspector shall notify the POI by telephone.

B. On-Site Activity.

(1) On arriving at the training site, inspectors should introduce themselves to the person conducting the training, present their FAA credentials, and state the purpose of the inspection.

(2) Inspectors shall refrain from active participation in the training being conducted and shall make every effort not to influence the training environment or the instruction in the subject matter.

(3) Should an inspector have comments on any of the areas of training, the inspector may communicate this information to the appropriate individual(s) in private. The inspector will reserve comments for debriefing of the instructor until after the training session or during an appropriate break in training.

NOTE: This does not alleviate the need to include the comments in the PTRS.

(4) Inspectors should be aware that approved training hours are measured by curriculum segments and that each hour of training normally contains a reasonable "break time" of 10 minutes.

C. Courseware Inspection. While observing the training, inspectors should evaluate the courseware. Inspectors should also evaluate whether or not the courseware and the instructor are effective in communicating the essential points of the lesson.

(1) *Instructor Courseware.* The inspector must observe whether or not the operator's instructor guides and lesson plans follow the approved outline. During observation, inspectors must also ensure that instructor guides and lesson plans adhere to the following criteria:

(a) Instructor courseware should be clearly titled for the appropriate curriculum segment.

(b) The instructor must be able to conduct detailed instruction for each subject area.

(c) Instructional material should be presented in a logical manner and in a sequence that is easy to use and comprehend.

(d) Courseware should provide references to applicable manuals of the operator.

(e) The instructor should use some means of determining that Th. students are properly assimilating the material (such as "responder" panels, multiple-choice questions, or in-class exercises).

(2) *Student Courseware.* The inspector must evaluate various "self-teaching" training mediums such as video tapes, audiovisual (carousel-type) slide presentations, computer-based training (CBT) presentations, programmed learning publications, and home-study materials, to ensure that they satisfy the requirements of the approved outline. Training mediums must adhere to the following standards:

(a) The information must agree with the operators manual and other publications.

(b) The material must have sufficient detail to ensure that students comprehend the applicable subject area.

(c) The courseware should include some means of testing student assimilation of information presented.

D. Instructional Delivery Methods. This inspection area consists of the following inspection modules:

(1) *Training Facilities/Environment Inspection.* The inspector must ensure that the operator's training facilities and the instructional environment are conducive to learning. An inspector must ensure that the facilities meet the following standards:

- Provide adequate seating space for students
- Provide storage areas for training materials
- Provide area for instructors to prepare their lessons
- Are free of distractions, which adversely affect instructional delivery (such as exces-

sive temperatures, extraneous noise, poor lighting, and cramped classrooms and/or work spaces)

(2) *Criteria for Instructors.* The inspector must ensure that the quality of instruction provided by instructors in both ground and flight training segments is effective. Instructors must create an effective environment for training. The instructor must be flexible and alert to individual needs of the students. The following guidelines apply to instructors and/or flight instructors. Instructors must follow these criteria where applicable.

(a) *Instructors.*

- Must know the operator's training policies and procedures, know how to complete required training forms, and must exhibit satisfactory instructional methods and techniques
- Must be knowledgeable in the specific area of instruction and must be able to present the material in a logical, clear, and organized manner
- Must be aware of the minimum equipment required for each element of training and must conform to the limitations imposed on the training element(s) by inoperative component(s)
- Should follow the applicable lesson plans, guides or other training aids to ensure that the material is properly presented as designed

(b) *Flight Instructors.*

- Must be competent in the operation of flight training devices or flight simulators and must be knowledgeable of the training elements that may be accomplished in that level of simulator or training device
- Should provide a thorough preflight briefing on all maneuvers and procedures that will be accomplished

- Should provide a thorough post-flight debriefing to review each student's performance during a training session

E. *Training Aids and Equipment.* Inspectors must ensure that the operator's train aids and equipment are appropriate to the subject matter and that they operate properly. This includes audiovisual equipment, systems back mock-up boards, panel layouts, ground training devices, instructor station equipment, student responders (if applicable), and other related items.

(1) All equipment used in the training program must operate and function in good working order. Replacement parts or components (such as slide projector lamps) should be readily available.

(2) Any equipment designated to be used for "self teaching" purposes, such as CBT platforms, must have clear operating instructions readily available for student use.

(3) Systems panels, layouts, boards, or mock-ups (such as aircraft exit mock-ups) should accurately represent the designated aircraft.

F. *Flight Simulator or Training Device Inspection Module.* The inspector should ensure that the operator's flight simulators and flight training devices are being adequately maintained and that they effectively replicate the associated aircraft.

NOTE: The national simulator team is responsible for conducting a flight evaluation of the training device or simulator. The inspector is responsible, however, for determining the general condition of the equipment and the operator's general ability to maintain the equipment to those same standards while training is in progress.

G. *Testing and Checking.* In the inspection of an operator's training program, the inspector must conduct observations of the elements that involve evaluation and qualification. These elements include, but are not limited to, check airman programs and activities, training records, failure rates, and testing and checking standards. The inspector must evaluate the following modules:

NOTE: Check airman observations (PTRS activity codes 1631, 1632, 1633, 1634) and crew/dispatcher records inspection activities. When these activities are accom-

plished as a part of a training program inspection, they will be recorded by using PTRS activity code 1626.

(1) *Check Airman Programs and Activities.* The inspector should evaluate all elements that relate to check airman training and qualification, check airman records, and standardization programs (see volume 3, chapter 3 for specifics on check airman inspection programs).

(2) *Training Records.* The inspector should evaluate the operator's training records for information regarding the overall effectiveness of an operator's training program. The testing and checking results available from the training records are an excellent source of information for POI's to establish positive or negative trends in the operator's training program.

(3) *Oral and Practical Tests.* Inspectors should observe or conduct a number of airman certification evaluations as well as proficiency, competency, or line checks (as applicable) to determine the overall effectiveness of the operator's training program, check airman programs, and testing and/or checking standards. Inspectors should place specific emphasis on flight events which require repetition or excessive instruction and should evaluate them according to the following criteria:

(a) Testing and checking standards must comply with the regulations, the safe operating practices, and the guidance contained in this handbook.

(b) Testing and checking standards must be consistently applied throughout the operator's training organization by its check airman and instructor personnel.

NOTE: Testing and checking observations provide a direct measure of the effectiveness of courseware and instructional delivery methods. Inspectors should use the applicable job aids contained in this volume when observing and evaluating testing or checking in progress.

(4) *Quality Control.* The inspector shall observe the operator's quality control program to ensure that training effectiveness is continually monitored and that specific areas or items are corrected when necessary. The opera-

tor's quality control system must ensure that students do not proceed to the next module or training segment until satisfactory proficiency has been achieved. Additionally, training folders must be maintained by the operator while students are in a specific curriculum. Inspectors should review the information contained in these folders to identify any deficient trends. This information, coupled with the results of testing and checking, provides a quantifiable method for measuring training effectiveness.

H. *Inspection Results.* As a source of information about an operator's overall performance, inspectors can use the PTRS to evaluate inspections and investigations previously done on the operator. A high rate of satisfactory performance usually indicates a strong, effective training program. Repeated cases of unsatisfactory performance, however, often indicate deficiencies in an operator's training program.

(1) *Use of the PTRS.* The PTRS is an effective tool for inspectors to use during the examination and analysis of information obtained from investigative and inspection reports. Standard and ad hoc reports can be generated by the system to search for inspector comment codes which specifically relate to or, through analysis, could lead to deficient areas in an operator's training program. Both standard and ad hoc reports should be generated through PTRS by using PTRS activity codes which relate to training program activities, including check airman inspections and the results of airman certification activities. For example, the inspector could pull up a standard report (referred to as a comment code summary report), to obtain all the "U" and "P" comments submitted by inspectors during training program evaluations (PTRS activity code 1306). Inspectors should refer to the applicable PTRS user manual for both a detailed explanation of what types of reports are available and the procedure for using the system.

(2) *POI Review.* The POI shall review results of inspection reports, incident and accident reports, enforcement actions, and other relevant information about the operator's performance for indications of training effectiveness. For example, repeated reports of deficiencies, such as configuring too late, incomplete briefings, or incorrect use of the checklists may be traceable to a lack of specific training or ineffective training in a particular area.

440. - 450. RESERVED.

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