AC 61-83F Nears Final Coordination

Welcome to issue three of the quarterly FAA FIRC Facts newsletter.

Naturally folks want to know what’s happening with the new Version F of the AC. Well, it’s going through channels as does every piece of formal FAA documentation, as you no doubt already know. It’s called final “coordination.”

Unfortunately, until it finishes with internal coordination, we can’t release it – yet.

This process helps to ensure that no (or at least as few as possible) mistakes are made and that everybody in the Agency is “on board” with whatever a particular document is stating, since that document represents the FAA’s position on a particular topic. The Flight Instructor Refresher Clinic (FIRC) guidance is certainly no exception.

Understandably, we’ve heard some concerns from folks whose renewals are coming up right after the expected late-summer release of the new AC, asking: “Who has ever been required to adhere to an FAA…AC without being able to see it?”

Although an AC is only guidance, they’re right – that’s not reasonable. So, for those of you who have upcoming renewals and are concerned that you might not have sufficient time to comply with the new AC, we can do a couple of things: First, check the FIRC website, the new (DRAFT) Core Topics and Electives appendices are now posted. Understand that they are still officially “DRAFT” documents, but this should help in providing topic-guidance. Second, if you are going to need more time to complete your new TCO, contact me at: gregory.french@faa.gov, and we’ll arrange an extension of your existing TCO. That should help you out.

Remember, for those of you wishing to change your TCOs incrementally, that can be arranged also. Just contact me and we’ll discuss it.

Ways to FIRC-Renew a CFI

Did you know that there are 10 different ways to renew a CFI? Well, there are and the FIRC is only one way, although in many estimates, the best. Since this is a FIRC newsletter, it’s not the place to go into the other nine, but you could look them up at a number of web sites. The National Association of Flight Instructors (NAFI) might be a good place to start.

But what about the FIRC? Is the AC guidance the only way to conduct one? Yes and no. 14 CFR 61.97(2)(iii) states that a CFI may renew their certificate by presenting a: “…graduation certificate showing…the person has successfully completed an approved flight instructor refresher course consisting of ground training or flight training, or a combination of both…” First remember that the AC is “guidance.” Follow it exactly and you’re pretty much guaranteed approval. If you’ve read the guidance you’ll know that there is nothing in there about flying. But, yes, a provider could submit a TCO that included components not listed in the AC (such as a flight component) and we’d be happy to review it to ensure that it was an effective method of instructor training and that it met the spirit of the regulation. A great example is TAA aircraft. An hour of glass-cockpit training in the air would easily meet the requirements for a TAA module. Can you think of any others? Let us know – we’ll work with you.
FAA FIRC Surveillances

FIRC providers must submit a specific TCO, or Training Course Outline, during their approval process. That TCO states what’s going to be covered in the FIRCs and how.

After the TCO has been submitted and approved, what does the FAA have to do with them? Well, the agency, through its Aviation Safety Inspectors (ASI), is mandated to confirm compliance with the approved TCO on a random basis. They (the inspectors) do this by monitoring, or surveilling, a FIRC. How? It’s not too tough. Basically, an Inspector from the local FSDO will simply attend part or all of a FIRC presentation and write up a report on what he/she observed.

This, naturally, begs the question: What are they looking for? Inspectors monitoring a FIRC are guided by their handbook, the 8700.1 (soon to be the digitally-based Combined Inspector Guidance, Order 8900.1). The handbook tells the inspector to be watching for two specific things. First, does the presentation follow exactly the TCO? Second, is what is presented factually correct? If the presentation doesn’t meet those two criteria, then it is not being presented as approved and some communication must take place between the provider and the inspector to correct this. Most likely this will result in some minor changes to the presentation to ensure future compliance. But be aware! In a worst-case scenario, it could result in revocation of the authorization.

How often are FIRCs monitored? Providers are first issued a provisional approval which remains in effect until one of their FIRCs are monitored, after which (assuming proper compliance) a full 2-year approval is granted. After that, it’s just a matter of whenever a monitoring effort can be scheduled, but an attempt is made to make it at least once per year per provider.

New Topic: Open Forum

There’s an old adage: learn from the mistakes of others – you won’t live long enough to make them all yourself. Thus – hanger talk. We’ve found that open forum discussions can often provide instructors with as much insight and new information as formal training. To help encourage that kind of cross-learning the new AC is encouraging providers to optionally set aside one of the required 16 hours for open discussion among all attendees on any timely (but aviation safety related) topic. Then, instead of spending the hour instructing, the provider only serves as a referee and lets the instructors themselves have at it.

Tid-Bits

This is just a bit of meaningless trivia, but, some folks have asked: “why does the current AC (Version E) always refer to the FIRC as ‘...an FIRC...’ rather than ‘...a FIRC...’?”

For example, Page 1, paragraph 1, sentence 3 reads: “Adherence to this AC provides one acceptable method to obtain approval of an FIRC.” And it’s repeated that way many times throughout the document. It does read kind of funny, doesn’t it?

It’s actually grammatically correct strange as it may sound. Remember what FIRC stands for: Flight Instructor Refresher Clinic. In other words, it’s an eff–eye–are–see, even though we say it as the single word ‘firc.’ If we pronounced FAA as “FAH”, then we might say “…it was a FAH initiative…” and it would sound right. But we spell it out F. – A. – A., so we say: “…it was an FAA initiative…” Make sense? Well, there you go, and now you’re a better person for knowing.

http://www.faa.gov/pilots/training/firc