



U.S. Department
of Transportation
Federal Aviation
Administration

Advisory Circular

Subject: Part 141 Pilot Schools, Application,
Certification, and Compliance

Date: 9/12/17

AC No: 141-1B

Initiated by: AFS-800

Change:

Federal Aviation Administration (FAA)-certificated pilot schools are regulated in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part [141](#). Unlike pilot training conducted under 14 CFR part [61](#), part 141 pilot schools are required to use a structured training program and syllabus. Part 141 pilot schools may be able to provide a greater variety of training aids and require dedicated training facilities, flight instructor oversight, and FAA-approved course curricula. Colleges and universities, which may offer aviation degrees, often provide pilot training under part 141.

This advisory circular (AC) provides guidance for part 141 pilot school applicants and others interested in the certification standards and requirements for certification under part 141. This revision updates information found in AC 141-1A, Pilot School Certification, dated February 18, 1993, including additional information on compliance with part 141, and includes a chapter on Transportation Security Administration (TSA) requirements for part 141 pilot schools.

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CHAPTER 1. GENERAL

- 1.1 Purpose of This Advisory Circular (AC).** AC 141-1, Pilot School Certification, was issued on August 29, 1974 and was revised on February 18, 1993. AC 141-1 was designed to assist in the certification of Title 14 of the Code of Federal Regulations (14 CFR) part [141](#) pilot schools. Since 1993, the Federal Aviation Administration (FAA) has made several amendments to part 141, which are reflected in this updated version. Additionally, after the events of September 11, 2001, the Transportation Security Administration (TSA) implemented requirements on the training of foreign nationals in the United States. This revision updates guidance on part 141; provides guidance on application, renewal, amendment, and compliance under part 141; and adds information on TSA requirements. FAA regulations can be found at: https://www.faa.gov/regulations_policies/faq_regulations/.
- 1.2 Audience.** The primary audience for this AC includes persons seeking certification for a part 141 provisional pilot school or pilot school, certificated provisional pilot schools and pilot schools, and provisional pilot schools and pilot schools seeking to renew their certificates. The secondary audience includes FAA Flight Standards District Offices (FSDO) and principal inspectors (PI) assigned oversight of certificate holders conducting operations under part 141.
- 1.3 Cancellation.** AC 141-1A, Pilot School Certification, dated February 18, 1993, is cancelled.
- 1.4 References and Related Information.** Appendix [C](#) contains a list of references and related information.
- 1.5 Definitions.** The following definitions apply to this AC and to the certification, renewal, and operation of a pilot school under part 141 (refer also to AC [120-78](#), Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals):
- 1.5.1 Air Agency Certificate.** An Air Agency Certificate is required for operation as a certificated pilot school under part 141, and is issued using FAA Form 8000-4, Air Agency Certificate.
- 1.5.2 Aviation Training Device (ATD).** A training device, other than a full flight simulator (FFS) or flight training device (FTD), that has been evaluated, qualified, and approved by the Administrator. In general, an ATD includes a replica of aircraft instruments, equipment, panels, and controls in an open flight deck area or an enclosed aircraft cockpit. It includes the hardware necessary to represent a category and class of aircraft (or set of aircraft) operations in ground and flight conditions having the appropriate range of capabilities and systems installed in the device.
- 1.5.3 Certification Course.** A certification course is a training course for a certificate or rating normally accomplished by a student from “zero time” to completion and prescribes the curriculum within a particular subject such as a recreational pilot course, private pilot course, or other listed approved training course.

- 1.5.4** Certification Job Aid. A checklist used by the jurisdictional FSDO to ensure the part 141 pilot school applicant has met all of the requirements for the issuance of an Air Agency Certificate.
- 1.5.5** Certificated Pilot School. A part 141 pilot school applicant meeting the pertinent requirements of part 141 that has been issued an Air Agency Certificate. This term, as well as part 141 pilot school, as used in this AC, refers to both provisional pilot schools and pilot schools.
- 1.5.6** Check Instructor. A check instructor is authorized to conduct student stage checks, end-of-course tests, and proficiency checks.
- 1.5.7** Curriculum. The courses offered by a part 141 pilot school. A set of courses depicting planned flight and/or ground instruction offered by a part 141 flight or ground school. Curricula are contained in a training course outline (TCO).
- 1.5.8** Examining Authority. The authority granting the holder of a pilot school certificate to conduct practical tests of its own graduates for the issuance of pilot certificates and ratings without further testing by the FAA.
- 1.5.9** Jurisdictional Flight Standards District Office (FSDO). The FAA FSDO assigned to a part 141 pilot school that provides certification and oversight to that school.
- 1.5.10** Lesson Plan. An organized outline for a single instructional period. It is a necessary guide for the instructor because it outlines what to do and in what order to do it, and what procedures to use in teaching the material of a lesson. Lesson plans should be prepared for each training period and be developed to show specific knowledge and/or skills to be taught.
- 1.5.11** Letter of Authorization (LOA). Issued to a part 141 pilot school by the jurisdictional FSDO as a standardized set of authorizations and approvals through the Web-based Operations Safety System (WebOPSS), in lieu of individual LOAs and approvals.
- 1.5.12** Letter of Intent (LOI). A letter sent to the jurisdictional FAA FSDO notifying the office of intent to submit an application for certification as a part 141 provisional pilot school.
- 1.5.13** Pilot School Rating. A part 141 pilot school is issued a rating for each of its approved courses. A part 141 pilot school rating is not to be confused with an airman certification rating, such as an instrument rating.
- 1.5.14** Provisional Pilot School. A part 141 pilot school that does not meet the requirements of § [141.5](#), but does meet the requirements of § [141.7](#) when its Air Agency Certificate is issued.
- 1.5.15** Satellite Base. A location other than the main operations base where approved ground or flight training courses are conducted.

- 1.5.16** Schedule of Events (SOE). A timetable provided by the applicant and accepted by the certification team, setting a reasonable expectation for the progression of the certification process.
- 1.5.17** Syllabus. An outline and summary of topics to be covered in a training course, textbooks, and other material used in the course. It is a step-by-step (building block) progression of learning with provision for regular review and evaluation at prescribed stages of learning. The syllabus defines the unit of training, states by objective what the student is expected to accomplish during the unit of training, shows an organized plan for instruction (building blocks, from the simple to the complex), and dictates an evaluation process for either the unit or stages of learning. A syllabus is contained within a training course outline (TCO).
- 1.5.18** Tablet. A wireless general purpose mobile computer with a touchscreen display.
- 1.5.19** Training Course Outline (TCO). A document describing the content of a particular course through a statement of objectives, description of teaching aids, definition of evaluative criteria, and indication of desired outcomes.
- 1.6 Background.** Part 141 prescribes rules governing the operation of part 141 pilot schools and their use of course curricula for pilot training under this part. This ensures that training by a part 141 pilot school is adequate, appropriate, and administered by qualified persons. Compared to 14 CFR part [61](#), flight time requirements for completing a course under part 141 are often reduced, in large part because part 141 training is more controlled through the structured courses approved by the FAA. Training is overseen by experienced chief instructors, and all instructors must have familiarization training and proficiency checks in the types of aircraft in which they provide training. Additionally, certificated schools receive regular surveillance from the FAA.
- 1.7 Provisional Pilot School Versus Pilot School.** An applicant for an Air Agency Certificate meeting the requirements of § 141.7 is issued a provisional pilot school certificate as initial certification under part 141, as the applicant will not have met the recent training activity requirements of § 141.5(d). It is a prerequisite for a part 141 pilot school to hold certification as a provisional pilot school before it may apply for a pilot school certificate. An applicant for a pilot school certificate must meet all of the requirements of § 141.5, including graduating at least 10 different people and establishing a pass rate of 80 percent or higher. Once a provisional pilot school has met all of the requirements of § 141.5, and all other pertinent sections within part 141, it may apply for a pilot school certificate.
- 1.8 Certification Process.** The certification of a part 141 pilot school is accomplished through a five-phase certification process. This includes (1) preapplication, (2) formal application, (3) document compliance, (4) demonstration and inspection, and (5) certification.
- 1.8.1 Preapplication Phase.** The applicant initiates the process leading to certification as a provisional pilot school. The applicant contacts the jurisdictional FSDO to obtain

pertinent information concerning a path to certification as a provisional pilot school. The applicant meets with one or more inspectors from the office (the certification team), who explain the certification process and can answer the applicant's questions.

- 1.8.2 Formal Application Phase.** The applicant submits the formal application, FAA Form [8420-8](#), Application for Pilot School Certification; an LOI; TCOs, including a syllabus that is contained in the TCO; a safety procedures guide; all other applicable documents required by part 141; and any other applicable FAA guidance and as outlined during the preapplication meeting.
- 1.8.3 Document Compliance Phase.** The certification team reviews all relevant documents for completeness and compliance. Should there be items missing or not in compliance, the team may delay the review process until the required corrections are submitted.
- 1.8.4 Demonstration and Inspection Phase.** Testing of the chief instructor and any assistant chief instructors, if applicable, by the FAA takes place, along with all required inspections. During this phase, the applicant will have to demonstrate it is capable of delivering training that is expected to meet the objectives of its TCO.
- 1.8.5 Certification Phase.** When all requirements are satisfied, the FAA will issue the letters to the applicant, indicating approval of courses and pilot school ratings based on the TCOs submitted to the certification team. The applicant is then issued a Provisional Pilot School Air Agency Certificate.
- 1.9 Where You Can Find This AC.** You can find this AC on the FAA's website at http://www.faa.gov/regulations_policies/advisory_circulars.
- 1.10 AC Feedback Form.** For your convenience, the AC Feedback Form is the last page of this AC. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this AC on the Feedback Form.

CHAPTER 2. PREAPPLICATION PHASE

2.1 General. This chapter will discuss the preapplication phase, in which the applicant generates and submits a Letter of Intent (LOI) to the jurisdictional Flight Standards District Office (FSDO). Contact information for FSDOs can be found at http://www.faa.gov/about/office_org/field_offices/fsdo/.

2.2 Actions Prior to LOI. Before contacting the jurisdictional FSDO, a prospective applicant is encouraged to evaluate its capability to meet the initial certification, as well as the ongoing requirements of a 14 CFR part [141](#) pilot school. Some considerations include:

1. Will the prospective applicant for a provisional pilot school certificate have adequate personnel, adequate certified flight and ground instructors, a chief instructor, and aircraft meeting the requirements of part 141?
2. Do the proposed chief instructor and any assistant chief instructors, if applicable, meet the requirements of part 141, §§ [141.35](#) and [141.36](#)?
3. Will check instructors be utilized, and do they meet the requirements of § [141.37](#)?
4. Does the applicant have continuous use of each airport at which training flights originate?
5. Does each airport used by the part 141 pilot school meet the requirements of § [141.38](#)(b) through (f)?
6. Does the applicant intend to utilize satellite bases, and how will compliance with § [141.91](#) be achieved?
7. What aircraft will be utilized in the course(s) the applicant is seeking and who will maintain these aircraft? How will the applicant comply with § [141.39](#)?
8. If the applicant proposes to utilize full flight simulators (FFS) or flight training devices (FTD), has the FFS or FTD received National Simulator Program (NSP) evaluation and an approval letter in the past 12 months? Has the applicant received training on the use of these devices? Does the FFS/FTD comply with § [141.41](#)(a)?
9. If the applicant plans to use aviation training devices (ATD), have the ATDs received an FAA letter of authorization (LOA) from the General Aviation and Commercial Division (AFS-800) within the past 5 years? Has the applicant received training on the use of the trainer? Does the ATD comply with § [141.41](#)(b)?
10. Will pilot briefing areas be in place as required under § [141.43](#)?
11. Does the applicant intend to use electronic recordkeeping and/or signatures, in accordance with Advisory Circular (AC) [120-78](#), Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals?
12. Does the applicant propose to submit electronic documents?

13. Will the Internet be utilized for the delivery of classroom instruction or other purposes, such as filing flight plans? If yes, how will the applicant comply with § [141.53\(d\)](#)?
14. Does the applicant understand its responsibility to maintain ongoing compliance with the standards regarding its aircraft, facilities, and personnel as specified in an approved training course outline (TCO) in accordance with § [141.89](#)?
15. Have the limitations in advertising under § [141.23](#) been considered?
16. What TCO and syllabus does the school plan to use for each course? Does the school plan to use a commercially developed syllabus, or will they develop their own?

2.3 Pilot School Ratings. An applicant should review § [141.11](#) and the appendices of part 141 and determine what course(s) will be part of the initial application package. The term “pilot school rating” as used in § 141.11 describes the certification and rating courses that are approved for part 141 pilot schools. Pilot school ratings are listed on a part 141 pilot school’s Air Agency Certificate. Examples of pilot school ratings include Recreational Pilot, Private Pilot, and Commercial Pilot. Courses are approved under § [141.55](#). There are more than 40 different courses, with each requiring a separate TCO and separate syllabus. The typical courses include:

1. Recreational pilot certification courses: Airplane Single-Engine Land (ASEL), rotorcraft helicopter, and rotorcraft gyroplane.
2. Private pilot certification courses: ASEL, Airplane Multiengine Land (AMEL), Airplane Single-Engine Sea (ASES), Airplane Multiengine Sea (AMES), rotorcraft helicopter, gyroplane, glider, lighter-than-air airship, lighter-than-air gas balloon, lighter-than-air balloon with an airborne heater, and powered-lift.
3. Commercial pilot certification courses: ASEL, AMEL, ASES, AMES, rotorcraft helicopter, rotorcraft gyroplane, glider, lighter-than-air airship, lighter-than-air gas balloon, lighter-than-air balloon with an airborne heater, and powered-lift.
4. Instrument rating courses: airplane, helicopter, and powered-lift.
5. Airline transport pilot (ATP) certification courses: ASEL, AMEL, ASES, AMES, rotorcraft helicopter, and powered-lift.
6. Flight instructor certification courses: airplane single-engine, airplane multiengine, rotorcraft helicopter, rotorcraft gyroplane, glider, and powered-lift.
7. Special preparation courses: pilot refresher courses, flight instructor refresher course, ground instructor refresher course, agriculture aircraft operations course, rotorcraft external load-operations course, special operations course, test pilot course, and Airline Transport Pilot Certification Training Program (ATP CTP).

8. Under § [141.57](#), a part 141 pilot school may combine courses, but it would have to meet the requirements of each course, which also includes completion of the entire course before issuing a graduation certificate. A special curriculum course must contain features that can be expected to achieve a level of pilot competency equivalent in scope and depth to that achieved by the curriculum prescribed in the appendixes of part 141.
 9. Under part 141 appendix [L](#), the applicant would propose an approved course of training that includes the aeronautical knowledge areas that are needed to safely exercise the privileges of the certificate, rating, or authority for which the course is established. Refer to part 141 appendix L for the requirements for each approved course under this appendix.
 10. Part 141 appendix [M](#) provides for the minimum curriculum for a combined private pilot certification and instrument rating course for airplane, airplane single-engine, airplane multiengine, rotorcraft helicopter, and powered-lift. Refer to part 141 appendix M for the requirement for this combined course.
 11. Under part 141 appendix [I](#), the approval of one or more courses of training that results in the issuance of an additional aircraft category or class rating to an existing pilot certificate entitles the school to have “Additional Aircraft Category or Class Rating” placed on its school certificate.
 12. Aircraft type rating courses for other than ATP Certificate (part 141 appendix [J](#)): A type rating in an airplane category, single-engine class; a type rating in an airplane category, multiengine class; a type rating in a rotorcraft category, helicopter class; and/or type rating in a powered-lift category.
- 2.4 TCO and Syllabus.** Although not needed at the time the LOI is submitted, the applicant is encouraged to consider the TCO and syllabus required at the time the applicant makes a formal application for a course. By that point, the applicant must decide whether to develop and submit its own syllabus, or utilize the current version of a commercially produced and FAA-approved syllabus, and consider what actions will be needed in order to comply with the requirements of §§ 141.53 and 141.55. Chapter [3](#), Formal Application Phase, explains the requirements for the TCO and syllabus. Appendix [B](#), Sample Training Course Outline and Syllabus, provides a sample TCO and syllabus submittal.
- 2.5 Training Records.** Certificate holders must maintain current and accurate records on each student and instructor, and must understand what actions will be needed in order to comply with § [141.101](#). A description of the proposed recordkeeping system must be included in the LOI. Chapter [4](#), Document Compliance Phase, provides more detail regarding the requirements for the TCO, syllabus, and required student recordkeeping.
- 2.6 Aircraft.** Each aircraft used for flight training must conform to § 141.39, and the makes and models (M/M) to be used in training must be included in the LOI. See Chapter 4 for more information on aircraft requirements.

2.7 Contact With the Jurisdictional FSDO. After an applicant decides which ratings and associated courses it will seek, reviews part 141, and reviews all requirements for certification, it is highly recommended the applicant contact its jurisdictional FSDO and make an appointment to meet with a manager. The jurisdictional FSDO manager and assigned inspector will outline the part 141 certification requirements, aircraft requirements, and FAA policy and procedures. This is a time for the prospective applicant to ask questions, learn what is required to be certificated as a provisional pilot school, and learn what will be needed to maintain the part 141 pilot school's certificate. This is also a time for the jurisdictional FSDO to learn about the applicant and what resources will be needed in order to support the prospective applicant during the certification process.

2.8 LOI. To be eligible for a pilot school certificate, the school must meet the pertinent requirements of part 141, and apply in a form and in a manner prescribed by the Administrator (under § [141.13\(a\)](#)). This includes submitting an LOI to the jurisdictional FSDO. Appendix [A](#), Figure [A-3](#), Sample Letter of Intent, shows a sample LOI. The LOI must include the following:

1. Statement of intent to become a certificated pilot school under part 141.
2. The company's legal name and any doing business as (DBA) names, the principal operation's base address, the primary airport address, the mailing address, telephone numbers, and email addresses.
3. M/M of aircraft, number of aircraft, numbers of each type of aircraft, and if available, aircraft registration numbers of the proposed part 141 pilot school's aircraft.
4. Estimated date when operations are planned to begin.
5. Training courses to be offered and ratings requested with any training course(s).
6. Name and qualifications of a proposed chief instructor for each course, and name and qualifications of any assistant chief instructor(s), if applicable, for each course who will be employed by the proposed part 141 pilot school.
7. Training aids to be used, including computer programs, FFSs, FTDs, and/or ATDs.
8. Intent to use computers, tablets, or other electronic devices for course delivery or portions of course delivery, including the use of electronic recordkeeping and the use of tablets during the operation of an aircraft.
9. Recordkeeping methods, including electronic logbooks and other electronic data storage, and the proposed method of security with these devices.
10. Any intended use of tablets in order to provide students with copies of syllabi, to be used by students in flight courses or for student recordkeeping.
11. Three separate, three-letter designators (in order of preference) for use in LOAs and certificate management.

- 2.9 FSDO Review of the LOI.** Typically, the jurisdictional FSDO will review all submissions and provide feedback to the applicant within 30 business-days of receiving an LOI. The FSDO will determine if the LOI provides sufficient information for the certification process to continue. The preapplication phase ends and the formal application phase begins with receipt of the completed application. Chapter [3](#) discusses the formal application phase.
- 2.10 The Applicant's Responsibility.** It is the applicant's responsibility to know, understand, and be prepared to comply with relevant parts of 14 CFR parts [61](#), [91](#), and 141. It is also the applicant's responsibility to contact the jurisdictional FSDO for guidance, ask questions if something is not understood, and devote the necessary time, financial, and human resources during the certification process. Ultimately, the applicant is responsible to its prospective students to deliver quality instruction based on a well-thought-out course of instruction.
- 2.11 The Jurisdictional FSDO's Responsibility.** It is the jurisdictional FSDO's responsibility to devote the time and resources to new and existing part 141 pilot schools and explain and answer questions the applicant may have. The FSDO will keep the applicant apprised on the status of their application.
- 2.12 Joint Responsibility.** Together, the applicant and the jurisdictional FSDO, through the assigned personnel on the certification team, must work together in order for the application to result in the initial certification of a provisional pilot school. This joint responsibility does not end with the certification of a part 141 pilot school; rather, this joint responsibility is an ongoing process.

CHAPTER 3. FORMAL APPLICATION PHASE

- 3.1 General.** The next step in the 14 CFR part [141](#) pilot school certification process is the formal application phase. This chapter will discuss what documentation must be submitted for consideration, and the appropriate format. For the formal application phase to begin, the applicant must submit all required documentation.
- 3.2 FAA Form 8420-8.** The formal application phase begins when FAA Form [8420-8](#), Application for Pilot School Certificate, is submitted to the jurisdictional Flight Standards District Office (FSDO). This form may be obtained from <https://www.faa.gov/forms/index.cfm/go/document.information/documentID/186278>. Preferably, the form is completed electronically in accordance with the instructions on page 2 of the form. Alternatively, the form may be completed in duplicate by paper (see Appendix [A](#), Figure [A-2](#), Sample Application for Pilot School Certification).
- 3.3 Requested Part 141 Pilot School Training Courses and Ratings.** Each part 141 pilot school training course must be listed on FAA Form 8420-8. Because the process to certificate a provisional pilot school is complex, it is recommended that the applicant begin the certification process by requesting certification for one or two training courses only. After initial certification, part 141 pilot schools are encouraged to add more courses to its certificate as needed.
- 3.4 Signatures on FAA Form 8420-8.** All applications must be signed, either in ink on paper or electronically. FAA Form 8420-8 contains information on who is authorized to sign the form. This depends on whether the applicant is an individual, partnership, corporation, company, club, or association.
- 3.5 Training Course Outline (TCO) and Syllabus.** A TCO and syllabus is required for each course under a rating when the formal application is submitted. When the jurisdictional FSDO has approved the TCO(s), a letter of approved courses will be issued and the appropriate pilot or provisional school rating(s) will be placed on the Air Agency Certificate. The TCO describes the content of a particular course by statement of objectives, description of teaching aids, definition of evaluative criteria, indication of desired outcomes, and duties and responsibilities of chief instructor and other personnel. The syllabus is an outline and summary of the topics to be covered in a training course. Appendix [B](#), Sample Training Course Outline and Syllabus, has a sample of a TCO and syllabus.
- 3.6 TCO.** The TCO must include, at a minimum, the items listed in part 141, § [141.55](#). These items may be listed in the sequence from the regulation or in any sequence the applicant wishes. The syllabus may be a separate document or in the same book, as appropriate. At a minimum, the TCO includes:
1. A description of each room used for ground training, including the room's size and the maximum number of students that may be trained in the room at one time, unless the course is provided via an Internet-based training medium. This can be a textual description or a "to-scale" drawing of the

building or specific rooms. If future growth is expected and a larger hangar or more rooms are planned, this could be put in an appendix.

2. A description of each type of audiovisual aid, projector, tape recorder, mockup, chart, aircraft component, or other special training aids used for ground training, other than full flight simulators (FFS) or flight training devices (FTD).
3. A description of each FFS, FTD, or aviation training device (ATD) to be used for training.
4. The name and identifier of the airport at which training flights originate and a description of the facilities, including pilot briefing areas, that are available for use by the part 141 pilot school's students and personnel. This is normally the home airport. It would be rare to originate training flights from a different airport, as this could involve a need for authorization of a satellite base.
5. A description of the type of aircraft, make and model (M/M), including any special equipment used for each phase of training. The aircraft list should indicate which are instrument flight rules (IFR) equipped and which aircraft are complex or high-performance for commercial pilot training. This would be a good list to place in an appendix of the TCO.
6. The name of the chief instructor, assistant chief instructor, and check instructor for each approved course.
7. The minimum qualifications and ratings for each instructor assigned to ground or flight training. See paragraph [3.23](#) for flight instructor requirements.
8. A training syllabus that includes the following information:
 - The prerequisites for enrolling in the ground and flight portion of the course, including the pilot certificate and rating (if required by this part), training, pilot experience, and pilot knowledge.
 - A detailed description of each lesson, including the lesson's objectives, standards, and planned time for completion.
 - A description of what the course is expected to accomplish with regard to student learning.
 - The expected accomplishments and the standards for each stage of training.
 - A description of the checks, stage exams, and end-of-course exams to be used to measure a student's accomplishments for each stage of training.
9. When a part 141 pilot school or new applicant applies for ratings, the syllabus included in each of the TCOs will be reviewed carefully against the appropriate appendix in part 141. The content must support the objectives, be arranged in a logical sequence, and be attainable within the estimated stage and course times. To accommodate for individual learning differences and other situations, reasonable variances in the timeframe should be considered when determining the estimated timeframes of lessons, stages, or courses.

3.7 Syllabus Location. The regulations require a TCO to contain a syllabus, but it does not state that the syllabus must be physically included in the TCO. The syllabus may be included as a chapter or an appendix. Part 141 pilot schools using a commercially produced syllabus may provide a copy in the TCO itself or refer to the syllabus by name and current version identification number. If the TCO is submitted electronically, the commercially produced syllabus may be submitted separately, reflecting what will be given to the students. Schools must update their syllabus each time a commercially available syllabus is revised by way of the new version identification number.

3.8 Formal Application Meeting. The FAA may decide to have a formal application meeting with the applicant. If the FAA meets with the applicant, the meeting may include, but is not limited to, the following:

- The application.
- The Schedule of Events (SOE), if applicable.
- Each TCO, syllabus, and curriculum.
- Personnel, including chief and any assistant chief instructors, aircraft, airports, and facility requirements.
- Electronic recordkeeping, signature, and/or manual systems.
- How approvals and authorization will be issued; this may include letters to the applicant or letters of authorization (LOA).

3.9 Electronic Recordkeeping/Manual/Signature Systems. Handwritten signatures, paper records, and paper manuals continue to be acceptable. However, an applicant may use electronic submissions, including submitting an electronic application (FAA Form 8420-8), electronic TCOs, and electronic syllabi, and may maintain a system of electronic recordkeeping. During the preapplication phase, the prospective applicant must inform the FAA of its intent to utilize electronic submissions for all TCOs, syllabi, records, and applications. One electronic TCO submission is equal to two paper copy submissions. As outlined in Advisory Circular (AC) [120-78](#), Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals, applicants and certificate holders intending to use electronic recordkeeping, TCOs, syllabi, applications, training records, or other documents, must inform their jurisdictional FSDO prior to implementing an electronic system. To obtain authorization, the applicant or certificate holder must submit a letter to the appropriate jurisdictional FSDO describing the proposed computer and electronic system, including the proposed sections or revision to the part 141 pilot school's electronic recordkeeping, TCOs, syllabi, applications, and other documents. See Appendix A, Figure [A-4](#), Sample Letter of Intent—Electronic Recordkeeping and Electronic Signature, for a sample Letter of Intent (LOI) to use electronic recordkeeping and electronic signatures.

- 3.9.1 Remote Access.** The FAA must be able to review the records, TCOs, syllabi, applications, and any other information stored electronically at the part 141 pilot school's offices. The part 141 pilot school must make this information available to both FAA and National Transportation Safety Board (NTSB) personnel when requested.
- 3.9.2 Requests.** Certificate holders must provide any requested information to the NTSB in the event of an accident or incident. When a certificate holder is required to provide manuals or manual information to the FAA or NTSB, it should be provided in the desired format of the requesting agency whenever possible.
- 3.9.3 FAA Review of the Electronic Recordkeeping Proposal.** If the proposed electronic hardware and computer software meet the guidelines of AC 120-78, the jurisdictional FSDO will note this acceptance.
- 3.9.4 Electronic Student Training Records.** Electronic training records must meet the requirements of part 141, § [141.101](#). Pilot schools may provide electronic copies of training records, TCOs and syllabi, and course content to any student enrolled in an approved course of training. Upon request by the student, the school must provide a paper copy of the requesting student's training record.

Note: This is as per § 141.101(e).

- 3.9.5 Technological Advances.** Part 141 pilot schools should ensure all electronic system components are maintained to enable the retrieval of archived manuals. Future changes in data storage media may result in a need to replace current computer hardware or use another storage medium. Future systems must be able to retrieve archived technical data. Otherwise, the certificate holder or operator will have to maintain the old system to ensure data availability.
- 3.10 Signature Authenticity/Verification.** Electronic signatures are acceptable, provided the electronic signature has a method of security by ensuring it is difficult for another individual to duplicate or alter the electronic signature. An electronic system producing signatures must restrict individuals from affixing another individual's signature to a record, record entry, document, or application. Through control and archives, the computer software must determine if the signature is genuine and if the individual is authorized to sign the document. For example, a proper signature affixed to an improperly created document, application, or record still results in a document, application, or record that may not meet regulatory requirements. A signature that is improperly applied to an otherwise legitimate document, application, or record still results in a document, application, or record that may not meet regulatory requirements.
- 3.10.1 Archiving Electronically Signed Documents.** Since no paper document with an ink signature exists, a means of safely archiving electronically signed documents must be a part of any electronic signature computer software.
- 3.10.2 Procedures to be Established.** The applicant must establish restrictions and procedures to prohibit the use of an individual's electronic signature when the individual leaves or terminates employment. This should be done immediately upon notification of the

individual's change in employment status. Procedures must also be established allowing a part 141 pilot school to correct documents signed electronically in error. The signature must be invalidated anytime a superseding entry is made on the same document. The entry must be voided but remain in place. Reference to a new entry must be made and electronically dated and signed.

3.10.3 Nonrepudiation. An electronic signature must prevent a signatory from denying he or she affixed a signature to a record, record entry, application, or document. The more difficult it is to duplicate a signature, the likelier the signature was created by the signatory.

3.10.4 Traceability. The electronic signature must provide traceability to the individual who signed the record, record entry, application, or any other document.

3.11 FAA Acceptance of Electronic Recordkeeping, Signature, and/or Manual Systems. The appropriate FAA inspector will review the electronic signature proposal, the proposed computer hardware and software system, and proposed procedures to check compliance with the guidelines of AC 120-78. If acceptable, the FSDO will provide the part 141 pilot school with an LOA.

3.12 Syllabus Content. Each syllabus should use a “building block” progression of learning, with provisions for regular review and evaluation at prescribed stages. Each applicant should develop training syllabi in a format similar to the Aviation Instructor's Handbook ([FAA-H-8083-9](#)). Section 141.55 provides information on the requirements of each syllabus, including any prerequisites necessary for enrollment in the course, such as minimum pilot certificates and ratings. The required class of medical certificate or statement of no medical deficiency (required for glider or balloon courses only) should be included in the syllabus. Other information that should be included in the syllabus is as follows:

1. Any training, pilot experience, or special knowledge required for enrollment in the course.
2. A description of objectives and standards, and the measurable unit of student accomplishment or learning to be derived from the course.
3. Stages of training and the completion standards for each stage. The standards and objectives must be stated in relation to the performance expected of the student.
4. Lessons of training and the completion standards for each lesson. The standards and objectives must be stated in relation to the performance expected of the student.
5. Objectives and completion standards must be included for the following:
 - Course objectives that state in broad terms the knowledge and skill goals to be reached by the student at the end of the course.
 - Stage objectives that state desired student goals in specific areas of knowledge and skill.

- Lesson objectives that clearly specify the desired student outcomes for each lesson must be consistent with the objective of the stage and the course.
6. The scope of knowledge, procedures, and maneuvers each lesson includes are left to the discretion of the part 141 pilot school. In no case, however, may the completion standards be less than those outlined in the appropriate section of 14 CFR part [61](#), the appropriate Airman Certification Standards (ACS), or practical test standards (PTS).

3.13 Syllabi With Reduced Time Requirements. Only pilot schools, not provisional pilot schools, may submit a TCO with reduced time. A provisional pilot school that subsequently receives certification as a pilot school and has held that pilot school certificate for 24 months may request and receive initial approval for 24 months for a course with reduced time requirements, provided it does not hold examining authority in accordance with § 141.55(d) or (e), as appropriate. If a pilot school applies for a special course of airman training under § [141.57](#) with reduced training times, then that pilot school must comply with the provisions set forth in § 141.55(d) and (e). In accordance with § 141.55(d)(3) and (e)(4), a pilot school may not be approved for examining authority for a special course of airman training that has been approved for reduced training times. A provisional pilot school may not apply for a special course of airman training with reduced training times under § 141.55(d) and (e).

3.14 Syllabus Stage Checks and End-of-Course Tests. The training syllabus must contain a description of the stage checks and end-of course tests used to measure a student's proficiency at each stage of training. The applicant must submit copies of each stage check and the end-of-course test as part of the syllabus for each course. Part 141 appendices allow a certain amount of the time acquired during stage and end-of-course tests to be credited toward the aeronautical knowledge and training required by the particular rating being taught and can be included in the overall total training times.

3.15 Commercially Developed Training Syllabi. Commercial companies have developed training programs, including TCOs and syllabi, which have been reviewed by the General Aviation and Commercial Division (AFS-800) and appear to meet all of the requirements for specific training courses. Part 141 pilot school applicants are encouraged to use commercially developed courses, as many of these programs are well established. However, applicants are cautioned that the jurisdictional FSDO has final approval authority for any TCO or syllabus submitted. Additionally, part 141 pilot schools must ensure their commercially produced syllabi are current, as they do change. For any change to a syllabus from the vendor, the part 141 pilot school must submit a revised syllabus to its jurisdictional FSDO for approval and an amended LOA.

1. Applicants must show that they understand and can apply the commercially developed training syllabus in the manner described in the syllabus, and the syllabus completely supports the rating being taught.
2. When a commercial syllabus is used, the part 141 pilot school must ensure the syllabus remains up to date. Only the FAA-approved version can be used. In the event of a commercial syllabus revision, the part 141 pilot school must

receive approval for that revision. Any subsequent modifications to the commercially developed syllabus must be approved by the FSDO before the part 141 pilot school may use the modified syllabus.

Note: The applicant should be alert to changes in the course content by producers of commercially developed syllabi.

3. Commercially produced syllabi should be submitted to the FAA for approval a minimum of 30 days before the expected training begins. Refer to §§ [141.53](#) and 141.55.

3.16 Internet-Based Training. An applicant for a part 141 pilot school certificate seeking to utilize Internet-based training must comply with § 141.53(d), ensuring security, integrity, confidentiality, availability, access control, and identification/authentication of its Internet-based training course.

1. A part 141 pilot school may use a commercially produced Internet course if it meets all of the requirements of § 141.53.
2. The Internet training provider (ITP) will receive a letter from AFS-800 stating that its syllabus and content appear to meet the requirements of part 141.
3. The applicant for a part 141 pilot school may receive a letter from the ITP stating that its course appears to meet the FAA's Internet-based requirements and meets the syllabus requirements of part 141.
4. The jurisdictional FSDO approving the TCO, which includes the syllabus, may use this letter in verifying that the Internet-based training meets the requirements of part 141. However, the jurisdictional FSDO retains the final authority for the approval of this ITP for use in the school's TCO.

3.17 Training Agreements. A part 141 pilot school may elect to provide flight training to an institution of higher education. The training agreement could make the institution of higher education eligible under part 61, § [61.169](#) to receive an LOA for certifying its graduates for an ATP certificate under the academic and aeronautical experience requirements in § [61.160](#).

3.18 Chief Instructor. A part 141 pilot school is required to designate a chief instructor for each training course. The chief instructor is required to meet the appropriate requirements prescribed under § [141.35](#). The chief instructor may also serve as an assistant chief instructor. With the jurisdictional FSDO's authorization, a chief instructor is allowed to serve in that capacity for more than one part 141 school.

1. The chief instructor, under § [141.85](#), bears the responsibility to certify each student's training record, graduation certificate, stage checks, end-of-course test reports, and recommendation for course completion.
2. The chief instructor is responsible to ensure each certificated flight instructor (CFI), certificated ground instructor, or commercial pilot with a lighter-than-air rating passes an initial proficiency check in each M/M

of aircraft prior to that instructor being assigned instructing duties in the school's approved training course. Additionally, the chief instructor is responsible to ensure each instructor passes a recurrent proficiency check every 12 calendar-months after the month in which the initial test was accomplished.

3. Section 141.85 states that the chief instructor is the responsible party to ensure "each student accomplishes the required stage checks and end-of-course tests in accordance with the school's approved training course." The chief instructor is also responsible to ensure the training techniques and standards for the school are acceptable to the Administrator. The authority for these tasks may be delegated, but the responsibility is always maintained by the chief instructor.

3.19 Assistant Chief Flight Instructor. Each part 141 pilot school must designate an assistant chief instructor for each of its satellite bases. In addition, one or more assistant chief instructors for a course or courses of training may be designated at any base if justified by the number of students involved, the complexity of the course, or the number of hours a day during which training is conducted. The assistant chief instructor must meet the requirements of § [141.36](#). With the jurisdictional FSDO's authorization, an assistant chief instructor is allowed to serve in that capacity for more than one certificated school.

3.20 Chief Instructor and Assistant Chief Instructor Test. Prior to serving as a chief instructor or assistant chief instructor in a course, the jurisdictional FSDO will administer a knowledge test and a proficiency test in accordance with §§ 141.35 (chief instructor) and 141.36 (assistant chief instructor). This is a one-time event for a course and school for both the chief instructor and assistant chief instructor.

3.21 Chief Instructor and/or Assistant Chief Instructor Who Also Provides Instruction. A chief instructor or assistant chief instructor who provides flight instruction in an aircraft must accomplish a proficiency check in each M/M of aircraft used in that training course and thereafter for each course of training the chief and/or assistant chief instructor participates in; and must comply with paragraph 3.23.

3.22 Chief and Assistant Chief Instructor Availability. The chief instructor or an assistant chief instructor must be available at the part 141 pilot school, or if away from the pilot school, be available by telephone, radio, or other electronic means during the time that training is given for an approved training course.

3.23 Flight Instructor Requirements. Part 141 requires all flight instructors to be qualified to teach each course of training to which they are assigned, and prescribes certain knowledge and proficiency tests to be accomplished prior to being assigned to an approved training course. If the chief instructor or an assistant chief instructor also provides flight instruction in the course they are assigned to, they must also comply with this section:

1. The instructor must satisfactorily accomplish a proficiency check for each course of training taught.
2. This proficiency check is given to the instructor by the designated chief instructor, assistant chief instructor, or check instructor.
3. The instructor must accomplish a proficiency check every 12 months thereafter for each course of training in which the instructor instructs.
4. The certificate holder must maintain a record of these proficiency checks to show compliance with § [141.79](#)(d).
5. The instructor must satisfactorily accomplish a one-time proficiency test in each M/M of aircraft (e.g., Cessna 150 or Cessna 172) before giving any flight instruction in the particular aircraft.
6. The chief instructor, assistant chief instructor, or check instructor must brief all instructors teaching that course on the objectives and standards of the course.
7. The certificate holder must maintain a record verifying this briefing to show compliance with §§ 141.79(d) and [141.81](#)(c). The instructor must maintain records of instructor briefings and instructor proficiency tests required by §§ 141.79(d) and 141.81(c) in either a logbook or in the permanent school records at the home base of operations.

3.24 Flight Instructor Responsibilities. Student pilots cannot depart on a solo training flight unless an authorized flight instructor, who is present at the airport, has approved and released that solo flight. This should include a review of the weather conditions/forecasts and the student's logbook, verifying that he or she is qualified to solo. Cross-country flights should be made to specific airports that the part 141 pilot school determines to be suitable. The part 141 pilot school may wish to provide students with a list of these suitable airports in its safety procedures guide. Solo cross-country flights, when properly dispatched from the originating airport, are considered to have approval for the entire flight (§ 141.79(b)). If unexpected weather or mechanical problems delay a student en route or a student intends to remain overnight, the part 141 pilot school should either:

- Arrange for another instructor based at the point of delay to dispatch the flight, or
- Have a part 141 pilot school instructor dispatch the flight electronically (via telephone, text, email, or fax).

3.25 Other Part 141 Pilot School Personnel. Section [141.33](#)(a)(2) states that an applicant for a pilot school or provisional pilot school certificate may choose to use dispatchers, aircraft handlers, line crewmen, and servicemen, and a school may wish to use a flight instructor as a dispatcher or a ground instructor. These personnel must receive instruction in the procedures and responsibilities of employment. It is recommended that the school keep a record of this instruction in the employee's personnel file. A school may elect to use verbal instructions, manuals, or any other means to ensure that dispatchers, aircraft handlers, line crewmen, and servicemen are knowledgeable and capable of performing their assigned duties.

- 3.26 TCO Approval.** When the jurisdictional FSDO has approved the TCO(s), a letter of approved courses and ratings will be issued and the appropriate course(s) placed on the Air Agency Certificate. A school with a private pilot rating on its Air Agency Certificate may conduct one or several private pilot certification courses, provided a TCO is submitted and approved under part 141 subpart C for each course of private pilot training given.

Note: Each requested pilot school rating must be listed on the application.

- 3.27 Application Denial.** Denial of an application will be substantiated by the jurisdictional FSDO with a letter to the applicant documenting the reasons for denial and what actions are needed in order to obtain a part 141 pilot or provisional pilot school authorization. An applicant may reapply at any time for a rating(s) in the same manner as prescribed for initial application. At the jurisdictional FSDO's discretion, reinspection of previously approved areas may not be necessary.

CHAPTER 4. DOCUMENT COMPLIANCE PHASE

- 4.1 General.** This chapter will focus on the document compliance phase, the documents necessary for certification as a 14 CFR part [141](#) pilot school or provisional pilot school, and the review of these documents by the jurisdictional Flight Standards District Office (FSDO). The applicant's proposed training course outline (TCO) and syllabus for each course, system for student record documentation, personnel records documentation, student safety guide, and training records of the chief instructor, assistant chief instructor, assigned instructors to a course, and check instructors, as well as other documents, are reviewed in depth to ensure compliance with part 141. At the conclusion of the document compliance phase, the proposed documents and proposed systems for record documentation reviewed will be evaluated during the next phase, the demonstration and inspection phase.
- 4.2 Student Training Records.** A certificate holder must maintain enough information for the FAA to determine the quality of training given. The record system used must include more than a simple description of a training flight. It will include a very accurate detailed chronological record of all training, both ground and flight. Part 141, § [141.101](#) requires each school to establish and maintain a current and accurate record of the participation of each student enrolled in an approved course. These requirements are not separate from the logging of training time required in 14 CFR part [61](#) (typically recorded in the student's logbook). Rather, the training records described here are an additional requirement to track part 141-specific activity. Aeronautical experience and flight training used to meet the requirements for a certificate or rating must be recorded in accordance with part 61, § [61.51](#)(a) through (k), as appropriate. This includes both aeronautical knowledge training and flight training. The records maintained in a student's logbook will not suffice for the recordkeeping requirements. This must be an independent training and recordkeeping system, not just a list of flights. It should be a detailed account of all of the student's activity while enrolled in an approved course.
- 4.3 Credit for Previous Training.** A student who transfers from one part 141 pilot school and enrolls in another part 141 pilot school may receive credit obtained in the previous course of training in accordance with §§ [141.67](#)(b)(1) through (5) and [141.77](#). The transferring student must present certified training records to the receiving school from the previous school, documenting topics and times of training completed and the result of each stage check. The receiving school must test a transferring student, document the results of that testing, and document any credit given. A student may not be credited with more training by the receiving school than was credited at the school from which the student transferred.
1. A student who enrolls in a course of training may receive credit for not more than 25 percent of the curriculum requirement for knowledge and experience received from other than a part 141 pilot school or 14 CFR part [142](#) approved aeronautical or flight training course.
 2. A student who enrolls in a course of training may receive credit for not more than 50 percent of the curriculum requirement for knowledge and experience received from a part 141 pilot school or part 142 training center.

3. The amount of credit for previous training allowed, whether received from a part 141 pilot school or other source, must be placed in the student's enrollment record at the time of enrollment.
4. When a student transfers from a part 141 pilot school or terminates training for any reason, the student must be given, upon request, a transcript of the results of the student's participation in that course of training. This transcript should be signed by the chief instructor of the course and should consist of at least the name of the school that gave the training, including the school's certificate number, if applicable; kind of training given; course or courses taken; a statement the student was enrolled in the school's course of training; and the results of each stage check and final check.
5. If the student is transferring into a part 141 pilot school that holds examining authority, the credit that may be granted is limited to a transferring student who received his or her training from another part 141 approved pilot school and training course.
6. Students seeking certifying statements for a restricted privileges Airline Transport Pilot (ATP) Certificate in accordance with § [61.160](#) may transfer credit for aeronautical knowledge and flight training gained at an institution of higher education which holds an Institutional Authority Letter of Authorization (IALOA) to another institution holding an IALOA, in accordance with § 141.77. This would apply to previous training for the instrument rating and commercial certificate, taken under a part 141 pilot school at an institution of higher education that holds an IALOA.

4.4 Student Enrollment Certificate. When a student enrolls, a part 141 pilot school must furnish the student with a copy of a certificate of enrollment, containing:

- The student's name;
- The name of the course in which the student is enrolled;
- The date of enrollment; and
- A copy of the safety procedures and practices, per § [141.93](#)(a)(3).

4.5 Student Graduation Certificate. A certificate holder must issue a graduation certificate to each student who completes its approved course of training. The certificate holder may not issue a graduation certificate to a student, or recommend a student for a pilot certificate or rating, unless the student has completed all of the training requirements of that course. Section [61.71](#) states that a person who graduates from an approved training program under part 141 is considered to have met the applicable aeronautical experience, aeronautical knowledge, and areas of operation requirements of part 61, if that person presents the graduation certificate and passes the required practical test as appropriate within the 60-day period after the date of graduation. Should an applicant not accomplish pilot certification within 60 days of the date of graduation certificate, additional training and an additional final progress check may be accomplished,

facilitating the issuance of a new graduation certificate, unless expressly prohibited by the TCO.

Note: Some TCOs may encompass “combined courses” such as a combined Private Certificate and Instrument Rating under part 141 appendix [M](#), or a combined Instrument Rating and Commercial Certificate Special Curriculum course under § [141.57](#). In these cases, a single graduation certificate will be issued at the completion of the entire course. However, as with conventional single-course TCOs, should an applicant not accomplish pilot certification within 60 days of the date of graduation certificate, additional training and an additional final progress check may be accomplished, facilitating the issuance of an updated graduation certificate, unless expressly prohibited by the TCO.

4.6 Chief Instructor Qualifications/Training Record. The certificate holder should keep a current and accurate record of the chief instructor’s qualifications and currencies. This record should include:

- The name and pilot certificate number of the designated chief instructor, including qualifications;
- A list of courses approved as chief instructor by the FAA;
- The date of approval from the FAA for the initial knowledge test and proficiency test for each course; and
- The date of all recurrent training or flight instructor refresher courses (FIRC), as applicable.

4.7 Assistant Chief Instructor Qualifications/Training Record. The certificate holder should keep a current and accurate record of the assistant chief instructor qualifications and currencies. This record should include:

1. The name and pilot certificate number of the designated assistant chief instructor, including qualifications.
2. A list of courses approved as assistant chief instructor by the FAA.
3. The date of approval from the FAA for initial knowledge test and proficiency test for each course.
4. The date of all recurrent training or FIRCs, as applicable.
5. The specific authorities designated by the chief instructor:
 - Name of course authorized to conduct stage checks;
 - Name of course authorized to conduct end-of-course checks; and
 - Authorization to conduct annual instructor proficiency checks.

4.8 Check Instructor Qualifications/Training Record. The certificate holder should keep a current and accurate record of any check instructor's qualifications and currencies. This record should include:

1. The name and pilot certificate number of the designated check instructor, including qualifications.
2. A list of courses approved as a check instructor by the FAA.
3. The date of approval from the FAA for each course as a check instructor.
4. The date of the proficiency test given by the chief instructor or assistant chief instructor on the flight procedures and maneuvers for each course designated as check instructor.
5. A listing of the specific authorities designated by the chief instructor, including:
 - Name of course authorized to conduct stage checks;
 - Name of course authorized to conduct end-of-course checks; and
 - The authorization to conduct annual instructor proficiency checks.

4.9 Flight Instructor Qualifications/Training Record. The certificate holder should keep a current and accurate record of all flight instructors assigned to a course and keep a record of their qualifications and currencies. This record should include:

- The name and pilot certificate number of the flight instructor;
- The date of initial proficiency check given by the chief/assistant chief instructor or check instructor in each make and model (M/M) of aircraft used in the training course the instructor is authorized to instruct;
- The date of all recurrent proficiency checks given by the chief/assistant instructor or check instructor;
- A list of courses the instructor is approved to teach; and
- The part 141 pilot school must maintain a record verifying a review and briefing on the objectives and standards of any training course the instructor is assigned to in accordance with §§ [141.79](#)(d) and [141.81](#)(c).

4.10 Student Safety Guide. The certificate holder must provide the student with a copy of the safety procedures and practices during the enrollment process, describing the use of the school's facilities and the operation of its aircraft. The procedures and practices must include at least the following information (§ 141.93):

- The weather minimums required by the school for dual and solo flights;
- The procedures for starting and taxiing aircraft on the ramp;
- Fire precautions and procedures;

- Redispatch procedures after unprogrammed landings, on and off airports;
- Aircraft discrepancies and approval for return-to-service determinations;
- Securing of aircraft when not in use;
- Fuel reserves necessary for local and cross-country flights;
- Avoidance of other aircraft in flight and on the ground;
- Minimum altitude limitations and simulated emergency landing instructions; and
- A description of and instructions regarding the use of assigned practice areas.

4.11 Full Flight Simulators (FFS), Flight Training Devices (FTD), and Aviation Training Devices (ATD). If an FFS, FTD, or ATD is used in an approved training course, the specific lessons for its use must be clearly identified in the training syllabus.

The objectives and completion standards should be well defined. Part 141 specifies the maximum credit (see Appendix E for the maximum credit allowed) for the experience or training requirements for a certificate or rating. ATD allowances are also provided on the letter of authorization (LOA) provided to the manufacturer or operator of the training device. The training course syllabus must clearly identify the specific lessons that will be accomplished in a FFS, FTD, and/or ATD and fully described in the FAA-approved TCO. The objectives and completion standards when using these ground trainers must be well defined, just as they are in an aircraft. This will facilitate training to proficiency, as students transition to the aircraft to complete their flight training.

1. Section [141.41](#)(a) prescribes the requirements for an FFS or FTD when using these devices for training credits in an approved pilot training course. FFSs or FTDs are evaluated and qualified under 14 CFR part [60](#) and require annual renewal.
2. Section [141.41](#)(b) provides the requirements when using an ATD for training credits. Their approval and use is prescribed in Advisory Circular (AC) [61-136](#), FAA Approval of Aviation Training Devices and Their Use for Training and Experience. This includes allowances for both basic and advanced ATDs that are approved by the General Aviation and Commercial Division (AFS-800). ATDs must be accompanied by the FAA LOA and are valid for 60 calendar-months.
3. The FAA will use discretion when approving a training syllabus that substitutes instruction in an FTD or FFS for the flight time required in a complex airplane. Any use of an FFS or FTD in lieu of flight time in a complex airplane must be justified with clearly stated objectives in the training syllabus that are applicable to the skills expected to be learned in a complex airplane. Approval of the TCO will be based on the ability of the FFS or FTD to provide effective training for a complex airplane. ATDs cannot be used to substitute for time in a complex airplane.

4. The National Simulator Program (AFS-205) qualifies a school's FFS or FTD and provides a letter of qualification. The General Aviation and Commercial Division (AFS-800) provides an LOA for all ATD approvals.
5. The permitted use of FFSs, FTDs, and ATDs are covered in the appropriate appendices of part 141 and §§ [61.4](#) and 141.41.
6. There are no restrictions on the amount of training time accomplished and logged in training devices. The logging of additional training time is always acceptable. However, the regulatory limitations on the maximum credit allowed in an FFS, FTD, or ATD for the "minimum" pilot experience requirements remain, and are specified in parts 61 and 141 and in the device LOA. No approvals or authorizations are provided for aircraft type ratings or practical tests using ATDs.

4.12 Aircraft Requirements. Each aircraft used by a part 141 pilot school for flight training and solo flights must comply with § [141.39](#) and must be inspected and maintained in accordance with the requirements for aircraft operated for hire under 14 CFR part [91](#) subpart [E](#). This requires aircraft used in an approved course of training to have 100-hour inspections and annual inspection, or to be maintained following a procedure prescribed under § [91.409](#)(c). The aircraft, which the FAA inspects, must meet the requirements of the training aircraft described in the appropriate TCO. Aircraft used by part 141 pilot schools may be listed in an LOA, if LOAs are issued.

1. All aircraft used in a part 141 flight school must have a standard airworthiness certificate, a primary airworthiness certificate, or a special airworthiness certificate in the light-sport category. Restricted category aircraft may also be used; however, the use of these aircraft are limited to the special purpose in which the aircraft was certificated.
2. Applicants are requested to submit to the jurisdictional FSDO the aircraft types and N-numbers designated for use in part 141 pilot schools.
3. An aircraft not completely equipped for IFR operations may be used for instruction in the control and maneuvering of an aircraft by reference to instruments if it is approved in the TCO. For example, an airplane need only be equipped with appropriate flight instruments needed for the basic instrument portion of a course.
4. All aircraft used by a part 141 pilot school for flight training must have two pilot stations with engine power controls that can be easily reached and operated in a normal manner from both pilot stations.

4.13 Aircraft—Checklist and Manuals. A variety of airplanes are used in pilot training. Some aircraft are less complicated while others are more complicated, and their checklists vary accordingly. The requirements for a checklist defined in the terms of "pretakeoff" and "prelanding" in § [141.75](#)(a) are broad and allow less complicated aircraft to be equipped with relatively simple checklists. Schools may consider expanding checklists for aircraft that are more complicated. Both the checklist and pilot's operating

handbook (POH) for the aircraft, and copies of the handbook if furnished to each student, must be carried on each aircraft used for flight training.

4.14 Aircraft—Instrument Training. Aircraft used for instrument training must be equipped to meet the requirements of § 141.39. For training in the control and precision maneuvering of an aircraft by reference to instruments, the aircraft may be equipped as provided in the approved course of training, if the approved training syllabus requires flights under IFR.

4.15 Aircraft—Commercial Training. The commercial pilot certification course (airplane) is set forth in part 141 appendix [D](#), and requires flight instruction in an airplane with retractable gear, flaps, and controllable pitch propeller or turbine powered.

1. Single-engine or multiengine airplanes may be used to fulfill this requirement. Use of an appropriately equipped multiengine airplane to meet the complex airplane requirements for a Commercial Single-Engine Airplane Certificate does not result in the issuance of a multiengine rating.
2. Utilizing an appropriately equipped multiengine airplane to meet the complex airplane requirements for a Commercial Single-Engine Airplane Certificate presents several issues. The instructors utilized must meet § [61.195](#)(b)(1) and (f). At the completion of the training, the student must provide an airplane adequate to complete all tasks for the practical test. The requirements of the current edition of Commercial Pilot Practical Test Standards for Airplane ([FAA-S-8081-12](#)) or the Airman Certification Standards (ACS) for the commercial pilot, as appropriate, must be met.
3. If a school applies for a commercial pilot certification course (airplanes) with a seaplane class rating (using seaplanes for the entire course), a special curriculum should be submitted under § [141.57](#), which includes the general requirements of part 141 appendix D. The complex airplane used in such a course must have flaps, a controllable pitch propeller, and floats. The use of an amphibious airplane in a commercial pilot certification course could qualify a student for both a land and sea class rating, provided the TCO was so approved.

4.16 Document Deficiencies. If the jurisdictional FSDO's review of the submitted documents reveals deficiencies in the applicant's submissions, the jurisdictional FSDO will notify the applicant of the deficiencies in writing. In the letter to the applicant, the jurisdictional FSDO will advise the applicant what deficiencies must be corrected before certification can continue. The jurisdictional FSDO will place a reasonable time limit on when the corrections must be completed. If the applicant does not respond to the jurisdictional FSDO within 90 days of the time limit, the entire application package will be returned to the applicant with a cover letter stating that the certification process has been terminated.

CHAPTER 5. DEMONSTRATION AND INSPECTION PHASE

- 5.1 General.** The demonstration and inspection phase is where the jurisdictional Flight Standards District Office (FSDO) inspects the applicant's facilities and equipment and observes personnel in the performance of their duties. Emphasis in this phase is on compliance with the regulations and safe operating practices for a 14 CFR part [141](#) provisional pilot school.
- 5.2 Facilities Inspection.** The applicant must demonstrate that it has adequate facilities to conduct its intended course(s) of training. These facilities include the business office, main base of operations, pilot briefing areas, aeronautical knowledge training facilities, airports, and any proposed satellite bases. A certificate holder is required to have the continuous use of an airport and a pilot briefing area. The school must, under part 141, § [141.31](#), have a written agreement indicating it has the continuous use of those facilities for 6 months at the time of certification or renewal of its certificate.
- 5.3 Principal Business Office.** The jurisdictional FSDO will inspect the business office. Each certificate holder must maintain a principal business office with a mailing address and name that matches its certificate. The purpose of a principal business office is to provide a specific location for the required part 141 pilot school files and records, and a location where the operation of school business may be conducted. This requirement should not be construed to mean that all school functions, such as scheduling flights and training functions, must be conducted at the principal business office. After certification, the FAA will continue periodic and routine inspections of the business office and facilities.
1. While part 141 does not require a business office to be a room with four walls and a door, the regulation does prohibit the sharing of a single business office by more than one part 141 pilot school. In that case, the business office must be conspicuously isolated by walls or partitions to ensure separation from another pilot school's activity.
 2. The business office should be situated so the required school files and student training records are kept up to date and available to students and instructors alike. This serves the purpose of providing on-the-spot information regarding training progress and other business interests.
- 5.4 Pilot Briefing Areas.** A certificate holder is required to have continuous use of a pilot briefing area at each airport where training flights originate. This does not include airports used as destinations for cross-country flight training. The briefing area must meet the requirements of § [141.43](#). Pilots not participating in the school's training programs can use the briefing facilities, providing orderly school functions are maintained. However, no other pilot school may use the area during the period it is to be used by the certificate holder. Briefing areas are subject to the jurisdictional FSDO's approval under the provisions of § [141.55](#)(c)(4).

1. To meet the requirements of § 141.43, the pilot briefing areas must be adequate to shelter students waiting to engage in flights and arranged and equipped for the conduct of pilot briefings.
2. If a school offers instrument or commercial pilot courses, it is required to have access to a Flight Service Station (FSS). A telephone, either by landline or other telephone communications such as the use of cell phones, is required in the briefing room.
3. To preclude a disruption of schedules due to excessive travel time between the business office and briefing area, the area should be located near enough to the airport where training flights originate.
4. The FAA recognizes that pilot training methods differ from other kinds of training methods. A part 141 pilot school enrolls students with widely varying backgrounds, goals, and degrees of motivation and aviation experience. For this reason, it is understandable it is not always possible to schedule large classes for aeronautical knowledge training at one time. Individual instruction is often necessary for maximum benefit to a particular student. Therefore, it is anticipated that part 141 pilot schools will use classrooms, small isolated rooms, training booths, or other areas with an instructor or a training aid. Each aeronautical knowledge training area is required to be heated, lighted, and ventilated to meet the applicable building code requirements for the area concerned. All ground instructional facilities are subject to approval by the jurisdictional FSDO under § [141.45](#).
5. If a training course is conducted through an Internet-based medium, the holder of a part 141 pilot school certificate that provides such training need not comply with § 141.45(a) and (b), but must maintain in current status a permanent business location and business telephone number.

5.5 Records. Certificate holders are required to maintain records to provide proof of their enrolled students' progress. A school is free to devise its own means of meeting the requirements of § [141.101](#). However, the school must demonstrate to the FAA that its recordkeeping method meets the regulatory requirements.

1. The school will be required to explain how its recordkeeping process works, as well as demonstrate that it is a permanent record. If the process uses paper, then permanent ink is necessary. The explanation and demonstration must also include a means of correcting errors. On subsequent inspections, the school must show it is continuing to maintain records in an acceptable fashion.
2. If a school chooses to maintain these records electronically, it must also show the records are as permanent and secure as paper records.
3. The jurisdictional FSDO must be provided access to examine part 141 pilot schools' records during normal business hours.

5.6 Training Aids. A certificate holder may use training aids to improve communication between instructors and students. Training aids are instructional aids defined by the National Education Association (NEA) as “devices that assist an instructor in the teaching and learning processes by presenting, supporting, or supplementing material, usually intermittently. They are not self-supporting.” The key factor is that such aids support, supplement, or reinforce the lesson being taught.

1. Training aids should be identified in each training course outline (TCO), and should be easily understood, readily visible, and compatible with the learning outcomes expected in the completion standards for the lesson. They must be accurate and appropriate to the course. The effectiveness of aids is judged by their organization, sequencing, pattern of logic, and overall effectiveness when used in support of obtaining the objectives and standards prescribed by the training syllabus.
2. Recent years have seen an abundance of excellent new material and techniques in training aids. The aids present many advantages for the school. Each school must keep in mind the teaching goals to be achieved, including the continuous monitoring of student progress necessary to develop effectively the knowledge of each student according to the training syllabus. Aids do not replace the instructor.
3. Notwithstanding the complexity or design of a training aid, the chief instructor or an authorized and qualified representative must determine through personal review or testing that the standards for each lesson have been attained when training aids are being used. The purpose of this personal review or testing is to ensure students meet the completion standards and understand missed questions, if a knowledge test is given. Only through such evaluation can the instructor make a sound determination the student should progress to the next lesson or the student requires review of subjects or procedures previously covered.

5.7 Aircraft. An Airworthiness inspector will inspect aircraft to be used by part 141 pilot schools. During the inspection, the school will demonstrate it has available aircraft appropriate for flight instruction in that course. Aircraft must meet the aircraft requirements listed in the Document Compliance Phase (see paragraph [4.12](#)).

1. Each aircraft used by a part 141 pilot school for flight training and solo flights must comply with § [141.39](#) and must be inspected and maintained in with the requirements for aircraft operated for hire under part [91](#) subpart [E](#). This requires aircraft used in an approved course of training to have 100-hour inspections and annual inspection, or to be maintained following a procedure prescribed under part 91, § [91.409\(c\)](#).
2. Aircraft must meet the requirements of the training aircraft described in the appropriate TCO.

5.8 Full Flight Simulators (FFS), Flight Training Devices (FTD), and Aviation Training Devices (ATD). During this phase the applicant should be prepared to demonstrate the operation of the FFS, FTD, or ATD as applied to its use in the pilot certification course and as described in the TCO. This would include presentation of the appropriate documentation required to verify current FAA qualification or approval as appropriate. The operator is expected to ensure the ground trainer's functionality and operation and facilitate any maintenance requirements.

5.9 Chief Instructor and Assistant Chief Instructor Tests. For designation as chief instructor or an assistant chief instructor, a person must hold the appropriate certificates and ratings, including medical certification, and must meet the pilot-in-command (PIC) requirements of 14 CFR part [61](#), § [61.57](#). During the demonstration phase, the chief instructor (and assistant chief, if one is being designated) must pass both a knowledge test and a proficiency test, as applicable. The knowledge test covers teaching methods, applicable provisions to the Aeronautical Information Manual (AIM), applicable provisions of parts 61, 91, and 141, and the objectives and approved course completion standards appropriate to the course. The proficiency test covers instructional skills and their ability to train students on the flight procedures and maneuvers appropriate to the applicable course. Both the chief and assistant chief instructor tests are administered by an FAA inspector. The school should keep a record of these tests.

5.10 Check Instructor Tests. For designation as a check instructor for a part 141 course, a person must hold the appropriate certificates and ratings, including medical certification, and must meet the PIC requirements of § [61.57](#), and the school must have an enrollment of at least 10 students. During the demonstration phase, a check instructor must pass both a knowledge and proficiency test on those items found in § [141.37](#). A chief or assistant chief instructor gives the proficiency test. The jurisdictional FSDO must approve the check instructor. After successfully completing these tests, the chief instructor designates a check instructor in writing, and must be approved by the jurisdictional FSDO.

5.11 Flight Instructor Tests. Prior to being assigned as a flight instructor for a training course under part 141, a flight instructor must accomplish a review and receive a briefing on the objectives and standards of the training course. The flight instructor must also accomplish an initial proficiency check, given by a chief, assistant chief or check instructor in each make and model (M/M) of aircraft used in that training course.

5.12 Airports. An applicant for a part 141 pilot school certificate must show continuous use of each airport where training flights originate (airports where flights are dispatched or initiated, such as main or satellite bases).

1. Airports where flights originate must meet the requirements of § [141.38](#).
2. Each airport used for night training flight must have permanent runway lights.
3. Though the wind tee and tetrahedron may serve as landing direction or wind indicators, the Pilot's Handbook of Aeronautical Knowledge ([FAA-H-8083-25](#)) and the AIM caution against using the tetrahedron

as a wind indicator. The wind tee, under certain circumstances, may be either an active runway or wind indicator.

4. When required, the traffic direction indicator (refer to § 141.38(d)) must show the direction of traffic patterns for all runways regardless of landing or takeoff direction.
5. When referring to part 141 pilot schools approved for lighter-than-air balloons, the term “airport” should be taken to mean launch site. An important training element in balloon training is proper site selection. Before the launch of a balloon, an instructor authorized by the school must approve the site. The specific equipment requirements of § 141.38 (i.e., runway lights, traffic direction indicators, and wind direction indicators) are inappropriate for lighter-than-air balloon operations. Wind direction may be determined by means of a pilot balloon. The area downwind from the launch site should be free of obstructions for 100 feet for each knot of wind. For example, a 4-knot wind requires a 400-foot area free of obstruction downwind. The PIC will determine the landing site.

5.13 Airports—Satellite Bases. A certificate holder may conduct aeronautical knowledge or flight training in an approved course of training at one or more satellite bases. Satellite locations are considered part of the main base of operations and allow schools to offer identical training programs at various locations. An assistant chief instructor must be designated for each satellite base. With the jurisdictional FSDO’s approval, an assistant chief instructor may serve for more than one satellite base. Personnel used at the satellite base must meet the requirements of § [141.91](#). The satellite base and its facilities must be approved in the TCOs for courses given at those bases.

5.13.1 The holder of a provisional pilot school certificate or pilot school certificate may conduct training at a location other than the primary address on record and would not be required to apply for a satellite base of operations, provided the secondary location is within the same metro area, town, or airport as the provisional pilot school or pilot school. The pilot school or provisional pilot school would need to utilize the same chief instructor, flight instructors, and TCO and syllabus on record for that course. Those training locations must be located within the same jurisdictional FSDO and must be sanctioned and approved by that same FSDO and formally listed in the TCO. In addition, the chief instructor must have reasonable access to any ground or flight instruction activities or facility during the period instruction is being provided at the secondary location.

5.13.2 For example, a university holds a pilot school certificate and uses the campus location for all the ground school training and recordkeeping, but then accomplishes the simulator training at an airport 10 miles away (but within the same city). The flight training is also conducted at another location at that same airport. In this case, the same chief instructor and flight instructors are conducting oversight and training for that pilot school. The jurisdictional FSDO has determined, in this case, a satellite base designation is not necessary. However, in this next scenario, everything is the same, with the exception that the simulator is located at a different airport in another town where it is difficult for the

chief instructor to provide oversight. In this case, this simulator is considered a satellite base, requiring an assistant chief instructor to provide oversight as per § 141.91.

- 5.13.3** If a valid reason exists, training may be conducted for periods up to 7 days at a satellite base without the approval of the jurisdictional FSDO. For example, runways may be closed at the main operations base for maintenance, or other activities may be underway on the airport. The jurisdictional FSDO must be notified in writing if training is conducted at a satellite base for more than 7 consecutive days.
- 5.13.4** When the jurisdictional FSDO is notified that a school will conduct training at an unapproved satellite base for more than 7 consecutive days, an Operations inspector should determine if the operations are of a temporary nature or if they will involve extended use of the unapproved base. If the FAA inspector concludes the temporary use of the unapproved base will not reduce safety or the quality of training, temporary operations at that base may be authorized for a period of time not to exceed 30 days.
- 5.13.5** If operations at the unapproved satellite base will exceed a period of 30 days, the school should apply to the jurisdictional FSDO for the approval of a satellite base, using FAA Form [8420-8](#), Application for Pilot School Certification, along with the application and the amendments for each approved training course to be given at the satellite base. Each satellite base approved may be inspected to ensure it meets the requirements of part 141. Section 141.91 provides the regulatory requirements for a satellite base.
- 5.13.6** If a satellite base is located in an area under the jurisdiction of another FSDO within the same region or in another region, additional coordination is required by the FSDOs involved. This may lead to additional time for approval.
- 5.14 Terminating the Demonstration and Inspection Phase.** When all demonstrations and inspections are complete, the demonstration and inspection phase is concluded.
1. If any demonstrations or inspections are unsatisfactory, the applicant will be immediately advised in writing of corrective actions needed. The appropriate demonstration or inspection will be rescheduled accordingly.
 2. When all demonstrations and inspections are satisfactory, the next step is the certification phase.

CHAPTER 6. CERTIFICATION PHASE

- 6.1 Completion of Reports.** In the certification phase, the certification team will confirm that all required items have been reviewed, inspected, and approved. Once all items have been addressed as satisfactory or not applicable, then the certification team can complete the certification process. The next step is for the certification team to complete all applicable documents, prepare the certification file, and send the entire file to the jurisdictional Flight Standards District Office (FSDO) management for review and signature.
- 6.2 Air Agency Certificate Number.** When all certification requirements have been met, the jurisdictional FSDO will obtain an Air Agency Certificate number. The Air Agency Certificate number is utilized on the Air Agency Certificate and letters of authorization (LOA). This unique number will be used on documents and correspondence as needed in the future. Upon receiving an Air Agency Certificate, the applicant is issued LOAs or letters of approval.
- 6.3 Air Agency Certificate Information.** The Air Agency Certificate will state if the certificate is a provisional pilot school or a pilot school. Upon initial certification, the Air Agency Certificate will reflect the granting of a provisional pilot school certificate. The Air Agency Certificate will also provide the following information (see Appendix [A](#), Figure [A-1](#), Sample Air Agency Certificate):
- The certificate holder's full legal name and any doing business as (DBA) names;
 - The address of the certificate holder's base of operations;
 - The Air Agency Certification number;
 - The date of issue (the date all certification requirements are met);
 - A list of all ratings that have been approved (per 14 CFR part [141](#), § [141.11](#));
 - The name and signature of the FSDO manager, along with the issuing office number; and
 - The expiration date of the certificate.
- 6.4 List of Approved Ratings and Courses.** The jurisdictional FSDO will send to the applicant an LOA, stating the approved pilot school rating(s) and courses approved under § 141.11. The LOA will contain an effective date for each of the courses.
- 6.5 Certification File for Applicant.** The jurisdictional FSDO will have all of the information in an operator file; as stated above, the applicant should have similar certification files for its records. It is important that applicants keep a file that includes all signed documents received by the jurisdictional FSDO. During the document compliance phase, the training course outline(s) (TCO) will be stamped approved by the principal operations inspector (POI).

Note: These signatures are important to keep filed because they will be inspected in the future to ensure the school is maintaining a record. This record may be kept electronically or as a paper file. Chapter [7](#), Other Certification Information, Post-Certification, and Acceptable Practices, discusses the processes after certification, what inspections will occur, and why files must be maintained.

- 6.6 Display of Certificate.** An Air Agency Certificate issued to the pilot school must be displayed in a place that is normally accessible to the public. The school's Air Agency Certificate must be available to the FAA Administrator, the National Transportation Safety Board (NTSB), or any Federal, state, or local law enforcement officer.
- 6.7 Certification Denial.** If any certification requirement is not met, the jurisdictional FSDO will send the applicant a letter of denial. The letter will explain the reason(s) for denial. The application will indicate "disapproved," with any necessary comments, and will be signed by the jurisdictional FSDO manager. The applicant may resubmit a new application with corrections.

CHAPTER 7. OTHER CERTIFICATION INFORMATION, POST-CERTIFICATION, AND ACCEPTABLE PRACTICES

- 7.1 Advertising.** As required by 14 CFR part [141](#), § [141.23](#), a part 141 pilot school may not advertise a course of training not listed on its Air Agency Certificate. The school may not advertise that it is certificated unless it clearly differentiates between the courses that have been approved under part 141 and those not approved under part 141.

Note: When a school certificate has expired, or has been surrendered, suspended, or revoked, it is required by § 141.23(c)(1) to remove all indications that the school is certificated by the FAA. This includes all advertising mediums and any websites.

- 7.2 Ongoing Documentation.** After the applicant receives certification as a provisional pilot school, there are ongoing documents and requirements the new provisional pilot school must continue to maintain. Such schools will receive surveillance from the jurisdictional Flight Standards District Office (FSDO) to ensure ongoing compliance with the training course outlines (TCO), syllabi, training records, aircraft requirements, and other documents.
- 7.3 Training Records.** Section [141.101](#) prescribes minimum standards for student recordkeeping for part 141 pilot schools. Many part 141 schools now use modern learning management systems (LMS), which incorporate more robust recordkeeping, including lesson grades, completion or noncompletion of each element of a lesson to a certain standard, and instructor notes. An electronic LMS also conveys the student's progress, any learning challenges being experienced, and syllabus items remaining to the student, instructor, and chief instructor.
- 7.4 Inspections.** Facility inspections are always conducted during the initial certification of a provisional pilot school and at 24-month intervals during the certification renewal. They also may be conducted during spot checks for quality control (QC) purposes. A facility inspection generally covers all areas pertinent to the certificate. These inspections are designed to assist part 141 pilot schools with regulatory compliance and are a way for a school to correct any issues that are found. Section [141.21](#) allows the jurisdictional FSDO to inspect the school, personnel, facilities, and equipment.
- 7.5 Inspection of Aircraft Maintenance Records.** During routine inspections by the jurisdictional FSDO, a Maintenance inspector inspects aircraft maintenance and alteration records in order to determine whether an aircraft has a current, appropriate inspection, and meets 14 CFR requirements. The aircraft records will be reviewed to confirm compliance with applicable Airworthiness Directives (AD) and life-limited parts requirements. During these inspections, some of the items which will be inspected include:

1. Current Weight and Balance (W&B) information is available to the pilot of the aircraft.
2. The school has procedures in place to ascertain that all discrepancies are corrected and recorded in the aircraft records.

7.6 Maintenance Facilities. The part 141 pilot school must have access to facilities and equipment sufficient to maintain its aircraft. A part 141 school is not required to have its own maintenance facilities. However, a point of contact (POC) with a maintenance provider for all maintenance issues is recommended.

7.7 Contract Maintenance. If the part 141 pilot school uses contractors to perform aircraft maintenance, the school's records, such as work orders, maintenance record entries, and repair invoices provided by the maintenance contractor, will be needed to validate what work and/or inspections have been performed. The maintenance facility is not required to be located on site. However, it is recommended that the part 141 pilot school have a maintenance POC available to answer any questions and arrange aircraft maintenance, as required. It is recommended that the part 141 pilot school or provisional pilot school contract maintenance agreements be in writing.

7.8 Examining Authority. A pilot school may request examining authority. Examining authority does not apply to provisional pilot schools. Section [141.65](#) states a pilot school holding examining authority may recommend a person who graduated from its course for the appropriate pilot, flight instructor, or ground instructor certificate or rating without taking the FAA knowledge test or practical test. If a pilot school does not hold flight test examining authority, an FAA aviation safety inspector (ASI) or a Designated Pilot Examiner (DPE) conducts final pilot certification. A pilot school must meet the following prerequisites to receive initial approval for examining authority:

1. The pilot school must complete the application for examining authority on FAA Form [8420-8](#), Application for Pilot School Certification, and in a manner prescribed by the Administrator.
2. In addition to meeting the requirements of part 141 subparts A through C, a pilot school must have met the provisions of § [141.63](#) within the preceding 24 calendar-months. The school must have held the rating in which examining authority is sought for at least 24 consecutive calendar-months preceding the month of application for examining authority, and must hold a pilot school certificate with the appropriate rating.
3. The training course for which examining authority is requested may not be a course that is approved without meeting the minimum ground and flight training time requirements of part 141.
4. Within 24 calendar-months before the date of application for examining authority, that pilot school must meet the following requirements:

- A pilot school must have trained at least 10 students in the training course for which examination authority is sought, and recommended those students for a pilot, flight instructor, or ground instructor certificate or rating.
 - At least 90 percent of those students must have passed the required practical or knowledge test, or any combination thereof, for the pilot, flight instructor, or ground instructor certificate or rating on the first attempt, and that test must have been given by an FAA ASI or an examiner who is not an employee of the school.
5. A pilot school must meet § 141.63(b) in order to retain its examining authority.

7.9 Renewal of a Part 141 Pilot School's Certificate. A pilot school which under § [141.27](#) has established a pass rate of 80 percent or higher on the first attempt for all knowledge tests leading to a certificate or rating, practical tests leading to a certificate or rating, or end-of-course tests for an approved training course specified in part 141 appendix [K](#), may have its certificate renewed. There is no requirement under § 141.27 for a pilot school renewing its certificate to have a certain number of individuals graduate from its course(s).

1. A provisional pilot school may not have its provisional pilot school certificate or the ratings renewed. In the event a provisional pilot school certificate is not renewed due to a lack of activity (10 different students graduating) or the establishment of an 80 percent pass rate and the certificate holder wishes to continue as a provisional pilot school, the former provisional pilot school may apply for another provisional pilot school certificate after 180 days have elapsed since its certificate expired.
2. A provisional pilot school may apply for a pilot school certificate any time prior to the end of 24 calendar-months of issuance, provided all of the requirements for a pilot school certificate have been met.
3. A pilot school not meeting the requirements for renewal as a pilot school may be issued a provisional pilot school certificate.

7.10 Changing the Location of the Principal Business Office or Base of Operations.

A part 141 pilot school changing the location of its business office or base of operations is required to notify the jurisdictional FSDO in writing of the planned move at least 30 days prior to the change. Such written notice must be accompanied by a new application, FAA Form 8420-8, showing the change of address or the change in the base of operations, as appropriate. The notice of a change of operating base must be accompanied by necessary amendments to the approved TCOs. The school is required to promptly remove all signs from its old premises indicating the school was certificated by the FAA at that location when it is no longer authorized for use.

7.11 Change in Chief and/or Assistant Chief Instructors. Section [141.87](#) states that when a certificate holder changes its chief instructor, the FAA must be immediately notified. The pilot school or provisional pilot school may conduct training without a chief

instructor for a period not to exceed 60 days, and may, for a period not to exceed 60 days, have stage checks and end-of-course tests administered by the training course's assistant chief instructor, if one has been designated; the training course's check instructor, if one has been designated; an FAA inspector; or an examiner. Beyond 60 days without a chief instructor, the part 141 pilot school or provisional pilot school certificate must be surrendered.

7.12 Flight Instructor Refresher Courses (FIRC) (Part 141 Appendix K). Under part 141 appendix K, paragraph 11, a provisional school or pilot school may develop a special preparation FIRC. Applicants wishing to include or add a FIRC under part 141 appendix K should refer to Advisory Circular (AC) [61-83](#), Nationally Scheduled, FAA-Approved, Industry-Conducted Flight Instructor Refresher Course, to develop its FIRC TCO. AC 61-83 provides information and standards for the preparation and approval of a TCO for an FAA-approved, industry-conducted FIRC in accordance with 14 CFR part [61](#), § [61.197](#)(a)(2)(iii). Graduates of a part 141 appendix K approved course who complete and pass the stage and end-of-course tests count towards the renewal requirements under § [141.5](#).

7.13 Institution of Higher Education With Letters of Authorization (LOA) to Certify Its Graduates for an Airline Transport Pilot (ATP) Certificate With Reduced Aeronautical Experience.

1. For an institution of higher education to receive a LOA to certify its graduates for a reduced aeronautical experience ATP Certificate in accordance with § [61.169](#), the institution of higher education must hold either of the following:
 - A part 141 school certificate with TCO(s) approved for flight and ground. This includes the designation of a chief instructor.
 - A part 141 school certificate with TCO(s) approved for ground training only, and has a formal training agreement with a part 141 pilot school with a TCO approved for flight training.
2. If the LOA-holding college or university elects to conduct its own part 141 ground training and has a formal training agreement with another part 141 flight school to conduct flight training for its students, the participating school, college, or university must keep two points in mind:
 - The part 141 pilot school conducting contract flight training for the LOA-holding college or university should have its own FAA-approved, flight-only curriculum that meets the needs of the college or university.
 - The college or university student applying for a practical test will need to provide two graduation certificates to the DPE: one graduation certification from the part 141 pilot school providing the ground school curricula, and another graduation certificate from the part 141 pilot school providing the flight training curricula for the airman certificate or rating sought.

Note: For further information on obtaining an LOA in accordance with § 61.169, refer to AC [61-139](#), Institution of Higher Education's Application for Authority to Certify its Graduates for an Airline Transport Pilot Certificate with Reduced Aeronautical Experience, or contact the FAA General Aviation and Commercial Division (AFS-800).

CHAPTER 8. FLIGHT TRAINING OF U.S. CITIZENS AND FOREIGN NATIONALS

8.1 Background. Shortly after September 11, 2001, the U.S. Congress enacted the Aviation and Transportation Security Act (ATSA), tasking the U.S. Attorney General with the vetting of persons seeking flight training in the United States in aircraft with a maximum takeoff weight (MTOW) of 12,500 pounds or more. Public Law (PL) [108-176](#), Section 612 of the Vision 100—Century Aviation Reauthorization Act (2003), transferred the vetting responsibility to the Secretary of Homeland Security. It also extended vetting to aircraft having an MTOW of 12,500 pounds or less. This vetting, under Title 49 of the Code of Federal Regulations (49 CFR) part [1552](#), § 1552.3, applies to pilot schools, flight training centers, air carrier flight training facilities, and flight instructors certificated under 14 CFR part [61](#), [121](#), [135](#), [141](#), or [142](#); or any other person or entity providing instruction in the operation of any aircraft or aircraft simulator. The Alien Flight Student Program (AFSP) ensures that non-U.S. citizen candidates seeking training at flight schools regulated by the FAA do not pose a threat to aviation or national security. Title 49 of the United States Code (49 U.S.C.) § [44939](#) and 49 CFR part 1552 prohibit U.S. flight schools from providing flight training to an alien unless the alien has submitted certain information to the Transportation Security Administration (TSA), and the TSA has determined that the alien does not pose a threat to aviation or national security.

8.2 Title 49 CFR Part 1552. This regulation prohibits flight schools, including part 141 pilot schools, provisional pilot schools, and others who provide pilot training, including flight training in an aircraft or aircraft simulator, to non-U.S. citizens without TSA approval. This regulation requires non-U.S. citizens desiring pilot training to create and maintain a TSA account at <https://www.flightschoolcandidates.gov>. TSA will make the determination that a candidate is not a threat to aviation or national security and issue permission to train in the United States. Part 141 pilot schools and provisional pilot schools need to be familiar with the TSA requirements, and other requirements, outside of the FAA's jurisdiction, for providing pilot instruction.

8.3 Categories of Training Under TSA. There are four categories of training requests that can be submitted to TSA:

1. Category 1: For pilots who do not have a heavy type rating (over 12,500 pounds) on their FAA or Foreign Airman Certificate.
2. Category 2: For pilots who do have a heavy type rating (over 12,500 pounds) on their FAA or Foreign Airman Certificate, but are training in an aircraft in which they are not currently qualified.
3. Category 3: For pilots training in any aircraft with an MTOW of 12,500 pounds or less.

Note: In many cases, Category 3 is waived and no TSA application is required.

4. Category 4: For pilots who are training in aircraft with an MTOW over 12,500 pounds in which they are already qualified (e.g., recurrent training). No fingerprints are required.

8.4 Flight Training for U.S. Citizens. U.S. citizens seeking pilot training must provide proof of citizenship by showing one or more of the following documents to the part 141 pilot school, provisional pilot school, or other training provider:

- A valid, unexpired U.S. passport (the FAA also requires another form of identification (ID) showing proof of address in addition to the passport).
- An original birth certificate of the United States, American Samoa, or Swains Island and a government-issued picture ID.
- An original certification of birth abroad with raised seal (Certification of Birth Abroad (FS-545) or Certification of Report of Birth (DS-1350)) and a government-issued picture ID.
- An original certificate of U.S. citizenship with raised seal (Certificate of U.S. Citizenship (N-560 or N-561)), or a Certificate of Repatriation (N-581), and a government-issued picture ID.
- An original Certificate of U.S. Naturalization with raised seal (N-550 or N-570) and a government-issued picture ID.

8.5 Recordkeeping Requirements. TSA requires, under 49 CFR § 1552.3, 14 CFR pilot schools, provisional pilot schools, and other training providers, including certificated flight instructors (CFI), to:

- Keep a copy of the documents used to provide proof of citizenship for 5 years; or
- Make an endorsement in both the student's logbook and instructor's logbook, or other record used by the instructor to record flight student endorsements, with the following statement:

I certify that (First name, MI, Last name) has presented me with a [insert type of document presented, such as a U.S. birth certificate or U.S. passport, and the relevant control or sequential number on the document, if any] establishing that [he or she] is a U.S. citizen or national in accordance with 49 CFR § 1552.3(h).

/s/ [date] J. J. Jones 987654321 CFI Exp. 12-31-19

8.6 The Student and Exchange Visitor Program (SEVP). SEVP is part of the U.S. Immigration and Customs Enforcement's (ICE) Homeland Security Investigations, the largest investigative arm of the U.S. Department of Homeland Security (DHS). SEVP provides integrity to the U.S. immigration system by collecting, maintaining, and analyzing information so that only legitimate nonimmigrant students or exchange visitors gain entry into the United States. SEVP ensures that the institutions accepting nonimmigrant students are certified and follow the Federal rules and regulations that govern them. SEVP uses the Student and Exchange Visitor Information System (SEVIS), a Web-based application, to track and monitor schools, programs, and nonimmigrant

students, exchange visitors, and their dependents, throughout the duration of their approved participation in the U.S. educational system. The program ensures that government agencies involved in the international student process have SEVIS data related to nonimmigrant students and exchange visitors that is essential to maintain national security.

8.7 Schools Certified by SEVP. Only schools or programs certified by SEVP are eligible to enroll nonimmigrant students with F-1 or M-1 visas. Prospective F-1 students must apply to the school and receive DHS Form I-20, Certificate of Eligibility for Nonimmigrant Student Status, in order to apply for an F-1 visa. F-1 students must show that they are able to support themselves during their stay in the United States, because their opportunities for legal employment are quite limited. F-1 students must maintain a full course of study. M-1 visas are a type of student visa reserved for vocational and technical schools. The SEVP certification process includes completing DHS Form I-17, Petition for Approval of School for Attendance by Nonimmigrant Student at <https://studyinthestates.dhs.gov/getting-started-with-sevp-certification> in SEVIS, and paying all required fees at <https://www.pay.gov/public/home>. SEVP also certifies schools to host F-1 and M-1 nonimmigrant students participating in flight training programs that are certified by FAA as either part 141 or part 142 flight training providers. F-1 or M-1 nonimmigrant students may not participate in any other type of flight training, unless it is incidental to their status. For more information about the SEVP certification process, refer to <https://www.ice.gov>.


APPENDIX A. APPLICATION INFORMATION

Figure A-1. Sample Air Agency Certificate

<p>UNITED STATES OF AMERICA DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION</p> <p>Air Agency Certificate</p> <p><i>Number</i> BX7S</p> <p><i>This certificate is issued to</i> Sebago Lake Aviation <i>whose business address is</i> 15 Airport Drive, Portland, Maine 04897</p> <p><i>upon finding that its organization complies in all respects with the requirements of the Federal Aviation Regulations relating to the establishment of an Air Agency, and is empowered to operate an approved</i> Provisional Pilot School</p> <p><i>with the following ratings:</i> Private Pilot Course, Commercial Pilot Course, Instrument Rating Course</p> <p><i>This certificate, unless canceled, suspended, or revoked, shall continue in effect</i> until October 31, 2019</p> <p><i>By direction of the Administrator</i></p> <p><i>Date issued:</i> October 15, 2017</p> <p><small>This Certificate is not Transferable, AND ANY MAJOR CHANGE IN THE BASIC FACILITIES, OR IN THE LOCATION THEREOF, SHALL BE IMMEDIATELY REPORTED TO THE APPROPRIATE REGIONAL OFFICE OF THE FEDERAL AVIATION ADMINISTRATION</small></p> <hr/> <p><small>Any alteration of this certificate is punishable by a fine of not exceeding \$1,000, or imprisonment not exceeding 3 years, or both</small></p> <p><small>FAA Form 8000-4 (1-67) SUPERSEDES FAA FORM 390. Electronic Forms (PDF)</small></p>

Figure A-2. Sample Application for Pilot School Certification

Paperwork Reduction Act Burden Statement: The information collected is used to certify pilot schools. The information is required to determine qualification and compliance. A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a currently valid OMB Control Number. The OMB Control Number for this information collection is 2120-0009. Public reporting for this collection of information is estimated to be approximately 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing and reviewing the collection of information. All responses to this collection of information are mandatory per 14 CFR Part 141. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to the FAA at 900 Independence Ave. SW, Washington, DC 20591, Attention: Information Collection Clearance Officer, AFS-200.



**US Department
of Transportation
Federal Aviation
Administration**

APPLICATION FOR PILOT SCHOOL CERTIFICATION

Form approved: OMB
No. 2120-0009
04/30/2019

CERT
No.

For FAA Use Only

APPLICANT - Read submittal and signature instructions on reverse.

NAME OF SCHOOL	TELEPHONE NO.	ADDRESS OF PRINCIPAL BUSINESS OFFICE
LOCATION OF MAIN OPERATIONS BASE	LOCATION OF SATELLITE BASE(S)	

APPLICATION IS HEREBY MADE FOR:

☐ Issuance of a Pilot School Certificate and associated ratings to conduct the training courses identified below, and for the approval of these courses (*three copies of each course outline are attached*), also, examining authority is requested for the courses appropriately checked.

☐ Renewal of a Pilot School Certificate and associated ratings currently numbered _____, which expires on _____

☐ without changes to the currently approved course outlines. ☐ with addition of course(s) identified below for which approval is requested (three copies of each course outline is attached), including request for examining authority for the course(s) appropriately checked; ☐ with deletion of course(s) identified below from the curriculum.

☐ Amending the current Pilot School Certificate and associated ratings numbered _____, which expires on _____

☐ by adding the course(s) identified below for which approval is requested (three copies of each course outline are attached), including request for examining authority where appropriately checked; ☐ for deletion of the course(s) identified below from the curriculum.

IDENTIFICATION OF TRAINING COURSES NOTE: Where examining authority for a course is desired, place and "X" in the box adjacent to the course identification.

<input type="checkbox"/>	_____	<input type="checkbox"/>	_____
<input type="checkbox"/>	_____	<input type="checkbox"/>	_____
<input type="checkbox"/>	_____	<input type="checkbox"/>	_____
<input type="checkbox"/>	_____	<input type="checkbox"/>	_____
<input type="checkbox"/>	_____	<input type="checkbox"/>	_____
<input type="checkbox"/>	_____	<input type="checkbox"/>	_____
<input type="checkbox"/>	_____	<input type="checkbox"/>	_____

(If more space is needed, continue on reverse in space provided)

I (WE) certify that I am (we are) familiar with Part 141 of the Federal Aviation Regulations, and, to the best of my (our) knowledge, believe that my (our) school meets the requirements for certification as prescribed therein.

Signature
and Title(s)

Date _____

}

FOR FAA USE ONLY

☐ APPROVED- ☐ a Provisional Pilot School Certificate ☐ a Pilot School Certificate, either with associated ratings bearing the number shown above is issued effective _____ and which expires on _____

☐ Renewal ☐ without amendments ☐ with amendments ☐ Amendments

☐ DISAPPROVED

SIGNATURE OF APPROVING OFFICIAL	TITLE	DATE
---------------------------------	-------	------

FAA Form 8420-8 (1-82) Recommendations of Inspector(s) on reverse

Figure A-2. Sample Application for Pilot School Certification (Continued)

INSTRUCTIONS TO THE APPLICANT: Submit an original and one copy of this application, completed in full, along with the required number of attachments where specified on the face of this form, to the FAA District Office having jurisdiction over the area in which the school is located. Signatures on the application should be as follows:			
a. Application from a person acting as an individual should be signed by the owner; b. Application from a partnership should be signed by all partners; c. Application from a corporation should be signed by the president or such other officers as authorized by the corporation by-laws to sign for the corporation and certified to by the corporate secretary attesting to the authority of the individuals to sign such a document; d. Application from a company, club, or association should be signed by the president or such other officer or director as authorized by the organization's by-laws, and attested to by the secretary.			
IDENTIFICATION OF TRAINING COURSES (Continued)		<i>NOTE: Where examining authority for a course is desired, place and "X" in the box adjacent to the course identification.</i>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		
THE FOLLOWING SPACE FOR FAA USE ONLY			
Recommendations of Inspector(s)			
INSPECTORS' SIGNATURES AND DATES	FOR OPERATIONS DATE	FOR MAINTENANCE DATE	FOR AVIONICS DATE

Figure A-3. Sample Letter of Intent

August 1, 2017

Mr. Robert Taylor
Manager, Flight Standards District Office
Federal Aviation Administration
Portland International Jetport
Portland, Maine 04897

Subject: Letter of Intent to Become a Provisional Pilot School under Title 14 of the Code of Federal Regulations

Dear Mr. Taylor:

This is to notify the Portland, Maine, Flight Standards District Office (FSDO), Federal Aviation Administration (FAA), of our intent to become a Provisional Pilot School under Title 14 of the Code of Federal Regulations (14 CFR) part 141. We are prepared to begin operations on August 30, 2017.

We will be using electronic signatures and electronic copies of all documents, including submitting FAA Form 8420-8, Application for Pilot School Certification; training course outlines (TCO); and syllabi electronically.

We anticipate operations will be conducted from the General Aviation Terminal, Portland Airport. Our primary airport address is 15 Airport Drive, Portland International Airport, Portland, Maine 04897. My email address is travislee@pwn.com and this will be the primary email address for all electronic communication between myself and the Portland FSDO.

We intend to operate two Cessna 152s, one Cessna 182RF, one PA-32 Piper Seneca, and a Robinson R-22 helicopter. We propose to use the three-letter designator SLX, SLY, or SLZ (in order of preference) for our letters of authorization (LOA) and certificate management purposes. Ms. Nancy Build, holder of Flight Instructor Certificate number 543848384, is the chief instructor for all courses and meets the chief instructor requirements of part 141, § 141.35. I have attached a copy of her pilot resume that may be verified when your inspection is conducted.

Attached to this email is a copy of each proposed TCO and syllabus for your review and approval.

Sincerely,

Travis E. Lee
Owner
Sebago Lake Aviation
Portland, Maine 04897

Figure A-4. Sample Letter of Intent—Electronic Recordkeeping and Electronic Signature

August 1, 2017

Mr. Robert Taylor
Manager, Flight Standards District Office
Federal Aviation Administration
Portland International Jetport
Portland, Maine 04897

Subject: Use of Electronic Systems—Signatures/Recordkeeping/Manuals

Dear Mr. Taylor:

This letter is to inform you that Sebago Lake Aviation intends to use an electronic system for signatures, recordkeeping, training course outlines (TCO), syllabi, and other documents.

Apple iMacs will be used for documents, including recording of pilot records, and other correspondence, including TCOs and syllabi. These documents will be in a Microsoft Word format, Adobe PDFs, and other formats to record information. Electronic signatures will use Adobe PDFs for all electronic signatures. We will also provide Apple iPads for each student's use to obtain weather briefings and store syllabi, electronic maps, and individual flying time.

This system has been established using the guidelines outlined in Federal Aviation Administration (FAA) Advisory Circular (AC) 120-78A, Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals.

This organization intends to implement the system on August 30, 2017.

Company facilities, equipment, and personnel are available for your review and/or inspection at 15 Airport Road, Portland, Maine 04897 on August 15, 2017. Please contact Travis E. Lee, at 207-555-6310, to arrange a visit to review the system and to discuss any FAA concerns.

Thank you in advance for your assistance in this matter.

Sincerely,

Travis E. Lee
Owner
Sebago Lake Aviation
Portland, Maine 04897

APPENDIX B. SAMPLE TRAINING COURSE OUTLINE AND SYLLABUS**Figure B-1. Sample Training Course Outline**

This sample private pilot training course outline (TCO) is intended to serve as a general guide for the preparation of a TCO for which FAA approval is sought. Schools may develop their own training syllabus or use a commercially prepared syllabus. If a commercially prepared syllabus is used, it must meet the needs of the particular school (e.g., physical layout of the operation, personnel, aircraft, kinds of training aids available, methods and procedures of operation, and the goals and standards of the school).

The content of the training syllabus contained herein is not considered to be the optimum. A syllabus should be developed that best suits the school, where training procedures are often dictated by weather, location, or specific training needs. This sample contains a training syllabus for both private pilot ground and flight training and is designed to be taught concurrently.

Note: Pilot school students trained under 14 CFR part [141](#) must be tested under 14 CFR part [61](#). However, part 61, § [61.71](#) provides for graduates from FAA-approved part 141 training programs.

Sample: Sebago Lake Aviation TCO

1. Flight School. Sebago Lake Aviation located at the Portland, Maine Airport; holds Air Agency Certificate No. BX7S; and is owned and operated as:

Sebago Lake Aviation
15 Airport Road
Portland, ME 04897

2. Course Title. Private Pilot Certification Course Airplane Single-Engine Land (ASEL).

- a. This TCO meets the curriculum requirements for the Private Pilot Certification Course contained in part 141 appendix B.
- b. The training syllabus provided contains separate ground and flight training courses, which will be taught concurrently.

3. Course Objective. The student will obtain the knowledge, skill, and aeronautical experience necessary to meet the requirements for a private pilot certificate with an airplane category rating and a single-engine land class rating.

4. Completion Standards. The student must demonstrate through written tests, practical tests, and appropriate records that he or she meets the knowledge, skill, and experience requirements necessary to obtain a private pilot certificate with an airplane category rating and a single-engine land class rating. Each individual must satisfactorily complete at least one stage of training within each training period of not more than 90 days.

5. Ground Instructional Facilities. Ground instructional facilities are located in Hangar No. 12 at the Portland Airport. They consist of two 50-feet x 50-feet rooms, equipped with tables, chairs, and instruction booths.

- a. Training Room No. 1 is equipped with 8 tables and chairs to accommodate 16 students. The room is also equipped with a large white board, an Apple 27-inch iMac (late 2015 model) computer, and a projector and screen. The tables are equipped with a “four-answer” responder system, with the master panel located on the instructor’s lectern.
- b. Training Room No. 2 is equipped with nine individual training booths. Eight booths are equipped with Apex Visual Screens and projectors. One booth is equipped with closed-circuit television.
- c. The training rooms are well lighted and the temperature is thermostatically controlled. Each room is well ventilated and conforms to the city of Portland building, sanitation and health codes. The rooms are designed and located so that students will not be distracted by instruction conducted in the other rooms or by flight and maintenance operations at the airport.

6. Airport. The Portland Airport is the main base of operations for training in this course and where training flights originate. Flight training operations, including the dispatching of flights, will be at this airport and also at the Sanford, ME airport. The Portland and Sanford airports have hard-surfaced runways and meet § 141.38 requirements for day and night flight operations. Both airports have fuel and maintenance services available.

7. Airport Facilities. Each airport is equipped with a pilot briefing room for Sebago Lake Aviation students. Both briefing areas have a computer with Internet access for weather briefings, a telephone, cell phone, and Internet connections dedicated to contacting Flight Standards Service (AFS) facilities used exclusively by Sebago Lake Aviation students. Both briefing rooms are equipped with numerous tables for planning purposes. Both briefing areas have a full set of current aeronautical charts, including the current Aeronautical Information Manual (AIM). Large wall maps with a mileage indicator depict the entire United States. The local practice areas are displayed along with the Portland Tower frequencies and Sanford Unicom frequencies.

8. Ground Trainers. [NAME of PILOT SCHOOL] has two [NAME OF MANUFACTURER & MODEL] [TYPE examples: Aviation Training Device (ATD), flight training device (FTD), or full flight simulator (FFS)] that will be used to provide training as described in the approved training course syllabus. The specific lessons will be identified when using the ATD for pilot training. Each trainer is FAA approved and is accompanied by a valid letter of authorization (LOA) and Qualification and Approval Guide (QAG). These training devices meet the requirements as described in § 141.41.

9. Airplanes. Airplanes used for all flight training in this course include one Cessna 150 Aerobat, three Cessna 152s, two Cessna 172s, and a Piper Arrow. These aircraft will meet the requirements of § 141.39. The Cessna 172s all are factory glass panels with Automatic

Dependent Surveillance—Broadcast (ADS-B) IN and OUT, which interface with an iPad. The Piper Arrow has a multifunction display (MFD) with Global Positioning System (GPS) navigation, a horizontal situation indicator (HSI), one very high frequency omni-directional range (VOR) navigational receiver, and a 4096 code transponder with Mode C capability. Each airplane is equipped for day and night visual flight rules (VFR) and instrument flight rules (IFR) flying, as specified in 14 CFR part 91, § 91.205.

10. Chief Instructor. The chief instructor for training must be designated by name in the appropriate TCO. If the school's requirements for a chief instructor are higher than those listed in § 141.35, those requirements should be listed.

11. Assistant Chief Instructor(s). The assistant chief instructor(s), if designated for a course of training, are listed by name in the appropriate TCO assigned duties at a satellite base. Those duties and the specific bases are listed by name.

12. Flight Instructors. The minimum qualifications and ratings for flight instructors are listed in the TCO. For example: Each flight instructor assigned to this course must be the holder of at least a commercial pilot certificate with an airplane category rating and a single-engine land class rating. The instructor must be the holder of a flight instructor certificate with an airplane category rating with a single-engine class rating and an instrument airplane rating. The instructor must also have a total of 1,000 hours of flying time, including at least 200 hours of flight instruction.

13. Chief Instructor for a Ground School Course. A chief instructor may be designated by name in the TCO for a ground school course of training, provided that person meets the requirements of § 141.35(e).

Figure B-2. Sample Syllabus**Private Pilot Course ASEL Ground Training [37 Hours]**

- 1. Ground Training Course Objectives.** The student will obtain the necessary aeronautical knowledge and meet the prerequisites specified in part 61 for a private pilot written test.
- 2. Ground Training Course Completion Standards.** The student will demonstrate through practical tests, written tests, and records that he or she meets the prerequisites specified in part 61, and has the knowledge necessary to pass the private pilot written test.
- 3. Prerequisites for Enrollment.** The minimum medical certification for this course is an FAA third-class medical. Upon enrollment in this course, the student must apply for a student pilot certificate.

Stage One: FAA Regulations and Other Publications [7 Hours]

- 1. Stage One Objective.** To develop the student's knowledge and understanding of the Federal aviation regulations, the AIM, the AC system, National Transportation Safety Board (NTSB) Title 49 of the Federal Code of Regulations (49 CFR) part 830, Chart Supplements, and the kind of flight operations facilitated by the private pilot certificate.
- 2. Completion Standards.** This Stage One will be complete when the student successfully passes the Stage One final written examination with a grade of 80 percent.

Lesson 1 [2:00 Hours]

Title: Regulatory Review Part 61

Objective: The student will be introduced to the appropriate content of 14 CFR part 1 and the regulatory requirements of parts 61 and 91.

Content:

- a) Airplane registration and airworthiness certificate.
- b) Part 1, Definitions and Abbreviations, appropriate to the private pilot.
- c) Part 61 review.
- d) Requirements for certificates and ratings, privileges, and limitations.
- e) Duration of pilot certificates.
- f) Medical certificate requirements, classes, and duration.
- g) Written tests.
- h) Practical tests.

- i) Pilot logbooks and flight records, logging of pilot time.
- j) Recency of experience requirements, including flight review,
- k) Private pilot privileges and limitations.

Completion Standards: The student will have successfully completed the lesson when, by oral examination, the student displays a working knowledge of the appropriate portions of parts 1, 61, and 91 and demonstrates how to locate and use information in the rule.

Lesson 2 [2:00 Hours]

Title: Regulatory Review Part 91 and NTSB

Objective: Lesson No. 1 will be reviewed. The student will be instructed in the pertinent regulatory requirements of part 91 and the accident report rules of the NTSB (49 CFR part 830) as related to private pilot operations.

Content:

- a) Part 91.
- b) General operation rules.
- c) VFR requirements.
- d) IFR requirements.
- e) Maintenance, preventative maintenance, and alteration.
- f) Aircraft registration and airworthiness.
- g) Transponder and encoder requirements.
- h) Traffic patterns (towered and nontowered airports).
- i) Temporary flight restrictions (TFR).
- j) Restricted and prohibited airspace.
- k) NTSB 49 CFR part 830 notification and reporting of accidents.

Completion Standards: The lesson will be successfully completed when, by oral examination, the student can demonstrate how to locate and use information in the part 91 rule as related to private pilot operations, and demonstrates an understanding of 49 CFR part 830.

Lesson 3 [2:30 Hours]**Title:** AIM and ACs**Objective:** The student will be given instruction in the basic content of the AIM for VFR operations, the AC system, and the Airport Facility Directory (AFD).**Content:**

(1) AIM.

- (a) Air navigation radio aids.
- (b) Airport air navigation lighting and runway and taxiway marking.
- (c) Airspace Classes A through G.
- (d) Restricted areas, TFRs.
- (e) Prohibited areas, warning areas, and Military Operations Areas (MOA).
- (f) Air traffic control (ATC).
- (g) Services available to pilots.
- (h) Airport operations, to include high-density airport operations.
- (i) Emergency procedures.
- (j) Good operating practices, to include collision avoidance.

(2) The AFD.

(3) FAA AC 00-, 60-, 90-, and 120-series (familiarization).

Completion Standards: The student will have successfully completed the lesson when, by oral examination and demonstration, he or she displays basic knowledge of the appropriate parts of the AIM for VFR operations, the AFD, and the AC system.

Lesson 4 [00:30 Hour]**Title:** Stage One Final Exam**Content:** Knowledge Examination (Written Exam)

Completion Standards: The student will have successfully completed Stage One when, by written examination, he or she demonstrates significant knowledge and understanding of the appropriate parts of parts 61 and 91, NTSB rules, the AIM for VFR operations, the AFD, and the AC system, with a pass rate of at least 80 percent, corrected to 100 percent after review of the exam results.

(A copy of the Stage One final knowledge examination should be included with the training syllabus when submitted to the FAA FSDO for review. The examination should be comprehensive and contain questions on information covered during this stage.)

Note: This is just a portion of a sample syllabus. The school can develop its own, or purchase a commercially developed syllabus for submission to the jurisdictional FSDO for review.

Figure B-3. Training Course Outline Checklist

1.	The name of the chief instructor and any assistant chief instructors designated for the course.
2.	A statement indicating which curriculum in part 141 or the name of the special curriculum upon which the TCO is based.
3.	A description of each room used for ground training, including room size and maximum number of students that may be trained at one time.
4.	A description of each type of training aid used for ground training.
5.	A description of each flight simulation training device (FSTD) and ATD used for flight training, in sufficient detail that the inspector can readily determine if the device may be used for the amount of flight training credit requested.
6.	A listing of airports at which training flights originate (main and satellite bases) and a description of the facilities, including pilot briefing areas available for use by school's students and personnel.
7.	A description of each type of aircraft and any special equipment used for each phase of training.
8.	The minimum qualifications and ratings for each instructor assigned to ground or flight training. (Review §§ 141.79 and 141.81; FAA Order 8900.1, Volume 2, Chapter 9, Section 1, subparagraph 2-1072D; and the appropriate part 141 appendix.)
9.	A method for tracking revisions (such as a record of changes page) to the TCO.
10.	A training syllabus that is a "building block" progression of learning with provisions for regular review and evaluation at prescribed stages. (Review § 141.55; AC 141-1; Order 8900.1, Volume 3, Chapter 53, Section 2, subparagraph 3-4309D; and the appropriate part 141 appendix.)

Figure B-4. Syllabus Checklist

1.	Must contain any prerequisites necessary for enrollment in the course, such as minimum pilot certificates and ratings, class of medical, and any training, pilot experience, or special knowledge required.
2.	Course objective(s) must contain a description of what the course is expected to accomplish with regard to student learning, and state in broad terms, the knowledge and skill goals to be reached by the student at the end of the course.
3.	Course content must identify the specific subject matter that will be taught to develop the student's knowledge and skills necessary to meet the course, stage, and lesson objectives, and completion standards.
4.	The content must support the objectives, be arranged in a logical sequence, and be obtainable within the estimated stages and course times.
5.	Reasonable variances in timeframes should be considered to accommodate for individual learning differences when determining the estimated timeframes of lessons, stages, and courses.
6.	Course content and syllabus should conform to the appropriate part 141 appendix, or part 61 knowledge and skill requirements if a Special Curriculum (§ 141.57). Completion standards shall never be less than the appropriate airman certification standards (ACS) or practical test standards (PTS), as appropriate.

APPENDIX C. REFERENCES AND ADDITIONAL INFORMATION (Current Editions)**C.1 Title 14 of the Code of Federal Regulations ([14 CFR](#)).**

- Part [60](#), Flight Simulation Training Device Initial and Continuing Qualification and Use.
- Part [61](#), Certification: Pilots, Flight Instructors, and Ground Instructors.
- Part [91](#), General Operating and Flight Rules.
- Part [141](#), Pilot Schools.

C.2 Title 49 of the United States Code (49 U.S.C.) Part [1552](#).**C.3 Federal Aviation Administration (FAA) Order [8900.1](#).**

- [Volume 2, Chapter 1, Section 1](#), Safety Assurance System: General Information and the Certification Process.
- [Volume 2, Chapter 1, Section 3](#), Safety Assurance System: Obtaining and Constructing Certificate/Designator Numbers.
- [Volume 2, Chapter 9, Section 1](#), Initial Certification or Renewal of a Part 141 Pilot School.
- [Volume 2, Chapter 9, Section 2](#), Introduction to Part 141 Airworthiness Related Tasks.
- [Volume 2, Chapter 9, Section 3](#), Evaluate Airworthiness Issues of Part 141 Pilot School.
- [Volume 3, Chapter 1, Section 1](#), Safety Assurance System: General.
- [Volume 3, Chapter 53, Section 1](#), Introduction to Part 141 Related Tasks.
- [Volume 3, Chapter 53, Section 2](#), Approve Training Course Outlines for a Part 141 Pilot School.
- [Volume 4, Chapter 4, Section 2](#), MEL Requirements for 14 CFR Parts 91, 137, and 142 Operations.
- [Volume 5, Chapter 12, Section 1](#), Conduct a Chief/Assistant Chief Instructor Practical Test for 14 CFR Part 141 Pilot School.
- [Volume 5, Chapter 12, Section 2](#), Conduct a Stage Test for a Title 14 CFR Part 141 Pilot School.
- [Volume 5, Chapter 12, Section 3](#), Designate and/or Renew an Airman Certification Representative (ACR) Title 14 CFR Part 141 Schools Only.
- [Volume 5, Chapter 12, Section 4](#), Examining Authority.
- [Volume 6, Chapter 7, Section 1](#), Conduct Facility Inspection of a Part 141 Pilot School.

- [Volume 6, Chapter 7, Section 2](#), Inspect a Part 141 Pilot School.
- [Volume 11, Chapter 1, Section 1](#), Voluntary Disclosure Reporting Program for Air Carriers and Regulated Entities.

C.4 Advisory Circulars (AC).

- AC [61-139](#), Institution of Higher Education's Application for Authority to Certify its Graduates for an Airline Transport Pilot Certificate with Reduced Aeronautical Experience.
- AC [120-78](#), Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals.

C.5 FAA Form [8420-8](#), Application for Pilot School Certification.

C.6 FAA Safety Team (FAASafetyTeam) Website. Additional information on part 141 pilot school certification can be found through the FAASafetyTeam online course 141 Pilot School: Pre-Certification Course at https://www.faasafety.gov/gslac/ALC/course_content.aspx?pf=1&preview=true&cID=182.

C.7 The U.S. Transportation Security Administration's (TSA) Alien Flight Student Program (AFSP). <https://www.flightschoolcandidates.gov>.

APPENDIX D. FREQUENTLY ASKED QUESTIONS (FAQ)**1. What is the purpose of 14 CFR part [141](#), and to whom does it apply?**

Part 141 applies to anyone who wants to apply for an FAA part 141 pilot school certificate, has been certificated as an FAA part 141 pilot school, is renewing his or her part 141 pilot school certificate, or any interested party.

2. What does part 141 pilot school mean?

An FAA part 141 pilot school is synonymous with the following: certificated pilot school, pilot school, provisional pilot school, 14 CFR part 141 flight school, part 141 certification, or part 141 training. It means the FAA has approved your submission and authorized you to offer flight and ground training to potential candidates in accordance with the Air Agency Certificate issued.

3. What is an Air Agency Certificate? I thought I was going to be certified as a part 141 pilot school.

An Air Agency Certificate is the certificate issued by the FAA to a part 141 pilot school, a 14 CFR part [145](#) repair station, or a 14 CFR part [142](#) training center. These are each considered to be an air agency.

4. Is 14 CFR part [61](#) training better than part 141 training?

This is one of the questions to be determined when deliberating about a flight school. There are advantages to both options. Because the regulations (parts 61 and 141) contain substantially different requirements, review and consideration must be exercised. Once your review is concluded, should you still have questions, contact your local Flight Standards District Office (FSDO) for clarification.

5. What is a Flight Standards District Office (FSDO)?

FSDOs are the FAA offices responsible for certifying applicants for pilot school certificates, among other responsibilities. This office will work with you through the certification process and subsequently, once certification is completed.

6. How do I begin the application process to become a provisional pilot school?

The first step is to submit a Letter of Intent (LOI) to your local FSDO. The letter needs to include specific information, which can be found in FAA guidance (see Chapter [2](#), Preapplication Phase).

7. If I have everything in order necessary to begin a part 141 pilot school, can the FSDO expedite my certificate?

The process for completing the part 141 certification requires a commitment of time and resources on the part of the local FSDO. The LOI you provide to the FAA will be acknowledged and you will be placed in the queue. The FSDO will notify you when the office is able to begin the certification process.

8. Are all phases of certification required, or can I skip some of them?

The phases of certification were established to accommodate the applicant and the FSDO by allowing sufficient time for review, resubmitting documentation when necessary, and the required inspections. The certification team assigned to your certification process is knowledgeable and will assist you through this process.

9. Once I am authorized by the FAA as a part 141 pilot school, what oversight should I expect from the FAA?

FAA oversight could be construed as a partnership with the certificate holder. It is the goal of the FAA to assure safe and compliant operations and to provide assistance when requested. The assigned principal operations inspector (POI), principal maintenance inspector (PMI), and principal avionics inspector (PAI) will have periodic surveillance tasks to perform, intending minimal disruption to the operation. Also, the inspectors serve as a resource to the certificate holder regarding expanding operations, understanding of regulations, or training considerations.

10. What are so-called “add-on” courses and who can take advantage of these courses?

Ratings may be added through an additional aircraft category and/or class rating course under part 141 appendix I. A person must hold the level of pilot certification for the additional aircraft category and class rating prior to enrolling in the flight portion of the add-on course. For example, a private pilot with a rotorcraft helicopter rating may be enrolled in the flight portion of a course approved for additional ratings at the private level. That same pilot would not be eligible for the flight portion of any additional category and/or class rating course at the commercial level.

FAA Guidance (FAA Order [8900.1](#))**1. What is the purpose of FAA guidance?**

FAA guidance, also referred to as “the guidance” or Order 8900.1, is an FAA directive that aviation safety inspectors (ASI) are required to follow in the execution of their job tasks. FAA guidance (specifically Order 8900.1) are procedures the FAA has established to implement FAA regulations.

2. I understand that part 141 pilot schools are required to follow FAA regulations, but am I responsible for following FAA guidance?

FAA guidance is sometimes referred to as “the inspector’s handbook,” and inspectors are required to follow this guidance. By creating guidance for inspectors, the regulations are consistently applied through these established procedures.

Another advantage of FAA guidance is that it can be an excellent reference to the applicant or a certificate holder. For example, the guidance specifies what the inspector must receive from an applicant in order to accept an applicant’s submission. By referring to the guidance, the applicant can better prepare for the certification process. Another example is the guidance telling the inspector how to inspect a certificate holder’s operation (e.g., facilities, records, personnel, and equipment); this may include job aids or checklists. If the certificate holder is aware of these task requirements and the tools used by the ASI, it may help the certificate holder to establish best practices and expedite inspections.

3. How is FAA inspector handbook guidance useful to the initial applicant or a current certificate holder?

Reference to the same material FAA inspectors use can help to clarify information or processes. It is a benefit to the applicant or certificate holder to have immediate access to this resource when an inspector is not readily accessible. It benefits the inspector to have well-informed applicants and certificate holders. Inspector guidance (Order 8900.1) is a public document and can be found at <http://fsims.faa.gov/PICResults.aspx?mode=EBookContents&restricttocategory=all~menu>.

APPENDIX E. PART 141 PILOT SCHOOL SIMULATION TRAINING CREDIT ALLOWANCES

E.1 All training time in a full flight simulator (FFS), flight training device (FTD), or aviation training device (ATD) must be provided by an authorized flight instructor and documented as described in 14 CFR part [61](#), § [61.51](#), including the type and identification of the FFS, FTD, or ATD as appropriate.

Figure E-1. Simulation Credit Table

Total Time Requirement	Training Credits Allowed For:	ATD Part 141	FTD Part 141	FFS Part 141
35 hours	Private Pilot	15% (5.25)	20% (7.0)	20% (7.0)
35 hours	Instrument Rating	40% (14.0)	40% (14.0)	50% (17.5)
70 hours	Combined Private/Instrument	25% (17.5)	25% (17.5)	35% (24.5)
120 hours	Commercial Pilot	20% (24.0)	20% (24.0)	30% (36.0)
25 hours	Flight Instructor	5% (1.25)	5% (1.25)	10% (2.5)
15 hours	Instrument Flight Instructor	5% (.75)	5% (.75)	10% (1.5)

Figure E-2. Airline Transport Pilot (ATP) Simulation Credit Table

Credits Allowed For:	ATD Part 141	FTD Part 141	FFS Part 141
ATP Training	25% (6.25)	25% (6.25)	50% (12.5)

Note: Concerning the 50 hours of flight time required in the class of airplane for the rating sought: a maximum of 25 hours of training in an FFS representing the class of airplane for the rating sought may be credited toward the ATP flight time requirement if the training was accomplished as part of an FAA-approved training course per 14 CFR parts [121](#), [135](#), [141](#), or [142](#).

Exception: Up to 7.5 hours in an advanced aviation training device (AATD) is allowed for Private Pilot Rotorcraft Helicopter. The FAA letter of authorization (LOA) for helicopter AATD approvals references § [61.4\(c\)](#) for this allowance. This facilitates training credit for both part 61 and 141 Private Pilot Rotorcraft Helicopter experience requirements.

E.2 For those pilot schools utilizing basic aviation training devices (BATD), those trainers can only be used for Private Pilot and Instrument Rating training. Additionally, only 25 percent of the training time requirements for the instrument rating can be accomplished in a BATD.

E.3 FFSs and FTDs must be qualified via a Statement of Qualification (SOQ) by the National Simulator Program (AFS-205), and ATDs must be approved via an LOA by the General Aviation and Commercial Division (AFS-800). It is then up to the principal operations inspector (POI) to approve the use of these training devices, within the guidelines established in the SOQ or LOA, in the appropriate section or lessons of the FAA-approved syllabus and Training Course Outline (TCO). There are no restrictions on the amount of training accomplished and logged in these training devices. However, the regulatory limits on maximum credit allowed for the minimum pilot experience requirements remain. For example, a private pilot training course can reflect 20 hours of training in an ATD, but the course would still need to reflect at least 29.75 hours of training in an aircraft.

Advisory Circular Feedback Form

If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by contacting the General Aviation and Commercial Division (AFS-800) at 9-AFS-800-Correspondence@faa.gov or the Flight Standards Directives Management Officer at 9-AWA-AFS-140-Directives@faa.gov.

Subject: AC 141-1B, Part 141 Pilot Schools, Application, Certification, and Compliance

Date: _____

Please check all appropriate line items:

An error (procedural or typographical) has been noted in paragraph _____
on page _____.

Recommend paragraph _____ on page _____ be changed as follows:

In a future change to this AC, please cover the following subject:
(Briefly describe what you want added.)

Other comments:

I would like to discuss the above. Please contact me.

Submitted by: _____

Date: _____