

# NOTICE

## U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.78

National Policy

Effective Date:  
06/24/2009

Cancellation Date:  
12/31/2009

**SUBJ:** Focused Program Review of Air Carrier Flight Crewmember Training, Qualification and Management

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**1. Purpose of This Notice.** This notice cancels N 8900.77, Focused Program Review of Air Carrier Flight Crewmember Training, Qualification and Management. This notice changes the focus of the requirements of the previous notice and establishes a new deadline. The requirement to conduct a focused program review of Title 14 of the Code of Federal Regulations (14 CFR) part 121 air carrier programs for training, checking and managing flight crewmembers with emphasis on low-time flight crewmembers and those who have failed evaluation events and/or demonstrated a repetitive need for additional training.

**2. Audience.** The primary audience for this notice is principal operations inspectors (POI) responsible for the approval, review and surveillance of 14 CFR part 121 air carrier flight crewmember training and qualification programs. The secondary audience includes Flight Standards personnel in certificate-holding district offices (CHDO), branches and divisions in the regions and headquarters.

**3. Where You Can Find This Notice.** Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators may find this notice on the Federal Aviation Administration's (FAA) Web site at <http://fsims.faa.gov/>.

**4. Applicability.** This notice applies to all 14 CFR part 121 air carriers with the exception of part 121 air carriers whose aircraft fleets have operation specification (OpSpec) A034 designated Advanced Qualification Program (AQP) curriculums. If OpSpec A034 does not cover all of an air carrier's fleets, then this notice applies to those fleets not covered.

**5. Explanation of Cancellation and Deadline Changes.** After reviewing the outcome of the Administrator's Call to Action on June 15, 2009, Flight Standards realized the need to accelerate the accomplishment of certain provisions in N 8900.77 and to rearrange the priority of the actions required by the notice. Issues concerning pilot training have become highly publicized. FAA needs to demonstrate to Congress and to the public that we can move quickly and decisively to address critical safety issues. Flight Standards management opted to reorder the tasks required by N 8900.77. The requirements remain essentially the same. Because, per agency policy, we cannot issue a change to a notice, we opted to cancel N 8900.77 and to issue this notice with re-prioritized tasks.

**6. Background.** Recent accidents have made it necessary to validate part 121 air carrier flight crewmember training and qualification programs. We need also to ensure that air carriers have the capability to identify, track, and manage low-time flight crewmembers, as well as those who have failed evaluation events and/or demonstrated a repetitive need for additional training.

**a.** For the purpose of this notice, we define a low-time flight crewmember as meeting at least one of the following criteria:

(1) One who has either fewer than 1,500 total flight hours in turbojet powered aircraft or fewer than 1,500 hours in 14 CFR parts 121, 135, or military operations; or

(2) Fewer than 300 total flight hours in type with his or her current employer; or

(3) Fewer than 13 months in his or her current crewmember position (not type specific) with their current employer.

**b.** To determine whether a flight crewmember has demonstrated performance problems, consider his or her training and checking history for a period of five years before the date of the review conducted as per paragraph 7b below.

**7. Action.** This focused program review has two parts to be implemented by the POIs. In Part I POIs will determine the capability of their carrier to identify, track, and manage low-time flight crewmembers and those who have failed evaluations and/or or have demonstrated a repetitive need for additional training. In Part II POIs will determine that their carriers' training and qualification programs meet regulatory standards in accordance with FAA guidance.

**a. Part I.**

(1) Meet with the Director of Operations (DO), the Director of Safety (DOS), and the company official responsible for flight crewmember training and qualification programs to review the company's procedures for identifying, tracking, and managing low-time flight crewmembers and those who have failed evaluation events and/or demonstrated a repetitive need for additional training.

(a) Determine if the carrier is aware of and implemented a voluntary remedial training program, as described in SAFO 06015, Remedial Training for Part 121 Pilots.

(b) Require company personnel to demonstrate that they use the company's procedures to identify, track, and manage low-time flight crewmembers and those who have demonstrated performance problems. Producing company policy and records for a sample of both types of flight crewmembers will meet this requirement.

(c) Examples of management procedures may include reducing the interval for a captain's line checks, reducing the interval between proficiency checks or training events for any seat position, or adding line observations for first officers.

(d) Complete this meeting as soon as possible but *no later than July 15, 2009*.

(2) If a carrier does not have procedures, or its procedures are ineffective, encourage company personnel to develop procedures to identify, track, and manage low-time flight crewmembers and those who have demonstrated performance problems.

(3) Adjust oversight (e.g., performance assessments, Constructed Dynamic Observation Reports (ConDOR), risk management plan (RMP)) as needed to increase vigilance because of unmitigated risk if company personnel will not commit to develop or change procedures.

(4) Document the results of Part I in a national ConDOR titled “Special Tracking of Certain Flight Crewmembers” which is currently available in ATOS automation.

(5) Enter N8900.78-ST (exactly as shown) in the Local/Regional/Local Use field of the ConDOR if not auto filled.

(6) Track corrective actions requested or required of the air carrier in the corrective action tracking tool (CATT). Enter N8900.78-ST (exactly as shown) in the description field.

**Note:** If you have already created ConDORs with N8900.77-ST (-TRN for 7b) in the National/Regional/Local use field, you do not need to change them.

#### **b. Part II.**

**Note:** Performance Assessments and ConDORs may be delegated to any operations certificate management team member with appropriate experience and qualifications.

(1) Construct a ConDOR that shall include a minimum of the following questions:

(a) Element Performance Inspection (EPI) 4.2.3, questions 1.1, 1.2, 1.5, 1.6, 1.7, 1.9, and 5;

(b) EPI 4.2.7, questions 1.3, 1.5, and 1.6 and;

(c) If your carrier contracts for training, EPI 4.2.9, questions 1.1, 1.2, 1.3, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, and 1.11.

(2) Create a sufficient number of ConDORs to observe enough qualification and proficiency evaluations, including line checks, to determine that your carrier’s training and qualification programs achieve intended results.

(a) The sample size will vary depending on the size of your carrier. If your carrier employs 25 or fewer flight crewmembers, observe 100 percent of the evaluation events scheduled before September 30, 2009, if practicable. If your carrier employs more than 25 flight crewmembers, observe a large enough sample of evaluation events for each make and model aircraft to determine that your carrier’s training and qualification programs are achieving intended results. Attempt to target low-time flight crewmembers in the sample you observe.

(b) Consider supplementing the observations required by 7b(2) with additional cockpit en route inspections using the ConDOR described in 7b(1).

(c) Enter N8900.78-TNG (exactly as shown) in the National/Regional/Local Use field on each ConDOR.

(d) Use the N/A (not applicable) response field in lieu of N/O (not observed) when you cannot answer a ConDOR question because of lack of opportunity to make a required observation. Enter "Not observed" in the comment field associated with the N/A response.

**Note:** If you have already created ConDORs with N8900.77-ST (-TRN for 7b) in the National/Regional/Local use field, you do not need to change them.

(3) If flight crewmember performance indicates deficiencies in your carrier's training and/or qualification programs, take one of the following actions:

(a) Schedule a System Analysis Team (SAT), open a RMP, or schedule a performance assessment of elements 4.2.3, Training of Flight Crewmember, and/or 4.3.2, Appropriate Airman/Crewmember Checks and Qualifications, (and/or related elements, as appropriate) to gather additional evidence to determine whether observed deficiencies indicate systemic problems in the training and/or qualification programs.

(b) Schedule a design assessment of elements 4.2.3 and/or 4.3.2 to identify systemic deficiencies and/or areas of noncompliance.

(c) Require your carrier to take immediate corrective action for observed deficiencies in its flight crewmember training and/or qualification programs.

(4) If deficiencies exist, track required corrective actions specified in 7b(3) in the CATT. Enter N8900.78-TNG (exactly as shown) in the description field. Enter the deficiencies and the choice of further action in the CATT. Continue to track follow-up actions in the CATT to resolution.

(5) Begin the actions required by Part II immediately and complete them no later than September 30, 2009.

**Note:** Corrective actions required of air carriers, SATs, RMPs and performance and design assessments may take longer than September 30, 2009, to complete.

**8. Additional References.** Advisory Circular (AC) 120-54, Advanced Qualification Program, current edition, and SAFO 06015, Remedial Training for Part 121 Pilots.

**9. Disposition.** This is a one-time focused program review. Therefore, Flight Standards will not incorporate the information in this notice into FSIMS. Direct questions concerning the completion of ConDORs to the Flight Standards Certification and Surveillance Division, AFS-900, (703) 509-7209. Direct questions concerning training activities to the Air Transportation Division, AFS-200, (202) 267-8166.

ORIGINAL SIGNED by

John M. Allen  
Director, Flight Standards Service