

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

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National Policy

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SUBJ: Part 141 Chief Instructor and Assistant Chief Instructor Qualifications for an Approved Part 141 Appendix K Special Preparation Course for the ATP CTP

1. Purpose of This Notice. This notice requires a focused review and provides revised policy and guidance on the qualifications for a Title 14 of the Code of Federal Regulations (14 CFR) part 141 chief instructor and an assistant chief instructor for a Federal Aviation Administration (FAA)-approved part 141 appendix K special preparation course for the airline transport pilot certification training program (ATP CTP).

2. Audience. The primary audience for this notice is personnel performing certification, surveillance, evaluation, and observation job functions in the Flight Standards (FS) Safety Assurance and Safety Standards offices. The secondary audience includes the Safety Standards and Foundational Business offices.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices and in the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>. Operators and the public can find this notice on the FAA's website at https://www.faa.gov/regulations_policies/orders_notices and DRS.

4. Background.

a. Public Law (PL) 111-216, Airline Safety and Federal Aviation Administration Extension Act of 2010. PL 111-216 became law on August 1, 2010. Section 217, Airline Transport Pilot Certification, of the Act required the FAA to modify the requirements of an ATP certificate, as issued under 14 CFR part 61. Specifically, to be qualified to receive an ATP certificate, the applicant must have received flight training, academic training, or operational experience that will prepare a pilot, in part, to function effectively in a multi-pilot (multi-crew) environment.

b. Addressing the Knowledge Gap. While PL 111-216 primarily focused on modifications to the certification requirements for an ATP certificate, a knowledge gap was identified by the First Officer Qualification Aviation Rulemaking Committee (FOQ ARC). Both focused on enhancing the qualifications and training for pilots who desire to work in an air carrier environment. The FOQ ARC recommended that this knowledge gap could be best and most effectively bridged through successful completion of a modern flight training program that

methodically integrates academic training and aeronautical experience in a flight simulation training device (FSTD).

c. ATP CTP. The ATP CTP is designed to bridge the knowledge gap between a commercial pilot and a pilot operating in an air carrier environment. Bridging this gap requires training in essential subject areas as determined by PL 111-216, recommended by the FOQ ARC, proposed by the Pilot Certification and Qualification Requirements for Air Carrier Operations Notice of Proposed Rulemaking (NPRM), and now required by the Final Rule in § 61.156. Successful completion of the ATP CTP conducted by a 14 CFR part 121, 135, 141, or 142 certificate holder (CH) helps ensure an ATP certificate applicant has received the baseline knowledge and experience to prepare them for the duties, responsibilities, and challenges of an air carrier environment, regardless of which part the training is conducted under. In addition, the FAA specified baseline instructor requirements that are the same for all CHs authorized to conduct this training.

d. Baseline Instructor Requirements. All instructors of the ATP CTP special preparation course must:

(1) Hold an ATP certificate with an airplane category rating and a multiengine class rating.

(2) Have at least two years of air carrier experience as a pilot in command in operations under 14 CFR part 91, § 91.1053(a)(2)(i) or part 135, § 135.243(a)(1), or as a pilot in command or second in command in any operation conducted under part 121.

(3) Except for the holder of a flight instructor certificate, receive initial training on the following topics:

- (a) The fundamental principles of the learning process;
- (b) Elements of effective teaching, instruction methods, and techniques;
- (c) Instructor duties, privileges, responsibilities, and limitations;
- (d) Training policies and procedures; and
- (e) Evaluation.

(4) If providing training in an FSTD, hold an aircraft type rating for the aircraft represented by the FSTD utilized in the training program and have received training and evaluation within the preceding 12 months from the CH on:

- (a) Proper operations of flight simulator and flight training device controls and systems;
- (b) Proper operation of environmental and fault panels;
- (c) Data and motion limitations of simulation;

- (d) Minimum equipment requirements for each curriculum; and
- (e) The maneuvers that will be demonstrated in the FSTD.

e. Qualifications for a Part 141 Chief/Assistant Chief Instructor for the ATP CTP Special Preparation Course. In 2013, the FAA revised part 141 to make provisions for the new ATP CTP training course. Notably, part 141, §§ 141.11 and 141.33 and appendix K were amended to accommodate the approval of ATP CTP special preparation courses. Since this time, all instructors in a part 141 ATP CTP special preparation course have been required to meet the baseline instructor requirements of § 141.33(a)(4). Furthermore, the chief instructor and assistant chief instructor of an ATP CTP special preparation course have been required to meet the same baseline instructor requirements. Only by meeting these baseline instructor requirements can a chief instructor and an assistant chief instructor possess the necessary knowledge and ability to meet the responsibilities of these positions in an ATP CTP special preparation course. Additionally, a chief instructor and an assistant chief instructor of an ATP CTP special preparation course must meet the requirements of §§ 141.35 and 141.36, respectively.

5. Discussion. Approved part 141 pilot schools and provisional pilot schools that hold or are applying for an ATP CTP special preparation course have asked whether a chief instructor or an assistant chief instructor needs to meet the qualification requirements set forth in § 141.33(a)(3) and (4).

a. Regulatory Requirements. There are six different sections in part 141 where chief instructor and assistant chief instructor are discussed: §§ 141.33, 141.35, 141.36, 141.85, 141.87, and 141.89. The most compelling reason why a chief instructor must meet baseline instructor requirements can be found in § 141.33(a)(1), which states, “Each applicant must have adequate personnel, including certificated flight instructors, certificated ground instructors, or holders of a commercial pilot certificate with a lighter-than-air rating, and a chief instructor for each approved course of training who is qualified and competent to perform the duties to which that instructor is assigned.”

b. Required Air Carrier Experience. Furthermore, § 141.33(a)(3) and (4) are not limited to specific instructors, but rather apply to all instructors, including a chief instructor and an assistant chief instructor designated for the ATP CTP special preparation course. These requirements help ensure that the material presented is applied and given in context to air carrier operations.

(1) There is an exception for an ATP CTP special preparation course subject matter expert (SME) to deliver a specialized subject, such as meteorology, human factors, or flight dispatch, because these subjects focus on applying knowledge to an air carrier environment. However, a ground or flight instructor who meets the minimum instructor baseline requirements of § 141.33(a)(4), including the required air carrier experience of § 141.33(a)(4)(ii), must be present to help ensure that the material presented is applied and given in context to air carrier operations.

(2) Therefore, it is equally important for the chief instructor and assistant chief instructor designated for the ATP CTP special preparation course to meet these same minimum instructor

baseline requirements, including the required air carrier experience, to ensure the instruction taking place by any instructor, including an SME, meets the standards and objectives of the ATP CTP special preparation course. Without the required operational experience, knowledge, and skills required by § 141.33(a)(3) and (4), the oversight of the instructors delivering the instruction in the ATP CTP special preparation course could not be validated effectively.

c. Knowledge and Proficiency Testing. To ensure that a chief instructor or an assistant chief instructor designated for an ATP CTP special preparation course can meet this responsibility, the FAA requires both to comply with either § 141.35(a) or § 141.36(a), as applicable, by demonstrating their knowledge and skills by passing a knowledge test and a proficiency test appropriate to this special preparation course. Doing so ensures they are qualified to oversee the ATP CTP special preparation course, including conducting the review and briefing on the objectives and standards of the ATP CTP special preparation course and the proficiency check for each certificated flight instructor used in the ATP CTP special preparation course, as required by § 141.79(d)(1). The chief instructor and assistant chief instructor could not meet these requirements without meeting the qualification requirements of § 141.33(a)(3) and (4).

6. Guidance Changes. The following revisions to FAA Order 8900.1 will help the Safety Assurance office verify that a chief instructor and/or an assistant chief instructor designated by a part 141 pilot school or provisional pilot school for an ATP CTP special preparation course meets the appropriate part 141 regulatory requirements for approval, as explained above. All other parts of these sections remain the same.

a. Order 8900.1, Volume 5, Chapter 12, Section 1, Safety Assurance System: Conduct a Chief/Assistant Chief Instructor Proficiency Test for a Part 141 Pilot School. Subparagraphs 5-1763A and B are revised as follows:

“A. Chief Instructor. A Federal Aviation Administration (FAA)-approved pilot school and provisional school must designate a chief instructor for each approved course of training who is qualified and competent to perform the duties to which that chief instructor is assigned. The chief instructor must meet the appropriate requirements prescribed under part 141, §§ 141.33(a) and 141.35. Specifically, for an approved part 141 appendix K special preparation course for the airline transport pilot certification training program (ATP CTP), the chief instructor must also meet the requirements of § 141.33(a)(4).

B. Assistant Chief Instructor. An FAA-approved pilot school and provisional pilot school may designate one or more assistant chief instructors for each approved course of training who is qualified and competent to perform the duties to which that assistant chief instructor is assigned. The assistant chief instructor must meet the appropriate requirements prescribed under §§ 141.33(a) and 141.36. Specifically, for an approved part 141 appendix K special preparation course for the ATP CTP, the assistant chief instructor must also meet the requirements of § 141.33(a)(4).”

b. Order 8900.1, Volume 5, Chapter 12, Section 1. Subparagraph 5-1764G1) is revised as follows:

“1) The chief instructor must meet the appropriate qualification requirements of subparagraph 5-1763A, and the assistant chief instructor must meet the appropriate qualification requirements of subparagraph 5-1763B.”

c. Order 8900.1, Volume 5, Chapter 12, Section 1. Subparagraph 5-1770H2) is revised as follows:

“2) Determine if the chief instructor’s or assistant chief instructor’s experience and qualifications meet the requirements of the regulations for the approval requested as specified in subparagraph 5-1763A or B, respectively.”

d. Order 8900.1, Volume 3, Chapter 53, Section 2, Safety Assurance System: Approve Training Course Outlines for a Part 141 Pilot School. Subparagraph 3-4314C2)a) is revised as follows:

“a) If the chief instructor or assistant chief instructor(s) are qualified in accordance with Volume 5, Chapter 12, Section 1, subparagraph 5-1763A or B, respectively, proceed with the chief instructor/assistant chief instructor proficiency test.”

e. Order 8900.1, Volume 3, Chapter 62, Section 2, Airline Transport Pilot Certification Training Program Approval Process for a 14 CFR Part 141 Pilot School. Subparagraph 3-4941A is revised as follows:

“A. Initial Inquiry. Upon initial inquiry from an applicant, determine all the following:

- The identity of the applicant and the address of the principal base of operations.
- Any intended satellite base(s).
- The type of ownership (e.g., private or corporate).
- The proposed curriculum.
- The types of aircraft.
- The intended chief instructor and assistant chief instructor(s) and their qualifications. The chief instructor and assistant chief instructor(s) must meet the appropriate qualification requirements of Volume 5, Chapter 12, Section 1, subparagraph 5-1763A or B, respectively.
- The type of flight training device (FTD)/FSTD.
- The possible use of commercially produced syllabi.
- If the operator intends to use contract training.”

7. Actions. Within 90 days of the publication date of this notice, each Safety Assurance office with oversight of a part 141 pilot school or provisional pilot school that holds Letter of Authorization (LOA) A504, Initial Approval of an Airline Transport Pilot Certification Training Program Training Course, or A304, Final Approval of an Airline Transport Pilot Certification Training Program Training Course, for an ATP CTP special preparation course will complete the following:

a. Review. Review the qualifications of the chief instructor and/or assistant chief instructor(s) for that school’s ATP CTP special preparation course.

b. Activity Recording (AR). The office will record the results of this review in a Safety Assurance System (SAS) AR record utilizing activity code 1352.

c. Failure to Meet Baseline Requirements. If the chief instructor or the assistant chief instructor(s) do not meet the baseline instructor requirements of § 141.33(a)(4), then the Principal Operations Inspector (POI) must ensure that compliance is accomplished within 90 days of the determination. If the air agency is unable or unwilling to comply, the POI must remove LOA A504 or A304 in accordance with the procedures in Order 8900.1, Volume 3, Chapter 62, Section 2, Subparagraph 3-4938C, General Provisions for Withdrawal of Initial/Final Approval, in DRS.

8. Disposition. We will incorporate the information in paragraph 6 of this notice into Order 8900.1 before this notice expires. Direct questions or comments concerning the information in this notice to the General Aviation and Commercial Division (AFS-800) via email at 9-AFS-800-Correspondence@faa.gov.



Timothy R. Adams for
Lawrence Fields
Executive Director, Flight Standards Service