

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.545

National Policy

Effective Date:
4/24/20

Cancellation Date:
4/24/21

SUBJ: Pilot Professional Development

- 1. Purpose of This Notice.** This notice provides policy, information, and direction regarding the revised pilot training and qualification requirements in Title 14 of the Code of Federal Regulations (14 CFR) part 121 published in the Pilot Professional Development Final Rule.
- 2. Audience.** The primary audience for this notice is aviation safety inspectors (ASI) (Operations) in Safety Assurance offices responsible for the oversight and approval of pilot training and qualification programs conducted in accordance with part 121 subparts N and O or subpart Y. 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. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the Federal Aviation Administration's (FAA) website at <http://fsims.faa.gov>. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.
- 4. Applicability.** The information and policy contained in this notice is applicable to Principal Operations Inspectors (POI) responsible for the oversight and approval of pilot training and qualification programs for the following:

 - Certificate holders that train and qualify pilots in accordance with part 121 subparts N and O;
 - Certificate holders that train and qualify pilots in accordance with part 121 subpart Y;
 - Certificate holders that are required by 14 CFR part 135, § 135.3(b) to train and qualify pilots in accordance with part 121 subparts N and O;
 - Certificate holders authorized in accordance with § 135.3(c) to train and qualify pilots in accordance with part 121 subparts N and O; and
 - Title 14 CFR part 91 subpart K (part 91K) program managers authorized in accordance with § 91.1063(b) to train and qualify pilots in accordance with part 121 subparts N and O.

5. Background. On February 25, 2020, the FAA issued the Pilot Professional Development Final Rule. This Final Rule includes amendments to the training and qualification requirements in part 121 subparts N and O. These amendments include:

- Changes to the second in command (SIC) to pilot in command (PIC) upgrade curriculum requirements;
- A new requirement for all PICs to complete leadership and command and mentoring training;
- A new requirement for SICs serving in part 121 operations that require three or more pilots to complete leadership and command training;
- A new requirement for new-hire pilots to complete operations familiarization; and
- Other conforming and miscellaneous amendments.

6. Effective Date and Compliance Date. The Final Rule is effective April 27, 2020. However, certain requirements have a compliance date of April 27, 2022 or April 27, 2023. The paragraphs below specify the effective date or compliance date applicable to each requirement.

7. Definitions (§ 121.400). These definitions are effective April 27, 2020.

a. Upgrade Training. The definition of “upgrade training” is revised to remove Flight Engineers (FE). Upgrade training is now defined as “the training required for flightcrew members who have qualified and served as second in command on a particular airplane type, before they serve as pilot in command on that airplane.” This definition will apply throughout part 121 subparts N and O and appendices E, F, and H.

b. Conversion Training. As a result of the change to the definition of upgrade training, a new term “conversion training” has been added. Conversion training is defined as “the training required for flightcrew members who have qualified and served as flight engineer on a particular airplane type, before they serve as second in command on that airplane.” This definition will apply throughout part 121 subparts N and O and appendices E, F, and H.

8. SIC to PIC Upgrade (§§ 121.420 and 121.426). The upgrade curriculum requirements are revised to account for the evolution in part 121 SIC qualification and experience requirements as a result of the Pilot Certification and Qualification Requirements for Air Carrier Operations Final Rule requirements. The revised upgrade curriculum requirements ensure technical knowledge and skills while focusing on the decision-making and leadership skills required of a PIC. The revised upgrade curriculum is a performance-based curriculum.

a. Upgrade Ground Training. Upgrade ground training must include instruction on seat dependent procedures, duty position procedures, and Crew Resource Management (CRM). Upgrade ground training must also include instruction and facilitated discussion on leadership and command and mentoring. Refer to Order 8900.1, Volume 3, Chapter 19, Section 5, Safety Assurance System: Flightcrew Ground Training Curriculum Segments, for detailed information regarding the upgrade ground training requirements of § 121.420.

b. Upgrade Flight Training. Upgrade flight training must include seat dependent maneuvers and procedures, duty position maneuvers and procedures, extended envelope training, wind-shear training, and scenario-based training (SBT) incorporating CRM and leadership and command skills. Refer to Order 8900.1, Volume 3, Chapter 19, Section 6, Safety Assurance System: Flight Training Curriculum Segments, for detailed information regarding the upgrade flight training requirements of § 121.426.

c. Upgrade Proficiency Check. Waiver authority is not allowed on a proficiency check for a pilot who has completed the upgrade curriculum in accordance with §§ 121.420 and 121.426. Refer to Order 8900.1, Volume 3, Chapter 19, Section 7, Safety Assurance System: Flightcrew Qualification Curriculum Segments, for detailed information regarding the upgrade proficiency check requirements of § 121.441 and part 121 appendix F.

d. Training/Checking Month (Base Month). A certificate holder may reset a pilot's training/checking month for recurrent flight training if the pilot satisfactorily completes the § 121.426 upgrade flight training and § 121.441 upgrade proficiency check. A certificate holder may only reset a pilot's training/checking month for recurrent ground training if the certificate holder's upgrade curriculum meets all recurrent ground training requirements of § 121.427. Refer to Order 8900.1, Volume 3, Chapter 19, Section 10, Safety Assurance System: Flightcrew Recurrent Training Curricula, for additional information.

e. Compliance Date. Compliance with the new upgrade curriculum requirements is required beginning April 27, 2022.

Note: Sections 91.1063 and 135.3 specify additional limitations applicable to upgrade curricula for certificate holders and program managers that are required or authorized by § 91.1063(b) or § 135.3(b) or (c) to train and qualify pilots in accordance with part 121 subparts N and O. Refer to Order 8900.1, Volume 2, Chapter 5, Section 3, Phase 2—Formal Application, for detailed information regarding the upgrade curriculum requirements of § 91.1063. Refer to Order 8900.1, Volume 3, Chapter 19, Section 2, Safety Assurance System: Training and Qualification Program Approval Process, for detailed information regarding the upgrade curriculum requirements of § 135.3.

9. PIC Initial (§§ 121.419 and 121.424). The PIC initial new-hire and initial equipment curriculum requirements are amended to add training on leadership and command and mentoring.

a. Initial Ground Training. PIC initial new-hire and initial equipment ground training must include instruction and facilitated discussion on leadership and command and mentoring. Refer to Order 8900.1, Volume 3, Chapter 19, Section 5 for detailed information regarding the initial ground training requirements of § 121.419.

b. Initial Flight Training. PIC initial new-hire and initial equipment flight training must include SBT incorporating CRM and leadership and command skills. Refer to Order 8900.1, Volume 3, Chapter 19, Section 6 for detailed information regarding the initial flight training requirements of § 121.424.

c. Compliance Date. Compliance with the new initial new-hire and initial equipment curriculum requirements is required beginning April 27, 2022.

Note: Sections 91.1063 and 135.3 specify exceptions applicable to initial curriculums for certificate holders and program managers that are authorized by § 91.1063(b) or § 135.3(c) to train and qualify pilots in accordance with part 121 subparts N and O. Refer to Order 8900.1, Volume 2, Chapter 5, Section 3 for detailed information regarding the PIC initial curriculum requirements of § 91.1063. Refer to Order 8900.1, Volume 3, Chapter 19, Section 2 for detailed information regarding the PIC initial curriculum requirements of § 135.3.

10. PIC Recurrent (§§ 121.409 and 121.427). The PIC recurrent curriculum requirements are amended to add training on leadership and command and mentoring.

a. Recurrent Ground Training. PIC recurrent ground training must include instruction and facilitated discussion on leadership and command and mentoring every 36 calendar-months. PICs must have previously completed leadership and command and mentoring ground training in accordance with § 121.419, § 121.420, or § 121.429, as applicable, prior to completing recurrent leadership and command and mentoring ground training. Refer to Order 8900.1, Volume 3, Chapter 19, Section 10 for detailed information regarding the recurrent ground training requirements of § 121.427.

b. Recurrent Line-Oriented Flight Training (LOFT). Recurrent LOFT must include an opportunity for each PIC to demonstrate leadership and command skills. Compliance is required beginning April 27, 2023. Refer to Order 8900.1, Volume 3, Chapter 19, Section 10 for detailed information regarding the recurrent LOFT requirements of § 121.409.

Note: Sections 91.1063 and 135.3 specify exceptions applicable to recurrent curriculums for certificate holders and program managers that are authorized by § 91.1063(b) or § 135.3(c) to train and qualify pilots in accordance with part 121 subparts N and O. Refer to Order 8900.1, Volume 2, Chapter 5, Section 3 for detailed information regarding the PIC recurrent curriculum requirements of § 91.1063. Refer to Order 8900.1, Volume 3, Chapter 19, Section 2 for detailed information regarding the PIC recurrent curriculum requirements of § 135.3.

11. Leadership and Command and Mentoring Training for All PICs (§ 121.429). All pilots currently serving as PIC must complete ground training on leadership and command and mentoring by April 27, 2023. The Final Rule allows the FAA to credit leadership and command and mentoring training previously completed by a pilot with that certificate holder or program manager. Refer to Order 8900.1, Volume 3, Chapter 19, Section 8, Safety Assurance System: Special Training, for detailed information regarding the leadership and command and mentoring training requirements of § 121.429 and the process for a certificate holder or program manager to request credit.

Note: Sections 91.1063 and 135.3 specify exceptions applicable to current PICs with certificate holders and program managers that are authorized by § 91.1063(b) or § 135.3(c) to train and qualify pilots in accordance with part 121 subparts N

and O. Refer to Order 8900.1, Volume 2, Chapter 5, Section 3 for detailed information regarding the PIC requirements of § 91.1063. Refer to Order 8900.1, Volume 3, Chapter 19, Section 2 for detailed information regarding the PIC requirements of § 135.3.

12. Leadership and Command Training for SICs Serving in Part 121 Operations That Require Three or More Pilots (§ 121.432). SICs serving in part 121 operations that require three or more pilots must be fully qualified as PICs except for PIC Operating Experience (OE) and mentoring ground training. Therefore, these SICs are required to complete the same leadership and command training, including recurrent, as PICs. Compliance for SIC initial new-hire, initial equipment, transition or conversion curriculums is required beginning April 27, 2022. All currently qualified SICs, serving in part 121 operations that require three or more pilots, must complete ground training on leadership and command by April 27, 2023. These SICs must have previously completed leadership and command ground training in accordance with § 121.419, § 121.420, or § 121.429, as applicable, prior to completing recurrent leadership and command ground training. Refer to Order 8900.1, Volume 3, Chapter 19, Sections 5, 6, 8, and 10 for detailed information regarding the leadership and command training requirements applicable to SICs serving in operations that require three or more pilots.

13. Operations Familiarization (§ 121.435). New-hire pilots must complete operations familiarization consisting of a minimum of two operating cycles. Compliance is required beginning April 27, 2022. Refer to Order 8900.1, Volume 3, Chapter 19, Section 7 for detailed information regarding the operations familiarization requirements of § 121.435.

Note: Certificate holders and program managers that are authorized by § 91.1063(b) or § 135.3(c) to train and qualify pilots in accordance with part 121 subparts N and O are not required to comply with the operations familiarization requirements.

14. Preflight Visual Inspection (Part 121 Appendices E and F and § 121.434). Pilot training and checking of the preflight visual inspection of the exterior and interior of the airplane may be conducted using approved pictorial means. If the preflight visual inspection is conducted using pictorial means during an initial, transition, conversion, or upgrade proficiency check, the pilot must demonstrate proficiency of a complete preflight visual inspection of the exterior and interior of the airplane during OE. These changes are effective April 27, 2020. Refer to Order 8900.1, Volume 3, Chapter 19, Sections 6 and 7 for detailed information regarding approval of pictorial means for training and checking and OE requirements.

15. Pilot Recurrent Ground Training Content and Programmed Hours (§ 121.427). Pilot recurrent ground training has been aligned with the pilot initial ground training requirements for pilots who have completed the Airline Transport Pilot Certification Training Program (ATP-CTP). As a result, the existing content and corresponding programmed hours for pilot recurrent ground training have been reduced. These changes are effective April 27, 2020. Refer to Order 8900.1, Volume 3, Chapter 19, Section 10 for detailed information regarding the recurrent ground training content and programmed hour requirements of § 121.427.

16. Flight Simulation Training Device (FSTD) Conforming Changes. Part 121 subparts N and O and appendices E, F, and H are amended to remove references to simulation technology that no longer exists and to reflect the terminology currently used to identify FSTDs approved for use in part 121 training and qualification programs. Additionally, the pilot experience requirements are removed from part 121 appendix H for use of a Level C full flight simulator (FFS) during pilot training and qualification. These changes are effective April 27, 2020.

Note: The experience requirements in 14 CFR part 61, § 61.64 for use of a Level C or D FFS still apply to proficiency checks for type ratings conducted in a part 121 training and qualification program.

17. SIC Training and Checking Conforming Changes. Part 121 appendices E and F are amended to align with the current § 61.71 requirements for SICs to obtain a type rating in a part 121 training and qualification program. SIC initial new-hire, initial equipment, conversion, and transition training and checking must include the few training and checking maneuvers and procedures formerly designated in part 121 appendices E and F as PIC-only. These changes are effective April 27, 2020.

18. Pilot Transition Ground Training (§ 121.419). Pilot transition ground training is aligned with the pilot initial ground training for pilots who have completed the ATP-CTP. This change is effective April 27, 2020.

19. FE to SIC Conversion Ground Training (§ 121.419). Conversion ground training for FEs who have completed the ATP-CTP is aligned with the pilot initial ground training for pilots who have completed the ATP-CTP. This change is effective April 27, 2020.

20. Action. POIs should discuss the requirements of this notice with their assigned certificate holders and program managers.

a. Planning. POIs should encourage certificate holders and program managers to develop a plan to meet these requirements to ensure:

(1) All affected pilot curricula can be revised and approved by the compliance date.

(2) In accordance with part 121 subparts N, O, and Y and appendix H, as applicable, the flight instructors and check pilots will be appropriately trained on the revised curricula prior to conducting training or checking using the new curricula.

b. Early Compliance. Certificate holders and program managers may choose to comply early by submitting revised curricula to the FAA for approval to comply with the new requirements prior to the compliance date.

(1) Upgrade Curricula. Revised curricula must comply with all the new upgrade ground training, upgrade flight training, and upgrade proficiency check requirements to be approved. Upgrade ground training curriculum segments may not be approved separately from the upgrade flight training curriculum segments.

(2) Initial Curricula. Revised curricula must comply with all the new initial ground training and initial flight training requirements to be approved. Initial ground training curriculum segments may not be approved separately from the initial flight training curriculum segments.

c. Advanced Qualification Program (AQP). In accordance with part 121 subpart Y, certificate holders with an approved AQP must submit revised Job Task Listing, Qualification Standards Document, and Qualification and Continuing Qualification curricula, as applicable, for the additional training and checking requirements described in paragraphs 7 through 19 above.

d. Exemption 5400 and 17723. With the removal of the pilot experience requirements from part 121 appendix H as described in paragraph 16 above, Exemption 5400 and 17723 are no longer necessary. For those certificate holders currently authorized Exemption 5400 or 17723, after April 27, 2020, POIs must revise and reissue Operations Specification (OpSpec) A005, Exemptions and Deviations, to remove the applicable exemption.

e. Exemptions 4416, 17066, and 17204. With the allowance to use approved pictorial means to conduct training and checking of the preflight visual inspection, Exemptions 4416, 17066, and 17204 will no longer be necessary. However, the FAA will continue to provide relief through these exemptions for preflight visual inspection using pictorial means until April 27, 2021 to allow sufficient time for certificate holders to obtain approval under the regulations from the POI. For those certificate holders currently authorized Exemption 4416, 17066, or 17204, once the certificate holder obtains approval under the regulations, the POI must revise and reissue OpSpec A005 to remove the applicable exemption.

21. Additional References. The current editions of the following advisory circulars (AC) provide additional information regarding the leadership and command and mentoring training requirements:

- AC 121-42, Leadership and Command Training for Pilots in Command.
- AC 121-43, Mentoring Training for Pilots in Command.

22. Disposition. We will incorporate the information in this notice into Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Air Transportation Division at 202-267-8166.



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