NOTICE **U.S. DEPARTMENT OF TRANSPORTATION**
FEDERAL AVIATION ADMINISTRATION

N 8900.755

National Policy

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12/16/26

SUBJ: Title 14 CFR § 61.58 Pilot-in-Command (PIC) Proficiency Checks Conducted Through 14 CFR Part 142 Training Center Curricula

1. Purpose of This Notice. This notice provides policy, information, and direction regarding Title 14 of the Code of Federal Regulations (14 CFR) § 61.58 pilot-in command (PIC) proficiency checks that are conducted through 14 CFR part 142 training curricula and will require evaluation of approved 14 CFR § 61.58 PIC proficiency check curricula. This notice contains guidance that is pertinent to 14 CFR § 142.35. This notice serves as the interim guidance and policy until the revised policy is developed and published.

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 14 CFR part 142. The secondary audience includes 14 CFR part 142 Training Center Evaluators (TCE) and 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 the Dynamic Regulatory System (DRS) at https://drs.faa.gov. Operators and the public can find this notice on the Federal Aviation Administration's (FAA) website at https://www.faa.gov/regulations_policies/orders_notices and DRS.

4. Background. In 2022, the Air Transportation Division (AFS-200) sent an email to Training Center Program Managers (TCPM) to clarify that, under progressive checking policy, every task must be trained prior to being checked. Since the clarification in 2022, AFS-200 has received several inquiries regarding the policy in FAA Order 8900.1, Volume 3, Chapter 54, Section 1, Part 142 Training Centers: Training Center and Training Center Program Manager Overview, regarding whether training on all tasks is required for progressive checking. AFS-200 conducted a thorough review of the 2022 clarification of the progressive checking policy and determined that the policy clarification requiring training of all tasks before checking is overly restrictive and inconsistent with the intent of progressive checking. Specifically, requiring training of all tasks for the PIC proficiency check would undermine the efficiencies of progressive checking by limiting the time available to focus on critical maneuvers. Furthermore, AFS-200 finds that there is no regulatory requirement that specifically requires training of all tasks prior to conducting the PIC proficiency check. While there is no requirement to train every task to be checked, the completion of only checking events does not satisfy the requirements of 14 CFR § 142.65(d) or

§ 142.73(a) as part of an approved curriculum intended to satisfy 14 CFR § 61.58 PIC proficiency check requirements.

5. Conflicts With Other FAA Directives. The guidance in this notice may conflict with that in other FAA orders and directives. Because this notice encompasses all aspects of the conduct of PIC proficiency checks required by 14 CFR § 61.58 when conducted through 14 CFR part 142 training curricula, this notice takes precedence over other FAA orders and directives containing conflicting information. If the guidance in this notice conflicts with a statute or regulation, the statute or regulation takes precedence.

6. Definitions. The following definitions are provided to clarify their use as they pertain to this notice and 14 CFR part 142 training centers. Other training and technical terms not specifically listed, but which appear in this notice, carry the same definition and/or connotation used elsewhere within Order 8900.1, 14 CFR, and/or other appropriate FAA guidance.

   a. Additional Training. Training that occurs after the trainee has been found unsatisfactory on a task during checking or testing. For a proficiency check, additional training may be administered immediately following unsatisfactory performance on a single task or may be administered in an additional training event following an unsatisfactory proficiency check to prepare a trainee for a rechecking event. Additional training time is training, not checking.

   b. Checking. Time during which the trainee is evaluated to determine whether they possess the knowledge, risk management, and skills defined in the applicable Airman Certification Standards (ACS)/Practical Test Standards (PTS). Training and checking of tasks do not occur simultaneously because the purpose of checking is to determine whether the trainee is proficient. A TCE cannot assess an individual's independent proficiency if the individual is simultaneously receiving instruction and training on the maneuvers being checked. To preserve the integrity of proficiency testing, a TCE must clearly differentiate between training and checking maneuvers.

   c. Progressive Checking. The practice wherein training and checking modules may occur sequentially during the same event; however, to preserve the integrity of proficiency testing, a TCE must clearly differentiate between training and checking maneuvers. Progressive checking is a method tailored to provide operational-orientated training and efficient evaluation of the trainee. Progressive checking provides for an immediate evaluation of tasks conducted by the trainee in day-to-day operations and the opportunity to focus training on high-risk tasks and tasks not frequently encountered. Not all tasks that are evaluated must be trained prior. Because progressive checking allows for retraining within the event, it does not meet requirements for airman certification.

   d. Rechecking. Rechecking is checking administered after an unsatisfactory task and occurs after the trainee receives additional training.

   e. Standalone Training/Checking. The practice that separates training and checking modules into separate events.

   f. Training. Time during which the trainee receives instruction or is allowed to practice tasks while not being checked. Training and checking of tasks do not occur simultaneously because the purpose of checking is to determine whether the trainee is proficient. A TCE cannot

assess an individual's independent proficiency if the individual is simultaneously receiving instruction and training on the maneuvers being checked. To preserve the integrity of proficiency testing, a TCE must clearly differentiate between training and checking maneuvers.

   g. **Unsatisfactory Event.** Failure to satisfactorily complete the checking event due to the trainee exceeding the maximum number of unsatisfactory tasks allowed during a checking event.

   h. **Unsatisfactory Task.** Failure to achieve the standards for a task as defined in the applicable ACS/PTS.

7. Title 14 CFR § 61.58 PIC Proficiency Check Curricula. A training center may develop a curriculum that conducts training and checking separately or may choose to conduct progressive checking. However, this policy does not preclude a training center from developing other methods or utilizing other terms to describe training and checking in curricula for 14 CFR § 61.58 PIC proficiency checks.

   a. **Unsatisfactory Events.** Regardless of the method, process, or terms used, the curriculum should identify how checking will occur and address unsatisfactory 14 CFR § 61.58 PIC proficiency checks.

   b. **Failure Rate.** If the TCPM identifies training objectives that are not being met, or a higher-than-expected failure rate is observed, the TCPM may require amendment to the program in accordance with 14 CFR § 142.37.

   c. **Trainee Experience and Recency.** Multiple curricula may be developed to ensure the training and checking is appropriate to the trainee's experience, recency, type of operation, and type of aircraft being used. A streamlined training curriculum may suit a trainee with extensive experience and frequent familiarity with the aircraft type, while a more comprehensive curriculum would better serve a less experienced trainee or one who hasn't recently operated the aircraft. The curriculum's prerequisites should be used to differentiate which curriculum is appropriate for the trainee to reduce failure rates.

8. Conduct of 14 CFR § 61.58 PIC Proficiency Check. TCPMs must ensure that TCEs conducting the 14 CFR § 61.58 PIC proficiency check have a plan of action that corresponds with the type of checking being conducted.

   a. **Plan of Action.** TCPMs must ensure that the TCE's plan of action includes all required tasks identified in the appropriate ACS or PTS and additional tasks identified in the curriculum.

   b. **ACS/PTS Requirements.** TCPMs must ensure that the plan of action includes oral questioning of knowledge and evaluation of risk management as required by the ACS/PTS.

   c. **Ground Portion.** The ground portion of the proficiency check allows the TCE to determine whether the trainee is sufficiently prepared to advance to the flight portion of the proficiency check.

9. Curriculum Submissions. Each curriculum submitted for approval must meet the requirements of 14 CFR § 142.39 and include the following:

   a. **Prerequisites.** The TCPMs must evaluate whether the 14 CFR § 61.58 PIC proficiency check curricula include the following prerequisites:

        (1) The curricula should state the specific trainee prerequisites for entry into each curriculum.

        (2) Prerequisites should include specific flight experience (including currency), previous training, minimum pilot certification, and qualifications. Prerequisites and training should be those that prepare the trainee for success in the proficiency check.

        (3) The training center should demonstrate the adequacy of the training and prerequisites as part of its implementation and evaluation plan.

        (4) Prerequisite experience must be recorded in accordance with 14 CFR § 142.73.

   b. **Unsatisfactory Checking Events.** The curriculum should describe the process for unsatisfactory checking events, subsequent additional training, and rechecking. Curricula must include checking of all tasks identified in the applicable ACS/PTS. (Refer to the PIC proficiency check described in 14 CFR § 61.58(d)(1).)

   c. **Meet or Exceed ACS/PTS.** Curricula may include a provision that if the trainee is checked and found to meet or exceed the ACS/PTS on normal tasks, the trainee may consider those tasks completed satisfactorily and the trainee need not repeat that task or set of tasks in subsequent modules.

   d. **Certification Curriculum.** Curricula created to satisfy 14 CFR § 61.58 PIC proficiency check requirements may not result in certification. This does not preclude a type rating certification check to count toward a PIC proficiency check under 14 CFR § 61.58(d)(2).

   e. **Training and Checking.** Curricula must contain both training and checking events. Curricula that does not contain both must not be approved. While there is no requirement to train every task to be checked, the completion of only checking events does not satisfy the requirements of 14 CFR § 142.65(d) or § 142.73(a) as part of an approved curriculum intending to satisfy 14 CFR § 61.58 PIC proficiency check requirements.

   f. **Conduct of Checks.** Instructors may not conduct any checks. Checks must be performed by a TCE or by the Administrator.

   g. **Special Emphasis Items.** The curriculum must include (if applicable) items identified in the Flight Standardization Board Report (FSBR) as recommended/required, Original Equipment Manufacturer (OEM) items required by the Aircraft Flight Manual (AFM) or Rotorcraft Flight Manual (RFM), and FAA-identified special emphasis items. To support required checking, the following items are recommended as part of the training syllabus:

   (1) Abnormal procedures.

   (2) Emergency procedures.

(3) Events not frequently observed by the crew during normal operations, and items found to have a high failure/retraining rate (such as from quality management system data).

(4) Flight Standardization Board (FSB)-identified training events.

(5) AFM/RFM-required events.

(6) Events identified by current accident statistics (e.g., circling approaches).

(7) High-altitude airport operations.

(8) Complex departure and arrival procedures.

(9) Ground proximity warning systems (GPWS) and Traffic Alert and Collision Avoidance Systems (TCAS).

(10) Recognition of and recovery from a full stall.

(11) Upset prevention and recovery.

(12) Engine and airframe icing.

(13) Takeoff and landing with gusting crosswinds.

(14) Recovery from a bounced landing.

h. Flight Simulation Training Devices (FSTD). Some training or checking items may require an FSTD to have 14 CFR part 60 Directive 2 qualification. Title 14 CFR part 60 Directive 2 qualification can be found in the Statement of Qualification (SOQ). FSTDs must be approved by the TCPM with consideration of 14 CFR § 142.59(a)(1) and any limitations properly documented.

10. Determination and Handling of Unsatisfactory Events. Should a trainee not satisfactorily meet the ACS/PTS on any task, the trainee will receive additional training prior to being rechecked on that task. The TCE administering the check may provide additional training as the instructor. The check will be determined to be unsatisfactory using the following criteria:

a. Single Tasks. If the trainee demonstrates unsatisfactory performance on the first checking attempt for the task, the trainee may receive additional training and subsequently be rechecked one time for that task. If the trainee is found unsatisfactory during the recheck for the task, this will result in the event being unsatisfactory for the trainee's 14 CFR § 61.58 PIC proficiency check.

b. Two Separate Tasks. The trainee may receive retraining and be rechecked on two separate tasks. After receiving retraining and rechecking on two separate tasks in accordance with subparagraph 10a above, any unsatisfactory performance by the trainee on any subsequent tasks will result in an unsatisfactory event for the trainee's 14 CFR § 61.58 PIC proficiency check.

   c.   Unsatisfactory Event. When a trainee receives an unsatisfactory event of the 14 CFR § 61.58 PIC proficiency check conducted, the trainee's records must show that the event is unsatisfactory, and the trainee should be provided additional training on the unsatisfactory tasks before attempting a recheck. The trainee may receive credit for all previous satisfactory ground training.

   d.   Failure of Subsequent Events. A trainee who fails subsequent events will have appropriate entries made in their record showing the unsatisfactory performance.

   e.   Retraining and Rechecking. If a checking event is halted to conduct additional training, the examiner must verbally convey to the trainee a clear separation between the retraining of the task and the rechecking of the task.

   f.   Additional Training. Additional training does not require a specific lesson plan. When conducting additional training, the training center must follow its quality control (QC) measures submitted with its curriculum(s).

11. Recordkeeping. The training center must record all training and checking events in the approved curriculum in accordance with 14 CFR § 142.73.

   a.   Tasks Trained and Checked. Title 14 CFR § 61.58 PIC proficiency check curricula records should record the trainee's performance on each task trained, each task checked, and clearly identify:

      (1) Tasks for which the trainee was trained and found to satisfactorily meet training objectives;

      (2) Training provided beyond the curriculum's allotted training hours for trainees who have not been found to meet the training objectives in the allotted training hours provided by the curriculum;

      (3) Checking, including whether the trainee's performance on each checked task was satisfactory or unsatisfactory. When unsatisfactory tasks are identified, there must be a record of additional training and rechecking for at least the task(s) found to be unsatisfactory;

      (4) Completed additional training; and

      (5) Rechecking.

   b.   Performance. Title 14 CFR § 61.58 PIC proficiency check training/checking records must contain and clearly identify the performance of the trainee during each lesson/module.

      (1) For ground training records:

         (a) A trainee's performance is determined by attendance of each training lesson/module and the evaluation of training objectives.

(b) The evaluation of each lesson/module may be assessed through a final test that contains all lessons/modules or through testing after each lesson/module.

(c) The performance record must clearly indicate if the trainee has satisfactorily achieved all ground lesson/module training objectives.

(d) The performance record must include the name of the instructor providing instruction for each lesson/module.

(2) For distance learning ground training:

(a) Records must show that the trainee attended the distance learning module either electronically recorded through a personal sign-in, instructor confirmation for virtual classroom applications, or onsite computer-based training (CBT).

(b) Training must be validated by an instructor and that instructor's name must be recorded in the trainee's file. In addition, evaluations and additional training must be recorded, as applicable. These actions would satisfy the requirements of 14 CFR § 142.73(a)(5) and (7) for offsite records.

(3) For flight training records:

(a) The records must include the trainee's performance in each lesson and the instructor providing the training. The records should identify if the trainee is progressing normally, is deficient, or has achieved all lesson/module training objectives.

(b) The records should include the tasks that are trained and identified in the lesson plan/module (training period).

(c) The records should include a performance indicator identifying the trainee's performance in relation to the established training objectives for each task.

(d) Training records should be easily distinguishable from checking records. This can be accomplished by formatting, grading scales, column separation, and other methods.

(e) The records should include training provided beyond the curriculum's planned training hours.

(4) For flight checking records:

(a) The records should include the trainee's performance on each task and must indicate the evaluator conducting the check. Checking records should be easily distinguishable from training records. (This can be accomplished by formatting, grading scales, column separation, and other methods.)

(b) The records should indicate the events that are checked and identified in the plan of action and applicable tasks in the ACS/PTS.

(c) The records should include a performance indicator identifying the trainee's performance in relation to the established checking standard for each task.

(d) All checking attempts and each attempt must be recorded as satisfactory or unsatisfactory.

(e) The record must indicate checking that was unsatisfactory and the subsequent additional training and rechecking.

> *1.* The records should include the tasks that were retrained,
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> *2.* The records must include the number of hours of additional training,
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> *3.* The records should indicate proficiency has been achieved in each event/task,
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> *4.* The records must include the results of any rechecking, and
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> *5.* The records should identify all items in which the trainee was provided additional training.

(f) Trainee records described above may be required to be retained in accordance with 14 CFR part 111.

12. QCs and Evaluation Plans. QCs submitted with the curriculum must establish or address the following:

   a. Multiple Failures. The TCPM should validate that the training QC measures required by 14 CFR § 142.11(b) include immediate notification to the TCPM when a trainee receives an unsatisfactory result on two consecutive 14 CFR § 61.58 PIC proficiency checks. The TCPM will determine appropriate follow-up actions when receiving these notifications.

   b. Disenrollment. If the trainee disenrolls from the curriculum, the trainee's performance in each lesson and the name of the instructor providing instruction must be included in the training records in accordance with 14 CFR § 142.73(a)(5); for reasons other than performance deficiencies, the records must show that the curriculum was incomplete. Disenrollment should not be used for unsatisfactory performance during the 14 CFR § 61.58 PIC proficiency check. Disenrollment should be used for circumstances beyond the control of the trainee or any time before the standalone training/checking or progressive check.

   c. QCs and Evaluation Plans for Progressive Checking. For progressive checking, the training center must submit QC measures and evaluation plans. The measures and plans should establish procedures and validate their effectiveness of the curriculum, including:

   (1) Procedures to prevent training credit during checking.

   (2) Procedures to prevent checking in place of required training.

(3) Procedures to advise the trainee when training or checking is taking place. This is to avoid confusion for the trainee so that they clearly understand when training or checking is occurring.

   d. Prerequisite Experience. The training center should develop QCs with processes for how the training center will determine the depth and breadth of the curriculum based on the trainee's prerequisite experience with consideration to the following:

   (1) The duration of the curriculum/course and number of sessions (flight training period—each flight period is defined by an associated lesson/evaluation plan) is dependent upon the complexity of the aircraft and the prerequisite experience of the trainees enrolled.

   (2) The training center should justify why a trainee would be prepared to succeed in a curriculum of specific depth and breadth, ensuring the training matches the experience and recency of a trainee.

   e. Effectiveness of the Curriculum. The QC measures should include methods to evaluate the effectiveness of the curriculum, including:

   (1) Evaluation of learning sessions to ensure appropriate duration for the complexity of the learning objectives.

   (2) Evaluation to determine adequate rest is provided between training sessions to prevent the degradation of the quality of training or evaluation.

13. TCPM Actions. TCPMs should conduct evaluations of the current training center curricula to ensure regulatory compliance and ensure that TCEs conduct PIC proficiency checks in accordance with this notice.

   a. TCPM Evaluation. Within 6 months of the publication date of this notice, TCPMs should evaluate currently approved 14 CFR § 61.58 PIC proficiency check curricula and ensure that the curricula satisfy the standards for the 14 CFR § 61.58 PIC proficiency check as identified in this notice.

   b. Updates and Requesting Extensions. If the training program requires updates, the TCPM may provide the training center up to 12 months from the date of notification to make the necessary changes and receive approval. If a training center is unable to make updates within the initial 12 months, the training center may request an extension of up to 12 months from the TCPM. The TCPM must request and receive AFS-200 concurrence before granting an extension. All extension requests should be sent to AFS-200 at 9-AFS-200-Correspondence@faa.gov. Once curriculum updates are made, training centers must ensure TCEs are trained on the revised 14 CFR § 61.58 PIC proficiency check curriculum.

14. Disposition. We will incorporate the information in this notice into the applicable sections of Order 8900.1 before this notice expires. Direct questions or comments concerning the information in this notice to AFS-200 at 202-267-8166, or via email at 9-AFS-200-Correspondence@faa.gov.

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