



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

55 M Street  
Washington, D.C. 20003

APR 26 2016

Dear Flight Instructor Refresher Course (FIRC) Provider:

In June of 2015, Federal Aviation Administration (FAA) Order 8000.373, Compliance Philosophy, became effective. This order, in conjunction with additional FAA guidance, directly supports the agency's Risk- Based Decision-Making approach to compliance. The FAA intends for the implementation of the Compliance Philosophy to accomplish the following:

- Manage risk through identification and control of existing or emerging safety issues;
- Place emphasis on effective compliance by focusing on how certificate, approval, authorization, license, or permit holders ensure compliance;
- Foster an open exchange of information between the FAA and the aviation community to allow safety problems to be understood and appropriately addressed;
- Encourage a problem solving approach to finding and fixing problems in the National Airspace System (NAS);
- Establish the expectation that NAS participants utilize safety management system constructs to identify risks; and,
- Clarify the difference between Compliance and Enforcement.

The Compliance Philosophy recognizes that enforcement is only one option when addressing an apparent deviation from regulatory standards. While the FAA will still use enforcement actions when necessary or required, additional tools, called compliance actions, are also available. The FAA can use compliance actions, instead of enforcement actions, for many deviations that occur.

Flight and ground instructors will play a pivotal role in promoting the concepts of the Compliance Philosophy within the aviation community. This is especially true for incorporating risk controls and safety management into pilot training, and instructors are a key component in the remedial training process. For this reason, providing instructors with relevant information on the Compliance Philosophy is vital to the success of the new policy and for increasing safety in the NAS.

The FAA is encouraging FIRC providers to provide Compliance Philosophy training to attendees, ideally through an entire elective lesson. Participating FIRC providers may draw from the example lesson plan included with this letter. Please recall that the FAA must approve any final lesson material prior to presentation, per Advisory Circular (AC) 61-83H,

*Nationally Scheduled, FAA-Approved, Industry-Conducted Flight Instructor Refresher Course*, for additional information.<sup>1</sup>

In addition to an elective lesson, it is permissible and encouraged to incorporate the information on the Compliance Philosophy into the core lesson on 'Regulatory, Policy, and Publications Changes and Updates.' Also, FIRC providers are encouraged to mention the withdrawal of Compliance and Enforcement Bulletin No. 2014-1, which the agency effected through the release of FAA Order 2150.3, Change 11. The withdrawal of this bulletin allows the FAA to utilize compliance actions when addressing deviations from security airspace Notices to Airmen. FIRC provider can present this information in an elective lesson on the Compliance Philosophy, the core lesson noted above, or the core lesson on 'Security-Related Special Use Airspace (SUA).'

Thank you for your consideration of providing Compliance Philosophy training to your attendees. By making a choice do so, you will help make the implementation of the Compliance Philosophy successful.

Sincerely,



*For* James A. Viola  
Manager, General Aviation and Commercial Division, AFS-800

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<sup>1</sup> AC 61-83H allows for amendments to the core lesson on 'Regulatory, Policy, and Publications Changes and Updates' without prior approval. As provided on page 5 of Appendix 1, "The provider is expected to immediately update their presentation materials to reflect any changing regulations or policies to stay completely up to date at all times. The provider may make such changes to this topic content without prior approval at any time, provided such changes accurately reflect the current regulatory or policy state."