From: David Oord
To: 9-AWA-ARAC (FAA)
Cc: Brian Koester
Subject: Re: FW: Draft Email for TSWG AR Clarification
Date: Monday, April 29, 2024 3:23:32 PM

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon - thank you for the follow-up, I appreciate it.

Yes, the request for added specificity from the TSWG on its recommendation for Adaptive Recurrent (AR) polity is received. With that, I am looping in Brian Koester (cc'd) so he can take the action to the TSWG for its review and input. Brian, if you need any help or have any questions, please let me know.

Best regards,
Dave

On Mon, Apr 29, 2024 at 2:18 PM 9-AWA-ARAC (FAA) <9-awa-arac@faa.gov> wrote:

> Good Afternoon Dave,
>
> We are just following up with you to ensure that you have acknowledged that the FAA is requested added specificity from TSWG on the Adaptive Recurrent Policy.
>
> Please let us know if you have any questions.
>
> ---
>
> **From:** 9-AWA-ARAC (FAA)
> **Sent:** Thursday, April 18, 2024 7:52 AM
> **To:** David Oord <david.oord@wisk.aero>
> **Subject:** FW: Draft Email for TSWG AR Clarification
>
> Good Morning Dave,
>
> The AFS-280 Standardized Curriculum policy team is in receipt of the March 2023 FAA Aviation Rulemaking Advisory Committee Training Standardization Working Group (TSWG) Recommendation Report. The TSWG recommended Adaptive Recurrent (AR) Policy for FAA's consideration as outlined in Appendix A. The following list is an example of TSWG's proposed Adaptive Recurrent policy statements from the report that do not have detailed procedures. These examples below are not an exhaustive list. Before FAA can

develop comprehensive guidance and AR policy, TSWG must provide more detailed information about the structure, methodologies and proposed procedures of several aspects of AR policy.

Please see the below email for added specificity.

From: Tarkington, Joshua (FAA) <Joshua.Tarkington@faa.gov>
Sent: Friday, April 5, 2024 2:09 PM
To: 9-AWA-ARAC (FAA) <9-awa-arac@faa.gov>
Cc: Nasr, Elie T (FAA) <Elie.T.Nasr@faa.gov>; Sapoznik, James (FAA) <James.Sapoznik@faa.gov>
Subject: FW: Draft Email for TSWG AR Clarification

Hello

Please see the updated draft request based on feedback from the meeting with ARM-2 with the original farther down the thread:

1. Ground School

   The recommendation report proposes a new concept to omit hours and to base training solely on learning objectives, including training outside the classroom. Please provide further clarification for this new concept, especially with regard to methodology for computer-based training, and recordkeeping of training records.

2. Supplemental Grading Criteria

   A 4-point grading scales for training events was proposed but the TSWG has not outlined the procedures that will be used to implement such a different type of grading system. Please provide a sample grading sheet with grading scales to illustrate how the grading system is used for either training, checking, or both, and a suggested process for extracting the data and using it for continuous improvement.

3. Scenarios

   The recommendation report proposes training and checking that focuses on day-to-day operationally based scenarios that are developed, regularly evaluated, and updated by the

SC Continuous Improvement Team. Further clarification is needed on the suggested process for initial development of scenarios and standardization between training centers and organizations, i.e., methodology for managing the regular evaluation and revision of scenarios on a regular basis that supports continuous improvement.

4. Oral Exam Split Across Multiple Days

One section of the recommendation report suggests the FAA develop new guidance for Standardized Curriculum that supports completing the oral exam over multiple days, rather than the traditional method of completing the oral portion prior any flight checking. Further clarification is needed on the suggested process for conducting this multi-day oral examination process within adaptive recurrent.

5. Incomplete FSTD Events

Clarification is needed to address incomplete simulator events. In cases of incomplete FSTD events, the pilot may not have completed all required checking events. How will these incomplete checking events be recorded? How will certificate holders and training centers ensure regulatory requirements are met with respect to using pilots as flight crewmember in operations when they have not demonstrated satisfactory performance of all required maneuvers?

Please let me know if there are further questions/concerns.

Thanks

Josh

Joshua R. Tarkington

FAA, Aviation Safety

Flight Standards Service

Air Transportation Division

Training & Simulation Group, AFS-280

Policy Support and Implementation Section

860-709-3839 (Eastern Time)

From: Tarkington, Joshua (FAA)
Sent: Monday, March 25, 2024 3:38 PM
To: 9-AWA-ARAC (FAA) <9-awa-arac@faa.gov>
Cc: Cooper, Thuy (FAA) <Thuy.Cooper@faa.gov>; Duckett, Aliah D (FAA) <Aliah.D.Duckett@faa.gov>; Nasr, Elie T (FAA) <Elie.T.Nasr@faa.gov>; Sapoznik, James (FAA) <James.Sapoznik@faa.gov>
Subject: Draft Email for TSWG AR Clarification

Hello

Below is the recommended email we would like to have published for TSWG response:

The AFS-280 Standardized Curriculum policy team is in receipt of the March 2023 FAA Aviation Rulemaking Advisory Committee Training Standardization Working Group (TSWG) Recommendation Report. The TSWG recommended Adaptive Recurrent (AR) Policy for FAA's consideration as outlined in Appendix A. The following list is an example of TSWG's proposed Adaptive Recurrent policy statements from the report that do not have detailed procedures. These examples below are not an exhaustive list. Before FAA can develop comprehensive guidance and AR policy, TSWG must provide more detailed information about the structure, methodologies and proposed procedures of several aspects of AR policy.

1. **Continuous Improvement.**

   A section of the report describes continuous improvement of SC training and its scenarios. The policy team seeks more detailed information and clarity from the TSWG regarding methodology to be used, shared definitions that are needed, and methods for how to collect and share the data that will be used for training and scenario improvements. The policy team is also seeking information such as the type of revision record the industry prefers for proper documentation, recordkeeping and archiving purposes. The TSWG also must define the actors in the process, i.e., which group gathers the data, where to enter the data that is gathered, who or which group will analyze it and determine how to use it for continual improvement, etc.

2. **Ground School.**

The policy team need more detailed information for the ground school section of AR:

- One section of the recommendation report describes ground school, but lacks sufficient information for the policy team to begin work. A concept was proposed to omit hours and to base training solely on learning objectives. However, there was no data that supports a departure from current Flight Standards policy. The suggested ground school portion of AR policy has no proposed procedures detailed in the recommendation report to accompany its training policy statement. The recommendation report lacks a methodology for recordkeeping of training records. The recommendation suggests training may be completed outside the classroom but offers no details for how to accomplish. This is not enough information for the policy team to develop comprehensive guidance and AR policy.
- One section of the recommendation report describes ground school being taught on a rotating basis and that some learning may occur outside ~~of~~ the classroom, via computer based training or other mechanisms. While the policy intent of industry is clear, no comprehensive process was proposed to accomplish training outside the classroom. No subject matter was identified to be taught in anything other than the current yearly requirement. In addition, no specifics were provided with respect to pilots who may leave a company in the middle of a training cycle and go to a different company at a different stage of the cycle. While there is no regulatory requirement that each training element of initial training be repeated during each period of recurrent training, there is not enough information for the policy team to develop comprehensive guidance and AR policy.

3. **Supplemental Grading Criteria.**

One section of the recommendation report suggests 4-point grading scales and rubrics for training events. The FAA uses grading scores/scales, etc., and does not currently use the term "rubric." The policy team is unsure if the different grading scales are intended to be used for both training and checking. And if so, how will data analysis be as used? The grading forms must be the same for all the data to be aggregated and properly used for continuous improvement. The TSWG also must define the actors defined in the process, i.e., which group gathers the data, where to enter the data after it's gathered, who or which group will analyze it and determine how to use it for continual improvement, etc. The TSWG has not clearly outlined the procedures that will be used to implement such a vastly different type of grading system, in addition, there was no data provided that supports such a departure from current Flight Standards policy.

4. **Scenarios**

The recommendation report proposes training and checking that focuses on day-to-day operationally-based scenarios that are developed, regularly evaluated, and updated by the SC Continuous Improvement Team. The TSWG has not assigned an individual or

group with responsibility for initial development of scenarios. Also lacking is a basis for standardization between training centers and organizations. Industry intent for scenario development must include proposed content and a methodology for managing the regular evaluation and revision of scenarios on a regular basis that supports continuous improvement.

5. **Oral Exam Split Across Multiple Days**

One section of the recommendation report suggests the FAA develop new guidance for ~~the~~ Standardized Curriculum that supports completing the ground school portion over multiple days, rather than the traditional method of completing the oral portion prior any flight checking. While the policy team does not disagree with this premise, clarification is needed with respect to industry's intent and vision for how to implement this multi-day oral examination process within adaptive recurrent. Currently, there is not enough information for the policy team to develop comprehensive guidance and AR policy.

6. **Incomplete FSTD Events**

TSWG must provide clarification with respect to industry's intent and vision to address incomplete simulator events. An incomplete SIM event could occur for many reasons, some of which may be the result of simulator mechanical issues or slow pilot progression. In all cases of incomplete FSTD events, the pilot has not completed all required checking events. How will these incomplete checking events be recorded? How will certificate holders and training centers ensure the requirements of §135.301 are met with respect to using pilots as flight crew members when they have not demonstrated satisfactory performance of all required maneuvers?

Thanks

Josh

Joshua R. Tarkington

FAA, Aviation Safety

Flight Standards Service

Air Transportation Division

Training & Simulation Group, AFS-280

Policy Support and Implementation Section

860-709-3839 (Eastern Time)