

**Air Carrier Training Aviation Rulemaking Committee (ACT ARC)**

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**Recommendation 15-6: Helicopter Air Ambulance (HAA) Operator Training Programs**

**I. Submission**

The recommendation below was submitted by the Air Carrier & Contract Training Workgroup (AC&CT WG) for consideration by the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) Steering Committee on the May 29, 2015 Steering Committee Telcon (TEL-4). The ACT ARC Steering Committee adopted the recommendation with unanimous consent, and the recommendation is submitted to the Associate Administrator for Aviation Safety (AVS-1) as ACT ARC Recommendation 15-6.

**II. Statement of the Problem**

The Federal Aviation Administration (FAA) Helicopter Air Ambulance (HAA) II Rulemaking Team posed a series of questions to the ACT ARC to obtain industry input for a Congressionally-mandated rulemaking and development of the associated guidance material. The following questions related to HAA Training Programs were included in Part II of that tasking:

- What elements should be included in an HAA pilot training program?
- What is different about an HAA operator's pilot training program than that of another part 135 helicopter operator?

After the ACT ARC Steering Committee assigned the task to the AC&CT WG, the AC&CT WG formed the Helicopter Air Ambulance Training Action Team, which included industry subject matter experts to review, discuss, and propose recommendations in response to the questions posed.<sup>1</sup> The AC&CT WG previously proposed recommendations associated with Part I of the FAA tasking. (See ACT ARC Recommendations 15-3 and 15-4.) Those recommendations were adopted by the ACT ARC Steering Committee (with amendments) during the Steering Committee Meeting held in January 2015, and submitted to the Associate Administrator for Aviation Safety (AVS-1) on April 10, 2015. The FAA accepted Recommendations 15-3 and 15-4 and assigned them to the Air Transportation Division (AFS-200) for action. The recommendations were provided to the Commuter, On Demand, and Training Center Branch (AFS-250), which is the Office of Primary Responsibility (OPR) for the HAA II rulemaking and HAA policy.

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<sup>1</sup> The HAA Training Action Team included subject matter experts representing operators and industry associations: Air Evac Lifeteam, Air Medical Operators Association (AMOA), Air Methods, California Shock Trauma Air Rescue (CALSTAR), Helicopter Association International (HAI), Metro Aviation, National EMS Pilots Association (NEMSPA), and PHI Air Medical.

### III. Proposed Recommendation

The ACT ARC Steering Committee proposes the following recommendation for FAA consideration:

The ACT ARC recommends the FAA develop guidance material that suggests the following modules/elements be included in an Helicopter Air Ambulance (HAA) operator training program, in addition to the requirements applicable to all 14 CFR Part 135 operators:

- a. Overview of Helicopter Air Ambulance (HAA) Operations
- b. Preflight Preparation for Unscheduled Departures
- c. Point-in-Space Approaches
- d. Airspace
  - Multi Aircraft Operations
  - Integration of Instrument Flight Rules(IFR) / Visual Flight Rules (VFR) Traffic
- e. Regulations
  - 14 CFR Part 135, Subpart L
- f. Single-Pilot Resource Management (SRM)
  - Workload
  - Multitasking
  - Distractions
- g. Definitions
  - Air Medical Resource Management (AMRM) / Crew Resource Management (CRM)
  - Helicopter Night Vision Goggle Operations (HNVGO)
  - Operation Control Center (OCC)
- h. Medical Equipment in Use
  - Installed and Carry-on
  - Associated hazards (Oxygen, etc.)
- i. Aircraft performance considerations
  - Loading/Weight and Balance
- j. NVG considerations
  - Off-Airport Landing NVG
  - NVG Use by Medical Personnel

### IV. Rationale

The HAA Training Action Team reviewed current regulatory requirements for Part 135 operators, the new requirements in 14 CFR Part 135 Subpart L, and current FAA guidance material, including Advisory Circular (AC) 135-14B, Helicopter Air Ambulance Operations (3/26/15) during the discussions that lead to the recommendation above.

The HAA Training Action Team developed the proposed Training Program outline cited in the Recommendation after consideration of the differences between an HAA operator's training program and that of another Part 135 operator. The differences included: continuous operational readiness requirements; the unique aspects of air ambulance operations (including day-to-day air operation training), soft skills (e.g., public impression and trust, customer service, public relations); incorporating an objective continuous risk assessment process; including medical personnel; and operational pressures (e.g., life and limb considerations).

The HAA Training Action Team members also noted that most of their training programs already incorporate all of the modules/elements listed in the recommendation.

## V. Background Information

### ACT ARC Initiative:

ACT ARC Recommendation 15-6 addresses Part II of the tasking associated with the following Steering Committee Initiative:

Initiative #31: Develop guidance for Helicopter Air Ambulance (HAA) operations under 14 CFR part 135 with regard to:

- HAA Pilot Training Program curriculums
- Incorporating Line Oriented Flight Training (LOFT) into pilot training curriculums
- Crew Resource Management (CRM) training

### Source Requirement:

Public Law 112-95, § 44730. Helicopter air ambulance operations

§ 44730(e). SUBSEQUENT RULEMAKING.—

(1) IN GENERAL.—Upon completion of the rulemaking required under subsection (b), the Administrator shall conduct a follow-on rulemaking to address the following:

(A) Pilot training standards, including—

- (i) mandatory training requirements, including a minimum time for completing the training requirements;
- (ii) training subject areas, such as communications procedures and appropriate technology use; and
- (iii) establishment of training standards in—

(I) crew resource management;

(II) flight risk evaluation;

(III) operational control of the pilot in command; and

(IV) use of flight simulation training devices and line-oriented flight training.

(B) Use of safety equipment that should be worn or used by flight crewmembers and medical personnel on a flight, including the possible use of shoulder harnesses, helmets, seatbelts, and fire resistant clothing to enhance crash survivability.

(2) DEADLINES.—Not later than 180 days after the date of issuance of a final rule under subsection (b), the Administrator shall initiate the rulemaking under this subsection.

(3) LIMITATION ON CONSTRUCTION.—Nothing in this subsection shall be construed to require the Administrator to propose or finalize any rule that would derogate or supersede the rule required to be finalized under subsection (b).

Note: Reference *Helicopter Air Ambulance, Commercial Helicopter, and Part 91 Helicopter Operations Final Rule* ([79 FR 9932](#) published February 21, 2014—effective date extended to April 22, 2015) for Congressionally mandated rulemaking required by P.L. 112-95 § 44730(b).