

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

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**Recommendation 15-9: Aircraft-Specific Part 135 Standardized Curriculum Model**

**I. Submission**

The recommendations below were submitted by the Air Carrier & Contract Training Workgroup (AC&CT WG)<sup>1</sup> for consideration by the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) Steering Committee at F2F-6. The ACT ARC Steering Committee adopted the recommendations with unanimous consent, and they are submitted to the Associate Administrator for Aviation Safety (AVS-1) as ACT ARC Recommendation 15-9.

**II. Statement of the Problem**

Under the current regulatory structure (and consistent with existing guidance material), Title 14 of the Code of Federal Regulations (14 CFR) Part 135 operators are permitted to send their personnel to a Part 142 Training Center. Pursuant to 135.324(b), a certificate holder may contract with, or otherwise arrange to use the services of, a training center certificated under part 142 to conduct training, testing, and checking required by part 135 if the training center—

- (1) Holds applicable training specifications issued under part 142;
- (2) Has facilities, training equipment, and courseware meeting the applicable requirements of part 142;
- (3) Has approved curriculums, curriculum segments, and portions of curriculum segments applicable for use in training courses required by part 135; and
- (4) Has sufficient instructor and check airmen qualified under the applicable requirements of §§135.337 through 135.340 to provide training, testing, and checking to persons subject to the requirements of part 135.

There are some limitations under which the 142 training center can deliver training to Part 135 operators based on the manner in which Part 142 was promulgated. Under 142.45, the applicability of Subpart C (Personnel and Flight Training Equipment Requirements) of part 142 is limited to: “the personnel and flight training equipment requirements for a certificate holder that is training to meet the requirements of part 61 of this chapter.”

The scope of the recommendations proposed by the AC&CT WG is limited to pilot training. Pilot training requirements are enumerated in 135.329 and further specified in 135.330, 135.331, 135.345, 135.347, and 135.351. The ground training requirements can be divided into two distinct sets—general ground training (including non aircraft-specific subjects) and aircraft-specific ground training (including aircraft systems and systems integration modules).

Generally, most 135 operators who use 142 training centers to deliver training to their pilots are asking the 142 training center to deliver aircraft-specific ground and flight training, as well as 135.293(a)(2)(3)&(b) and 135.297 checks. As a practical matter, 142 training centers have developed “templates” for 135 operators to use in developing these portions of the operator’s training program to ensure the operator’s training program aligns with the training delivered by the 142 training center.

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<sup>1</sup> The AC&CT WG is comprised of ACT ARC Steering Committee Members including 135 operators, 142 training centers, and membership organizations/industry associations. The AC&CT WG Standardized 135 Pilot Training Curriculum Action Team developed these recommendations with input from industry subject matter experts (SME) who are represented by membership organizations/industry associations on the ACT ARC Steering Committee.

Under the current framework, the argument is often made that if the operator “trains” the 142 training center instructors/evaluators to deliver the “operator’s” training program when the operator contracts with the training center, those 142 training center instructors/evaluators can train future 142 training center instructors/evaluators to deliver those portions of the operator’s training program which happen to align with the 142 training centers curriculum.

When part 142 was promulgated, the applicability of subpart C was never fully aligned through rulemaking with the provisions of 135.324, and current legal interpretations limit 142 training centers to using core curriculums (approved under 14 CFR Part 142) only for pilot certification under part 61. There is no current methodology under which 142 training centers provide training, testing, and checking under part 135—142 training centers can deliver a 135 operator’s training program to that operator’s pilots. As a practical matter, the aircraft ground and flight training portions of that operator’s training program align exactly with the 142 center’s Part 61 core curriculum; however, the distinction is important from a regulatory perspective. The training program, the instructors and the contract check airmen (training center evaluators (TCE)) belong to the operator. The operator submits the training program to the operator’s Principal Operations Inspector (POI), and the POI issues a Letter of Approval (LOA) for each contract check airman. Essentially, the aircraft ground and flight training portions of the operator’s training program (which align with the 142 center’s core curriculum) are reviewed by dozens of POIs across the country for approval under Part 135 after being approved by a Training Center Program Manager (TCPM) under Part 142. In addition, each TCE is submitted by each operator to that operator’s POI for consideration and issuance of an LOA by the POI to conduct testing and checking for that operator under Part 135 (even though the TCE is deemed qualified and authorized as a TCE by the TCPM under Part 142). While the regulatory requirements differ under Part 61 and Part 135, the administrative inefficiencies result in an ineffective deployment of resources on the part of the FAA and the operator.

In addition, differences in terminology and requirements applicable to part 135 vs. part 142 instructors and part 135 check airmen vs. part 142 evaluators have caused a number of administrative inefficiencies for 135 operators and 142 training centers. The non-alignment of the regulations and guidance documents can lead to inconsistent application of regulatory requirements by FAA personnel (POIs for 135 operators and TCPMs for 142 training centers) and conflicting guidance material published by the FAA.

Rather than continue this inefficient model, the ACT ARC tasked the AC&CT WG to address the challenges associated with the current guidance and application of the existing regulatory framework for contract training delivered by 142 training centers to 135 operators. In order to address the issues raised, the AC&CT WG developed a scope of work with defined short-term and long-term deliverables. The package of recommendations presented at F2F-4 and adopted by the Steering Committee as Recommendations 15-1 and 15-2 was designed to address the short-term deliverable of recommendations on check airman/evaluator and instructor qualifications and training to address administrative inefficiencies. ACT ARC Recommendations 15-1 and 15-2 were adopted based on the foundational assumption that 142 training center instructors and evaluators would be conducting training, testing, and checking for 135 operators using FAA-approved standardized curriculums that meet all the applicable regulatory requirements under Part 135.

The AC&CT WG developed this package of recommendations (consolidated Proposed Recommendation AC&CT-11) to complete its initial tasking and propose the framework for the Aircraft-Specific Part 135 Standardized Curriculum Model.

### **III. & IV. Recommendations & Rationale**

The ACT ARC submits the following recommendations on the development, structure, implementation, evaluation, and continuous improvement of the Aircraft-Specific Part 135 Standardized Curriculum Model for FAA consideration:

#### Proposed Recommendation AC&CT-11(a): Curriculum Development

The ACT ARC recommends the FAA develop guidance to establish a new Aircraft-Specific Part 135 Standardized Curriculum Model which will include standards for the development of a single curriculum (by type that addresses each variant, as appropriate) comprised of aircraft-specific ground training and flight training, together with 135.293(a)(2),(3)&(b) and 135.297 checks, approved by the FAA (at the national level) for 135 operator training conducted by a part 142 training center.

- The process for developing the aircraft ground training and flight training should include a team of subject matter experts from 135 operator(s), 142 training center(s), the aircraft manufacturer, and the FAA.
- The standardized aircraft ground and flight training should meet the applicable 14 CFR parts, as well as the requirements of the relevant technical documents including, but not limited to the Airplane Flight Manual (AFM), Flight Standardization Board (FSB) Report, and Practical Test Standards (PTS) or successor standards.
- The team of subject matter experts should use a standardized methodology to develop aircraft ground and flight training to the element/event level.
- The standardized curriculum should include/address checklists, standard operating procedures, certain operational authorizations, and special emphasis items.
- A cadre of instructors/check airmen (evaluators) will be trained and qualified at the 142 training center in accordance with 135.337 through 135.340 to deliver aircraft ground and flight training, and conduct testing and checking under the Aircraft-Specific 135 Standardized Curriculum Model.

#### *Rationale:*

As a practical matter and in cases where the operator's aircraft is similar to the 142 training center's Flight Simulation Training Device (FSTD), 142 training center core curriculums developed for use under part 61 (and approved by the TCPM) address 135 regulatory training requirements since 142 training centers generally have a number of 135 clients. Currently, these Part 142 core curriculums cannot be used by 135 operators. Instead, each 135 operator must have its own training program approved by the operator's POI. The training program can be based on the 142 training center's core curriculum, but the POI may make any number of suggested changes, which combined with the time it takes for each POI to conduct an in-depth review of each operator's curriculum, creates strain on the POI, the operator and the training center. The operator has to have the training center TCEs approved by the operator's POI as "contract check airmen" to conduct checks under the operator's training curriculum. It is important to note that the TCE/contract check airman is already approved by the TCPM to conduct certification under the core curriculum. In cases where the operator's aircraft is similar to the FSTD, there are very few, if any, differences between the operator's curriculum and the core curriculum.

The standardized curriculum model proposed by these recommendations would be similar to the current 142 core curriculum model used under Part 61, but it would go further to address all of the training, testing and checking requirements under Part 135. In addition, it would create an environment where operators and training centers would partner with the FAA to develop and implement data collection and continuous feedback to continually improve the standardized curriculum. The standardized curriculum itself (comprised of aircraft ground and flight training) would be developed by a group of subject matter experts representing FAA and industry stakeholders (operators, training centers, and manufacturers). This group would use a defined, standard methodology to develop the curriculum for that specific aircraft type (and variants as appropriate). The curriculum would include modules to the element/event level, each 142 training center will develop its own courseware based on the same curriculum using standard guidelines (e.g., common task analysis and task evaluation).

The operator's POI will approve the use of the standardized curriculum as part of the operator's Training Program, and each 142 center's courseware, training aids, and training devices will be reviewed and approved by the FAA (e.g., TCPM under current model). In addition, each 142 training center will have its own cadre of instructors/check airmen (evaluators) qualified by the training center and approved by the TCPM to conduct training/checking under the Aircraft-Specific Part 135 Standardized Curriculum.

Inspector guidance should specify the method (and tools) a POI can use to verify if the Aircraft-Specific Part 135 Standardized Curriculum is suitable for use by an operator and how to approve the use of that standardized curriculum as part of the operator's training program. The advisory guidance for industry (Advisory Circular) would provide a recommended avenue (and decision tools) to assist the operator in considering whether to build the operator's training program using the Standardized Curriculum Model. The advisory guidance would also include tools to assist the operator in demonstrating suitability to the POI.

(See Attachment A: Aircraft-Specific Part 135 Standardized Curriculum Supporting Information (including Draft Concept Diagram, Draft Frequently Asked Questions Document, and Draft Talking Points Document).)

#### Proposed Recommendation AC&CT-11(b): Curriculum Approval

The ACT ARC recommends the FAA develop inspector handbook guidance and corresponding advisory guidance for industry stakeholders (i.e., Advisory Circular) that includes the methodology by which approval would be granted for a 135 operator to use the aircraft-specific standardized curriculum as a portion of the operator's training program.

Further, the ACT ARC recommends the FAA develop inspector handbook guidance and corresponding advisory guidance for industry stakeholder (i.e., Advisory Circular) that includes the methodology by which approval would be granted for a 142 training center to deliver the aircraft-specific standardized curriculum as a portion of the operator's training program.

#### *Rationale:*

Under the proposed Aircraft-Specific Part 135 Standardized Curriculum Model, FAA approval of the standardized curriculum content is granted once at the national level by FAA-determined subject matter experts (i.e., AFS-280), and the operator's POI would grant approval for use of the Aircraft-Specific Part 135 Standardized Curriculum (without changes) as part of the operator's training program.

In conducting the review and holding discussions with the operator, the POI would determine whether use of the Aircraft-Specific 135 Standardized Curriculum (which comes with a cadre of pre-screened/pre-approved instructors/evaluators the POI can accept) is appropriate for that operator based on the published guidance, as opposed to reviewing the specific content of individual modules in the standardized curriculum and individual qualifications of the accompanying approved training center instructors/evaluators. Introducing the Aircraft-Specific Part 135 Standardized Curriculum Model for operators coupled with guidance enabling 142 training centers to develop a curriculum that would qualify 142 training center instructors and evaluators to conduct training/checking under that Aircraft-Specific 135 Standardized Curriculum would address a number of inefficiencies in the current system.

#### Recommendation AC&CT-11(c): Transition Process

The ACT ARC recommends the FAA develop inspector handbook guidance and advisory guidance targeted at industry (i.e., Advisory Circular) that would define the transition process for implementation of the Aircraft-Specific Part 135 Standardized Curriculum Model. The guidance should include tools that assist FAA personnel (TCPMs and POIs) and industry stakeholders (135 operators and 142 training centers) to demonstrate existing curriculums, courseware, and other materials align with the standardized curriculum and/or can be used during the defined transition process.

##### *Rationale:*

While developing the components of the standardized curriculum model, the AC&CT WG members noted the importance of including a transition process in the guidance material that specifies clear guidelines and expectations. Since training will be ongoing, it will be essential that FAA personnel and industry stakeholders have the tools necessary to transition to the standardized curriculum model without a significant interruption in training.

#### Recommendation AC&CT-11(d): Revision & Change Management

The ACT ARC recommends the FAA develop guidance that establishes a defined, transparent process for revising each curriculum developed under the Aircraft-Specific Part 135 Standardized Curriculum Model. The guidance should include a change management process that addresses suggestions from FAA and industry stakeholders, as well as changes driven by final rule, new technologies, or other sources, in a timely fashion.

##### *Rationale:*

The guidance for development of the standardized curriculum will include the process by which a curriculum will be revised based on SMS change management system principles. The guidance will specify certain external inputs that may drive changes, as well as a risk analysis process to assess the significance of the change (and urgency of a revision to the curriculum). The guidance should also address how stakeholder data and feedback will be used to revise the curriculum. The change management process should be transparent and track all regulatory changes, and other external and internal inputs with a risk-based approach employed to determine when revisions are published outside the regular interval.

The Aircraft-Specific Part 135 Standardized Curriculum Model will enhance operator/training center safety programs and create a feedback loop that allows 135 operators/142 training centers to partner in an effort to systematically collect meaningful data that can be used to continually review and improve the standardized curriculum, as well as target areas of emphasis to enhance the quality of training provided.

Recommendation AC&CT-11(e): Standardized Recordkeeping Requirements

The ACT ARC recommends the FAA develop specific inspector handbook guidance for FAA personnel and corresponding advisory guidance for industry stakeholders (i.e., Advisory Circular) that addresses recordkeeping requirements under the Aircraft-Specific Part 135 Standardized Curriculum Model. The guidance should sufficiently address recordkeeping requirements associated with: documentation of instructor qualification and currency; documentation of check airman (evaluator) qualification, currency, and authorization to perform testing and checking under Part 135; training records; qualification (testing and checking) records/forms. In addition, the guidance should address a transition period and a method by which equivalent documentation can be used during the transition period.

Further, the ACT ARC recommends the FAA develop (or facilitate the development of) a centralized web-based tool/database that can be used by FAA personnel and industry stakeholders to access the information about the approved instructor and contract check airmen for each standardized curriculum.

*Rationale:*

Under the Aircraft-Specific Part 135 Standardized Curriculum Model, the AC&CT WG contemplated the importance of using standardized documentation (i.e., same forms to document checks). Guidance material would be developed and implemented at the national level to include forms (and an appropriate tool for evaluating equivalents to the extent feasible) for testing and checking that will be used when documenting completion of training, testing and checking. In addition, the guidance material for 142 training centers would include the forms (and an appropriate tool for evaluating equivalents to the extent feasible) for documenting instructor and contract check airman/evaluator qualifications and currency. The AC&CT WG notes that it will be important to address standardized recordkeeping requirements in the transition planning and guidance will also be necessary on how to evaluate and allow for equivalent records for some period of time while an aircraft type is in transition to the standardized curriculum model.

The AC&CT WG further discussed the importance of web-based (cloud) access to electronic records. While large 142 training centers currently have such platforms in place for customer and regulator access, smaller 142 centers that want to implement the standardized curriculum model may have challenges associated with implementation of web-based technology for access of records. The guidance for recordkeeping requirements should include specific expectations of the system requirements, including access.

Recommendation AC&CT-11(f): Quality Assurance & Continuous Improvement

The ACT ARC recommends the FAA develop guidance for FAA personnel and industry stakeholders (135 operators and 142 training centers) under the Aircraft-Specific Part 135 Standardized Curriculum Model to ensure a quality assurance process is used to integrate meaningful data collection, audit, and validation processes (consistent with safety management system principles and industry best practices) to ensure feedback and continuous improvement of training provided under each standardized curriculum.

*Rationale:*

One of the greatest advantages to the Aircraft-Specific Part 135 Standardized Curriculum Model used by multiple 135 operators is the ability to collect training and checking data and create a feedback loop that can continually inform and improve the standardized curriculum. If standardized training is being provided to 135 operators, who have integrated standardized procedures in their operations, data can be collected and shared among operators. Both stakeholders (135 operators and 142 training centers) will be in a unique position to collect data to share with the FAA, which will serve to significantly improve the quality of the training provided.

Under the standardized curriculum model, 142 Training Centers will be able to collect data during training, and multiple 135 operators using exactly the same standardized curriculum would be able to validate the training by evaluating the pilot after he or she returns to the operator after the training is complete.

Currently, each individual operator performs the similar perfunctory document-based audit to obtain OpSpec A031 (and periodically, as required, thereafter). Validation conducted by operators can be integrated into the current audit paradigm in lieu of the “paperwork review” concept to create a better quality assurance process.

Recommendation AC&CT-11(g): Rulemaking

Further to ACT ARC Recommendation 15-2, the ACT ARC recommends the FAA pursue rulemaking in order to implement the Aircraft-Specific Part 135 Standardized Curriculum Model, and clarify 14 CFR part 61, 135 and 142 requirements to eliminate inefficiencies, address inconsistencies, and harmonize terminology and concepts related to training, checking, and qualification delivered to a part 135 operator by a part 142 training center.

*Rationale:*

In developing this package of recommendations, the AC&CT WG acknowledged that the Aircraft-Specific Part 135 Standardized Curriculum Model can be implemented solely through the development of new guidance material and the revision of existing guidance documents. However, the harmonization of certain requirements between part 135 and part 142 (as proposed in ACT ARC Recommendation 15-2) will enable 135 operators and 142 centers to more easily implement the standardized curriculum model concept, as well as enable the FAA to streamline the development of supporting guidance documents to provide the tools necessary for FAA personnel and industry stakeholders. The AC&CT WG emphasizes that rulemaking is not required to initiate or otherwise implement the standardized curriculum model concept and sub-parts (a) – (f) of this recommendation can be implemented regardless of whether rulemaking is initiated under ACT ARC Recommendation 15-2.

## V. Background Information

### ACT ARC Initiatives:

These recommendations address Initiative #9.3 and the Long Term Action component of Steering Committee Initiative #33:

Initiative #9: Establish a Workgroup to make recommendations about the relationship between training centers and air carriers in order to achieve standardization (where appropriate) in the following areas:

9.1 Check Airman Qualification

9.2 Flight Instructor Qualification

9.3 Air Carrier Training Curriculums delivered by Part 142 Training Centers

Initiative #33: Short Term Action—Instructor/Evaluator Training  
Long Term Action—Consider methods to use data collected under the Aircraft-Specific 135 Standardized Curriculum model to incorporate innovative risk mitigation training techniques to continually improve the curriculum.

(Note: Initiatives #9.1 & 9.2, as well as the Short Term Action component of Initiative #33, were addressed by ACT ARC Recommendations 15-1 and 15-2 adopted at F2F-4. Initiatives #9 and #33 are closed as a result ACT ARC Recommendations 15-1, 15-2 and 15-3.)

### Source Report:

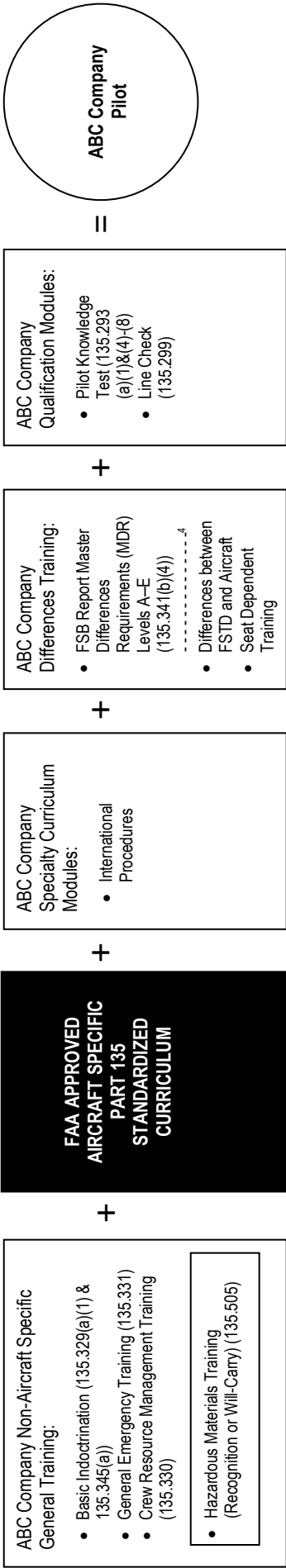
Flightcrew Member Training Hours Requirement Review Aviation Rulemaking Committee: *Report from THRR ARC* (ARC 209), May 23, 2011 at pgs. 2, 14-15. (See Recommendation that “an ARC be established to evaluate and clarify the rules governing the relationship between part 121 and part 135 air carriers and part 142 training centers.”)

Note: As noted in ACT ARC Recommendations 15-1 and 15-2, a similar “Special Rules” provision exists in 14 CFR part 121 that permits training to be conducted by 142 training centers. (See 121.402) However, training for part 121 air carriers is outside the scope of the initiatives assigned to the AC&CT WG. Steering Committee Recommendations 15-1 and 15-2, as well as the recommendations submitted by the AC&CT WG for consideration at F2F-6, can be considered and expanded to address certain aspects of contract training provided to part 121 air carriers if the ACT ARC Steering Committee modifies the tasking, adds appropriate members/SMEs to the workgroup, and assigns the expanded tasking to the AC&CT WG (or other ACT ARC workgroup) in the future. The scope of the recommendations herein is specifically limited to 135 operator training, testing and checking delivered by a 142 training center.



DRAFT CONCEPT DIAGRAM

135 OPERATOR TRAINING CURRICULUM (INH-PILOT)



What does the Aircraft-Specific Part 135 Standardized Curriculum portion include (what's in the box—which curriculum segments are inside the box)?

**Aircraft-Specific Part 135 Standardized Curriculum:**

(Note: Aircraft Ground Training & Flight Training Segments under current Definitions.)<sup>1</sup>

- Aircraft-Specific Ground Training/Aircraft Systems (135.345(b))
- Flight Training (135.347)<sup>2</sup>
- SOPs
- Profiles (Maneuvers) (135.327(b)(3))
- Checklists (OEM or developed by SMEs)
- Aircraft-Specific Qualification Modules (Testing/Checking)<sup>3</sup>
  - Pilot Testing: 135.293(a)(2)&(3)
  - Proficiency Check: 135.293(b)
  - Instrument Proficiency Check: 135.297

- Instructors/Check Airman (Evaluators) qualified by the 142 Training Center in accordance with 135.337 through 135.340 to deliver training, testing & checking under Aircraft-Specific Part 135 Standardized Curriculum.

## Attachment A: Supporting Information

### Notes:

- 1 In general there will also be items in Basic Indoctrination and CRM that will be reflected/incorporated in the Standardized Curriculum modules because the “box” includes SOPs, OpSpec limitations, flight training scenarios, etc. Consideration will need to be given to how to properly address such integrated training concepts when constructing the Standardized Curriculum.
- 2 Anything that is linked to flying skill sets would likely need to be “in the box.” There a could be a separate module within the box if there was an optional training event such as international flying that might have some integrated skills assessed in training.
- 3 Differences Training currently divided between regulatory Differences training (above the line) and differences training described in current guidance (below the line). Careful review will need to be given to “differences” training that is not regulatory and whether such training should be incorporated in the Standardized Curriculum (e.g., seat dependent training).
- 4 Many of the items that are found in 135.293 (a)(1)&(4-8) may also be able to be evaluated by a contract evaluator. Content of qualification segment(s) will be evaluated during development of Standardized Curriculum.

## **DRAFT FREQUENTLY ASKED QUESTIONS**

### **Who approves the Aircraft-Specific Part 135 Standardized Curriculum for each aircraft type?**

There will be a single (national) FAA approval (Level and Mechanism TBD) for the Aircraft-Specific Part 135 Standardized Curriculum (e.g., SOPs, Profiles, and Checklists – the box).

Inspector guidance will specify the method (and tools) a POI can use to verify if the Aircraft-Specific Part 135 Standardized Curriculum is suitable for use by an operator and how to approve the use of that standardized curriculum (the box) as part of the operator's training program.

The advisory guidance for industry (Advisory Circular) would provide a recommended avenue (and decision tools) to assist the operator in considering whether to build the operator's curriculum using the Standardized Curriculum Model. The advisory guidance would also include tools to assist the operator in demonstrating suitability to the POI.

### **Will each 142 Training Center use the same Aircraft-Specific Part 135 Standardized Curriculum?**

Yes, there will be one FAA-approved Aircraft-Specific Part 135 Standardized Curriculum for each aircraft type. However, variant type aircraft and the qualification levels of the FSTDs to be used to deliver training will need to be considered.

However, each 142 training center will develop its own courseware using standardized guidelines (e.g., common task analysis and task evaluation). Each 142 center's courseware, training aids, and training devices will be reviewed and approved by the FAA (e.g., TCPM under current model). In addition, each 142 training center will have its own cadre of instructors/check airmen (evaluators) qualified by the training center and approved by the TCPM to conduct training/checking under the Aircraft-Specific Part 135 Standardized Curriculum.

### **What if an operator wants to use its own checklists, SOPs, etc.?**

Then the operator has a customized training program (similar to the current model), and the operator cannot take advantage of the efficiencies afforded under the Aircraft-Specific Part 135 Standardized Curriculum model. The operator will be responsible for training 142 Training Center personnel who will be conducting testing and checking under the operator's Training Program. The operator will also be completely responsible for tracking qualifications and currency for all contract instructors and contract check airmen.

**How will Part 135 Training be Delivered by a 142 Training Center after Implementation of the Aircraft Specific Standardized Curriculum Model?**

There will be Two Models Post-Implementation:

Model One: Aircraft-Specific Part 135 Standardized Curriculum Model

*See diagram*

Model Two: Customized Training Program Model

- Company (Operator) instructors conduct all general non-aircraft specific training.
- Company (Operator) Flight Instructors/Check Airmen conduct all flight instruction in the aircraft or in an approved FSTD.
  - Company (Operator) conducts all qualification segments.
  - Company (Operator) conduct all required testing/checking.
  - Instructors and Check Airmen/Evaluators are all trained and qualified in accordance with the Company's (Operator's) Training Program.

## DRAFT TALKING POINTS

- A. The Aircraft Specific Part 135 Standardized Curriculum Model will:
- Clarify 14 CFR Part 61, Part 135, and Part 142 requirements to eliminate inefficiencies, address inconsistencies, and harmonize terminology and concepts relating to training, testing checking delivered to a 135 operator by a 142 training center.
  - Align guidance material with the source regulatory requirements in 14 CFR Part 135 and Part 142.
  - Use a risk based approach consistent with safety management system principles, including continuous evaluation, to develop and revise standardized training and checking.
- B. The Aircraft Specific Part 135 Standardized Curriculum Model concept enhances operator/training center safety programs and creates a feedback loop that allows 135 operators and 142 training centers to partner to:
- Collect data on training, testing and checking from multiple operators that can be shared with all stakeholders (operators, training centers, and the FAA)
  - Continually review and improve the standardized curriculum
  - Target areas of emphasis
  - Enhance the quality of training provided by the training center to the 135 operator
- C. The Aircraft Specific Part 135 Standardized Curriculum Model concept allows the 135 operator and Principal Operations Inspector (POI) to focus on the **quality** of training program, rather than the administration of the training program. The 142 training center and Training Center Program Manager (TCPM) bear primary responsibility for issues related to administration of the training, testing and checking delivered to the 135 operator by the 142 training center.
- D. The ACT ARC Steering Committee has tasked the Air Carrier & Contract Training Workgroup (AC&CT WG) to build on the Aircraft Specific Part 135 Standardized Curriculum Model by developing recommendations that afford 135 operators a structured path toward performance-based recurrent training, including integrated evidence and scenario-based training checking and qualification concepts.