

Federal Aviation Administration
Flight Standards Service
Air Carrier Training Aviation Rulemaking Committee (ACT ARC)

**Recommendation 17-3:
Guidance for 142 Instructor/Evaluator Training Requirements**

I. Submission

The recommendations below were submitted by the Air Carrier & Contract Training Workgroup (AC&CT WG)¹ for consideration by the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) Steering Committee at F2F-12. 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 17-3.

II. Statement of the Issue

Guidance on the qualification of 14 CFR part 142 instructors and examiners on differences within a type and with regard to variant, common and related aircraft types can lead to inconsistent application by FAA personnel across training centers.

Current guidance can be enhanced with clarification as to whether the 14 CFR Part 142 instructor requirements for proficiency under 14 CFR Part 142.53(a)(7) and examiners under 142.55(a)(4), as well as the observations under 14 CFR Part 142.53(a)(1) and current guidance are required for variant models, or if the requirement can be met with one check/observation in the base model and differences in accordance with the Flight Standardization Board (FSB) to the other variants.

The proposed recommendations and supporting rationale below suggest an effective strategy to address this area of concern.

III. Recommendations

The ACT ARC proposes the following recommendations on guidance related to 142 instructor/evaluator training requirements for FAA consideration:

The ACT ARC recommends the FAA publish/revise guidance indicating how 14 CFR part 142 instructors and examiners qualify, with regard to proficiency checks and observations, on an individual M/M/S within a type and to related aircraft series consistent with Flight Standardization Board (FSB) requirements for pilot qualification.

The ACT ARC further recommends the FAA align language/standardize definitions within current inspector handbook guidance applicable to 14 CFR parts 135, 141 and 142 with regard to the definitions associated with descriptions of a training program (e.g., training program, curriculum, core curriculum, specialty curriculum, curriculum segment, course and flight training equipment).

¹ The AC&CT WG is comprised of ACT ARC Steering Committee Members including 135 operators, 142 training centers, and membership organizations/industry associations. Proposed Recommendation AC&CT-15 was originally developed by the 142 Action Team, comprised of representatives from 142 training centers.

IV. Rationale

In order to address the issues raised, the AC&CT WG 142 Action Team specifically recommended the procedures defined in [AC 120-53B](#), Guidance for Conducting and Use of Flight Standardization Board Evaluations, and Order 8900.1, Volume 3, Chapter 19, Section 12, Paragraphs [3-1376 B](#) and [3-1378](#), apply to individual make, model, series (M/M/S) within a type, and to related aircraft series in accordance with FSB requirements. For aircraft that have no FSB report and or Operator Differences Requirements (ODR) table, current language in Order 8900.1, Volume 3, Chapter 19, Section 9, Paragraph [3-1316 A\) 2\)](#) or [3-1316 A\) 3\)](#) applicable to air carriers could be similarly used by 14 CFR part 142 training centers to determine the level of differences required for instructor/examiner training and qualification.

Current guidance leaves the opportunity open for inconsistent application with regard to instructor and examiner qualification requirements. Clarification of the meaning of 'a representative segment of each curriculum' as used in 14 CFR 142.53 (a)(1), 142.53 (a)(7)(ii), 142.55(a)(2) and Order 8900.1, Volume 3, Chapter 54, Section 2, Paragraph 3-4355 would support agency goals for standardization of such application. Similar language can also be used to define the meaning of 'flight training equipment' referenced in 142.53(a)(7)(i).

Federal Register Docket/Volume 61/Number 128, Page 34541 provides discussion of instructor requirements under 14 CFR 142.53(a)(1) and adds 'representative segment' terminology. The FAA notes that each 'curriculum' must be evaluated. As core curriculum and specialty curriculum are defined in 142.3 as a 'set of courses', the current language supports one check or observation for the training program to suffice for this requirement. This language further indicates intent as to the level of observation and evaluation required to maintain instructor and evaluator currency.

Further supporting this line of reasoning is the 14 CFR 142.55(a)(4) requirement to 'pass a written test and annual proficiency check in a flight simulator or aircraft in which the evaluator will be evaluating', and not '...each flight simulator...'. The proficiency check requirements of 121.411 and 121.412 fall under the allowances of the applicable FSB report in regards to common pilot type ratings. It follows then that the instructor and evaluator proficiency check requirements under Part 142 would also adhere to the applicable FSB report provisions in the same fashion.

For 142 training centers, provide a consolidated framework for related aircraft and their associated systems for the purpose of providing credit for pilot training and qualification with regard to related aircraft. The FSB report associated with applicable fleets allow and take credit for mixed fleet flying options for internal qualification training. This clarity will increase the efficiency of the agency by reducing the number requested FAA observation events to be accomplished in a given year for 14 CFR part 142 instructors and examiners.

Also, current guidance in Order 8900.1 is not consistent in the application of definitions and the use of terminology such as: 'curriculum', 'curriculum segments', 'courses' and 'training programs'. These terms are being used interchangeably in current guidance which may inadvertently cause cases of inconsistent application of the guidance. By way of example, in Order 8900.1, Volume 3, Chapter 54, Section 2, Paragraph 3-4345(D), where it is indicated that an instructor must be designated for each 'curriculum', the language does not clarify whether the FAA intent is that the instructor be approved for each 'course', or once for each 'series of courses'.

V. Background Information

AC&CT WG Scope of Work:

These recommendations partially address the following component of the AC&CT WG Scope of Work:

Consider current guidance documents for 142 training centers to assess the requirements for curriculum/program and instructor/training center evaluator (TCE) approval

ACT ARC Initiatives:

These recommendations partially address the following Steering Committee Initiative assigned to the AC&CT WG:

- Initiative #41: Review 14 CFR 142, Subpart C and current guidance documents to assess the requirements for instructors and training center evaluators (TCE) and suggest improvements/changes to current guidance, if required.