

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

**Recommendation 17-6:
Training Center Approval Process Efficiencies**

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-14. The ACT ARC Steering Committee adopted the recommendations with unanimous consent, and they are submitted to the Federal Aviation Administration as ACT ARC Recommendation 17-6.

II. Statement of the Issue

Training centers, operating in accordance with 14 Code of Federal Regulations (CFR) part 142, experience inconsistency in the FAA's review and approval of curricula. Curriculum submission expectations, evaluation, and response times vary among FAA offices and personnel. Many part 142 training centers provide contract training to part 135 operators. Therefore, differences between FAA approval process guidance for part 142 and for parts 135/121 compound the lack of standardization. Simple curriculum updates may be approved within a few weeks or several months, depending on the FAA office or inspector. This results in administrative inefficiency and training center inability to accommodate pilot training events.

III. & IV. Recommendations & Rationale

The ACT ARC proposes the following recommendations for FAA consideration:

Recommendation 17-6(a):

The ACT ARC recommends that the FAA revise guidance for part 142 training centers to adopt the 5-phase process for training program approval found within FAA guidance for parts 135/121.²

Rationale:

FAA guidance for approval of part 142 training center curricula does not harmonize with the general 5-phase training approval process reflected in FAA guidance and used for approval of part 135 and part 121 training programs and curricula. FAA guidance for part 142 states, "The curriculum development guidelines in Volume 3, Chapter 19, Sections 1, 2, and 9, (for 121/135) are the acceptable standards for training program development and should be followed to the maximum practical extent."³

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

² FAA guidance on training center curriculum approval is found in FAA Order 8900.1, Vol. 3, Ch. 54, Sec. 6. FAA guidance on the training approval process for certificate holders operating under parts 135/121 is found in FAA Order 8900.1, Vol. 3, Ch. 19, Sec. 2.

³ FAA Order 8900.1, Vol. 3, Ch. 19, Sec. 2, 3-4434

The differences in approval process guidance for part 142 and parts 135/121 contribute to the inconsistent expectations, evaluation, and response time experienced by part 142 training centers. This makes it difficult for training centers to schedule and plan Ready For Client Training dates. Having different approval processes and response times without justification is not an optimal use of FAA or training center resources.

Recommendation 17-6(b):

The ACT ARC recommends that the FAA publish guidance to specify that minor editorial changes to courses or curricula do not require FAA approval, provided the training center notifies the FAA within 30 days of their insertion.

Rationale:

Title 14 CFR part 141 includes a provision for internet-based training courses stating that “Minor editorial changes do not require FAA approval, provided the school notifies the FAA within 30 days of their insertion.”⁴ The ACT ARC recommends that FAA revise applicable guidance to include a similar allowance for part 142 training centers. Minor editorial and typographical changes to training programs do not typically create a safety issue. In addition, language already allows for the FAA to request changes to training programs within the 30-day window. Implementation of this recommendation would prevent the training center and the FAA from investing resources into the review and approval of minor, non-substantive changes.

Recommendation 17-6(c):

The ACT ARC recommends that the FAA publish guidance to clearly indicate that FAA personnel evaluating part 142 training center course or curriculum amendments should adhere to a 30-day evaluation process (similar to that found in FAA guidance for manufacturer-required training programs).

Rationale:

FAA guidance on manufacturer-required training states:

Approval or renewal of manufacturers required training programs, applies to TCPMs responsible for 14 CFR part 142 Training Program amendments. Paragraph 5-1889 (B)(3) Amendment states that “When the POI receives an amendment from the training provider, whether initiated by the training provider or the FAA, he or she will have 30 days to evaluate and reply to the training provider. If approved, the inspector issues the amendment using paragraphs A004 and B001. If the amendment is denied, the training provider is notified, in writing, explaining the reason for the denial (Figure 5-222, Letter Disapproving an Amendment to a Manufacturer’s Required Training Program (Initiated by the Training Provider), and Figure 5-223, Letter Disapproving an Amendment to a Manufacturer’s Required Training Program (Initiated by the Principal Operations Inspector)).⁵

Implementation of Recommendation 17-6(a) would define a process where a training center would proactively communicate the intention to initiate a new or update an existing program. Current FAA guidance states that submissions should be made 60 days prior to the planned training dates. Current FAA guidance also states that if there is cause for concern and a denial

⁴ §§ 141.53(d)(1)

⁵ FAA Order 8900.1, Vol. 5, Ch. 13, Sec. 1

is warranted, it should be done within five days. Supplementing these existing timelines with a 30-day process for FAA evaluation of training center course or curricula amendments would increase consistency of the evaluation process across FAA offices and personnel. In addition, implementation of a 30-day evaluation process would set baseline expectations for training providers and their clients.

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.