

Air Carrier Training Aviation Rulemaking Committee (ACT ARC)

**Recommendation 17-7:
Training Standardization Board Structure and Functionality**

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 17-7.

II. Statement of the Issue

In previous recommendations submitted to the FAA, the ACT ARC recommended that aircraft-specific standardized curricula for part 135 training delivered by part 142 training centers be guided by a team of experts, known as the Training Standardization Board (TSB). The ACT ARC Steering Committee tasked the AC&CT WG to provide supplemental proposed recommendations on the structure, roles and responsibilities, and functionality of a master TSB and subordinate TSBs for aircraft-specific standardized curricula. The supplemental recommendations are intended to advise the FAA in its development of guidance to implement ACT ARC recommendations for standardized curricula.²

III. & IV. Recommendations & Rationale

The ACT ARC proposes the following recommendations for FAA consideration:

Recommendation 17-7:

The ACT ARC recommends the FAA establish a high-level Training Standardization Board (TSB) which would establish and oversee subordinate action teams for the development and continuous improvement of aircraft-specific standardized curricula.

Rationale:

TSB Structure: The ACT ARC recommends that the FAA establish the TSB as a standing, permanent body consisting of a high-level TSB (referred to as “the Board”) with subordinate actions teams.³ The Board would include representation from the following entities: part 142 training centers, part 135 operators (through National Air Transportation Association and National Business Aviation Association), Original Equipment Manufacturers (through the General Aviation Manufacturers Association), and the FAA (through FAA-280). Board members would elect an industry chair for the Board. The industry chair would not be required to represent any particular segment of the industry (i.e. part 135 operator, part 142 training center). The FAA would co-chair the board. Board members would occupy strategic, leadership positions within their respective organizations. Each action team would have a lead. Action

¹ The AC&CT WG is comprised of ACT ARC Steering Committee Members including part 135 operators, part 142 training centers, and membership organizations/industry associations.

² The AC&CT WG developed these recommendations with the aid of a Discussion Guide provided by the FAA (attachment).

³ This recommendation is presented with the underlying premise that the TSB structure and functionality will be impacted by the legal authority under which the FAA establishes the TSB (i.e., Advisory Committee).

team members would be subject matter experts (SME) on aircraft and training experts at the working level. There would be formal indoctrination before a candidate occupies a position on an action team, which may consist of observing the process. In addition, each action team would report to a specific member of the Board to increase efficiency of oversight.

TSB Functionality: The Board would perform the following functions:

- Establish action teams and prioritize the development of Standardized Curriculum Requirements Documents (SCRD)⁴, incorporating resource considerations.
- Use data on industry demand and fleet composition to examine priorities strategically and gauge resources.
- Determine action team representation and ensure that the necessary experts and stakeholders are present prior to SCRD initiation.
- Provide governance and direction to action teams as they develop SCRDs.
- Maintain and apply guidelines on timing, continuity, and resolving conflicts/forging consensus.
- Ensure standardization, completeness, and quality of SCRDs.
- Submit SCRDs to the FAA for acceptance and publication.
- Monitor maintenance and continuous improvement of SCRDs.
- Promote transparency and participation in the process. Report to the public quarterly on ongoing work (i.e., which SCRDs are in production). Make SCRDs available to be posted for public comment to ensure feedback mechanism for those entities without direct participation on the Board.
- Meet regularly and review material between formal meetings.

Action teams would perform the following functions:

- Develop SCRDs and submit them to the Board for review.
- Maintain and continuously improve SCRDs based on stakeholder feedback and available data. Consider requests for changes to SCRDs and determine whether updates are necessary.
- Meet at least once a year (after initial SCRD publication) to validate whether there are any issues that would necessitate updates to the SCRD.

V. Background Information

AC&CT WG Scope of Work:

These recommendations supplement previous recommendations (ACT ARC Recommendations 15-9 and 16-1) and partially address the following component of the AC&CT WG Scope of Work:

- Consider strategies to improve 135 operator training and checking, including training/checking conducted by 142 training centers.

ACT ARC Initiatives:

These recommendations supplement previous recommendations (ACT ARC Recommendations 15-9 and 16-1) and partially address Initiative #9.3 and the Long Term Action component of Steering Committee Initiative #33:

⁴ Under the Standardized Curriculum Concept, a Standardized Curriculum Requirements Document (SCRD) defines the curriculum requirements for a particular aircraft or series of aircraft.

- Initiative #9.3: 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.

Previous ACT ARC Recommendations

The ACT ARC previously recommended that 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 ACT ARC recommended that 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. In addition, the ACT ARC expressed that the team of subject matter experts should use a standardized methodology to develop aircraft ground and flight training to the element/event level. (ACT ARC Recommendation 15-9)⁵

The ACT ARC referred to the proposed team of subject matter experts that includes 135 operator(s), 142 training center(s), the aircraft manufacturer, and the FAA as the “Training Standards Board.” The ACT ARC expressed that the Training Standards Board would be responsible for developing and continually improving the Aircraft-Specific Part 135 Standardized Curriculum for that aircraft type. (ACT ARC Recommendation 16-1)⁶

Attachment: AC&CT WG Meeting Discussion Guide, June 2017

⁵ Recommendation 15-9, *Aircraft-Specific Part 135 Standardized Curriculum Model*, was adopted by the ACT ARC Steering Committee at F2F-6 in August 2015.

⁶ Recommendation 16-1, *Scenario-Enhanced Recurrent (SER) Training and Checking for 135 Operators*, was adopted by the ACT ARC Steering Committee at F2F-8 in January 2016.

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

Air Carrier & Contract Training Workgroup (AC&CT WG)
F2F-19 Meeting Discussion Guide

Summary

On January 21, 2014, the FAA established the ACT ARC to provide a forum for the U.S. aviation community to discuss, prioritize, and provide recommendations to the FAA concerning operations conducted under parts 121, 135, and 142, specifically addressing air carrier training. The ACT ARC Steering Committee established an Air Carrier and Training Center Workgroup (AC&TC WG) and tasked it to consider strategies to improve part 135 operator training and checking, including training and checking conducted by part 142 training centers. The AC&TC WG produced several recommendations that aim to address the relationship between training centers and air carriers in order to achieve, improve safety, standardization (where appropriate) and significant administrative efficiency gains in check pilot qualification, flight instructor qualification, and part 135 air carrier training curricula delivered by part 142 training centers. The FAA is coordinating guidance to implement the ACT ARC recommendations for standardized curricula for instructor and check pilot training as well as part 135 training provided by part 142 training centers. The FAA expects to post draft guidance to the FAA Draft Documents Web site for public comment and seeks additional AC&CT WG input to support policy development.

Objective

The FAA seeks AC&CT WG input in the following areas:

- Proposed recommendations on structure, roles and responsibilities, and functionality of a Master Training Standardization Board (TSB) and subordinate TSBs for the aircraft-specific standardized curriculum.
- Proposed recommendations on data collection methodology to validate and continuously improve standardized curricula (with emphasis on data formats, usability, consistency, and protection).

Training Standardization Board

The standardized curriculum concept relies on the establishment of a new entity, referred to as Training Standardization Board (TSB). The TSB would be industry-led and composed of subject matter experts who represent manufacturers, part 135 operators, part 142 training centers, and the FAA. The TSB's primary function would be the development and maintenance of the standardized curriculum requirements for a specific aircraft or series of aircraft operating in the part 135 environment. The TSB would accomplish this task by developing a published Standardized Curriculum Requirements Document (SCRD). A training center would develop a Standardized Curriculum Package (SCP) that meets the requirements defined by the SCRD.

The TSB would play a critical role in maintaining and continuously improving standardized curricula.

Under the current concept, the TSB would assess data collected through a variety of sources to identify risks and areas for curricula improvement. Training centers (delivering standardized curricula) and part 135 operators (using standardized curricula) would provide reports to the TSB that would be analyzed to identify areas for curricula improvement. The TSB would continuously update and improve the SCRD to address any risks identified through certificate holder provided reports and other data sources, such as National Transportation and Safety Board or other safety recommendations, Voluntary Safety Program data, or aircraft/technology updates. The TSB would update the SCRD to include the change identified. Consequently, training centers delivering a standardized curriculum based on that SCRD would update the training to meet the requirements of the SCRD. SCRDs and SCRD updates would be published by the FAA as they are produced by the TSBs.

In consideration of this framework and previous ACT ARC recommendations for part 135 standardized curricula, the FAA poses the following questions for AC&CT consideration:

TSB Structure and Functionality –

- Should there be a higher-level TSB to oversee TSB establishment, functionality, and work product? If so, what should the governance structure be?
- Should there be a governance structure for an aircraft-specific TSB? If so, what should it be? (e.g., Should there be set timeframes for providing input or reviewing draft documents? What should the process be to adjudicate conflicting positions?)
- How should an aircraft-specific TSB be established? Should there be a lead, and if so, should the lead represent a particular segment of the industry (training centers, industry trade associations, part 135 operators, and manufacturers)? Should there be a minimum participation defined in order for a TSB to proceed? What should the role of industry trade organizations in determining part 135 operator representation in a TSB be?
- Does industry have the resources to support initial TSB establishment and long-term commitment to various TSBs?
- How should the priority of TSB establishment be determined? Will TSBs for certain aircraft receive priority if industry resources are limited?
- How long should it take to establish a TSB and for the TSB to produce an SCRD?
- How should industry and the FAA ensure that SCRDs are produced in a standard and comprehensive manner?
- Would the WG support a pilot TSB to produce a pilot SCRD? (This SCRD would likely serve as the model for those moving forward).

Data Collection and Continuous Improvement –

- The TSB would drive changes to standardized curricula by updating the SCRD. Should the TSB convene on a regular basis as part of the change management process? If so, at what interval?
- If the TSB is to assess a variety of data sources, including Voluntary Program Data, to identify risk and continuously improve SCRDs, how does the TSB access the necessary data? What entity performs the analysis?
- If training centers (delivering standardized curricula) and part 135 operators (using standardized curricula) provide annual reports to the TSB with data that could be used for continuous improvement, should the reports be provided to the TSB with responsibility for the SCRD on which the curricula are based? Or, should all reports be submitted to the higher-level TSB with

distribution to subordinate TSBs?

- What should the format and mechanism be for the provision of these reports?
- Should there be any documentation produced in association with the TSB's assessment of data and evaluation of an SCRD for continuous improvement (in addition to the updated SCRD)?
- What data protection issues should be considered in establishing the methodology for TSB data collection and analysis?

Additional Background

ACT ARC Recommendation 15-9(d), Revision and 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.”

ACT ARC Recommendation 15-9(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.”