# Contract Training Initial and Recurring Audits

This section outlines the Audit Program and Summary reporting requirements applicable to Title 14 of the Code of Federal Regulations (14 CFR) part 121 or 135 air carriers that propose to contract with a part 142 training center or another air carrier operating under the same rule part to provide training and evaluation services for its crewmembers as permitted in section 121.402(a) or section 135.321(a)(1) and 135.324(a).

## CONTRACT TRAINING AUDIT AND SUMMARY REPORT: TWENTY-FOUR CALENDAR MONTH CYCLE.

Where contract training is concerned, an audit and summary report cycle must be used as the plan to implement more effective operator-driven quality assurance. An initial audit must be conducted and summary report issued to the POI within 60 days after commencement of training or checking operations in accordance with the operator’s operations specification paragraph A031. Recurrent audit reports are required at least once each twenty-four calendar months thereafter. It should be also conducted at any time when a significant change affects the operator’s contract flight crew training. It is the operator’s responsibility to submit to the POI a summary report of each audit conducted by operator. The audit performed by the operator must objectively evaluate in person actual training being provided to assure that the training provider is delivering the training required by the operator’s approved training program.

**NOTE: For guidance in developing an Audit program similar to an IEP (Internal Evaluation Program), see Advisory Circular (AC) 120-59A, Air Carrier Internal Evaluation Programs, and FAA Order 8900.1.**

## B. DEFINITIONS.

**Audit:** An audit is a methodical, planned review or inspection which is used to determine how business is being conducted and compares results with how business should have been conducted in accordance with established procedures.

**Auditor:** The person performing the Audit should be **a**n individual who meets defined experience prerequisites and is qualified, through defined training, to conduct audits.

**Contract Training:** Any training, testing, or checking activity that an air carrier certificate holder provides by way of a contract or other arrangement with another party. It includes any flight training, testing, or checking leading to, and maintaining certification and qualification of, air carrier crewmembers in accordance with 14 CFR parts 61, 121, and/or 135.

## C. AUDIT OVERVIEW.

**1. Training Program Components: Adherence to Approved Program.** The operator must document that the training program delivered by the training provider is identical to the training program approved for the operator’s use by the POI. The documentation must address at least the following:

1. Manuals,
2. The format and content of curricula, curriculum segments, training modules, and documents depicting flight maneuvers and procedures,
3. Courseware,
4. Facilities,
5. Qualifications of instructors and check pilots.
6. Flight Training Equipment
7. Records of training, testing and checking of crewmembers

**2. Training Curriculums: Adherence to Approved Program.** The operator must audit curriculums, as well as document that the curriculums presented by the training provider adhere to the curriculums contained in its FAA-approved training program. The documentation must address at least the following, including ground training and flight training curriculum segments:

(a) Initial new-hire training,

(b) Upgrade training,

(c) Transition training,

(d) Recurrent training,

(e) Refresher training (part 121 only),

(f) Initial equipment training,

(g) Requalification training, and

(h) All other approved training such as differences, hazmat, security, and Crew Resource Management (CRM) subject to the contract training and listed in OpSpec A031.

**3. Flight Testing: Adherence to Approved Program.** The operator must observe its contract check pilots and document that regulations contained in sections 121.411 through 121.414 and sections 135.337 through 135.340 are being met and that approved standards are being maintained. Documentation must address at least the following, as applicable:

(a) Proficiency/competency checks for the purpose of certification,

(b) Competency and instrument proficiency checks (part 135 only),

(c) Flight training in lieu of the proficiency check, including Line-Oriented Flight Training (LOFT),

(d) Competency checks,

(e) Maneuver validation (AQP), and

(f) Line Operational Evaluations (LOE).

**4. Training Records: Completion of All Approved Training.** The operator must review the training and testing records required by sections 121.683 and 135.63. This review must cover all of the operator’s flight crewmembers, including pilots and flight engineers, who have received training through the training provider since the last review/audit cycle. The operator must document that each crewmember has successfully completed all of the required components of training and checking required by its approved training program.

## D. SUMMARY REPORT (SAMPLE ATTACHED).

The operator must prepare a report summarizing the findings of its self-audit. A sample report is attached to this appendix. A sample report is also shown in the guidance for operations specifications paragraph A031 under “Guidance” in the Web Based Operations Specifications Subsystem (WebOPSS). This report form may be used to compile audit findings and to submit findings to the POI as a summary report. Another form mutually acceptable to the operator and the POI may be used instead. The operator’s director of operations or other appropriate management official must sign the summary report. In all instances in which discrepancies are found between the training program delivered by the training provider and that which is approved by the FAA, the operator must propose effective remedies. Those remedies must be included in the summary report and must be addressed under the following categories:

1. Immediate corrective action:

(a) Action already taken, showing dates, and

(b) Action planned, showing target dates;

2. Long-term corrective action, showing target dates;

3. A strategy for ensuring continuing prevention of recurrence.

Any discrepancy or finding should include a system for ensuring a continuing prevention of recurrence.

Operators who contract for training and evaluation from a training center must address any training program discrepancy and undertake corrective action at once. When the operator’s own remedies are insufficient, the POI must take additional steps as deemed necessary and appropriate, in accordance with applicable provisions of Title 49 of the United States Code (formerly the FAA Act of 1958), 14 CFR, FAA Order 8900.1, and/or Order 2150.3A, Compliance and Enforcement Program.

**SAMPLE AUDIT and SUMMARY REPORT**

**for *ABC Airlines***

**Concerning Contract Flight Crew Training**

**Provided by the XYZ Part 142 Training Center**

**in accordance with the ABC Airlines**

**Boeing B-727-200 Training Program**

**[*Date*]**

This report is submitted in accordance with the requirements of operations specifications paragraph A031, *Contract Training*, issued to ABC Airlines. The audit of the training and evaluation provided to ABC Airlines crewmembers by the XYZ Part 142 Training Center was performed during the period 01/01/2007 to 01/04/2007 at the XYZ Training Center facilities located in Anywhere, Wisconsin. This audit report covers the period from 02/01/2005 through 01/31/2007.

**TRAINING PROGRAM COMPONENTS.** ABC Airlines has reviewed the following training program(s) or AQP equivalents, and training provider(s) and certifies that the training program(s) are identical to the training program(s) approved by the Federal Aviation Administration (FAA):

Categories of Training Date of Approval/Revision Date

Initial New Hire 1/31/98

Initial Equipment 1/31/98

Transition 2/20/98

Upgrade 2/20/98

Recurrent 1/31/98

Training Provider(s) Category of Training Type

XYZ Training Center Initial Equipment Ground and Simulator

 Requalification Ground and Simulator

 Recurrent Ground and Simulator

 Transition Ground and Simulator

 Upgrade Ground and Simulator

**Training Components.**

Manuals Revision Date

 General Operations Manual \_\_\_\_\_\_\_\_\_\_\_\_

 Airplane Flight Manual \_\_\_\_\_\_\_\_\_\_\_\_

 Aircraft Operations Manual \_\_\_\_\_\_\_\_\_\_\_\_

 Aircraft Checklists \_\_\_\_\_\_\_\_\_\_\_\_

 Airport/Runway Analysis \_\_\_\_\_\_\_\_\_\_\_\_

 Minimum Equipment List \_\_\_\_\_\_\_\_\_\_\_\_

 Configuration Deviation List \_\_\_\_\_\_\_\_\_\_\_\_

Curriculum Segments Content Review Date

 Basic Indoctrination \_\_\_\_\_\_\_\_\_\_\_\_

 Aircraft Ground Training (initial/recurrent/upgrade) \_\_\_\_\_\_\_\_\_\_\_\_

 Emergency Training \_\_\_\_\_\_\_\_\_\_\_\_

 Flight Training (initial/recurrent/upgrade) \_\_\_\_\_\_\_\_\_\_\_\_

 Special Curriculum Segment: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_-- \_\_\_\_\_\_\_\_\_\_\_\_

 Hazardous Materials \_\_\_\_\_\_\_\_\_\_\_\_

 Differences \_\_\_\_\_\_\_\_\_\_\_\_

 Simulator Flight Instructor \_\_\_\_\_\_\_\_\_\_\_\_

 Check Pilot \_\_\_\_\_\_\_\_\_\_\_\_

 Qualification Segment

 Proficiency Check \_\_\_\_\_\_\_\_\_\_\_\_

 Competency Check \_\_\_\_\_\_\_\_\_\_\_\_

 Operating Experience \_\_\_\_\_\_\_\_\_\_\_\_

 Line Check \_\_\_\_\_\_\_\_\_\_\_\_

 Familiarization Flight \_\_\_\_\_\_\_\_\_\_\_\_

 Other (list by name) \_\_\_\_\_\_\_\_\_\_\_\_

**Training Equipment.** Provide a list of each training device, mockup, systems trainer, procedures trainer, simulator, or other training devices (include FAA ID number if available).

**Facilities.** Provide a general description of facilities, including physical addresses.

**Qualification of Instructors and Check Pilots.** A list of all contract ground, flight instructors and/or contract pilots utilized by the training provider to provide training and evaluation for the operator during the audit period must be provided. In addition, a statement must be included to the effect that “ABC Airlines has reviewed the qualifications of all contract instructors and check pilots utilized by ABC Airlines and certifies that they meet regulatory requirements of Title 14 of the Code of Federal Regulations (14 CFR) part 121, 135, or both.”

**Example**:

Bob Smith XYZ Training Center Contract Ground Instructor

Nancy Jones XYZ Training Center Contract Flight Instructor, Simulator

Douglas Sanders XYZ Training Center Contract Flight Instructor, Simulator

Frank Baker XYZ Training Center Contract Check Pilot, Simulator

ABC Airlines has reviewed the qualifications of all contract instructors and check pilots utilized by ABC Airlines and certifies that they meet regulatory requirements of part(s) 121/135, as appropriate.

**TRAINING CURRICULUMS.** This section involves a side-by-side examination of the curriculum outline with the appropriate regulations, or with an approved AQP alternative means of compliance. This examination will ensure that all required ground and flight training is provided.

Available courseware (lesson plans, audiovisual programs, flight maneuvers, procedure documents, student handouts) must be reviewed to ensure that courseware is consistent with each curriculum and curriculum segment and the type of operations conducted by the operator.

This section must address at least the following training programs, or its AQP equivalents, including ground and flight training:

* Initial New Hire Training
* Initial Equipment Training
* Transition Training
* Upgrade Training
* Recurrent Training
* Requalification Training
* Any Other Approved Training (CRM, Security, RVSM, etc)

**Example:**

ABC has observed the following training and evaluation being performed by the XYZ personnel and certifies that the training and evaluation is in accordance with the ABC requirements and approved training program.

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of Training Observed** | **Date of Observation** | **Contract Instructor** | **Remarks** |
| Initial B-727 Ground | 01/01/2007 | Bob Smith |  |
| Initial B-727 Simulator #4 & 5 | 01/02-03/2007 | Doug Sanders |  |

**FLIGHT EVALUATIONS:** This section involves the observation of the operator’s contract check pilots and other evaluators. The review must be completed to ensure compliance with sections 121.411, 121.412, 121.413, and 121.414; or 135.337, 135.338, 135.339, and 135.340, as appropriate. The report must address at least the following, as appropriate:

* Certification Flight Checks
* Proficiency Checks
* Flight Training in lieu of the Proficiency Check
* Line-Oriented Flight Training (LOFT)
* Competency Checks
* Maneuver Validation (AQP)
* Line Operational Evaluations (LOE)

**Example**:

ABC Airlines has observed the following evaluation being performed by the XYZ personnel and certifies that the evaluations are conducted in accordance with the ABC requirements and approved training program.

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of Evaluation Observed** | **Date of Observation** | **Contract Check Pilot** | **Remarks** |
| Initial B-727-200 Proficiency Check for the purpose of type rating | 01/04/2007 | Frank Baker |  |

**TRAINING RECORDS.** This section requires that the operator review the training and evaluation records required by section 121.683, or section 135.63, as appropriate. This review must include all flight crewmembers, including pilots and flight engineers, who have received training and/or evaluation from a contract training provider.

Also, a statement must be included to the effect that each crewmember has successfully completed all of the required components of training and checking as required by the operator’s FAA-approved training program.

**Example**:

ABC Airlines certifies that all flight crewmembers, including pilots and flight engineers, have successfully completed all required components of training and checking as documented in our FAA-approved training programs.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_

Bob Jones, Director of Safety

ABC Airlines

**DISCREPANCIES.** The audit must identify each discrepancy found between the training delivered by the training provider and that required by the operator’s FAA approved training program. Note each discrepancy by section, i.e., Training Program Components, Training Curriculums, Training Records, and Flight Testing. Include with each discrepancy the corrective action taken or planned, and the timeframe for the remedy (immediate or long-term), showing calendar dates.

Any discrepancy or finding must include a system for ensuring a continuing prevention of recurrence.

Example:

Training Program Components

Manuals (Immediate)

General Operations Manual − Copy of manual at XYZ Training Center facility missing latest revision. Latest revision sent and posted. Director of Training Captain Smith, or his successor, will ensure, on the first day of each calendar month, that revisions to company manuals have been accomplished and verified.