

# NOTICE

## U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.RED

### National Policy

Effective Date:

xx/xx/xx

Cancellation Date:

xx/xx/xx

### **SUBJ:** Part 135 Training Program Review: Training/Checking Credit

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**1. Purpose of This Notice.** This notice requires principal operations inspectors (POIs) to conduct a focused program review of Title 14 of the Code of Federal Regulations (14 CFR) part 135 certificate holder's approved training programs. The objective of this review is to:

**a. Identification.** Identify part 135 certificate holder training programs that provide credit for previously obtained ground and/or flight training and checking received from a different certificate holder.

**b. Correction.** Correct training programs that have provided credit for previously obtained ground and/or flight training and checking received from a different certificate holder.

**c. Guidance.** Additionally, this notice will provide POIs with guidance concerning the approval of reduced hour initial new hire, transition or upgrade training curriculums based on flightcrew member experience that may be developed by part 135 certificate holders.

**2. Audience.** The primary audience for this notice is principal operations inspectors (POIs) responsible for the approval and surveillance of part 135 certificate holders. The secondary audience includes other Flight Standards personnel in certificate-holding district offices (CHDO), 14 CFR part 142 training center program managers (TCPMs), FAA branches and divisions in the regions, and headquarters Flight Standards personnel.

**3. Where You Can Find This Notice.** You can find this notice on the MyFAA employee Web site at [https://employees.faa.gov/tools\\_resources/orders\\_notices](https://employees.faa.gov/tools_resources/orders_notices). Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the Federal Aviation Administration's (FAA) Web site at <http://fsims.faa.gov>. This notice is available to the public at [http://www.faa.gov/regulations\\_policies/orders\\_notices](http://www.faa.gov/regulations_policies/orders_notices).

**4. Applicability.** This notice applies to all part 135 certificate holder POIs except POIs of part 135 single pilot operations or other part 135 operations that hold training program deviation authority in accordance with part 135, §§ 135.341(a) and 135.343, as authorized by the issuance of operations specification(s) (OpSpecs) A037-A040.

**5. Background.** Title 14 CFR parts 121 and 135 address what entities may provide training, testing, and checking for a certificate holder's crewmembers subject to requirements of the subpart. Other than the certificate holder, only another certificate holder certificated under the same part or a training center certificated under part 142 training may be contracted with to provide training, testing, and checking. The training, testing, and checking that the contractor provides must be the contracting certificate holder's approved program. There have been numerous inquiries regarding the acceptance of training/evaluations previously completed by a crewmember while in the employment of another certificate holder. Regulations do not permit the crediting of such training (with the exception of CRM and DRM training).

**6. Terms Used in this Notice.**

**a. "Credit for Previous Qualification."** This is the erroneous practice of accepting documentation or certification that a crewmember has satisfactorily completed training and/or an evaluation while in the employment of another part 135 certificate holder as being suitable for meeting the requirements of the hiring certificate holder's training evaluation/program.

**Note:** Some part 142 training centers have distributed training programs that provide credit for training/evaluations conducted by another operator. Such provisions are contrary to the intent as well as the technical provisions of part 135 and are not appropriate for inclusion in a certificate holder's approved training program.

**b. Reduced Training Hour Curriculums.** Part 135 certificate holders may develop and submit for approval multiple curriculums for a particular crewmember position and aircraft make/model/variant. For example, a part 135 certificate holder may develop an initial new-hire curriculum designed for pilots that have previous experience as a crewmember in part 135 operations and or the particular aircraft and duty position. A second curriculum for the same aircraft may be designed to meet the requirements of new hire crewmembers that have minimal flight time, no previous part 135 experience, or qualifications related to the certificate holder's operational environment. The second curriculum in this example would have more training hours due to the crewmember's lack of knowledge and skill related to the certificate holder's operation or aircraft.

**Note:** Certificate holders that choose to develop multiple curriculums for pilots must clearly specify the minimum crewmember prerequisites for entry into each of their curriculums.

**c. Evaluations.** The term "evaluations" is used to refer to all testing and checks (proficiency, competency, line, etc.) that a certificate holder must conduct to ensure its crewmembers meet the requirements of the applicable their operating rule and the conditions of the certificate holder's OpSpecs.

**7. Training Program Review.** All POIs who are assigned to part 135 certificate holders must, within 90 days of the issuance of this notice, conduct a focused review of their assigned certificate holder's flightcrew member training curriculums. This review shall identify those curriculums that provide for a certificate holder to take credit for previous training/evaluations that were completed by another certificate holder. The provisions and requirements of this review are outlined in the following paragraphs.

**8. Credit for Previous Training/Evaluation.** POIs must advise their assigned certificate holder(s) that training program provisions that allow credit for previous training and or evaluations are not in compliance with this notice and not consistent with the intent of current operating rules or FAA policy. POIs must direct their assigned certificate holder(s) to modify their training programs in accordance with the guidance in this notice and as provided for in § 135.325(d). Certificate holders that are affected may be given a reasonable time, not to exceed 12 calendar-months from the date of notification, to revise and resubmit their affected training programs for approval. Retraining of affected crewmembers is not required unless the POI believes a proficiency or safety issue is involved.

**9. Reduced Training Program Planned Hours.**

**a. Requirements.** Part 135 does not require programmed hours to be defined within training programs. The hours associated with these programs are typically referred to as planned hours to avoid confusion with the requirements of part 121. Part 135 does however, require each instructor, supervisor, or check airman to certify the proficiency and knowledge of each crewmember upon completion of required training or evaluation. This certification may occur at any time the instructor believes the individual has reached the required level of proficiency during his or her scheduled training, provided all elements and events of the approved training program have been successfully trained.

**b. Limitations.** Reductions in training program planned hours may include aircraft-specific systems ground training and/or flight training. However, reductions in training based on a crewmember's previous knowledge or skill may not be made for certificate holder-specific modules such as:

- (1) Basic Indoctrination (§ 135.329)
- (2) Hazardous materials (§ 135.505);
- (3) Emergency Training (§ 135.331);
- (4) Other operator specific approvals such as those typically approved by an operator's OpSpecs or as determined by the operator's POI.

**Note:** Individuals must also satisfactorily complete the certificate holder's testing/evaluation and qualification modules before being assigned as a required crewmember. For example; required written/oral exams, proficiency (flight) evaluations, line checks, etc.

**c. Curriculum Proposal.** In order for POIs to consider approval of a reduced hour training program, the certificate holder must provide a detailed curriculum proposal in accordance with FAA Order Volume 3, Chapter 19, Section 2. Particular attention should be given to:

(1) The prerequisites for entry into the reduced hour curriculum. (For example, proficiency check currency within the last 12 calendar-months, minimum flight hours (total) as well as minimum flight hours in type or class as appropriate, experience as a flight crewmember, education, etc.

**Note:** POIs must carefully evaluate the curriculum's proposed entry prerequisites against the programmed/planned hours, complexity of the operation, aircraft complexities, operational environment, and the certificate holder's authorized operations when considering any reduction of the carrier's training footprint.

(2) The proposed reduced hour curriculum must contain all the training elements of full curriculum to include a comprehensive qualification module.

**Note:** POIs must carefully evaluate the certificate holder's request for a reduced training hour curriculum and make a determination as to whether the entry prerequisites are sufficiently comprehensive to support the proposed hour reduction.

(3) Other special training authorizations, such as those found within the certificate holder's OpSpecs.

**d. Crewmember Recordkeeping.** A certification and record that verifies the crewmember's qualification meets or exceeds the prerequisites of the reduced training curriculum must be made a part of the crewmember's permanent training record. When the certification required by this paragraph is made by an entry in a computerized recordkeeping system, the certifying company official who made the determination must be identified with that entry.

**e. Modification Procedures.** If modification of a previously approved training curriculum or a reduced training curriculum becomes necessary as provided for in § 135.325(d), the POI must follow the procedures outlined FAA Order 8900.1, Flight Standards Information Management System (FSIMS), Volume 3, Chapter 19, Section 2, paragraph 3-1111.

**f. Previous Qualifications.** Regardless of an individual's previous qualifications it is the certificate holder's responsibility to ensure that each individual is proficient and fully qualified in the certificate holder's operations and procedures prior to authorizing the individual to operate as a required crewmember.

**10. Documenting Completion of Focused Program Review.** Once the POI has verified that each of his or her assigned certificate holder(s)' training curriculums is in compliance with this notice.

- Open a PTRS record using code 1307 and complete all required and any applicable optional fields;
- Enter "NOCREDIT" in the "National Use" field (without quotes); and

- Close the PTRS record.

**11. Additional References.** FAA Order 8900.1, Volume 3, Chapter 19.

**12. Disposition.** We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Air Transportation Division (AFS-200) at 202-267-8166.

John M. Allen  
Director, Flight Standards Service