Part 135 Training Programs
Compliance With Current & New Guidance

Suran Wijayawardana - President  ACP Jets
NATA 135 Committee
Overview of Training Program Requirements

Proposed new FAA guidance is **NOT** a new rule.

- **14 CFR 135.323  Training program: General**
  (a) Each certificate holder required to have a training program under §135.341 shall:
  (1) Establish and implement a training program that satisfies the requirements of this subpart and that ensures that each crewmember, aircraft dispatcher, flight instructor and check airman is adequately trained to perform his or her assigned duties.

- **14 CFR 135.341  Pilot and flight attendant crewmember training programs**
  (a) Each certificate holder, other than one who uses only one pilot in the certificate holder's operations, shall establish and maintain an approved pilot training program, and each certificate holder who uses a flight attendant crewmember shall establish and maintain an approved flight attendant training program, that is appropriate to the operations to which each pilot and flight attendant is to be assigned, and will ensure that they are adequately trained to meet the applicable knowledge and practical testing requirements of §§135.293 through 135.301.

- **14 CFR 135.324  Training program: Special rules.**
  (a) Other than the certificate holder, only another certificate holder certificated under this part or a training center certificated under part 142 of this chapter is eligible under this subpart to conduct training, testing, and checking under contract or other arrangement to those persons subject to the requirements of this subpart.
Overview of Training Program Requirements

FAA Draft Notice Dec 27\textsuperscript{th}, 2012 (For Commenting)
Training Program Review: Training/Checking Credit

- Prohibits New Hire credit for training/checking
- Acknowledges Part 135 does not have programmed hour requirements
- Guidance for reduction of training based on previous experience (RTHC’s):
  - Reduced Training Hour Curriculums (INH-A, INH-B...)
  - Pre-Requisites for each curriculum
  - Pre-Training Validation/Evaluation
- Reduction of planned training hours for:
  - Aircraft specific systems ground training
  - Flight Training
- Special emphasis inspections / 12 months to Comply

Air Charter Summit - June 12, 2012
Structuring Your Training Program
Structuring Your Training Program

YOUR POI + A GRAY AREA = FRUSTRATION

Don’t leave it to chance...

- Implement processes in your Training Program to ensure written regulatory compliance
  - Reference CFR 14 135   Subpart G & H
  - FSIMS
    - 8900.1 Chapter 19 - 135 Training Programs
    - 8900.1 Chapter 54 - 142 Training Centers: Outsource Training
- Processes to document training and crew qualifications
- Have sufficient detail where it matters
Structuring Your Training Program

CFR 14 Part 135.341 (B) Categories of Training

- **Initial New Hire (INH)**: All personnel who have no previous experience as a flight crewmember for the operator under part 135.

- **Transition (TRA)**: Crew member previously trained and qualified for a specific Duty Position, being assigned to same duty position on another aircraft.

- **Upgrade (UPG)**: Crew member previously trained and qualified as an SIC by Operator under 135 Being assigned as PIC to same aircraft type previously trained and qualified for.

- **Differences (DIF)**: Crewmembers previously trained and qualified on a type of aircraft to serve in the same duty position on a variant of that aircraft type.

- **Recurrent (REC)**: All Crewmembers previously trained and qualified, who continue to serve same duty position and who must receive recurring training and/or checking within an eligibility period to maintain currency.

- **Requalification (REQ)**: Crew Member who has been trained and qualified by the operator, but has become unqualified to serve in a particular duty position and/or aircraft due to not having received recurrent testing or required competency check within the eligibility period.

Air Charter Summit - June 12, 2012
Have A Robust Initial New Hire Program

- No previous experience with Operator
- (INH) Training includes Basic Indoctrination, specific duty position and aircraft type
- Most comprehensive of all six categories of training

Reduced Training Hour Curriculums:

REF 8900 Volume 3 Chapter 19 Section 1. 3-1077 E

- Operators can have Multiple New Hire Curriculums to reduce planned training hours based on Flight Crews previous experience.
- Multiple Curriculums require a defined set of pre-requisites to determine the candidates Eligibility into a Curriculum

Example:
- Documentation such previous training records detailing extent and scope of previous employer’s training.
- Validated Pre-testing
Reduced Training Hour Curriculums (RTHC’s)

**INH - A**
- NO previous 135 experience
- NO Experience in the same Duty Position in the Aircraft

**INH - B**
- With Previous 135 experience
- With experience in the same duty position in the aircraft

**INH - C**
- NO previous 135 experience
- With experience in the same Duty Position in the aircraft

**INH - D**
- With previous 135 experience
- NO Experience in the same Duty Position in the aircraft

Full INH Course
No Hour Reduction

Reduced Training Hours
- Based on Pre-Requisites
- Validated Pre Testing
- Reduction must be authorized by POI
Structuring Your Training Program

Sample Pre-Requisite Checklist

<table>
<thead>
<tr>
<th>INH – B Duty Assignment: PIC</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Crewmember Qualifications</strong></td>
</tr>
<tr>
<td>135.243 PIC Qualifications or Operator Specific Hiring Minimums- ATP?</td>
</tr>
<tr>
<td>135.244 Operating Experience (minimum 25 hours)</td>
</tr>
<tr>
<td>135.247 Recent Experience</td>
</tr>
<tr>
<td><strong>Previous Training</strong></td>
</tr>
<tr>
<td>Comprehensive Records</td>
</tr>
<tr>
<td>Verification of Initial Equipment Ground Training</td>
</tr>
<tr>
<td>Subsequent recurrent or Requalification Training</td>
</tr>
<tr>
<td>Verification of active 135 hours 12 months</td>
</tr>
<tr>
<td><strong>Pilot Currency</strong></td>
</tr>
<tr>
<td>3 Takeoffs and Landings Previous 90 days</td>
</tr>
<tr>
<td>135.293 (B) within previous 12 months</td>
</tr>
<tr>
<td>135.297 Check within previous 6 months</td>
</tr>
<tr>
<td>135.299 within previous 12 months</td>
</tr>
</tbody>
</table>

- **With** Previous 135 experience
- **With** experience in the same duty position in the aircraft

Not Just 8410-3 or Training Certificate

Establish Continuous Training History

Extent Crew Member was Active in Duty

Upon successfully meeting established Pre – Requisites, Crew Member’s previous experience must be validated by the Operator
Structuring Your Training Program

Validating Crew Member Previous Experience

Reduction for Equipment Ground Training
- Can be validated by written, oral or electronic testing by an approved company instructor
- Scope: At least one question for each element contained in each training module
- Acceptable Standard = 80% corrected to 100%
- If Oral Test: Statement from Instructor required

Approval Process
- Submit along with all documentation for Pre Requisites to POI For Approval
- Once POI Approves Candidate can be enrolled in RTHC
Structuring Your Training Program

Sample RTHC Curriculum (INH-B)

**Curriculum Segments**

<table>
<thead>
<tr>
<th>Basic Indoctrination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator Specific Segment</td>
</tr>
<tr>
<td>Airman Specific Segment</td>
</tr>
<tr>
<td>Emergency Training</td>
</tr>
<tr>
<td>General Emergency – Situation</td>
</tr>
<tr>
<td>General Emergency - Drill</td>
</tr>
<tr>
<td>Specialty Curriculums</td>
</tr>
<tr>
<td>Hazardous Material</td>
</tr>
<tr>
<td>Aircraft Ground Training</td>
</tr>
<tr>
<td>Aircraft Flight Training</td>
</tr>
<tr>
<td>Crew Qualification Segment</td>
</tr>
</tbody>
</table>

**Completion Requirements:**

Ref: 8900.1 Vol 3 Chapter 19 Section 6 3-1231

A Crewmember may complete a curriculum segment without completing Planned hours, providing the following conditions are met:

1. Crewmember successfully competes all events
2. An Instructor Recommends (suitably Documented) the test be conducted prior to completion of planned hours
3. Crew Member Satisfactorily completes the Qualification Segment

**INH - B**

- **With** Previous 135 experience
- **With** experience in the same duty position in the aircraft

**Allowable Reduction in Training Hours**

135.293 / 135.299 / 135.297  
* Consider 135.293 (C) – 135.297 may be substituted for 135.293 (B) if same aircraft and Pre-Requisites have been met
## Structuring Your Training Program

### Programmed vs. Planned Training Hours

<table>
<thead>
<tr>
<th>Curriculum Segment</th>
<th>Initial New Hire</th>
<th>Active Crewmember</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>INH A</td>
<td>INH B</td>
</tr>
<tr>
<td>Basic Indoc – Operator</td>
<td>18</td>
<td>18</td>
</tr>
<tr>
<td>Basic Indoc – Airman</td>
<td>14</td>
<td>14</td>
</tr>
<tr>
<td>Subtotal / Basic Indoc</td>
<td>32</td>
<td>32</td>
</tr>
<tr>
<td>General Emergency – Situation</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>General Emergency – Drill</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Emergency Training – Sub Total</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>Hazardous Material</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Aircraft Ground Training</td>
<td>56</td>
<td>AR</td>
</tr>
<tr>
<td>Ground Training Sub Total</td>
<td>100</td>
<td>AR</td>
</tr>
<tr>
<td>Aircraft Flight Training</td>
<td>12</td>
<td>AR</td>
</tr>
<tr>
<td>Flight Crew Qualification</td>
<td>AR</td>
<td>AR</td>
</tr>
<tr>
<td><strong>Total Planned Training Hours</strong></td>
<td>AR</td>
<td>AR</td>
</tr>
</tbody>
</table>

Part 135 regulatory requirements do not specify required training hours.

Training hours are based on national norms.

REF: 8900 Vol 3 Chapter 19 Sections 1 – 11

**AR** = Planned hours as required depending on proficiency
Structuring Your Training Program

Training Program Suggestions

- Verify correct terminology: Planned Hours vs. Programmed Hours
- Detailed Recordkeeping:
  - Update Forms:
    - Pilot Information Sheet – Previous Experience
    - Document Pre-Requisites
    - Include Validation in Competency / Proficiency Check Records
    - Label forms to include proper reference to RTHC’s
- Give comprehensive Indoctrination Training for New Hires
- Reference regulatory guidance (especially on RHTC’s)
- Defined Crew Qualification Segment for each curriculum
Working With Part 142 Training Centers
135 Air Carrier’s may contract with a training center approved under part 142 to conduct portions of their training curriculum as an **alternative means** of providing training to their employees.

- “Alternative means” permits an operator to outsource or arrange to have its approved training conducted by a third party. It does not mean that an operator has an “alternative means” to meet the training approval requirements governing its particular operation.

- Training Centers governed by Training Center Program Managers (TCPM’s)

- Core Curriculums approved by their TCPM’s. Designed to meet CFR 14 Parts 61 and/or 63.

- Operators can adopt 142 approved Core Curriculums as a part of their training Program

- Add additional 135 and Operator Specific elements to meet regulatory requirements of part 135.
Part 142 Contracted Training Centers

Ops Spec A031 Approval:

- Center Audit (60 days prior)
  - comparison and analysis of the Center’s curriculum, courseware, procedures, equipment and personnel to determine the center will meet their operational needs.
- Have Differences Training Module for Instructors and Check Airmen on Operators Curriculum
- Records for Instructors and Check Airman to verify qualifications to conduct training. Ref CFR 14.135.335 – 135.339
- POI Issues Ops Spec A031 authorizing Air Carrier to conduct contracted Training
- Each training curriculum/module approved must be listed in A031
- Operator must audit facility and effectiveness to provide training every 24 months.
Part 142 Contracted Training Centers

Best Practices

- Encourage POI to interact with Center’s TCPM
- Provide Training Center with guidance and Operator Specific forms
- Ensure training center forms adopted by Operator use the correct references for operator’s curriculums.
- Create a “Training Source” document - which specific portions of the Training Program conducted by the operator and the contracted center?
- Maintain comprehensive recordkeeping to ensure training center personnel authorized as contract instructors and/or check airmen are appropriately trained and qualified.
  - Operators Responsibility to ensure that they meet the requirements of 135.337 through 135.339
- Maintain an open relationship with Training Center personnel during all training and surveillance events. (Quality Assurance)
Training Program Should Be A Reflection Of Your Company Culture!

Suran Wijayawardana - President ACP Jets
NATA 135 Committee