

Part 135 Training Programs

Compliance With Current & New Guidance

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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 27th, 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

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
- Quality Assurance for Training Curriculum Segments - Flight Crew, Instructor and Check Airman performance, training and 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 whop 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

Structuring Your Training Program

Have A Robust Initial New Hire Program

Initial New Hire (INH)

All personnel who have no previous experience as a flight crewmember for the operator under part 135.

- 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

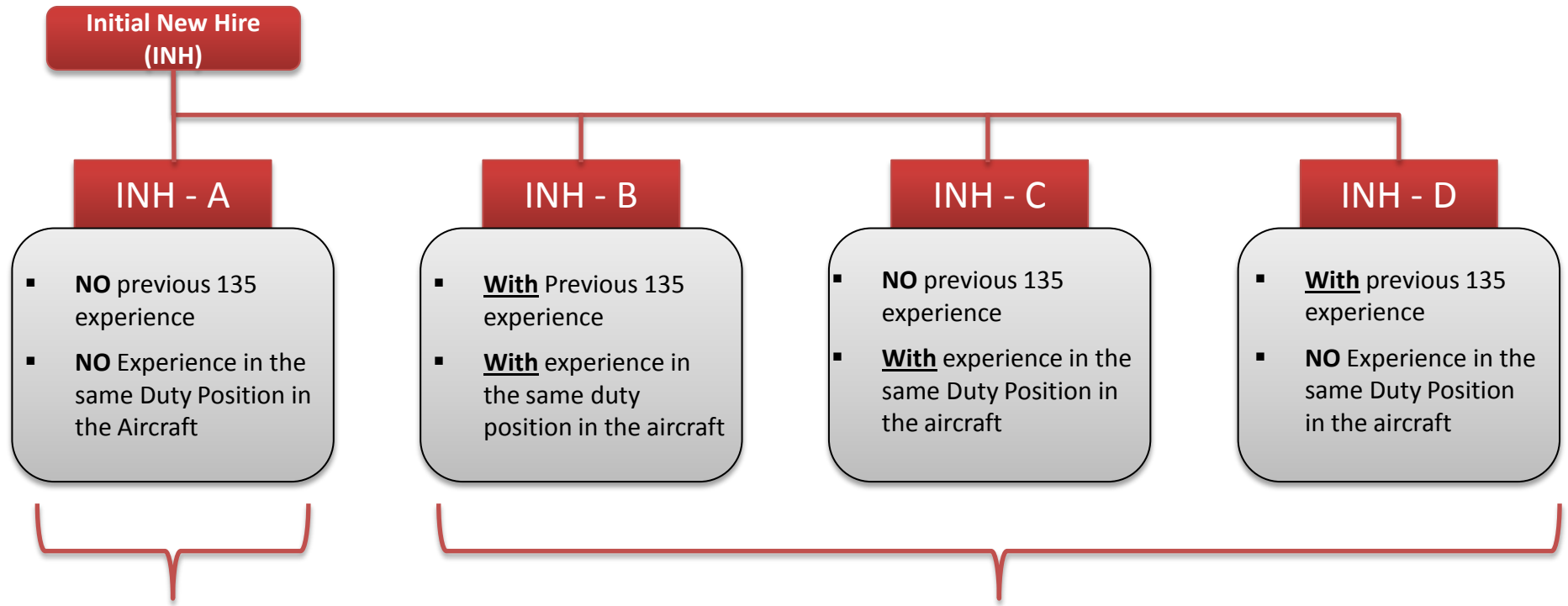
- Operators can have Multiple New Hire Curriculums to reduce planned training hours based on Flight Crews previous experience.
- Multiple Curriculums require a defined set of pre-requisites to determine the candidates Eligibility into a Curriculum

Example:

- Documentation such previous training records detailing extent and scope of previous employer's training.
- Validated Pre-testing

Structuring Your Training Program

Reduced Training Hour Curriculums (RTHC's)



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

INH - B

Sample Pre-Requisite Checklist

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

- **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

INH - B

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

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

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

INH - B

Sample RTHC Curriculum (INH-B)

Curriculum Segments
Basic Indoctrination
Operator Specific Segment
Airman Specific Segment
Emergency Training
General Emergency – Situation
General Emergency - Drill
Specialty Curriculum
Hazardous Material
Aircraft Ground Training
Aircraft Flight Training
Crew Qualification Segment

No Reduction

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

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

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



Structuring Your Training Program

Programmed vs. Planned Training Hours

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

Curriculum Segment	Initial New Hire				Active Crewmember			
	INH A	INH B	INH C	INH D	DIF	TRA	UPR	REC
Basic Indoc – Operator	18	18	18	18	0	0	0	4
Basic Indoc – Airman	14	14	14	14	0	0	0	4
Subtotal / Basic Indoc	32	32	32	32	0	0	0	8
General Emergency – Situation	4	4	4	4	0	0	0	2
General Emergency – Drill	4	4	4	4	0	2	0	2
Emergency Training – Sub Total	8	8	8	8	0	2	0	4
Hazardous Material	4	4	4	4	0	0	0	2
Aircraft Ground Training	56	AR	56	56	AR	48	16	8
Ground Training Sub Total	100	AR	100	100	AR	48	16	22
Aircraft Flight Training	12	AR	6	12	6	6	6	4
Flight Crew Qualification	AR	AR	AR	AR	AR	AR	AR	AR
Total Planned Training Hours	AR	AR	AR	AR	AR	AR	AR	AR



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

Part 142 Contracted Training Centers

Relationship with 142 Training Center

REF: 135.324, 8900.1 Vol 3 CH 54 Section 5

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!

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