

**FSANA CFI Training & Currency Qualifications Working Group Recommendations**  
**06/02/2022**

**Synopsis:**

On April 20, 2022 FSANA hosted a meeting of industry representatives to discuss and provide recommendations regarding potential FAA changes to CFI renewal and initial CFI training requirements. This document is the recommendations from the workgroup representatives.

**Executive Summary:**

The workgroup recommends that the FAA should:

- Transition to a process that does not require subsequent reissuance of a physical CFI certificate when renewed and that the tracking of currency or reinstatement after a lapse in currency can be completed through a digital airman registry tracking process. Also, the FAA should not reduce or remove the current regulatory requirements to maintain the eligibility to exercise the privileges of a CFI.
- Add to 14 CFR 61.183 a requirement for “3 hours of flight training with an authorized instructor in the category and class of aircraft in which the test will be given in preparation for the practical test, which must have been performed within the preceding 2 calendar months from the month of the test.” This would ensure at least a minimum amount of training from an authorized instructor specifically related to the issuance of the initial CFI certificate and is a parallel requirement as is currently in place for all other initial certification levels and the instrument rating, but not in place for a CFI certificate aeronautical experience requirement.
- Amend 14 CFR 61.195 (h) by removing the words “who serves as a flight instructor in an FAA-approved course for the issuance of a flight instructor rating.” This will allow flight instructors who meet higher hours of total flight instruction with a positive demonstrated pass rate to provide training to initial CFI applicants sooner in all sectors of aviation training; not just as a part of an FAA-approved 141 course. This will maintain quality while expanding the potential human resource base of instructors who can provide for initial CFI training.
- Ask that the FAA establish an Aviation Rulemaking Advisory Committee (ARAC) Working Group and/or Aviation Rulemaking Committee (ARC) should any further changes of Restricted ATP (R-ATP) requirements be considered prior to any NPRM issuance.

### **Workgroup Recommendation Detail:**

The role of the flight instructor remains critical to safety and for the training of the next generation of pilots who will operate in our National Airspace System (NAS) professionally, for business, and for hobby and pleasure. Ensuring those who provide training are competent, proficient, and current is critical to safety in both training and the future operations of those to whom training is provided. It is also critical to the NAS that there are sufficient numbers of Certificated Flight Instructors (CFIs) available and that they are also able to provide training efficiently and effectively in a manner that leverages knowledge and experience to make our next generation of pilots.

In consideration of future rulemaking and policy changes, a workgroup of industry representatives uniquely engaged and experienced with Certified Flight Instructor certification and currency was formed. The workgroup met to discuss potential changes to who may be authorized to train initial CFI applicants, how CFIs should maintain eligibility to provide training with their certificates, and briefly, how CFI certification and quality impacts ATP certification and hour requirements.

Considering the current and future demand for CFIs, data indicates there are numerically enough holders of CFI certificates. However, we also know that a significant number of these CFIs maintain their certificates, but are not actively providing training due individual circumstances, such as service to the aviation industry in other professional pilot operations, or medical issues. While these individuals may not be routinely exercising their privileges, they are still required to “keep their CFI current or lose it” under the current FAA certification process, which requires a renewal of the CFI certificate every 24 calendar months.

It is the position of this group that a current FAA rulemaking effort entitled “Removal of the Expiration Date on a Flight Instructor Certificate” has strong merit for additional NPRM proposal and adoption.<sup>1</sup> The abstract from the notice indicated that the: “action would remove the expiration date on flight instructor certificates. In addition, it would remove the requirement for a flight instructor to renew his or her flight instructor certificate. Instead, the rule would call for the flight instructor to meet and demonstrate recent experience requirements to exercise the privileges of his or her certificate.” Reference to this notice can be found at: <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202110&RIN=2120-AL25>.

This workgroup wholly agrees with the general concept of a change in the regulatory requirements to make it such that a CFI certificate would no longer “expire” but would instead require a CFI to continue satisfying 14 CFR 61.197 to maintain their flight instructor privileges.

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<sup>1</sup><https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201710&RIN=2120-AL25>

## **Removal of Expiration Date on CFI Certificate and Continued CFI Currency Requirements**

The group recommends the FAA to maintain the current requirements for currency, or reinstatement, but allow for the tracking of this currency to be performed solely through digital means within the U.S. Civil Airmen's Registry. The group agrees that there is no need to reissue a new plastic certificate at every renewal application and that CFI currency should be tracked digitally while using the same recurrency and reinstatement processes that are currently in place. As record of this, a CFI could submit the same tracking events that are currently issued that may result in a non-printed paperwork record of the currency event.

The group notes that it remains critical that a flight instructor be current and proficient in their knowledge and abilities, which is the case today. Removal of any requirements in 61.197 to maintain the privileges of a Flight Instructor Certificate would serve to undermine the level of continued skill and knowledge for the practitioners of flight training and potentially decrease safety in the NAS. The group posits that the existing methods to remain current or to again become current (i.e., a reinstatement) are adequate and correctly ensure at least a base level of proficiency in our CFI certificate holders.

Ensuring that these methods are maintained allows a student to be confident that the training they are receiving is meeting a minimal knowledge and skill level and that the training they are receiving is valid. If this currency was not tracked through the publicly available Airman Registry, the general public would have no way of ensuring this. Additionally, continued tracking of this allows the airman certification system to ensure that when an applicant is endorsed for a practical test that the certification of their training is being given from a properly qualified and current Certificated Flight Instructor. Any complete removal of this tracking would remove this quality control step in the airman certification process.

## **Change to Regulatory Requirements for Eligibility to Train Initial CFI Applicants**

Additional emphasis for greater levels of experience and structure in training by an instructor of initial CFI applicants has been historically valued. The responsibility of training a new CFI includes developing a pilot from just being able to fly themselves and passengers to imparting the knowledge, skill, and risk management tools onto others while still managing the aircraft in the teaching process. With this comes added risk, and added responsibility. Ensuring that the process of teaching those who will do this task has been, and in the opinion of this workgroup, continues to be something that should be done only with a greater level of experience or structure in the training.<sup>i</sup>

Considering the need to make changes, the ARAC explained in their 2017 document,

“The turnover of CFIs across the nation is tremendous and there are very few full-time/permanent CFIs. The flight instructor profession is a transient position for the vast majority of pilots on their way to fly jets professionally. As a result, instructors are moving fast to Regional Airlines; our turnover (and the turnover across the training industry) is approaching 90% annually. This turnover is severely limiting the number of flight instructors available that meet the requirement of 61.195. This regulation sets the requirements for an instructor pilot to train individuals in the CFI course. As of right now, we have about 40 students waiting to start their CFI training who cannot start due to the lack of human resources that meet the requirements of 61.196 (and the backlog is growing).”

Further,

“A shortage of CFIs increases the training time of new flight students thus increasing the time it takes for new pilots to complete their flight training and ATP requirements. This delay further exacerbates the pilot shortage problem.”

Most training providers due to active airline hiring are seeing 90-95% turnover of their flight instructor employees every 10-16 months.

The workgroup agrees with this effort and offers some input for positive changes to this regulatory requirement to ensure quality training while at the same time offering an ability to have more parties provide the training than might have been able to do so in the past.

The workgroup developed specific recommendations that can maintain quality while at the same time enhancing the potential availability of instructors who would be eligible to provide initial flight instructor training.

The first recommendation is to amend 14 CFR 61.195 (h) to remove the words “who serves as a flight instructor in an FAA-approved course for the issuance of a flight instructor rating.” This will allow flight instructors who meet higher hours of total flight instruction with a positive demonstrated pass rate to provide training to initial CFI applicants sooner in all sectors of aviation training; not just as a part of an FAA approved 141 course. This will maintain quality while expanding the potential human resource base of instructors who can provide for initial CFI training.

A second recommendation that would enhance training reliability is to add to 14 CFR 61.183 a requirement for “3 hours of flight training with an authorized instructor in the category and class of aircraft in which the test will be given in preparation for the practical test, which must have been performed within the preceding 2 calendar months from the month of the test.” This would

ensure at least a minimum amount of training from an authorized instructor specifically related to the issuance of the initial CFI certificate and is a parallel requirement as is currently in place for all other initial certification levels and the instrument rating, but not in place for a CFI certificate aeronautical experience requirement.

The workgroup believes these two changes would significantly increase the pool of eligible instructors who can provide training to the next generation of CFIs, while maintaining the safety of the NAS and the public. The ability to ensure that future generations of CFIs can be trained, even as the tenure of CFIs is shortened due to considerable professional pilot hiring, is critical to the ability of the flight training community's ability to keep the pilot workforce pipeline robust. These proposed changes maintain quality in training provided, safety, and enhance the efficiency of the system.

Flight instructors are a critical staffing infrastructure for flight training providers. The position of working as a flight instructor is additionally an experience building professional activity that is used by a large percentage of pilots who then transition into future jobs as professional pilots. It is the work as a flight instructor that many future professional pilots leverage to meet requisite Airline Transport Pilot (ATP) experience requirements for these jobs.

Working to build time as a flight instructor, or any other commercial pilot work, is a career building path process that must be completed.

### **Changes to R-ATP Minimums in Relation to CFI Certification and Quality**

The workgroup briefly discussed concerns about some parties in the aviation industry seeking to reduce Restricted ATP (R-ATP) requirements for candidates from some select pathways to allow faster entrance of pilots into airline pilot (FAR Part 121 operating) positions.

The workgroup strongly encourages any potential changes to R-ATP minimums be considered only with input from the entire industry. It is the request of the group that any proposed changes to R-ATP minimums be made only after an Aviation Rulemaking Advisory Committee Working Group and/or Aviation Rulemaking Committee (ARC) has been formed and asked for input on how changes might affect all sectors of the aviation industry.

While the workgroup strongly encourages the FAA and the aviation industry as a whole to develop more robust and alternate pathways to become an airline pilot, until that has been done, any new reduction in total hour requirements for R-ATP certification will have visible and potentially significant unintended consequences for the flight training community.

There is no doubt that significant pressure from some vested interests would like to reduce total experience hours requirements to expedite the transition of pilots from the training segment of their careers to direct service as pilots in the airline environment. These interests may have clouded views when it comes to the effects such changes would have on the training sector, the sector that must remain robust to continue training the pilots they need.

The workgroup brings this topic up due to its relation to the experience needed to train new CFIs and what it takes to keep CFIs current and proficient. Reduction of R-ATP criterion will further inhibit the flight training community's ability to source instructors and to train future generations of CFIs. Any change to these requirements should be done carefully and in full consideration of the overall environment and not in a way that quickly expedites a current group of airline pilots at the expense of the next generation of pilots.

The workgroup considers these changes proposed to be substantive and critical to enhancement of the throughput of pilot growth in the United States. Additionally, the workgroup cautions the FAA to make changes in a manner that allow for continued and expanded enhancement of safety. It is the position of the workgroup that this can be done while additionally improving growth and efficiency in the pilot training pipeline. Finally, the recommended changes can help make the FAA efforts in pilot certification and administration more efficient.

The members of this workgroup stand ready to provide any additional input the FAA and the aviation industry seek as we work together to enhance and improve our pilot training systems.

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<sup>i</sup> The FAA Aviation Rulemaking Advisory Committee (ARAC) has previously proposed that the FAA change long-standing requirements under FAR 61.195(h)(2)(iii) that a CFI must have been a CFI for more than 24 months before they are authorized to train a first-time instructor applicant.