# ACT ARC Recommendation 24-1 Pilot Training Pathway Enhancements

# Who made this proposal?

The proposal comes from the **Air Carrier Training Aviation Rulemaking Committee (ACT ARC)**

# What does the Air Carrier Training Aviation Rulemaking Committee (ACT ARC)do?

The ACT ARC provides a forum for the United States aviation community to discuss, prioritize, and provide recommendations to the FAA concerning operations conducted under parts 121, 135, and 142.

# When did the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) begin?

It was chartered January 21, 2014.

# Who are the members of the Air Carrier Training Aviation Rulemaking Committee (ACT ARC)?

**The ACT ARC member organizations include pilot, flight attendant, and dispatcher training stakeholders across part 121 air carriers, part 135 air carriers and operators, part 142 training centers, and safety advocacy organizations.**

# Who is the Chair of the Air Carrier Training Aviation Rulemaking Committee (ACT ARC)?

**Industry Co-Chair:** Rob Thomas, Managing Director Flight Standards, United Airlines

**FAA Co-Chair:** Lee P. Abbott, Manager, Air Transportation Division, Training & Simulation Group Manager, AFS-280

# Who is the  Pipeline, Pathways and Partnerships Working Group

Referred to as the 3P WG, very little information is available on this working group. It is headed by Michael Dee who is a workgroup co–lead. He is the Managing Director, Flight Operations, Republic Airways. The other co-lead is Paul Ryder who is with the Air Line Pilots Association, International (ALPA).

# The Report Overview

- Not everything in this report is bad. In fact, they are a few good things that FSANA has been pushing for several years.

- They speak of collaboration in the report and if they had communicated or included stakeholders in the very group they are seeking to regulate, they would known what the GA flight training industry is doing.

# The Report Overview Continued

- Most of the recommendations submitted would be a better fit with a rewrite of the ATP ACS, additions to the Commercial ACS, and a few changes to the current 141 regulations.

- While we are not an enemy of airlines, in fact they keep us a float with demand, to see their hand deep in the GA flight training industry would be like FSANA, a GA organization, making recommendation as to the operations of a Part 121, 135, or 142 operation.

# Concerns with the players

- Who made the recommendation. **(Air Carrier Training Rule Making Committee. When airlines start making rules for general aviation, we are on a slippery slope).**

- Their mission. **(Recommendations to the FAA concerning operations conducted under <u>parts 121, 135, and 142</u>).**

- The Chair and Co-Chair of the committee. **(United Airlines and the FAA).**

- Members of the committee. (**Pilots, flight attendants, and dispatcher training stakeholders across part 121 air carriers, part 135 air carriers and operators, part 142 training centers, and safety advocacy organizations).**(Who is left out? The GA community.)

# Concern with the players continued

- Lack of information on the P3 WG.

- The Co-Leads on the P3 WG **(Republic Airlines, remember what we just fought them last year with the 1500 rule submitted by Republic Airlines. This seems like round two).**

# The Question

- The P3 WG was tasked with answering the question, "Is there room for creating an additional regulatory path for individuals seeking a professional piloting career?

- **I would argue that since the group was formed to make recommendations to the FAA concerning Part 121, 135 and 142 operations, this was outside of their scope.**

- …Considered current and past initiatives…

# Stated Goals

**Additional pathways must necessarily enhance the pilot training experience, result in a pilot with a higher degree of advanced aviation knowledge and skill, and not negatively impact the sustainability of the existing pathways.**

# Stated Goals Rebuttal

- If these recommendations where included in a rewrite of the ATP ACS, we could support many of them. In fact, if ANY school wanted to invest and train students for a revised ATP ACS to include these proposals, we may could even support a reduction in the 1500 rule to the current 1000 hour level for colleges. It would level the playing field between colleges and traditional flight schools.

# Lack of Facts

- **Very few details of the plan are being presented at this time.**

- **No mention directly of trying to kill the 1500 hour rule.**

- **However… "The P3 WG discussed whether greater training efficiencies could be achieved by recommending PFTOs train pilots to a purely competency-based standard, with either no fixed minimum training and experience requirements or reduced requirements."**

# Lack of Facts

- Their stated goals are to train to proficiency. I would not be surprised if they ultimately seek lower than 750 hours when the details emerge.

# Additional Goals

**The concept the ACT ARC proposes is an additional Professional Flight Training Organization (PFTO) Certification for pilot schools satisfying standards above and beyond those currently required for certification under Title 14 Code of Federal Regulations (14 CFR) part 141.**

Collegiate Flight Schools will be the primary benefit.

# THIS WILL HURT CURRENT PART 61 and 141 FLIGHTS SCHOOLS.

**This will ultimately cost tax payers more money in government and student loans, and cost of training.**

# Analogy

- Colleges would be the Wal-Mart's of the flight training industry while traditional flight schools would be the mom and pop shops.

- Many of the mom and pop shops would be driven out of business by the "Wal-Mart" colleges.

# PROPOSALS

- Minimum fleet and ground training device requirements; **(SMALL SCHOOLS ARE LEFT OUT)**
- Minimum flight training and ground training curriculum requirements in excess of the existing requirements under 14 CFR part 141, including: Upset prevention and recovery training (UPRT) conducted in an all attitude aircraft; **(This can be added to current 141 regulations or in a new ATP ACS. It could be an endorsement given as a requirement for ATP).**

# PROPOSALS CONTINUED

- A jet transition course administered to a performance standard utilizing a full flight simulator **(This will isolate small schools with limited resources. This could also be a requirement for the airline ATP).**

- Aviation academic training equivalent to a minimum of 30 semester credit hours of coursework in an accredited aviation degree program; **(30 hours of college credit is a year of college and will not speed up getting pilots in the cockpit. What would the equivalent look like? Most colleges would give 30 hours for the full sweep of ratings. So, that would mean no real additional educational requirements other than flight training).**

# PROPOSALS CONTINUED

- An air carrier-oriented training environment, including elements and characteristics encountered in air carrier flight training and line operations, such as flows and memory items, Minimum Equipment Lists, and Line Oriented Flight Training; **(IS IT THE RESPONSIBILITY OF FLIGHT SCHOOLS TO PROVIDE TRAINING TO PILOTS FOR THE AIRLINES SPECIFIC OPERATIONS? THESE COULD BE ADDED TO CURRENT 141 REGULATIONS IF DESIRED OR AN UPDATED ATP ACS).**

# PROPOSALS CONTINUED

- Industry Advisory Boards **(AIRLINES and NOT CURRENT FLIGHT SCHOOLS IS NOT A GOOD BOARD MAKEUP. THIS IS AN ATTEMPTED TAKEOVER OF CURRENT 141 FLIGHT TRAINING).**

- Entry screening standards or candidate assessment protocols. **(This is already being done some and FSANA if leading the way in MENTAL HEALTH screening. Can and should be requirement of commercial, ATP, or any level CFI).**

# PROPOSALS CONTINUED

- Establishment of a safety management system meeting the standards of 14 CFR part 5 **(Every school should be doing this already. However, this could be required under current 141 regulations. FSANA has pushed this for the past two years on the safety committee).**

- Standardized instructor/evaluator training **(We do this now! Its called the ACS. We could do better in instructor training).**

# PROPOSALS CONTINUED

- Demonstrated performance as a flight training provider **(This is wide open to a lot of interpretation. This could limit a lot of schools that might otherwise qualify. However, ASI's should follow up on poorly performing CFI's and flight schools).**

- Data collection and use standards **(This could be added to current 141 schools and annual surveys of Part 61 schools).**

- The ACT ARC proposes that the FAA pursue academic accreditation of Part 141 Pilot Schools, particularly PFTOs. **(FSANA IS DOING THIS ALREADY. This can further limit the participating schools. In addition, no information is presented to state how this will be done).**

# PROPOSAL CONTINUED

- Enhancement of initial and recurrent training for FAA Aviation Safety Inspectors (ASI) assigned to Pilot Schools/PFTOs, review and revision of inspector guidance, and an increase in the number of ASIs available for certificate holder oversight to ensure standardization and quality of oversight; **(More ASIs are needed. The reauthorization bill does expand the number of ASIs but not for adding new programs, it increases their number to managing existing ones. Managing current 141 schools would be easier than adding a new pathway to provide oversight).**

# PROPOSAL CONTINUED

- Encouragement of industry/FAA collaboration and information sharing relating to pilot training **(They encourage us to work together but are leaving traditional flight training out of the equation. This means they want collaboration between colleges).**

- Continued actions to ensure the availability of adequate numbers of Designated Pilot Examiners to satisfy practical examination needs **(FSANA has been pushing this for several years. Will new DPE resources be absorbed by this new program. We have options by modifying DMS to prevent double booking, student preparation for the ride, and airworthy aircraft to eliminate the backlog and increase capacity by 30% or more).**

# PROPOSALS CONTINUED

- Exploration of validation and use of current and emerging technologies **(We are doing this already but welcome additional technology like virtual and traditional flight simulators).**

- We could support an increase of simulator usage in most training programs and the use of virtual flight training devices.

# ISSUES DISCUSSED

- For individuals with the requisite aptitude and interest to pursue a career as a professional pilot, the greatest obstacles to achieving that goal may be the cost of flight training, the lack of easy access to financing, and the inability to make repayment on financing immediately after completing training. **(This program will not change student loans becoming due after the completion of school. It will also increase the amount of student debt because of an increase in training cost if colleges are the sole provider of professional flight training).**

# ISSUES DISCUSSED CONTINUED

- The inconsistent availability of Designated Pilot Examiners (DPE) has a significant impact on students' ability to timely complete oral and practical examinations for certificates and ratings. **(This program will make this worse because it will be another program to absorb current resources. This could be drastically reduced by the expedient approval and implementation of ODA).**

# ISSUES DISCUSSED CONTINUED

- Due to multiple barriers of entry, some demographic groups, particularly women and persons of color, are disproportionately represented in the ranks of professional pilots. **(DEI has been proven to not be a good thing for many industries. (Recent United Airlines hard landing and damaged aircraft in Houston). Many industries are eliminating their DEI policies. We should all want the best candidates regardless of DEI. Candidates from diverse groups deserve to NOT be discriminated against. If any of these groups want to fly, current programs and schools are available to teach them).**

# ISSUES DISCUSSED CONTINUED

- Despite the wide variety of training providers available to aspiring pilots, they lack ready access to reliable information needed to make meaningful comparisons between options. Secondary to this issue is a lack of financial literacy or awareness of available financing options, including the lack of appreciation of the impacts of borrowing large sums of money at unfavorable terms. **(They are saying all schools except colleges are not good at what they do. This is a slap in the face of every 61 and 141 school in America. Financing is an issue and needs help. If truck driving, beauty, and other trade schools can get student loans, Why can't flight schools? A success rating of students that pass their checkride on the first attempt would be a good guide for potential students.)?**

# ISSUES DICUSSED

- There is no regulatory difference between flight academies offering robust, career-oriented training programs and flight schools with more general programs. **(Small schools can train to high standards. Part 61 and 141 are a difference and regulations are DIFFERENT. Although they both test to the same standard, these programs and current college level programs are a difference. ATP Flight School would be considered a robust trainer, I would submit that they are NOT better than many small schools and in fact have a lower first time pass rate).**

# ISSUES DISCUSSED CONTINUED

- any new pathway must enhance the pilot training experience, result in a pilot with a higher degree of advanced aviation knowledge and skill that better meets the expectations of airlines/operators, and not negatively impact the sustainability of the existing pathways. **(It will negatively impact existing pathways. What happens when airlines want accept anyone that did not come from this pathway. The past 16 years have proven the success of what we have. In addition, experience gives a pilot all these things. The only complaint with airlines is the 1500 rule when they get in a crunch for pilots).**

# ISSUES DISCUSSED CONTINUED

There is a lack of standardization among the training offered by various providers. **(They are <u>NOT</u> a lack of standardization. This is an insult to every flight school in America. ALL schools <u>MUST</u> follow and test by the ACS).**

# ISSUES DISCUSSED CONTINUED

- The framework for flight training and certification under 14 CFR parts 61 and 141 and related guidance does not adequately cover advanced skills and competencies important to preparing pilots for transport category aircraft operations. **(That is not the objective of the ACS nor has it ever been the objective. It is to build a foundation to prepare them for that that transition. Commercial and ATP ratings do prepare a pilot for these transitions. If they want to do something, then expand ATP training requirements to include simulators for GA schools and provide them the grants to on-board the equipment).**

# ISSUED DISCUSSED CONTINUED

- There are no consistent screening processes or standards for candidates entering the professional aviation realm. **(None exist to be a DPE either or most anything else in the FAA. A problem has been identified, find a solution. It does not take a new program to this. FSANA is leading the way in this arena).**

# ISSUES DISCUSSED CONTINUED

- While students seeking entry to aviation degree programs at colleges and universities must satisfy the applicable admission standards, these standards may not assess aptitude relevant to a flying career. **(Another problem identified, find a solution. This could be implemented in every 61 and 141 school or a part of the pilot medical requirements. So many times a pilot wants there private and eventually decides to go to the airline later, it should be implemented for all Commercial, ATP, and any level CFI).**

# ISSUES DISCUSSED CONTINUED

Similarly, to the extent non-university flight schools have admission or other screening criteria, they are not standardized, and may not be relevant to the likelihood of success as a professional pilot. **(Another problem identified. Find a solution. Standardize policy and implement for all schools. PILOTS HAVE BEEN SUCESSFUL IN THE AIRLINES SINCE THEY BEGAN WITHOUT THIS NEW PROGRAM).**

# ISSUES DISCUSSED CONTINUED

- There is a lack of data collection, comparison, and collaboration within the flight training industry to expand on best practices. **(FAA could send a survey to all 61 schools. They could require ASI's to complete it on all official 141 schools in their jurisdiction.  This is needed).**

# ISSUES DISCUSSED CONTINUED

- FAA oversight of flight training providers varies, with policy differences between field offices. **(Rework the ASI training to eliminate this problem. Again, another problem identified. Fix it. Don't blame flight schools for the failures of the FAA. If field office's have a policy difference, FAA legal should clear up that issue. It does NOT take a new program to accomplish this task).**

# ISSUES DISCUSSED CONTINUED

- ASI training, inadequacies of associated guidance material, and lack of FAA Headquarters oversight of ASIs and field offices may be significant factors affecting the application of consistent oversight. **(This will NOT improve by adding another program. It will only weaken the existing ones.  They admit to another problem. FSDO's work independently  of the FAA HQs. The NEW DPE oversight office will improve this for DPE's. FAA leaders should provide MORE oversight to FSDO's instead of allowing them to function as independent facilities. Many FAA leaders do not want to get "get in their lane").**

# ISSUES DISCUSSED CONTINUED

- Better FAA oversight, support, and geographic prioritization of DPEs would reduce delays and bottlenecks in student training. **(Increase DPEs in some areas and reduced in others areas. Geographical expanison for DPE's has been in place for a number of years. The national oversight office for DPE management is fulfilling this task).**

- Enhanced training requirements would better prepare pilots for employment in the professional aviation domain**. (Improve the current paths without creating a new program. Improve current ACS's for Commercial and ATP flight training with enhancing current 141 regulations. Airlines have operated proficiently for years with the current programs).**

# ISSUES DISCUSSED CONTINUED

- Enhanced requirements for training providers will aid in standardizing the training experience of those seeking a professional pilot career and result in improved safety and better prepared pilots for air carriers and other operators. **(THE PTS AND NOW ACS DOES STANDARDIZE TRAINING! Safety should be the top priority for any training. Almost 16 years with no major accident of a US carrier.)**

# ISSUES DISCUSSED CONTINUED

- Additionally, the framework for flight training and certification under 14 CFR parts 61 and 141 and related guidance does not place emphasis on skills and competencies most important to preparing pilots for transport category aircraft operations. **(This has never been the goal stated in the ACS or PTS. Enhance the ATP rating and move these desires to the ATP ACS).**

# ISSUES DISCUSSED CONTINUED

- They promote the following that could be added to the ATP ACS and some are taught now:

- Use of Flows/Memory Items and Checklists;

- Standard Operating Procedures (SOP)/Flight Operations Manual (FOM)/Flight Crew Operating Manual (FCOM);

- Operational Control;

- Minimum Equipment Lists (MEL)/Configuration Deviation Lists (CDL); and

- Ground Operations.

- Mentoring/professional development

- CRM and ADM

# FINAL THOUGHTS

- THIS IS AN ATTEMPT TO HELP COLLEGES AND AIRLINES.

- All of the Quantitative data is from colleges only with NO current non college part 61 or 141 school included regardless of size.

- ESTIMATE cost based on $75000 to $220000 for zero to hero training.

# THE DEATH OF TRAITIONAL FLIGHT TRAINING

- **LETS STAND AGAINST THIS!**

- **PROTECT OUR ASSETS!**

- **IMPROVE THE CURRENT PROGRAMS WHERE POSSIBLE.**

- **LEAD THE WAY FORWARD!**

THE END

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