VOLUME 3 GENERAL TECHNICAL ADMINISTRATION

CHAPTER 24 EVALUATE 14 CFR PARTS 91 SUBPART K/121/135.411(A)(2)
MAINTENANCE TRAINING PROGRAM RECORD

Section 1 Safety Assurance System: Training Program Evaluation

3-1891 REPORTING SYSTEM(S).

A. Program Tracking and Reporting Subsystem (PTRS). For Title 14 of the Code of Federal Regulations (14 CFR) part 91 subpart K (part 91K) fractional ownership operations, use activity codes 3633 and 5633.


3-1892 OBJECTIVE. This section provides guidance for evaluating and accepting a certificate holder/applicant’s or fractional program manager’s (hereafter referred to as the program manager) maintenance/inspection training program.

3-1893 GENERAL. Effective training is the basis for a successful maintenance/inspection program. Although many procedures for maintaining and inspecting aircraft may be similar, the equipment, procedures, and task documentation used may all be unique to the certificate holder’s/program manager’s/applicant’s specific programs.

A. Maintenance/Inspections. Title 14 CFR part 91K and part 135 may require, and parts 121 and 145 do require, that maintenance/inspections be performed in accordance with the certificate holder/applicant’s or program manager’s manual.

B. Maintenance/Inspection Training Programs. Maintenance/inspection training programs are the most efficient manner to inform personnel of the requirements of the certificate holder/applicant’s or program manager’s program.

3-1894 COORDINATION REQUIREMENTS AND SCHEDULING. Aviation safety inspectors (ASI) should encourage applicants to discuss pending maintenance/inspection training program development with the certification team before the program is submitted for final acceptance. It is especially important that programs be reviewed for conformity with appropriate regulatory requirements. This review can reduce the number of major changes a certificate holder will have to make after a program has been printed and distributed.

3-1895 SCHEDULING MAINTENANCE TRAINING PROGRAMS. Delays in program acceptance result in delays in the certification process, or in the case of fractional ownership programs, delays in issuance of management specifications (MSpecs). To facilitate the evaluation of the training programs, the applicant should be encouraged to schedule a classroom training session in a timely manner.
3-1896 CONTENT OF MAINTENANCE/INSPECTION TRAINING PROGRAMS. The program manager’s Continuous Airworthiness Maintenance Program (CAMP) or certificate holder/applicant’s training program should include company indoctrination and technical training (formal and on-the-job training (OJT)). The program should contain a list of tasks to be taught and a method for recording the training. Completion of the training must be entered in the individual’s training record.

A. Company Indoctrination. Each maintenance/inspection employee should receive instruction in the use of the certificate holder/program manager/applicant’s manuals, policies, procedures, and forms. The training program should contain a policy statement that emphasizes the importance of following the certificate holder’s documented maintenance procedures without deviation. Additionally, the program should include information pertaining to the certificate holder’s procedures for identifying errors or deficiencies in maintenance procedures and actions to be taken to ensure safe Federal Aviation Administration (FAA)-acceptable practices and Airworthy aircraft.

B. Maintenance/Inspection Technical Training.

1) Training may consist of a combination of formal (classroom) instruction and OJT. The certificate holder/program manager/applicant may give training credit to individuals for experience gained while employed by other certificate holders/program managers.

2) Procedures unique to the certificate holder/program manager/applicant should be taught. Training records should indicate the amount of formal training, OJT, and experience each individual receives.

3) Technical training may be contracted to another certificate holder or manufacturer, or in the case of a specialized process, to a person knowledgeable in that specialized process. The certificate holder/program manager/applicant is responsible for the content and quality of such training.

4) The FAA does not establish a fixed amount of time for indoctrination or technical training courses, but the courses should use a minimum time proportional to the certificate holder/program manager/applicant’s complexity.

C. Responsibilities for Persons Other than a Certificate Holder/Program Manager’s Employees. Part 121 requires each certificate holder to be primarily responsible for having a training program and to ensure that the training received throughout the certificate holder’s system is of equal quality and effectiveness. This covers all personnel, such as the certificate holder’s employees and contract personnel for emergency maintenance and servicing.

1) Part 91, § 91.1433; part 121, § 121.375; and part 135, § 135.433 are similar in that each certificate holder or person who performs maintenance shall have a training program. The training program ensures that each person, including inspection personnel, is fully informed about procedures, techniques, new equipment in use and is competent to perform the applicable duties.
2) Sections 91.1429(a), 121.371(a), and 135.429(a) are similar in that no person may use any person to perform required inspections unless the person performing the inspections is appropriately certificated, properly trained, qualified, and authorized to do so.

NOTE: Title 14 CFR part 1 defines “a person” as an individual, firm, partnership, corporation, company, association, joint-stock association, or governmental unit.

D. Category (CAT) II/III Maintenance Personnel Training. Each applicant for CAT II/III must establish an initial and recurrent training program. This program must be acceptable to the Administrator and cover all personnel performing quality control inspection and maintenance work on CAT II/III airborne systems and equipment. Training records for such personnel are to be kept current and made available to the FAA for inspection.

E. Recurrent Training. The certificate holder/program manager/applicant’s training program should ensure that deficiencies discovered through continuous analysis and surveillance are corrected during recurrent training. Fractional ownership program manager’s personnel who are responsible for maintenance are required to receive annual training. Additionally, recurrent training should include at least the following:

- Review, reinforcement, and upgrade of all training given in both indoctrination and technical subjects,
- Input from maintenance bulletins and/or maintenance newsletters, and
- Tasks, such as run-up/taxi, Required Inspection Items (RII), and nondestructive inspection (NDI).

F. Training Records. Training records must be retained by the certificate holder/program manager/applicant to document that personnel are adequately trained. Training records should be maintained at a central location, but may be maintained at other locations, provided these locations are listed in the certificate holder/program manager/applicant’s manual. The format for recordkeeping may be electronic, or any other media acceptable to the Administrator.

G. Special Emphasis Training. Special maintenance/inspection training programs are required when new or different types of aircraft and/or equipment are introduced.

H. Fractional Ownership Training Requirements. Fractional ownership programs require aircraft-specific technical training for those persons who are responsible for maintenance. This training is intended for persons within the fractional ownership program who oversee and/or schedule maintenance and inspections and are responsible for creating or amending the manager’s inspection or maintenance program(s). The training, which is required both initially and annually (recurrent), ensures that those personnel are technically knowledgeable of the aircraft. This specific training requirement does not extend to the persons performing the maintenance. However, all maintenance personnel must still meet the requirements of the applicable regulations, such as 14 CFR parts 43, 65, and 145.
I. Fractional Ownership CAMP. Program managers who maintain their aircraft in accordance with a CAMP have additional training requirements. Section 91.1433 requires that the program manager, or person performing maintenance for the program manager, has a training program. This program must ensure that each person, including inspection personnel, who determines the adequacy of work performed is fully informed about the procedures, techniques, and new equipment in use and is competent to perform the work. Section 91.1429 also requires any person who performs required inspections to be properly trained. This is in addition to his or her certification, authorization, and qualification requirements.

3-1897 ACCEPTING THE MAINTENANCE/INSPECTION TRAINING PROGRAM. The task of acceptance differs from approval in that no specific procedure or vehicle is used to accept a training program. See Volume 3, Chapter 32, Section 6, Evaluating, Accepting or Approving Maintenance-Related Manuals, Procedures, and Checklists for comprehensive information on the acceptance process.

3-1898 COORDINATION REQUIREMENTS. This task requires coordination with maintenance, avionics, and regional specialists.

3-1899 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- Title 14 CFR parts 65, 91K, 121, 135, and 145.
- Title 49 of the Code of Federal Regulations (49 CFR) part 173.
- 8900.1 Volume 10, Safety Assurance System Policies and Procedures.

B. Forms. None.


3-1900 PROCEDURES.

A. Review Certificate Holder/Program Manager File.

B. Review Schedule of Events (SOE). If this task is performed as part of an original certification or issuance of MSpecs, review the SOE to ensure that this task can be accomplished in accordance with the schedule.

C. Review Maintenance/RII Training Programs. The program should include the following elements in both the maintenance training program and the RII training program.

1) The name of the person responsible for the overall administration of the maintenance/RII training program.

2) The name(s) of the person(s) responsible for other processes within the maintenance/RII training program (e.g., recordkeeping, revisions to training programs, and security of the program).
3) Designated maintenance/RII training instructors.

4) A description of how instructors are determined to be qualified.

5) Procedures used to authorize instructors.

6) A file on the instructors consisting of qualifications, authorizations, and other documents pertaining to instructor assignments.

7) A list describing what type of training is required for new employees or RII candidates (indoctrination, OJT, etc.).

8) Procedures for evaluating, crediting, and documenting a new employee’s previous training.

9) Procedures for determining what additional training is required for a new employee.

10) A schedule for recurrent training, a description of recurrent training, and procedures for determining requirements for other training.

11) Recordkeeping procedures, including records of the following:

   - Training dates,
   - Who performed the training (instructor should indicate by signing),
   - The number of hours of training performed, and
   - The content of the training performed.

12) Criteria for determining the quality of the training program (training standards).

13) Evaluation of the need to revise training programs.

14) A training syllabus that describes the following:

   - Content of each training course,
   - Format of training (classroom, OJT),
   - Duration of training courses,
   - Standards for grading students, and
   - Training aids.

15) Criteria to determine acceptability of contract training, to include:

   - Qualifications of instructors,
   - Criteria to establish appropriateness of reference material being taught,
   - Reporting procedures to inform the certificate holder/program manager of student progress,
   - Criteria to determine adequacy of facilities, and
   - Criteria to evaluate contractor’s training syllabus.
D. **Review RII Training.** The certificate holder/program manager/applicant must provide RII original and recurrent training, including:

1) A statement that RII students are appropriately certificated, qualified, trained, authorized, and current as airframe and/or powerplant mechanics or appropriately certificated repairmen.

NOTE: Part 91K does not allow repairmen to be used for RII purposes.

2) A method for notifying the RII candidate of the successful completion of the course.

3) A method for receiving confirmation by the candidate of acceptance of RII authorizations and responsibilities.

E. **Observe Certificate Holder/Program Manager/Applicant Performing Training.**

This observation is performed regardless of whether the certificate holder/program manager performs the training or contracts with another company.

1) Ensure that facilities are adequate, including classrooms, training aids, and reference materials.

2) Evaluate the instructor’s presentation and knowledge.

3) Ensure that course content and instruction is in accordance with the training syllabus.

4) Ensure that training recordkeeping is performed in accordance with the maintenance/RII inspection program.

F. **Analyze Findings.** Evaluate all deficiencies to determine what changes will be required.

G. **Debrief the Certificate Holder/Program Manager/Applicant.**

1) If deficiencies are discovered during the interview, return the program to the certificate holder/program manager/applicant with a letter describing the problem areas. If the review is being performed as part of a certification, inform the certificate holder/program manager/applicant that the issue of the certificate will be withheld until deficiencies are corrected.

2) Schedule a meeting with the certificate holder/program manager/applicant to discuss the problem areas if it may be helpful in resolving deficiencies. Discuss how to resolve deficiencies.
3-1901 TASK OUTCOMES.

A. Complete PTRS Record. For part 91K.


C. Complete the Task. Successful completion of this task will result in the following:

1) A letter to the certificate holder/program manager/applicant indicating acceptance of the program.

2) The original accepted program sent to the certificate holder/program manager/applicant along with instructions to provide a copy of the program to the certificate-holding district office (CHDO).

3) SAS successful completion of this task will result in the acceptance of the Maintenance Training Program or revision and/or a determination that the training is being performed properly and is producing the desired results.

D. Document the Task. File all supporting paperwork in the certificate holder/program manager/applicant’s office file.

3-1902 FUTURE ACTIVITIES.

A. Part 91K. For part 91K, schedule normal surveillance as required.

B. Parts 121 and 135. For parts 121 and 135, follow SAS guidance for planning and accomplishing future risk-based surveillance.

| RESERVED. N/A. |