

VOLUME 6 SURVEILLANCE**CHAPTER 7 PART 141 INSPECTIONS****Section 1 Conduct Facility Inspection of a Part 141 Pilot School****6-1551 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.**

A. Initial Certification. Use activity code: 1371 TECH/ADMN/AGNC/EVAL TNG FACIL.

B. Surveillance. Use activity codes:

- 1640 SURVL/AGNCY/FACILITY INSP.
- 1646 SURVL/AGNCY/AMN TNG/CURRICULUM.
- 1647 SURVL/AGNCY/TNG FACILITY/EQUIP.
- 1648 SURVL/AGNCY/PROF CHIEF/ASST FI.
- 1649 SURVL/AGNCY/STUDENT RECORDS.
- 1650 SURVL/AGNCY/PERSONNEL RECORDS.
- 1651 SURVL/AGNCY/PHASE CHECKS.
- 1652 SURVL/AGNCY/RAMP.
- 1653 SURVL/AGNCY/ACFT/DOCUMENTS.
- 1654 SURV/AGNCY/SIMLTR-TNG DEV DOC.

6-1552 OBJECTIVE. Determine whether an applicant for a Title 14 of the Code of Federal Regulations (14 CFR) part 141 certificate meets the certification requirements, or an existing school continues to comply with the regulations. Successful completion of this task results in an indication of a satisfactory or an unsatisfactory inspection.

6-1553 GENERAL. The initiative for this task comes from either the Flight Standards District Office (FSDO) work program schedule or the Regional Office (RO). Facility inspections are always conducted during the initial certification of a pilot school and at 24-month intervals during the certification renewal. They also may be conducted during spot checks initiated for quality control purposes. A facility inspection generally covers all areas pertinent to the certificate.

6-1554 GUIDELINES FOR CONDUCTING FACILITY INSPECTIONS.

A. Coordination. When an Airworthiness aviation safety inspector (ASI) cannot attend the facility inspection, the Operations ASI should tailor the inspection to examine the aspects that an Airworthiness ASI would normally examine. For example:

- 1) The ASI should be prepared to examine any available aircraft.
- 2) The ASI should coordinate with the principal maintenance inspector (PMI) and the principal avionics inspector (PAI) to ensure followup inspections of any items outside of the Operations ASI's expertise.

B. Levels of Deficiency and Appropriate Corrective Action. Following are some examples of various deficiencies that might occur in an inspection, and the appropriate action to take for each situation. The actions described are based on two assumptions.

1) Even if a discrepancy is found, the ASI continues the facility inspection for all items. After inspection, all the deficiencies and recommended corrective actions are summarized in a note to the file and/or in remarks in the PTRS.

2) An unsatisfactory report may initiate an enforcement investigation. Unsatisfactory reports are based usually on obvious violations found during the inspection. There are intermediate stages between satisfactory and unsatisfactory results, any of which may result in a satisfactory inspection with corrective action.

a) A spot correction involves a discrepancy that was not a violation and was noted and corrected during the inspection. Because it was corrected on-the-spot, it may require no further action. An example of a spot correction is as follows: The ASI finds a student record that does not contain the student's date of graduation in the appropriate box. However, a photocopy of the student's graduation certification with the date is included with the record. The corrective action consists of the ASI verbally notifying the school of this discrepancy. During the remainder of the inspection, the chief instructor enters the record according to the school's procedures. Additional corrective action is not necessary. The ASI will note the discrepancy and the spot correction in PTRS and/or the job aid.

b) A followup action involves a deficiency or a lack of pilot knowledge or skill that does not involve a violation, but does require action other than a spot correction. For example, during an inspection the ASI notes that the pretakeoff and prelanding checklists were not in the aircraft and those copies of the checklists were not readily available. There was no evidence that the aircraft had been operated for student instruction without the checklists. The corrective action consists of the ASI verbally advising the operator that the checklists must be in place before the aircraft is operated again for instruction in a Federal Aviation Administration (FAA)-approved course. At the office, the ASI confirms this in writing to the operator and schedules a followup inspection to determine if the checklists were replaced. The ASI will note the discrepancy by marking the PTRS and/or the job aid with an "F" as a reminder that followup action is required.

c) A blatant violation is cause for a finding of "unsatisfactory" for the facility inspection. For example, during the inspection an ASI finds that training was conducted for more than 60 days without a chief instructor. The ASI marks the PTRS with an "E" indicating that the inspection resulted in an enforcement investigation (see Volume 7, Chapter 6, Conduct an Investigation of FAA Flight Operations to Determine Compliance, and the current edition of FAA Order 2150.3, FAA Compliance and Enforcement Program).

C. Spot Checks on Chief Instructor and Other Instructors During an Inspection.

Spot check the knowledge and skill of the instructors that a school uses. Spot checks of instructors are necessary to verify continuing compliance and to ensure that the chief instructors are fulfilling their responsibilities in standardizing instruction.

D. Discrepancies Between FSDO Files and Operator Files. When a discrepancy is found between office records kept on the operator and records maintained by the operator, the ASI determines which set of records is current, approved, and correct. The outdated records must be brought up to date. For example, if the operator's records indicate a change in address of the base of operations that the FAA was not aware of, FSDO records must be altered to reflect the correct address. The ASI determines whether an enforcement action is necessary and updates the enhanced Vital Information Database (eVID) files.

6-1555 INITIAL CERTIFICATION VS. LATER SURVEILLANCE. When this task is performed as the facility inspection for an original certification during the demonstration and inspection phase of the certification process, some items cannot be inspected. For example, an applicant for an application will not have complete student records for the ASI to examine. For an original certification, the ASI marks the "N/A" column on the job aid (see Figure 6-87, Part 141 Facility Inspection Job Aid, for items that cannot be evaluated).

6-1556 PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites. This task requires:

- Knowledge of the regulatory requirements of part 141 and FAA policies.
- Qualification as an ASI (Operations).

B. Coordination. This task requires coordination with the principal operations inspector (POI) and the airworthiness unit.

6-1557 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- Title 14 CFR Parts 1, 61, 91, and 141.
- FAA Order 2150.3, FAA Compliance and Enforcement Program.

B. Forms. None.

C. Job Aids:

- Part 141 Facility Inspection Job Aid (Figure 6-87).
- Sample letters and figures.
- Job Task Analyses (JTA): 2.4.1 (OP), 2.4.6 (OP), 2.4.7 (OP), 3.4.9 (OP), 3.4.11 (OP), 3.4.12 (OP), 3.4.18 (OP), 3.4.19 (OP), and 3.4.20 (OP).

6-1558 PROCEDURES.**A. Conduct Pre-Inspection Activities.**

- 1) Determine the need for the inspection.
 - a) Is the inspection scheduled on the FSDO work program?
 - b) Is the inspection a request of the RO or of headquarters (HQ)?
 - c) Is the inspection the result of complaints?
 - d) Is the inspection part of the certification process?
- 2) Determine if the inspection is to be conducted with or without notice to the school. Conduct initial certification inspections according to the submitted Schedule of Events.
 - a) If the inspection is to be conducted with notice to the school, notify the school in writing of the day, time, and nature of the inspection (see Figure 6-85, Letter Informing School of Facility Inspection).
 - b) If the inspection is to be conducted without notice to the school, schedule the day and time.
- 3) Review the school's FSDO file for complaints, previous enforcement history, accident/incident history, previous facility inspections and surveillance reports, and previous regional or national work program actions.
- 4) Review the school's FSDO file with the airworthiness or the avionics units for a plan of action and for any specific problem areas.

B. Open the PTRS Record.**C. Conduct Facility Inspection.**

- 1) Determine if the following documents are current, complete, and accurate (for a certificated air agency, a sampling may be sufficient):
 - School certificates (part 141, § 141.19).
 - List of approved courses.
 - Facility use agreement.
 - Type of advertisement (§ 141.23).
 - Chief/assistant instructor records.
 - Flight instructor records.
 - Student records (§§ 141.95 and 141.101).
 - Enrollment certificates (§ 141.93).
 - Graduation certificates (§ 141.95).
 - Aircraft records (including aircraft checklist).

- Practical test standards (PTS).
- Training course outline (TCO) revisions (must match revisions in FSDO file).

2) Inspect the following physical facilities and equipment for compliance:

- Airports (§ 141.38).
- Aircraft (airworthiness).
- Full flight simulators (FFS), flight training devices (FTD), aviation training devices (ATD), and training aids (§ 141.41).
- Pilot briefing areas (§ 141.43).
- Ground training facilities (§ 141.45).

3) Check these additional points:

- Compliance with provisions or limitations (§ 141.77).
- Flight training (§ 141.79).
- Quality of training (§ 141.83).
- Chief instructor responsibilities (§ 141.85).

D. Follow Procedures for a Satisfactory Facility Inspection. If the facility inspection is satisfactory, indicate the outcome on the job aid (Figure 6-87).

- 1) For an initial certification, ensure that the job aid becomes part of the certification report.
- 2) For post certification surveillance, place the job aid in the FSDO file on the school.

E. Follow Procedures for an Unsatisfactory Facility Inspection.

1) If the facility inspection was unsatisfactory when conducted as part of an initial certification, inform the applicant immediately of the discrepancies.

- a) Advise how to correct any deficiencies or discrepancies.
- b) Confirm the findings in writing (see Figure 6-86, Letter Confirming Results of Inspection), including a suspension date for correction of deficiencies.
- c) Note the outcome on the job aid.
- d) Ensure that the job aid is included in the certification report.

2) If the facility inspection was unsatisfactory when conducted as part of post certification surveillance, note the outcome on the job aid.

- a) Place the job aid in the FSDO file on the school.

b) Determine if an enforcement investigation is required (see Volume 7, Chapter 6).

F. Conduct Post Inspection Actions. Discuss any findings discovered during the inspection with the school. Bring areas that need improvement to the attention of the school. Compliment the areas that exceed certification or inspection requirements.

G. Close the PTRS Record.

6-1559 TASK OUTCOMES. Completion of this task results in either of the following:

- An indication of a satisfactory facility inspection in the FSDO file on the school.
- A letter indicating an unsatisfactory inspection and indicating areas of deficiency or discrepancy.

6-1560 FUTURE ACTIVITIES:

- Schedule followup inspections for any deficiencies.
- Possible enforcement investigation on items not in compliance.

Figure 6-84. Reserved

Figure 6-85. Letter Informing School of Facility Inspection

FAA Letterhead

[Date]

[School name and address]

Dear [name]:

Inspectors from this office will conduct an inspection of your pilot school at [time] on [date]. The purpose of this inspection is to determine whether your school is operating in accordance with 14 CFR part 141.

Enclosed is a copy of the inspection job aid for your review. This job aid will be used to assist us in conducting the inspection. If you have any questions, please contact this office [telephone number].

Sincerely,

[Principal operations inspector's signature]

Figure 6-86. Letter Confirming Results of Inspection

FAA Letterhead

[Date]

[School name and address]

Dear [name]:

The results of the inspection of your pilot school conducted on [date] are as follows:

List the discrepancies and the specific 14 CFR requirement.

Note any corrective action that was taken or needs to be taken.

Note date of followup inspections, if necessary.

Indicate that any items not corrected by a specific date may result in enforcement action, if already certificated.

If all discrepancies were resolved by the date of this letter, indicate that no enforcement action is pending.

Sincerely,

[Principal operations inspector's signature]

Figure 6-87. Part 141 Facility Inspection Job Aid

NAME OF SCHOOL:	INSPECTION TEAM				
	Name		Specialty		
ADDRESS:	INSP. INI-TIAL	DATE	SAT	UNS	N/A
1. TCOs					
a. Current					
b. Conforms to copy from district office file					
c. All changes FAA-approved					
2. Verification of flight instructor’s qualifications					
3. Chief instructor/assistant for each course					
4. Enrollment procedures conform to § 141.93					
5. Copies of enrollments sent to district office					
6. Safety procedures/practices as per § 141.93					
7. Graduation certificates as per § 141.95					
8. Recordkeeping as per § 141.101					
9. Minimum equipment lists (MEL) current (if applicable)					
10. Aircraft meet requirements of § 141.39/141.75					
11. Chief instructor standardization of all instructors					
12. Pilot briefing areas (§ 141.43)					
13. Ground training facilities (§ 141.45)					
14. Airports (§ 141.38)					
15. Flight Simulators/Flight Training Devices (§ 141.41(a) and (b))					
16. Training aids (§ 141.41(c))					
17. Air Agency Certificate matches one on file					
18. List of current approved courses					
19. Other					
REMARKS:					

RESERVED. Paragraphs 6-1561 through 6-1575.