VOLUME 3 GENERAL TECHNICAL ADMINISTRATION

CHAPTER 20 CHECK AIRMAN, INSTRUCTOR, AND SUPERVISOR PROGRAMS FOR TITLE 14 CFR PARTS 121 AND 135 CERTIFICATE HOLDERS

Section 6 Safety Assurance System: Part 135 Check Pilot Approval and Surveillance

Source Basis:
- Section 135.291, Applicability.
- Section 135.293, Initial and Recurrent Pilot Testing Requirements.
- Section 135.297, Pilot in Command: Instrument Proficiency Check Requirements.
- Section 135.299, Pilot in Command: Line Checks: Routes and Airports.
- Section 135.321, Applicability and Terms Used.
- Section 135.323, Training Program: General.
- Section 135.324, Training Program: Special Rules.
- Section 135.329, Crewmember Training Requirements.
- Section 135.337, Qualifications: Check Airmen (Aircraft) and Check Airmen (Simulator).
- Section 135.339, Initial and Transition Training and Checking: Check Airmen (Aircraft), Check Airmen (Simulator).
- Section 135.341, Pilot and Flight Attendant Crewmember Training Programs.
- Section 135.351, Recurrent Training.

3-20-6-1 REPORTING SYSTEM(S).

A. Program Tracking and Reporting Subsystem (PTRS) Codes.
   - Approve Check Pilot: 1346.
   - Remove Check Pilot: 1359.
   - Check Pilot Observation—Proficiency Check Oral or Part 135, § 135.293(a) Knowledge Test: 1641.
   - Check Pilot Observation—Proficiency or Competency Check (Simulator): 1642.
   - Check Pilot Observation—Proficiency or Competency Check § 135.293(b) or § 135.297 (Aircraft): 1643.
   - Check Pilot Observation—Line Check § 135.299: 1644.
   - Check Pilot Observation—Operating Experience (OE): 1645.

B. Safety Assurance System (SAS) Element(s). This section is related to SAS Element 2.1.2 (OP) Training of Check Airmen and Instructors.

3-20-6-3 OBJECTIVE. This section establishes Federal Aviation Administration (FAA) procedures for the approval and surveillance of check pilots. All check pilots must be approved by an operator’s Principal Operations Inspector (POI). The check pilot approval process follows the five phases described in this section.
3-20-6-5 APPROVAL BASIS. Approval is based on a candidate:

- Satisfying the qualifications and training requirements found in Title 14 of the Code of Federal Regulations (14 CFR) part 135;
- Having the proper certificates and ratings;
- Being qualified in accordance with the operator’s approved initial, transition, or upgrade training program;
- Having completed the operator’s approved check pilot training program for the appropriate check functions; and
- Having demonstrated the ability to conduct a check and to evaluate the performance of flightcrew members to the satisfaction of an FAA inspector.

3-20-6-7 PHASE ONE—OPERATOR FAMILIARIZATION WITH REQUIREMENTS AND LETTER OF REQUEST.

A. Beginning the Approval Process. The first phase of the check pilot approval process involves a discussion between the operator and the POI. The POI should ensure that the operator understands the regulatory check pilot training requirements and that a candidate must satisfactorily demonstrate the ability to perform check functions to an FAA inspector before approval. The POI should also ensure that the operator is prepared to submit the necessary documentation to initiate the approval process, which is as follows.

B. Required Information. The letter of request constitutes the operator’s nomination. It originates from the operator, not a training center, candidate, or some other party. It includes:

- The candidate’s name;
- Business address;
- Applicable Airman Certificate number;
- Current flightcrew member position;
- Requested check pilot classification and functions;
- Aircraft type(s);
- Brief résumé of the candidate’s aviation background and experience; and
- Copies of the candidate’s training records, including his or her initial, transition, or upgrade training in requested aircraft type; most recent applicable recurrent training; and check pilot training.

NOTE: See paragraph 3-20-6-33, Affidavit Use, for additional training record options. Applicable only to contract check pilots associated with 14 CFR part 142 training centers.

NOTE: A POI may require that this information be expanded for unique circumstances.

3-20-6-9 PHASE TWO—SUBMISSION OF DOCUMENTATION. Phase two begins when the operator submits the documentation listed in paragraph 3-20-6-7 to the POI for evaluation. The operator may transmit this submission by conventional mail, email, fax, or by other means mutually acceptable to the operator and the POI. The POI will initially review the information.
to determine if the candidate meets the basic qualification requirements for the classification of check pilot approval sought (see Volume 3, Chapter 20, Section 5).

A. **Unacceptable Submission.** If the operator’s submission is unacceptable, the POI should return the submitted documentation with a letter defining the reason for nonacceptance.

B. **Acceptable Submission.** If the operator’s submission is acceptable, the POI should initiate phase three.

### 3-20-6-11 PHASE THREE—REVIEW OF DOCUMENTATION.

A. **Verification.** The POI will verify the candidate’s certificates and background using the enhanced Vital Information Database (eVID), the Safety Performance Analysis System (SPAS), PTRS, other sources, and local office procedures. The POI will then create a file for the individual in the check airman section of eVID.

**NOTE:** Creation of the eVID file at this point in the process will allow for documentation of subsequent action regarding the individual without having the records rejected. During the upload/download process, check pilot surveillance records are cross-checked (last name and certificate number) against the check airman ancillary file in the eVID file for the operator.

B. **Training Requirements and Considerations.** Before the POI can evaluate a candidate for approval as a check pilot, all required training must be completed. The candidate’s training records must show satisfactory completion of initial, transition, or upgrade training and all training required under the operator’s approved check pilot training program for the specified classification and functions requested. The approved training program must contain all training required by §§ 135.337 and 135.339 that is applicable to the approval being sought.

C. **Check Pilot Expansion of Approved Functions.** Check pilot training requirements are identified in § 135.339. When additional check pilot functions are requested, the operator must ensure the respective check pilot training is completed.

D. **Nonqualification.** If after reviewing the documentation the POI determines that the candidate does not qualify as a check pilot, the POI will provide the operator with a statement identifying the reason for nonqualification.

### 3-20-6-13 PHASE FOUR—CHECK PILOT EVALUATION GENERAL.

In order to evaluate a candidate effectively, inspectors must become thoroughly familiar with the operator’s procedures. Inspectors must also become familiar with any special regulatory requirements affecting the operator, such as special conditions contained in the operations specifications (OpSpecs) and exemptions.

A. **Choosing Airmen as Subjects.** The inspector conducting an evaluation for an original check pilot approval must observe the candidate conducting an actual check. The purpose of the evaluation is to ensure that the candidate has achieved the required skills for briefing, evaluating, and debriefing a flightcrew member. The flightcrew member receiving the
check should be a line flightcrew member who is due for an evaluation. The flightcrew member will not be an instructor or check pilot, unless previous approval has been received from the POI. Such approval is reserved for unusual circumstances.

**B. Candidate’s Flying Skills.** Except for an initial cadre approval, an evaluation does not entail an evaluation of the candidate’s flying skills in a flightcrew member duty position. An operator should not request approval of an individual as a check pilot when there is any question about the individual’s flying skills in a flightcrew member duty position. Should the POI have reason to question a candidate’s proficiency, the evaluation will not be conducted until the candidate’s proficiency is verified. An acceptable way to verify the candidate’s proficiency is to check the candidate. An inspector may conduct a proficiency check, a competency check, or a line check of the candidate, scheduled at some time before the official evaluation. (Such checks are not routinely required.)

**C. Satisfactory Evaluation.** If the inspector determines that a candidate meets criteria for the requested approval, the inspector will inform the candidate that a recommendation of approval will be reported to the POI. In this case, the candidate will certify the proficiency of the flightcrew member receiving the check and complete the necessary recordkeeping tasks. The POI may permit the new check pilot to be scheduled immediately as a check pilot, even though processing of the letter of approval has not been completed, provided that a PTRS entry has been completed to document the satisfactory evaluation.

**D. Unsatisfactory Evaluation.**

1) If the inspector determines a candidate does not qualify for the requested approval, the inspector will inform the candidate that approval will not be granted. In such a case, the inspector must determine whether the flightcrew member receiving the check performed satisfactorily, and must certify the flightcrew member’s proficiency and complete the necessary records.

2) The failure of a candidate is uncommon and usually ends a candidate’s eligibility for check pilot status. In rare circumstances, the POI may allow a reevaluation. In such a case, the operator must conduct sufficient additional training, recertify the candidate’s proficiency, and arrange to have another evaluation conducted by an FAA inspector.

**3-20-6-15 PHASE FIVE—CHECK PILOT APPROVAL.** All check pilots approved for part 135 operations must be approved by the operator’s POI.

**A. Check Pilot Letter of Approval.** All check pilots approved to conduct part 135 checks must be approved by the operator’s POI. Approval of a check pilot will be in the form of a letter of approval found in Figure 3-20-6B, Sample Check Pilot Letter of Approval, addressed to a responsible official of the operator, and signed by the POI or a representative approved by the POI. This letter of approval may be transmitted to the operator by conventional mail, email, fax, or by other means acceptable to the operator and the POI. The responsible Flight Standards office must retain a copy of the check pilot letter of approval together with the operator’s original letter of nomination for the candidate.
B. Check Pilot Approval Renewal Requirements. Regulations do not require renewal or a term of expiration for the approvals of check pilots. However, check pilots must continue to demonstrate competency and ability in those functions authorized. Since check pilot oversight requirements have defined intervals, the need to reissue approvals is unwarranted, inefficient, and thus not required. Inspectors make performance assessments of the check pilot on an ongoing basis and address deficiencies as needed. Check pilots are selected, appointed, and trained to serve the needs of the operator to meet regulatory requirements. Therefore, a check pilot’s approval may be given, limited, or withdrawn at the discretion of the POI for any reason considered appropriate by the Administrator. Check pilots who are performing poorly as a check pilot or as a pilot in line operations, or require excessive resources to manage may have their approval withdrawn to ensure continued effectiveness of the check pilot program. The check pilot letter of approval must contain the following (see Figure 3-20-6B):

- Name and certificate number of the operator for which the approval is granted;
- Check pilot’s name and applicable FAA Airman Certificate number;
- Approved check pilot classification;
- Specified category, class, or type of aircraft;
- Authorizations and limitations; and
- Effective date of each approval. (Since different approvals may occur at different times, this information simplifies record checks. The date on which the check pilot was recommended for approval by an inspector will be the effective date of approval.)

C. Letter of Approval—Other Copies.

1) The original letter of approval will be sent to the operator for which the check pilot has been approved.

2) A copy of the letter of approval will be retained in the POI’s files, together with the operator’s original letter of request for the check pilot. Additional documentation submitted with the letter of request must also be retained if it is not accessible in an FAA database. The file must be maintained in the FAA office files in accordance with the current edition of FAA Order 1350.14, Records Management.

3) When the individual is a training center instructor or Training Center Evaluator (TCE) who is being approved to evaluate an operator’s personnel, and if the POI anticipates requesting assistance from the Training Center Program Manager (TCPM) with check pilot surveillance and oversight, a copy of the letter of approval may be forwarded to that TCPM for inclusion in his or her records.

D. PTRS and eVID. PTRS and eVID entries are required whenever there is a change in the approval status of the check pilot. The POI must ensure that a record of the initial approval or when additional functions are added, a PTRS is completed. Each time an approval is given or withdrawn, the POI must ensure that the check pilot eVID file reflects the classification of check pilot and approved functions.
1) **Recording Check Pilot Functions in the eVID.** Check the following boxes in the eVID Configuration Check Airman Information Panel (see Table 3-20-6A, Configuration Check Airman Information Panel). In addition, add comments in eVID when optional functions are approved.

**Table 3-20-6A. Configuration Check Airman Information Panel**

<table>
<thead>
<tr>
<th>eVID Selection Options</th>
<th>Check corresponding eVID box when authorized</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pilot-All Checks</td>
<td>§ 135.293, § 135.297, § 135.299 checks</td>
</tr>
<tr>
<td>Pilot-Proficiency Aircraft</td>
<td>§ 135.293, § 135.297–Aircraft</td>
</tr>
<tr>
<td>Pilot-Proficiency Simulator</td>
<td>§ 135.293, § 135.297–Simulator</td>
</tr>
<tr>
<td>Pilot Line All Seats</td>
<td>§ 135.299–when authorized in all seats</td>
</tr>
<tr>
<td>Pilot Line Observers (Jump) Seat Only</td>
<td>§ 135.299–when limited to observer seat only</td>
</tr>
</tbody>
</table>

2) **Issuing Functions.** Comment entries:

   a) When issuing functions that allow § 135.293(a)(1) and (4)–(8) written or oral tests for other multiple airplanes (applicable for all check pilots types), enter a comment in eVID as follows: “§ 135.293(a)(1) and (4) through (8) multiple airplanes, (list airplane type(s)).”

   b) When issuing functions that allow § 135.293(a)(1) and (4)–(9) written or oral tests for other multiple rotorcraft (applicable for all check pilots types), enter a comment in eVID as follows: “§ 135.293(a)(1) and (4) through (9) multiple rotorcraft, (list rotorcraft type(s)).”

   c) When issuing functions that allow § 135.293(a)(1) and (4)–(9) written or oral tests for other multiple airplanes and rotorcraft (applicable for all check pilots types), enter a comment in eVID as follows: “§ 135.293(a)(1) and (4) through (9) multiple aircraft, (list aircraft type(s)).”

   d) When issuing functions that allow § 135.293(a) written or oral tests (applicable only to line check pilots), enter a comment in eVID as follows: “§ 135.293(a) written or oral tests, (list aircraft type(s)).”

3) **Initial Approval and/or Additional Functions.** When the POI determines the initial approval of the check pilot or adds additional functions, it must be recorded in the PTRS using code 1346.

   **NOTE:** Due to PTRS archiving, the PTRS record of initial approval or addition of functions may not be available.
3-20-6-17 PREVIOUSLY ISSUED LETTERS OF APPROVAL. Previously issued letters of approval will remain in effect until replaced. Approval letters for contract check pilots do not need to be updated at this time.

3-20-6-19 APPROVAL OF INITIAL CADRE CHECK PILOTS. During the early phases of establishing a check pilot program, initial cadre check pilots are required. Initial cadre check pilot candidates must first become fully qualified as flightcrew members and then be trained, evaluated, and approved as check pilots. Because the regulatory language of part 135 does not address a training process for initial cadre check pilots, this section provides guidance. This process that follows is valuable for startup operations for at least two reasons:

- It is a practical way to initiate and build a check pilot program; and
- It takes advantage of proving flights, when the operator/applicant is under close FAA scrutiny, with desirable effects on the check pilot program.

A. Letter of Request from Operator. The overseeing inspector must arrange with the operator/applicant to approve one or more likely candidates to form an initial cadre of temporary check pilots. The operator/applicant will submit a letter of request, as described earlier in this section. This letter comprises the request for initial cadre check pilots and a description of the training that they will undergo.

B. Letter of Approval. The POI must approve the candidates using procedures described earlier in this section. The initial cadre letter of approval is a temporary approval, to be replaced with a permanent letter of approval after the check pilot is fully qualified. The initial cadre letter must contain a statement similar to the following:

(Name) is approved as an initial cadre check pilot with the following functions for the purpose of initiating operations with the (type of aircraft) for (name or operator). This approval expires on (expiration date).

C. Training, Certification, and Qualification—Startup. The operator must provide a full qualification process for its initial cadre check pilots.

D. Initial Training and Certification. The operator must first arrange to have initial cadre check pilots trained and appropriately certificated for their flightcrew member duty positions. The operator may provide the training by contracting with a manufacturer, with another operator of the same 14 CFR operating part, or with properly qualified individuals. An inspector or an aircrew program designee (APD) designated examiner may certificate the initial cadre, provided that the examiner is employed by a U.S. air carrier/operator.

E. Gaining Proficiency as Instructors. After the initial training and certification, initial cadre check pilots must become proficient in the operator’s proposed training program by instructing each other, or in the case of a single initial cadre check pilot, by self-training. During this training, an operator may arrange for a pilot from the manufacturer, from another operator, or from another source to act as the safety pilot or instructor pilot.

F. Proficiency and Competency Checks. After the first initial cadre check pilots have become proficient as instructors, they may then begin the training and checking of other
initial cadre check pilots in accordance with the operator’s initially approved flight training and qualification curriculum segments. Each check must be observed by an FAA inspector who holds the appropriate Airman Certificate, and the appropriate type rating, when applicable. If the inspector determines that the performance of an initial cadre check pilot conducting a certain check is satisfactory, the inspector will recommend to the overseeing inspector that the candidate be approved as an initial cadre check pilot for that type of check. One initial cadre check pilot may check another, with the process repeated until each candidate has been approved as an initial cadre check pilot or has been terminated from the program. If only one person is being considered to be the initial cadre check pilot an inspector will observe that person conducting a check of another flightcrew member. If the candidate’s performance is satisfactory, the inspector must recommend to the POI that the candidate be removed from temporary status and approved for full-time check pilot duty with the operator.

G. OE.

1) Initial cadre check pilots will be permitted to acquire OE flight hours on any flight that can be credited toward the proving test flight-hour requirement (including training flights, ferry flights, and representative en route proving flights). OE flight hours may be accrued by initial cadre check pilots while they are:

- Conducting aircraft checks,
- Overseeing the OE of other flightcrew members,
- Being checked, or
- Acquiring OE under the supervision of other initial cadre check pilots.

2) Initial cadre check pilots must receive a line check and conduct a line check during an en route proving flight or a ferry flight. The same process (see above) will apply: one initial cadre check pilot line checks another while being observed by an FAA inspector. If the check pilot’s performance is satisfactory, the inspector may recommend that the person be removed from temporary status and approved for full-time duty as a check pilot for the operator. If there is only one initial cadre check pilot, then the FAA inspector will conduct the line check.

3-20-6-21 APPROVAL OF A CHECK PILOT IN MULTIPLE AIRCRAFT. Before a candidate may be approved as a check pilot in more than one type of aircraft, the operator must show that there is a need. The candidate must be fully qualified and current in each of the aircraft types. Overseeing inspectors must be judicious in approving check pilots and vigilant in overseeing their performance. There are various acceptable combinations of check pilot approvals.

A. All Single-Engine, Normal, or Commuter Category Airplanes. A check pilot may be approved to serve in all single-engine, normal, or commuter category airplanes that an operator operates under part 135.

B. Helicopters. A check pilot may be approved to serve in two different types of helicopters.

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C. **More Than One Aircraft Family.** A check pilot may be approved to serve in a combination of two of the following aircraft families:

- One series of multiengine, normal, or commuter category airplanes;
- Single-engine, normal, or commuter category airplanes; or
- Helicopters.

D. **More Than One Commuter or Transport Category Aircraft Type.** Before a candidate may be approved as a check pilot—aircraft, in two commuter category aircraft types or two transport category types, the overseeing inspectors must ensure that the following conditions are met:

1) Check pilots with § 135.293 or § 135.297 authority. The candidate must have logged at least 500 hours as pilot in command (PIC) in each type.

2) Check pilot with only § 135.299 authority—all seats. The candidate must have logged at least 100 hours as PIC in each type and at least 1,000 hours as PIC in transport or commuter category airplanes.

### 3-20-6-23  APPROVAL OF A CHECK PILOT OR FOR MULTIPLE OPERATORS.

This paragraph provides a standardized method for approving a check pilot to serve multiple operators. When the following considerations are satisfied a letter of approval may be issued by the certificate holders POI. Only one certificate holder may be listed on a check pilot’s letter of approval.

A. **Limitations.** The approval of a check pilot to serve more than one operator is limited to those cases in which the operator’s aircraft, aircraft operating manuals, procedures, and checklists are compatible in the judgment of the overseeing inspector(s).

B. **Multiple Check Pilot Approvals.** Provision for multiple check pilot approvals may be made for part 135 single-pilot operators, part 135 single PIC operators, and part 135 operators with programs that are compatible, in the judgment of the respective operator’s POI.

C. **Temporary Check Pilot Approval.** An operator’s POI may also approve a check pilot on a temporary basis, when a startup operation is initiated or when new equipment is being introduced.

D. **Other Situations.** Other multiple approvals may be made with the concurrence of the applicable General Aviation Division manager when justified.

E. **Unique Situations.** For unique situations, the Air Transportation Division (AFS-200) may be consulted for additional information.
3-20-6-25  TRAINING CENTER INSTRUCTORS/EVALUATORS APPROVED BY AN OPERATOR’S POI AS CONTRACT CHECK PILOTS. Training centers have made flight simulation training device (FSTD) training and checking available to a broad range of aviation users, including operators with smaller fleets and smaller aircraft. With the approval of an operator’s POI, an employee of a part 142 training center may serve one or more operators as a contract check pilot. The guidance contained in this paragraph applies to training center personnel who have been requested to serve as such contract check pilots.

A. POI Approves the Check Pilot Candidate. Only the POI may approve a check pilot for use in an operator’s training program. Normal procedures apply, including a letter of request from the operator, and a letter of approval from the operator’s POI.

B. TCPM Role. Without diminishing the responsibility or authority of the POI, experience has shown that the TCPM may be in the best position to make quality assessments at training centers on behalf of the Administrator. The TCPM continually assesses training programs conducted by a training center for certification of airmen under 14 CFR part 61. Similarly, the TCPM assesses the instructors and TCEs employed by a training center. At the request of an operator’s POI, a training center’s TCPM may therefore assist with the evaluation of an operator’s request to use the services of a center’s employee as a contract check pilot.

C. Scheduling Multiple Use Check Pilots and Maintaining Check Pilot Status. Before a multiple-use approval is made, the overseeing inspector must ensure that the operators understand that the scheduling and use of the check pilot is their responsibility. An operator entering into a multiple-use arrangement may employ a check pilot on a part-time basis, may contract with another operator or training center to provide a check pilot, or may contract directly with the check pilot.

NOTE: Each operator is responsible for ensuring that the check pilot maintains currency as specified in the appropriate operating rule, and in Volume 3, Chapter 20, Section 5, and that he or she performs adequately when serving the operator.

D. Issuing Additional Letters of Approval. An operator seeking check pilot approval for an individual who is serving as a check pilot for another operator must provide the necessary information to its POI. The operator’s POI must consider the means the operator will use to train, to qualify, and to maintain qualification of the contract check pilot candidate and the documentation that will be required. Contract check pilots may be able to meet recurrent training requirements for more than one operator simultaneously. When the operator and the POI have agreed on the training and qualification necessary for the contract check pilot the operator must submit a written letter of request to the POI, as described earlier in this section. When the second or subsequent POI approves the individual as a contract check pilot for his or her operator, that POI will issue an additional letter of approval following the procedures described above. Additionally, if the subject check pilot is an employee of a part 142 training center, the POI will forward a copy of the new approval letter to the center’s TCPM.

E. Primary Oversight Responsibility. Each operator for which an individual is approved as check pilot along with the operator’s POI, has responsibility for oversight of the
contract check pilot. When the check pilot is employed by a training center, the FAA TCPM may provide assistance as requested by the POI with this responsibility. Any POI who has issued a letter of approval to the check pilot may, however, conduct surveillance activities at any time.

F. Contract Check Pilot or Letter of Approval. When approved as a contract check pilot for an operator, the POI of that operator will issue a letter of approval showing the operator, the check pilot classification, the type(s) of aircraft authorized, and the type(s) of checks authorized (by regulatory reference). A sample contract check pilot letter of approval is provided on the FAA Air Carrier Training Systems and Voluntary Safety Programs Branch’s (AFS-280) website at: http://www.faa.gov/pilots/training/part_142/media/check_pilot_loa.docx.

G. Recordkeeping. Each operator is required by their operating rules to maintain training and qualification records for their check pilots. This responsibility cannot be delegated. However, by agreement between the operator and the training center, a training center may keep a contract check pilot’s training and qualification records. This agreement must be documented in each operator’s recordkeeping system and approved by the POI. The POI must maintain a record in the operator’s file that documents the details of any such arrangement, including the location in the operator’s manual where such arrangement is described.

3-20-6-27 FLIGHTCREW MEMBER FAILURE RATES. The repetitive failure of a single flightcrew member or the failure of several flightcrew members during proficiency or competency checks, may indicate a training program deficiency. Overseeing inspectors must establish procedures with their certificate holders that provide for FAA notification when flightcrew member unsatisfactory performance occurs. Identified deficiencies should be promptly investigated and corrective action taken.

3-20-6-29 OVERSIGHT OF CHECK PILOTS. Responsible inspectors must establish a surveillance program for each check pilot at the time of approval.

A. Biennial Check Pilot Observation.

1) Observation of Approved Checking Activity. The surveillance program for each office must include an observation by an FAA inspector or APD of each approved check pilot in his or her area of responsibility at least once every 24 months. Check pilot observations should be conducted while the check pilot is conducting an approved checking activity. For example, a check pilot approved to conduct proficiency checks and line checks should be observed conducting a proficiency check in the aircraft or FSTD or conducting a line check. At the discretion of the POI, an observation conducted by another inspector or by a TCPM for a check under the same rule part need not be repeated. It is the responsibility of the operator to maintain records showing that this observation has been completed. See paragraph 3-20-6-31, Check Pilot Oversight and Surveillance, for additional details regarding the 24-month observation required by § 135.339.

NOTE: Section 135.339(a)(2) requires a check pilot to be observed conducting a “proficiency or competency check.” In the preamble to the Training and Qualification Requirements for Check Airmen and Flight Instructors final rule (61 FR 30734), which established this requirement, the FAA explained that, “This...
final rule addresses check airmen as a broad category. Other specific categories of check airmen (i.e., line check airmen, proficiency check airmen, etc.) also were not mentioned. It was not the intent of this rule to address specific categories of check airmen beyond check airmen (airplane) and check airmen (simulator).” Therefore, in § 135.339(a)(2), the phrase “proficiency or competency check” is used broadly to include checks required under part 135 that assess a pilot’s flight proficiency or competency. Observation of any of the following checks can meet the requirement of § 135.339(a)(2): PIC or SIC § 135.293(b) competency check, § 135.297 PIC instrument proficiency check, or § 135.299 PIC line check.

An FAA inspector or APD should observe the check pilot conducting a check appropriate to the checking functions approved for that check pilot. For example, a check pilot who is only authorized to conduct § 135.299 PIC line checks should be observed conducting a PIC line check.

2) Constraints of Aircraft With Two Pilot Seats. Inspectors may encounter difficulties in conducting the surveillance of check pilots whose activities are restricted to two-place airplanes or helicopters. In such cases, it may not be possible for an inspector to observe the check pilot conducting actual checks. In lieu of these observations, the POI may review the check pilot’s activities and arrange for an inspector to administer the check pilot’s competency and line checks.

B. Periodic Report by the Operator. The POI should arrange to have the operator provide the POI with a periodic report of each check pilot’s activities, including a pass/fail rate, to coincide with the POI’s periodic review (annual, semiannual, or other). A POI may arrange for these reports to arrive at a time that meets the POI’s needs. A check pilot should be active enough to retain the required knowledge and skills. This activity level may vary depending on the check pilot function, the size of the operator, and the number of approved check pilots. The POI should specifically reassess the operator’s need for those check pilots whose records indicate low activity levels or when deficiencies are observed when performing authorized functions.

C. Withdrawing Check Pilot Approval. The POI’s reasons for withdrawing the approval of a check pilot may include a lack of check pilot activity, a request by the operator, or an unsatisfactory performance on the part of the check pilot. To withdraw approval of a check pilot, the POI must notify the operator by letter that approval is withdrawn. The letter should include the name of the check pilot, the effective date of withdrawal, and the reason approval is being withdrawn. If the approval of a check pilot is withdrawn because of unsatisfactory performance, the letter of withdrawal must be sent to the operator by certified mail—return receipt requested. The POI must make a PTRS entry identifying the reason for the withdrawal or termination of a check pilot’s letter of approval.

NOTE: Under current regulations, no normal term of expiration is specified for approvals of check pilots. Contract check pilots who are employees of a part 142 training center will have their term contingent upon continued employment with the training center and maintaining their instructor or evaluator qualification with the employing center.
D. **POI Authority.** A check pilot’s approval may be given, limited, withdrawn, or terminated at the discretion of the POI.

3-20-6-31 **CHECK PILOT OVERSIGHT AND SURVEILLANCE.** This paragraph will explain the surveillance methods available to inspectors as well as general oversight considerations.

A. **Elements of a Check Pilot Evaluation.** Maintaining an accurate surveillance records in the Enhanced Flight Standards Automation System (eFSAS) is crucial to long term management of individual check pilots.

B. **Surveillance Event Types.** Inspector surveillance events are described below.

1) **Check Pilot Observation.** Refer to § 135.339(a)(2). This observation conducted by the FAA or APD is to determine if the check pilot has the ability to perform the function(s) authorized in accordance with the operator’s training program and regulatory requirements. Use PTRS activity codes 1641–1645.

2) **Records Review.** Records review is an administrative function that allows the POI to review the quality of the records submitted by the check pilot, whether paper or electronic.

3) **Check Pilot Interaction.** This is a record of any interaction that has occurred with the check pilot that the POI deems relevant enough to include in the check pilot’s file.

C. **Check Pilot Observations.** Section 135.339(a)(2) requires that check pilots are observed by an inspector or an Aircrew Designated Examiner (ADE) within the preceding 24 calendar-months. Check pilots are required to be observed conducting an applicable § 135.293(b) competency check or § 135.297 PIC instrument proficiency check in an aircraft or FSTD, or § 135.299 PIC line check in an aircraft, in addition to optional functions that are issued. The observation check required by § 135.339(a)(2) is considered to have been completed in the month required if completed in the calendar-month before, or the calendar-month after, the month in which it is due. If the observation check is not conducted, the individual may no longer serve as a check pilot.

D. **Check Pilot With Optional Function Approval(s).** The following oversight applies to the content of the inspector’s evaluation of the check pilot when additional functions have been approved. The content of the evaluation is dependent upon the approval(s) requested.

1) **Written or Oral Test Approval (Available to § 135.299 Check Pilots Only).** As part of the § 135.339 observation check, an inspector must evaluate the candidate while the candidate conducts a complete written/oral test required by § 135.293(a).

2) **Written or Oral Test Multiple Aircraft Approval (Available to All Check Pilots Except Contract Check Pilots).** As part of the § 135.339 observation check, an inspector must evaluate the check pilot conducting an oral/written test required by § 135.293(a)(1) and (4) through (9) as authorized in their approval letter. (Section 135.293(a)(9) only applies to rotorcraft.)

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E. **Check Pilot Performance Measures.** The performance measures below have been established to aid in the consistent evaluation of all check pilots. The three categories of performance measures are technical, procedural, and professional (see Figure 3-20-6A, Performance Measure Consolidation). The type of oversight activities conducted will determine the performance measure attributes considered by the inspector.

**Figure 3-20-6A. Performance Measure Consolidation**

1) **Technical.** The check pilot must demonstrate a superior level of technical knowledge, skill, and ability in order to conduct authorized tasks.

   a) Equipment and Materials. Does the check pilot select or use the appropriate equipment, device, tools, and reference material when planning or conducting checks?

   b) Knowledge and Understanding.

      1. Does the check pilot understand the technical terminology contained in the operator manual, the training program, and other reference material used in planning, describing, or conducting pilot checks?

      2. Is the check pilot thoroughly familiar with the operator’s standard operating procedures, authorizations/limitations, checklists, and other items used by the operator?

      3. Does the check pilot demonstrate an expert level of knowledge about the aircraft operation and systems?

   c) Interpret and Apply.

      1. Does the check pilot correctly interpret and apply the technical performance standards defined by the appropriate training program standard?

      2. Does the check pilot demonstrate effective questioning techniques?

2) **Procedural.** The check pilot must demonstrate compliance with the operator policies and procedures contained within the operator’s manuals and applicable regulations used to conduct approved functions. Factors in determining procedural proficiency:
a) Does the check pilot properly submit information, documents, or data to the operator when required by operator procedures and FAA regulations?

b) While conducting the check:

- Does the check pilot follow the correct procedures when conducting, grading, and providing feedback to pilots during checks or observations?
- Does the check pilot have a plan of action to conduct the check?
- Do pre-briefings contain clear objectives, safety briefing elements, and completion standards?

c) Does the check pilot:

- Complete required events?
- Demonstrate effective workload management?
- Identify deviations from applicable standards and procedures?
- Demonstrate knowledge and observation of the operator’s procedures?
- Conduct the check and ensure safe operation of aircraft or proper operation of the FSTD?
- Use proper air traffic control (ATC) phraseology?
- Conduct a debriefing that is accurate, appropriate, clear/concise and informative?
- Demonstrate the proper use of training aids and FSTDs that are realistic and contain appropriate scenario progression?
- Utilize training aid and FSTD capabilities?
- Demonstrate the ability to efficiently use FSTDs?

d) Does the check pilot follow the correct procedure(s) when completing approvals, recording results, or other administrative items upon completion of the checking activity?

3) **Professional.** Professionalism means compliance with ethical and technical standards that indicate a professional representation of a person approved by the Administrator. This includes the quality, completeness, and timeliness of oral and written communications and the continual demonstration of integrity, tact, and diplomacy with pilots, industry, and the FAA. Factors in determining professionalism are:

a) Oral/Written Communication. There are no reported issues of deficient communications between the check pilot, operator, and FAA.

b) Professional Representation of the Operator and the FAA. The POI should consider whether the check pilot demonstrates a positive reflection of the approval provided by the FAA and a willingness to comply with FAA requirements and operator policies and procedures.
c) Cooperative Attitude. The POI should consider whether the check pilot works effectively with and presents a positive attitude when interacting with pilots, operators, and the FAA.

d) Ethics and Judgment. The POI should consider whether the check pilot maintains the highest standards and demonstrates good judgment in the conduct of authorized activities.

F. Overall Oversight Assessment. In determining the overall oversight assessment, the inspector considers the frequency, causal considerations, and safety significance of the three performance measure criteria.

1) Frequency of Deficiencies. The frequency of deficiencies is based on the inspector’s evaluation with the following considerations applied:

   a) No performance related issues noted.
   b) Few or minor performance related issues noted.
   c) Some issues noted, but were corrected and/or were of minimal impact to safety.
   d) Some significant issues were noted and were safety related.

2) Causal Considerations.

   a) Unknowingly—the check pilot was not aware of the error.
   b) Carelessly—as a result of inattention by the check pilot, an error was made.
   c) Intentionally—the check pilot demonstrates a disregard for policy, procedures, or regulatory requirements.

3) Safety Significance.

   a) Because the role of the check pilot is to ensure that the pilot has met competency and safety standards required by regulations and the operator, the position requires an exceptional level of integrity, dedication, knowledge, and professionalism. With high initial standards required, any deficiencies should be carefully noted, reviewed, and appropriate action taken.

   b) There is minimal tolerance for the display of safety deficiencies, less tolerance for careless acts, and no tolerance for the intentional disregard of safety standards by check pilots. The inspector must carefully consider the cumulative safety significance of deficiencies and causal factors when determining the overall assessment of the check pilot. If the inspector determines that the level of performance expected of the check airman is unsatisfactory, actions must be taken to rescind the check pilot’s approval.
4) **Recording the Observation.** Upon completion of the check pilot observation, the inspector must record the result of the inspection in PTRS by using the appropriate activity codes 1641–1645. If the POI determines that the results of the event require additional review, the POI should determine and record in eFSAS any appropriate followup activity.

**3-20-6-33 AFFIDAVIT USE.** This paragraph is applicable only to contract check pilots and instructors associated with part 142 training centers.

A. **Lost or Unattainable Records.** A POI may accept an affidavit for initial training records if a contract instructor or contract check pilot is unable to produce all required records because:

- The records are lost;
- The air carrier is defunct; or
- The air carrier remains in existence, but no longer has the records.

B. **Supporting Documentation.** The pilot and the air carrier/operator or program manager for which the contract instructor or contract check pilot nomination has been requested may submit a signed and notarized statement (affidavit) attesting to the completion of training identified in Volume 3, Chapter 54, Section 5, subparagraph 3-4415F3) as the basis for having completed the training. The statement must be substantiated by all available evidence, such as completed check ride forms, available training records, logbook entries and other records attesting to flight operation participation, associated pay stubs, W-2 forms (with financially confidential information redacted), tax returns, a statement from a current or former employee of the air carrier/operator or program manager, and other proofs of employment. The pilot and the air carrier/operator or program manager representative must read, sign, and submit a notarized statement containing the information found in Figure 3-20-6D, Contract Instructor and Contract Check Pilot Nominee Training Records Affidavit, and Figure 3-20-6E, Nominating Air Carrier/Operator Affidavit for Lost/Unobtainable Pilot Training Records, and provide supporting documentation to the POI. If the affidavit and documentation that reasonably support the affidavit are provided, the POI may accept the information as meeting the initial new-hire training requirement. An affidavit without supporting documentation must not be accepted.

C. **False Statements.** A pilot who has lost or is unable to obtain training records should be reminded that any fraudulent or intentionally false statements concerning these records are a basis for enforcement action in accordance with Title 18 of the United States Code (18 U.S.C.) § 1001 and part 61 that could result in a fine, imprisonment, and action against any certificate or rating held.

D. **Supporting Documentation Review.** The POI should consider the following when determining the acceptability of the documentation provided:

1) **Review Records.** Review and determine the validity of the records.

2) **Ensure Clarity.** Ensure that records clearly identify the air carrier/operator and associated employment.
3) **Review FAA Database(s).** Review FAA database(s) to determine if the air carrier/operator or program manager has records to verify its existence.

4) **Review PTRS Records.** Review PTRS records that may support the nominee’s activities with the air carrier/operator or program manager. (This is not required, but could be used for confirmation in some cases.)

5) **Review Evidence.** Review the evidence the nominee has provided that confirms the air carrier/operator or program manager no longer retains the records or has not responded to a record request for an air carrier/operator or program manager that currently remains in existence.

6) **Review Participation and Qualification.** Review records or supporting documents (e.g., logbooks, dispatch releases, evidence of employment, or a statement from a current or former employee of the air carrier/operator or program manager) that attest to or confirm the nominee’s flight program participation and qualification as a pilot for the air carrier/operator or program manager.

7) **Recordkeeping Requirements.** For a contract check pilots only, the POI must maintain a copy of the affidavits in the FAA’s check airman file.
Figure 3-20-6B. Sample Check Pilot Letter of Approval

April 19, 2013

Mr. Sam A. Frost  
Chief Pilot  
Transcon Express, Inc.  
48 Perimeter Rd.  
Utica, OH 22032

Dear Mr. Frost:

John R. Smith, FAA certificate number 467120928, is approved as a check pilot. This check pilot is approved to conduct checks for Transcon Express, certificate number A1BC, and their pilots. This approval is applicable for the following checking functions:

<table>
<thead>
<tr>
<th>Classification and Types</th>
<th>Simulator M/M/S(s)</th>
<th>Aircraft Type(s)</th>
<th>Effective Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 135.293 competency check</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Section 135.297 proficiency check</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Section 135.299 line check</td>
<td>Observer’s seat only, or</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>All seats</td>
<td>BBD-700</td>
<td>05/01/2013</td>
</tr>
</tbody>
</table>

Optional functions when § 135.299 or § 135.293 is also approved

<table>
<thead>
<tr>
<th>Aircraft Type(s)</th>
<th>Effective Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 135.293(a) written or oral test (Not used when check pilot has § 135.293 approval)</td>
<td>BBD-700 only</td>
</tr>
<tr>
<td>Section 135.293(a)(1) and (4)–(8) written or oral test for pilots assigned to the following airplanes</td>
<td>G-V, CL-604, multiengine Cessna reciprocating-series airplanes</td>
</tr>
<tr>
<td>Section 135.293(a)(1) and (4)–(9) written or oral test for pilots assigned to the following rotorcraft</td>
<td>S-76D, BHT-206, R-22</td>
</tr>
</tbody>
</table>

N/A = Not approved

Please retain a copy of this letter in Mr. Smith’s individual flight training records.

Sincerely,

James J. Jones  
Principal Operations Inspector  
Flight Standards Office (XXXX)
Figure 3-20-6C. Check Pilot Approval Job Aid

1. Operator’s Letter Contains Necessary Information:
   - [] Name of candidate.
   - [] Business address of candidate.
   - [] Flightcrew member duty position and aircraft type.
   - [] Check pilot classification and functions requested.

2. Training Records (Copies):
   - [] Initial, transition, or upgrade to requested aircraft and flightcrew member duty position.
   - [] Recurrent.
   - [] Check pilot training.

3. [] Résumé of Experience Included.

4. [] eVID, SPAS, and PTRS Verification Satisfactory.

5. [] Open eVID File.

6. [] Check Pilot Evaluation Scheduled.

7. [] Report of Evaluation Received From PTRS.

**Favorable Report:**

8. Prepare Letter of Approval:
   - [] Original letter to operator.
   - [] Copy to operator file.
   - [] Copy to other POI (if check pilot for another operator).

9. [] Update Operator eVID File.

10. [] Complete PTRS.

**Unfavorable Report:**

11. [] Prepare Letter to Operator Indicating Disapproval.

12. [] Update Operator eVID File.

13. [] Complete PTRS.
Figure 3-20-6D. Contract Instructor and Contract Check Pilot Nominee Training Records Affidavit

STATE OF ______________________________
COUNTY OF ______________________________

[Name of Applicant], being duly sworn, says:

1. On [today’s date], I, [Name of Applicant], certify that I have been unable to find or obtain the training records documenting my completion of initial training with [name of air carrier/operator/program manager] on [date].

2. I acknowledge that any fraudulent or intentionally false statements concerning aeronautical experience are a basis for suspension or revocation of any certificate or rating I hold.

Considering the above, I offer the following statement in lieu of the actual records:

I, [Name of Applicant], hereby attest that I successfully completed initial training as a pilot for [name air carrier/operator/program manager], a 14 CFR part(s) [121/135/91K] [air carrier/operator/program manager] based in [city, state, country], on [date training completed].

______________________________________________________________________________

Airman’s Signature

______________________________________________________________________________

Airman’s Name (Printed) and Pilot Certificate Number

SUBSCRIBED AND SWORN TO before me this _______ day of ______________, _______

[Seal]

Notary Public in and for

County________________________________________________________

State of______________________________________________________

My Commission expires on _______________________________________

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[Name of Company Representative], being duly sworn, says:

1. On [today’s date], I, [Company Representative], [Company Name], certify that I have been unable to find or obtain the training records documenting that [Nominated Contract Check Pilot’s Name] completed the initial training curriculum with [Company Name] on [date].

2. I have made a good faith effort to obtain such training records. Notwithstanding this effort, I have been unable to find such records. I do not know where such records presently are, or where they may be found. I believe them to be lost or destroyed.

3. I acknowledge that any fraudulent or intentionally false statements concerning aeronautical experience are a basis for suspension or revocation of any certificate or rating I hold, as well as revocation or suspension of this [air carrier certificate/operating certificate/management specifications].

For the above reason, I offer the below statement in lieu of the actual records:

I, [Company Representative], on behalf of [Company Name], attest the information above is accurate, and therefore [Name of Nominated Contract Check Pilot] meets the baseline requirements of a(n) [instructor/check pilot] as set forth in FAA Order 8900.1, Volume 3, Chapter 54, Section 5; and 14 CFR part(s) [91K/121/135].

Company Representative’s Signature________________________________________________

Company Representative’s Pilot Certificate Number (if applicable)________________________

Company Representative’s Name (Print)_____________________________________________

Company Name and Certificate Number_____________________________________________

SUBSCRIBED AND SWORN TO before me this ________ day of _______________, _______
[Seal]

Notary Public in and for

County___________________________________________________

State of __________________________________________________

My Commission expires on _______________________________________________________________________

3-20-6-35 through 3-20-6-49 RESERVED.