October 28, 2021

Delivered by email; read receipt requested: lincoln.c-ctr.greenhaw@faa.gov

Federal Aviation Administration
Aircraft Maintenance Division, AFS-300

Re: Comments on Draft Advisory Circular (AC) 65-IART
      Inspection Authorization Refresher Course Training Acceptance in Accordance with
      14 CFR § 65.93(a)(4)

Dear Mr. Greenhaw:

The Aeronautical Repair Station Association's (ARSA) members, allies, and aviation industry colleagues, respectfully submit these comments on Draft AC 65-IART. The FAA's current procedures for reviewing, accepting, and publishing individual courses for Inspection Authorization (IA) renewal credit under Title 14 Code of Federal Regulations (CFR) § 65.93(a)(4) unnecessarily burden agency personnel, training practitioners, and IA holders in ways not addressed by the draft AC. Government and industry would benefit from process simplification based on the plain language of the regulation.

The rule focuses on the responsibility of IA holders, who are eligible for renewal of inspection authority after they have presented evidence of—
(1)   Meeting the requirements of § 65.91(c) (1) through (4).
(2)   "[A]ttend[ing] and successfully complet[ing] a refresher course, <u>acceptable to the Administrator</u>, of not less than 8 hours of instruction." (Emphasis added.)

FAA guidance regarding the elements that make refresher courses "acceptable to the Administrator" acknowledges "the FAA's active review and acceptance prior to use is not normally required." An IA renewal refresher course can be acceptable under § 65.93(a)(4) without the agency "actively" reviewing it, but instead establishing criteria that make such learning experiences acceptable and auditing courses presented by eligible providers for the acceptable elements.

The agency already recognizes this flexibility in both the current procedures outlined in Order 8900.1 and in paragraph 7.3 of the draft AC. Certain entities, including private organizations as well as specified FAA offices, may provide courses that are acceptable to the Administrator without prior review. This practice should be expanded to any provider that demonstrates in writing their ability to offer appropriate training and document completion in a way that is "sufficient for the student to claim IA renewal credit." (*See,* Draft AC 65-IART, paragraph 7.3.3, Note.)

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To support the FAA in its overhaul of this guidance, AC 65-IART has been redrafted (enclosed). In addition to defining areas of knowledge and other basic requirements for acceptable courses, the draft alters the current guidance in three ways—
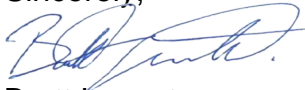
(1) Eliminates the FAA's self-imposed requirement to individually review and accept courses. Instead, the draft AC defines elements that make providers eligible to conduct training acceptable for IA refresher credit. The elements can be verified by attendees and audited by the agency.

(2) Removes unnecessary time restrictions on course acceptability. The FAA would not need to track and enforce the expiration of acceptable training, since the provider and mechanic using the learning experience would bear responsibility for currency of information.

(3) Includes instruction to eligible mechanics wishing to use the course(s) for IA renewal for submitting evidence of course completion to their responsible Flight Standards District Office. It is at this point – where credit is bestowed on the person completing training – that the agency may confirm acceptability and address deficiencies for both the student and provider when necessary.

By simplifying IA renewal training acceptance, the FAA can limit its own administrative burden while allowing flexibility to both training providers and IA renewal applicants. The resulting procedures would be consistent with the requirements of § 65.93(a)(4) while advancing agency-wide goals for improving workforce development and training.

Sincerely,

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Enclosure: Rewrite of Draft AC 65-IART

**U.S. Department
of Transportation**
Federal Aviation
Administration

Advisory Circular

Subject: Acceptable Inspection Authorization Refresher Course Training under 14 CFR § 65.93(a)(4)	**Date:** DRAFT **Initiated by:** AFS-300	**AC No:** 65-IART **Change:**

1   PURPOSE OF THIS ADVISORY CIRCULAR (AC). It provides a means of compliance—

For Inspection Authorization (IA) refresher training providers to offer courses that meet the requirements of Title 14 of the Code of Federal Regulations (14 CFR) part 65, § 65.93(a)(4).

For mechanics with airframe and powerplant ratings and IA to submit evidence of course completion to their responsible Flight Standards District Office for credit.

This document describes an acceptable means, but not the only means, for demonstrating compliance with the applicable regulation. The Federal Aviation Administration (FAA) will consider other means of compliance that an applicant may elect to present. While these guidelines are not mandatory, they are derived from extensive FAA and industry experience in determining compliance with part 65.

    1.1   The material in this AC is advisory in nature and does not constitute a regulation. This guidance is not legally binding in its own right and will not be relied upon by the Department of Transportation (DOT) as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with this guidance document (as distinct from existing statutes and regulations) is voluntary only, and nonconformity will not affect rights and obligations under existing statutes and regulations. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

    1.2   The content of this AC does not change or create any additional regulatory requirements, nor does it authorize changes in, or permit deviations from, existing regulatory requirements.

2   AUDIENCE. The primary audience for this AC is persons and entities that offer refresher training courses for the purpose of IA renewal and mechanic certificate holders with an IA. The secondary audience includes Flight Standards (FS) personnel that have responsibilities in the IA renewal process.

3   WHERE YOU CAN FIND THIS AC. You can find this AC on the FAA's website at https://www.faa.gov/regulations_policies/advisory_circulars.

4   **RELATED REGULATIONS AND READING MATERIAL.**

1.   Title 14 CFR. This AC is related to 14 CFR part 65, § 65.93(a)(4). You can download the full text of the regulation at the U.S. Government Publishing Office e-CFR website (https://www.ecfr.gov). You can order a paper copy by sending a request to the U.S. Superintendent of Documents, U.S. Government Publishing Office, Washington, DC 20402-0001; by calling (202) 512-1800; or by sending a request by facsimile to (202) 512-2250.

2.   FAA Order 8900.1, Volume 3, Chapter 56, Section 1, Information and Policy for Acceptance and Renewal of Inspection Authorization Refresher Training. FAA inspector guidance and policy for the acceptance and renewal of inspection authorization refresher courses training.

3.   FAA Form 8610-6, Inspection Authorization Refresher Course Acceptance Request. Request form for acceptance of IA refresher courses.

5   **DEFINITIONS.**

5.1   **Aircraft Maintenance Division, Airmen and Special Projects Group, Airmen Section.** The Aircraft Maintenance Division, Airmen and Special Projects Group, Airmen   Section is the Office of Primary Responsibility (OPR) for part 65 subpart D, including administration of the IA refresher training courses.

5.2   **Competency.** The requisite knowledge, skills and abilities, or a specified level of mastery.

5.3   **Curriculum.** A collection of subjects or training topics constituting an area of study.

5.4   **Course.** An individual instance of instruction presented either independently or as a component of a curriculum that provides knowledge on technical, regulatory, or professional competencies.

5.5   **IA Refresher Course Coordinator (IA RCC).** An aviation safety (ASI) inspector from the Airmen and Special Projects Group, Airmen Section. The IA RCC has the duty to receive and review submissions for IA refresher training courses to determine acceptability in accordance with and § 65.93(a)(4).

5.6   **Syllabus.** The instructional objectives, course materials, training methodology and aids, and evaluation of attendee or participant knowledge after instruction, e.g., testing.

5.7   **Provider.** Person responsible for administering the training program or course, including creating and updating syllabi, qualifying instructors, providing instruction, and overseeing the logistical requirements for managing attendance,

administering tests, and recognizing completion.

5.8   **Training.** An organized curriculum or course of instruction designed to achieve defined learning objectives provided through a variety of methods, including classroom, computer-based, web-based, distance learning and other forms of instruction and aids.

5.9   **National FAA Safety Team (FAASTeam).** The FAASTeam Program Manager's (FPM) role is to be supportive and to be a resource to course providers. Some FPMs may produce their own IA refresher training events.

6   GENERAL REQUIREMENTS.

6.1   **Areas of Knowledge.** Acceptable curricula or courses fit within the following areas—

    1.   Regulatory compliance—14 and 49 CFR elements, guidance documents such as Advisory Circulars, FAA Orders, policy, and the like, that are either—

       •   Directly related to the performance of the CH's work; or

       •   Indirectly related to the performance of the CH's work but within the regulatory framework covering 14 and 49 CFR compliance elements.

    2.   Technical competency—knowledge, skills, and information directly or indirectly related to competencies required to hold the certificate, approval, or authority.

    3.   Professionalism—computer hardware and software skills, human resources and management, human factors, safety and risk management, public speaking, crisis management, and other career-enhancing competencies that are either directly or indirectly related to the job/position, certificate or approval held.

6.2   **Areas Excluded.** Providers shall not offer as acceptable to the FAA training in the following areas—

    1.   Programs/courses that promote or sell products; or

    2.   Familiarization or orientation courses that deal with company administrative procedures unrelated to regulatory, technical, or professional knowledge or skills.

6.3   **Training increments.** Acceptable minimum increments are 15 minutes. Any increment of training must be composed of no less than 80 percent instruction, i.e., 12 out of every 15 minutes, that focuses on reading, interpreting, and applying the

rules, technical knowledge or professionalism set forth in the syllabus. Instruction may be divided among and between—

1.   Direct instruction methods (like substantive lecture or other direct methods),

2.   Indirect instruction methods (in which the instructor facilitates leaning, such as through the Socratic method, through question-and-answer, through learner observation, through exploration of case studies, etc.), and

3.   Interactive/participative methods (like instructor-led exercises, exercises that require the students to use the class material to identify solutions, etc.).

7   **PROGRAM ACCEPTABILITY.** Providers with appropriate procedures in place may produce courses acceptable to the FAA without individual review—

7.1   **Automatically eligible providers.** The following providers will be automatically eligible to offer training under this Policy.

1.   Any division or office of the agency may organize and provide training.

2.   Courses provided by other federal agencies or international governmental bodies that are open to the public.

3.   Training in any of the areas of study developed by a design and/or production approval holder found acceptable under part 21, an air carrier or operator certificate holder found acceptable under parts 121 or 135 or an air agency certificate holder found acceptable under parts 141, 142, 145 or 147.

4.   Training in any of the areas of study provided by an accredited secondary or post-secondary academic institution, including but not limited to high schools, state and community colleges and universities, research institutes, and schools certificated by the FAA under 14 CFR.

5.   Training provided by non-profit organizations or their designees to fulfil domestic or international aviation safety requirements, e.g., courses offered by trade associations, trade unions or other entities representing aviation professionals.

6.   Training provided where existing law or regulations establishes standards for the instruction (e.g., hazardous materials training that meets the requirements of 49 U.S.C. 5107).

7.2   **Other eligible providers.** A provider that is not automatically eligible may submit to the IA RCC a request to 9-AFS-IARefresher@faa.gov including a completed Form 8610-6 and a written description of how courses are administered in a manner that captures the course and participant documentation described in this AC and what personnel will be available to offer training.

7.3 **Course Documentation.** Eligible providers produce and make available to attendees/participants the following information for each course and/or curriculum related to areas of knowledge identified by this AC—

1.   A syllabus including—

- Training course identifier;

- Training increment;

- Resume(s) of course presenter(s)/instructor(s) establishing the individual's competence in the subject matter;

- Title and brief description of the course (regulatory compliance, technical competency or professionalism) with stated goals and objectives;

- Key reference material, including references to statutes, 14 or 49 CFR or other applicable regulation, agency guidance, technical skill documentation, etc.;

- The target audience, including the specific approvals, certificates or authority of participants, professional roles, or operational needs; and

- The currency of course information as indicated by tracking creation and revision materials by date and content.

2.   Training materials, including but not limited to presentation slides, reference guides and additional resources, e.g., language from 14 CFR or other regulation, provided to attendees; and,

3.   Test materials or documentation of how the provider measures participant understanding of material or implementation or application of technical competency.

7.4 **Attendee/Participant Documentation.** Each attendee or participant must receive written confirmation of training completion. The participant or FAA may confirm that the provider will be able to maintain the documentation for a period of two years and make available on request the following information for each course and/or curriculum—

1.   Name of training provider;

2.   Name of instructor/presenter;

3.   Name of participant;

4.   Name and identifier of course;

5. Increment of training completed; and

6. Date training was completed.

7.5 **Personnel.** The provider will make available on request of a participant or the appropriate FAA office a roster of presenter(s)/instructors, including brief resumes explaining everyone's experience and/or qualifications.

8 USE FOR RENEWAL CREDIT BY IA HOLDERS.

8.1 Each person who intends to use 8 hours of annual instruction to meet § 65.93(a)(4) must, at the time of renewal, provide to their responsible Flight Standards District Office proof of attendance for instruction received. Acceptable proof of attendance consists of documentation showing the following information—

1. Name of training provider;

2. Name of instructor/presenter;

3. Relevant contact information for the instructor/presenter and/or training provider;

4. Name of attendee/participant;

5. Name of course;

6. Basic course description, learning objectives or other indication of content applicability to the knowledge or skills intended to be demonstrated under § 65.93;

7. Increment of training completed; and

8. Date training was completed.

8.2 The person receiving instruction should, at the time of renewal, include with the information listed above an explanation as to how the material presented falls within the areas of knowledge outlined in this AC. Whenever possible, the applicant for IA renewal should include a syllabus, course material or other references from the course in order to demonstrate acceptability to the FAA.

[Signature]