

## Element Performance Inspection (EPI) Data Collection Tool

### 4.2.9 Outsource Crewmember Training (OP)

#### ELEMENT SUMMARY INFORMATION

**Purpose of this Element** (certificate holder's responsibility):

- To audit the Outsource Crewmember Training for compliance with the FAA approved training program and operations specification paragraph A031.

**Objective** (FAA oversight):

- To determine the effectiveness of the certificate holder s procedures in meeting the desired output of the process.
- To determine if the certificate holder follows its procedures, controls, process measurements, and interfaces for the Outsource Crewmember Training process.
- To determine if there were any changes in the personnel identified by the certificate holder as having responsibility and/or authority for the Outsource Crewmember Training process.

**Specific Instructions:**

- To accomplish this EPI, the inspector will need to observe all or part of the curriculum segments of the FAA approved training program. For each question answered, the inspector should enter the name of the observed curriculum segment (examples listed below)\*, in the comments block. If the answer is "Yes", use the "Yes" button
- if the answer is "No", use the appropriate selection from the drop down menu.
- -Basic indoctrination training
- -Initial and transition training
- -Emergency training, including hands-on drills
- -Differences training
- -Security training
- -Recurrent training
- -Requalification training
- \*Although operating experience is part of the training program, that element is located in the "Crewmember and Dispatch Qualifications" system.
- The inspector should ensure all aspects of the training program are covered: manuals, lesson plans, mock-ups, training devices, facilities, etc. In addition to reviewing the training program, other documentation to review should include record keeping locations, operations specifications, specifically part A for deviations to training requirements, etc.

**Related EPIs:**

- 4.2.3 Training of Flight Crewmembers (OP)
- 4.2.4 Training of Flight Attendants (OP)
- 4.2.7 Training of Check Airmen and Instructors (OP)
- 4.2.10 Aircrew Designated Examiner (ADE) Program (OP)
- 4.2.8 Simulators / Training Devices (OP)
- 4.2.12 Hazardous Material Training Program (OP)

## SUPPLEMENTAL INFORMATION

### Specific Regulatory Requirements (SRRs):

- SRRs:
  - 119.43(b)
  - 119.43(b)(1)
  - 119.43(b)(2)
  - 119.43(c)
  - 121.135(a)(1)
  - 121.135(b)(1)
  - 121.135(b)(2)
  - 121.135(b)(3)
  - 121.402(a)
  - 121.402(b)(1)
  - 121.402(b)(2)
  - 121.402(b)(3)
  - 121.402(b)(4)
  - 121.403(a)
  - 121.411(d)
  - 121.412(d)
  - A.031

### Related CFRs & FAA Policy/Guidance:

- Related CFRs:
  - Intentionally left blank
- FAA Policy/Guidance:
  - FAA Order 8000.88, chapters 1-3
  - AC 120-68C

<b>EPI Section 1 - Performance Observables</b>	
<p><b>Objective:</b> The tasks and questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder follows its written procedures and controls and meets the established performance measures of the process. To accomplish this, questions have been generated to test both the outputs of the process as well as the process itself. Question 1 and its following subquestions are directed at the output(s) of the process, whereas questions 2-6, when answered, should be directed at the process itself.</p>	
<b>Tasks</b>	
	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the information listed in the Supplemental Information section of this DCT.
2.	Review the certificate holder's policies, procedures, instructions, and information for the Outsource Crewmember Training process.
3.	Review the last accomplished associated safety attribute inspection (SAI) for this element with emphasis on the controls, process measurements, and interface attribute section responses.
4.	Observe the certificate holder's Outsource Crewmember Training process to gain an understanding of the procedures, instructions, and information.
5.	Discuss the Outsource Crewmember Training process with the personnel (other than management) who perform the duties and responsibilities required by the process.

<b>Questions</b>		
	To meet this objective, the inspector must answer the following questions:	
1.	Determine whether the following performance measures were met:	
1.1.	<p>Was the training provider qualified to perform the contracted training?</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> <li>1. Check, at the records repository, that the Certificate Holder verified that a Certificate Holder who provided flight training, testing, and checking under contract or other arrangement was certificated under part 121 in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(b)(26); 121.402(a)</li> <li>2. Check, at the records repository, that the Certificate Holder verified that a training center who provided flight training, testing, and checking under contract or other arrangement was certificated under part 142 in accordance with the Certificate Holder's design.. <i>Sources:</i> 121.135(b)(26); 121.402(a)</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	<p>Did the training provider meet the required standards?</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> <li>1. Check, at the records repository, that the Certificate Holder verified that a part 142 training center, who provided training, testing, and checking, held the applicable training specifications issued under part 142 in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(1)</li> <li>2. Check, at the records repository, that the Certificate Holder verified that the part 142 training center who provided training, testing, and checking, had facilities that met the applicable requirements of part 142 in accordance with the Certificate Holder's design.</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<p><i>Sources:</i> 121.135(a)(1); 121.402(b)(2)</p> <p>3. Check, through observation, at the part 142 training center who provides training, testing, and checking, that they have facilities that meets the applicable requirements of part 142 in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(2)</p> <p>4. Check, at the records repository, for verification that the part 142 training center who provided training, testing, and checking, had training equipment that met the applicable requirements of part 142 in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(2)</p> <p>5. Check, through observation, at the part 142 training center who provides training, testing, and checking, that they have training equipment that meets the applicable requirements of part 142 in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(2)</p> <p>6. Check, at the records repository, that the Certificate Holder verified that the part 142 training center who provided training, testing, and checking, had courseware that met the applicable requirements of part 142 in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(2)</p> <p>7. Check, through observation, at the part 142 training center who provides training, testing, and checking, that they have courseware that meets the applicable requirements of part 142 in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(2)</p>	
<p>1.3.</p>	<p>Did the training provider have adequate qualified staff to provide the contracted training, testing, and checking? <i>Related Performance JTIs:</i></p> <p>1. Check, at the records repository, that the Certificate Holder verified that a part 142 training center, who provided training, testing, and checking, had sufficient instructors in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(4)</p> <p>2. Check, at the records repository, that the Certificate Holder verified that a part 142 training center, who provided training, testing, and checking, had sufficient check airmen in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(4)</p> <p>3. Check, at the records repository, that the Certificate Holder verified that a part 142 training center, who provided training, testing, and checking, had qualified instructors in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(4)</p> <p>4. Check, at the records repository, that the Certificate Holder verified that a part 142 training center, who provided training, testing, and checking, had qualified check airmen in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(4)</p> <p>5. Check, at the records repository, that each person who serves as a check airman has satisfactorily conducted a proficiency check under the</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No, Explain</p>

	<p>observation of an FAA inspector or an aircrew designated examiner employed by the operator <i>Sources:</i> 121.135(a)(1); 121.413(a)(2)</p> <p>6. Check, at the records repository, that each person who serves as a check airman has satisfactorily conducted a competency check under the observation of an FAA inspector or an aircrew designated examiner employed by the operator <i>Sources:</i> 121.135(a)(1); 121.413(a)(2)</p> <p>7. Check, at the records repository, that each person who serves as a flight instructor has satisfactorily conducted instruction under the observation of an FAA inspector, an operator check airman, or an aircrew designated examiner employed by the operator <i>Sources:</i> 121.135(a)(1); 121.414(a)(2)</p>	
1.4.	Did only qualified personnel provide contracted training, testing, and checking?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.5.	<p>Was all training provided identical to the certificate holder's approved training program? <i>Related Performance JTIs:</i></p> <p>1. Check, at the technical publications library, that the Certificate Holder's manual contains a current training program curriculum for each type of airplane with respect to each crewmember required for that airplane <i>Sources:</i> 121.135(a)(1); 121.135(b)(15); 121.403(a)</p> <p>2. Check, at the records repository, that the Certificate Holder verified that a part 142 training center, who provided training, testing, and checking, had approved curriculums, curriculum segments, and portions of curriculum segments applicable for use in training courses in accordance with the Certificate Holder's design. <i>Sources:</i> 121.135(a)(1); 121.402(b)(3)</p> <p>3. Check, at the records repository, that the certificate holder maintains current records of each crewmember that shows that the crewmember complies with training. <i>Sources:</i> 121.135(a)(1); 121.683(a)(1)</p> <p>4. Check, at the principal base of operations or other location approved by the POI, that the Certificate Holder, conducting supplemental operations, maintains current records of each crewmember that shows that the crewmember complies with proficiency checks <i>Sources:</i> 121.135(a)(1); 121.683(b)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.	Did the training provider's check airmen/designated examiners/approved evaluators use approved testing standards in the conduct of flight checks?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.7.	Were the training provider's records accurate and complete?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.8.	Were responsible management personnel made aware of audit results?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.9.	Did the certificate holder and the training provider each have a system to detect and report deficiencies in training programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.10.	Was there an effective interface between the certificate holder and training provider to identify and correct deficiencies in crewmember training procedures and requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> <li>1. Check, at the training center, through interview, that the person(s) employed by the subject training organization, who determine(s) the adequacy of the training program, is fully informed about the procedures in use with regard to the Certificate Holder's approved training program. <i>Sources:</i> 121.135(a)(1); A.031(e)</li> <li>2. Check, at the training center, through observation, that the person(s) employed by the subject training organization, who determine(s) the adequacy of the training program, is fully informed about the procedures in use with regard to the Certificate Holder's approved training program.. <i>Sources:</i> 121.135(a)(1); A.031(e)</li> <li>3. Check, at the training center, through interview, that the person(s) employed by the subject training organization, who determine(s) the adequacy of the training program is fully informed about the requirements of the Certificate Holder's approved training program. <i>Sources:</i> 121.135(a)(1); A.031(e)</li> <li>4. Check, at the training center, through observation, that the person(s) employed by the subject training organization, who determine(s) the adequacy of the training program is fully informed about the requirements of the Certificate Holder's approved training program. <i>Sources:</i> 121.135(a)(1); A.031(e)</li> </ol>	
1.11.	Did crewmembers (including pilots, flight engineers, and flight attendants) who received outsource training successfully complete all of the required components of the certificate holder's approved training program?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Were the certificate holder's policies, procedures, instructions, and information for the Outsource Crewmember Training process, followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Were the Outsource Crewmember Training process controls followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	<p>Did the records for the Outsource Crewmember Training process comply with the instructions provided by the certificate holder?</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> <li>1. Check, at the records repository, that the Certificate Holder maintains current records of each crewmember that shows that the crewmember complies with proficiency checks. <i>Sources:</i> 121.135(a)(1); 121.683(a)(1)</li> <li>2. Check, at the records repository, that the Certificate Holder maintains current records of each crewmember that shows that the crewmember complies with route checks. <i>Sources:</i> 121.135(a)(1); 121.683(a)(1)</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Were the process measurements for the Outsource Crewmember Training process effective in identifying problems or potential problems and providing corrective action for them?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
6.	Did personnel properly handle the associated interfaces by complying with other written policies, procedures, instructions, and information that are related to this element?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>EPI Section 1 - Performance Observables Drop-Down Menu</b>	
1.	Personnel.
2.	Tools and Equipment.
3.	Technical Data.
4.	Procedures, policies or instructions or information.
5.	Materials.
6.	Facilities.
7.	Controls.
8.	Process Measures.
9.	Interfaces.
10.	Desired Outcome.
11.	Other.

### EPI Section 2 - Management Responsibility & Authority Observables

**Objective:** The questions in this section address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

#### Tasks

	To meet this objective, the inspector must accomplish the following tasks:
	NOTE: If no personnel or major program changes (as defined by the principal inspector (PI)) affecting the responsibility or authority attributes for this element have occurred since the last SAI and/or EPI was accomplished, then do not perform tasks 3–6, below. Answer questions 1 and 2, below, and provide the name/title.
1.	Identify the person who has overall responsibility for the Outsource Crewmember Training process.
2.	Identify the person who has overall authority for the Outsource Crewmember Training process.
3.	Review the duties and responsibilities for those who manage the Outsource Crewmember Training process.
4.	Review the appropriate organizational chart.
5.	Discuss the Outsource Crewmember Training process with the management personnel identified in tasks 1 and 2.
6.	Evaluate the qualifications and work experience of the management personnel identified in tasks 1 and 2.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Is there a clearly identified person who is responsible for the quality of the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
2.	Is there a clearly identified person who has authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
3.	Does the responsible person know that he/she has responsibility for the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
4.	Does the person with authority know that he/she has authority for the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
5.	Does the person with responsibility for the Outsource Crewmember Training process meet the qualification standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain



		<input type="checkbox"/> No Change
6.	Does the person with authority to establish and modify the Outsource Crewmember Training process meet the qualification standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
7.	Does the person with responsibility understand the controls, process measurements, and interfaces associated with the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
8.	Does the person with authority understand the controls, process measurements, and interfaces associated with the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
9.	Does the responsible person know who has authority to establish and modify the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
10.	Does the individual with authority know who has the responsibility for the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change

<b>EPI Section 2 - Management Responsibility &amp; Authority Observables Drop-Down Menu</b>	
1.	Assignment of responsibility.
2.	Assignment of authority.
3.	Does not understand procedures, policies or instructions and information.
4.	Does not understand controls.
5.	Does not understand process measurements.
6.	Does not understand interfaces.
7.	Span of control.
8.	Position vacant.
9.	Other.