

**Safety Attribute Inspection (SAI) 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 if the certificate holder's Outsource Crewmember Training process meets all applicable requirements of Title 14 of the Code of the Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Outsource Crewmember Training process incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Outsource Crewmember Training process.

**Specific Instructions:**

- Intentionally left blank

**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 Policy/Guidance:  
FAA Order 8000.88, chapters 1-3  
AC 120-68C

### SAI Section 1 - Procedures Attribute

**Objective:** Procedures, instructions, and information are documented methods for accomplishing a process. The certificate holder's policies should establish their compliance posture. Policies may be stand-alone statements, or they may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

#### Tasks

	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 duties and responsibilities for management and other personnel identified by the certificate holder who accomplish the Outsource Crewmember Training process.
3.	Review the certificate holder's Outsource Crewmember Training process to ensure it contains the policies, procedures, instructions and information necessary for personnel to perform their duties and responsibilities with a high degree of safety.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does certificate holder's system meet the specific regulatory and FAA policy requirements for an Outsource Crewmember Training process:	
1.1.	Does the certificate holder's system include all the requirements of operations specifications paragraph A031, to permit another certificate holder certificated under 14 CFR, part 121, or a flight training center certificated under 14 CFR, part 142, to provide flight training, testing, and checking under contract or other arrangement? SRRs: 121.402(a); 121.403(a); A.031	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	If the certificate holder contracts with or arranges to use the services of a training center certificated under 14 CFR part 142 to provide training, testing, or checking, does the certificate require:	
1.2.1	That the training center holds applicable training specifications issued under 14 CFR part 142? SRRs: 121.402(b)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.2.2	That the training center has facilities, training equipment and courseware to meet the applicable requirements of 14 CFR part 121, section 402? SRRs: 121.402(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.2.3	That the training center has approved curriculum segments and portions of curriculum segments applicable for use in training courses required by 14 CFR part 121, section 402? SRRs: 121.402(b)(3)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.2.4	That the training center have sufficient instructors and check airmen qualified under the applicable requirements of 14 CFR, part 121, section 411, 412, 413,	<input type="checkbox"/> Yes

	and 414, to provide training, testing and checking for the certificate holder's employees? SRRs: 121.402(b)(4)	<input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.3.	Does the certificate holder require that the results of the required (flight instructor or check airman) training are entered in the individual's training records maintained by the certificate holder? SRRs: 121.411(d); 121.412(d)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.4.	Does the certificate holder's Outsource Crewmember Training process comply with the guidance contained in FAA Advisory Circular 120-68C, paragraphs 4-10 (as referenced in FAA Order 8000.88, "PRIA Guidance for FAA Inspectors")?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.5.	Does the certificate holder document the required references to, or excerpts from, operations specifications, paragraph A031? SRRs: 119.43(b)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.	If the certificate holder's system includes excerpts from its operations specifications, are the excerpts clearly identified as part of the operations specifications? SRRs: 119.43(b)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.7.	Does the certificate holder require compliance with operations specifications, paragraph A031? SRRs: 119.43(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.8.	Does the certificate holder's system contain a method for keeping all persons engaged in its operations informed of the provisions of operations specifications, paragraph A031? SRRs: 119.43(c)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder's manual contain general policies for the Outsource Crewmember Training process that comply with the SRRs? SRRs: 121.135(b)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 121.135(b)(3)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder's manual contain the duties and responsibilities for personnel who will accomplish the Outsource Crewmember Training process? SRRs: 121.135(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Does the certificate holder's manual include instructions and information for personnel to meet the requirements of the Outsource Crewmember Training process? SRRs: 121.135(a)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 1 - Procedures Attribute Drop-Down Menu</b>	
1.	No procedures, policy, instructions or information specified.
2.	Procedures or instructions and information do not identify (who, what, when, where, how).
3.	Procedures, policy or instructions and information do not comply with CFR.
4.	Procedures, policy or instructions and information do not comply with FAA policy and guidance.
5.	Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
6.	Procedures, policy or instructions and information unclear or incomplete.
7.	Documentation quality (e.g., unreadable or illegible).
8.	Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).
9.	Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
11.	Other.

### SAI Section 2 - Controls Attribute

**Objective:** Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the system to ensure that the most important policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

#### Tasks

To meet this objective, the inspector must accomplish the following tasks:

1. Review the control questions below.
2. Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the controls that it has documented.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Outsource Crewmember Training process:	
1.1.	Is there a control or controls in place to ensure that the training provider is qualified to perform the contracted training?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Is there a control or controls in place to ensure that the training provider meets the required standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.3.	Is there a control or controls in place to ensure that the training provider has adequate qualified staff to provide the contracted training, testing, and checking?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.4.	Is there a control or controls in place to ensure that only qualified personnel provide contracted training, testing, and checking?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.5.	Is there a control or controls in place to ensure that all training provided is identical to the certificate holder's approved training program?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.	Is there a control or controls in place to ensure that 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.	Is there a control or controls in place to ensure that the training provider's records are accurate and complete?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.8.	Is there a control or controls in place to ensure that responsible management personnel are made aware of audit results?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.9.	Is there a control or controls in place to ensure that the certificate holder and the training provider each has a system to detect and report deficiencies in training programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.10.	Is there a control or controls in place to ensure that there is 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

1.11.	Is there a control or controls in place to ensure that crewmembers (including pilots, flight engineers, and flight attendants) who receive 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.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 2 - Controls Attribute Drop-Down Menu</b>	
1.	No controls specified.
2.	Documentation for the controls do not identify (who, what, when, where, how).
3.	Controls incomplete.
4.	Controls could be circumvented.
5.	Controls could be unenforceable.
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
7.	Other.



### SAI Section 3 - Process Measurement Attribute

**Objective:** Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety-related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection-related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

#### Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the process measurement questions below.
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Outsource Crewmember Training process include the following process measurements:	
1.1.	Is there a process measurement or process measurements that would reveal if the training provider was not qualified to perform the contracted training?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Is there a process measurement or process measurements that would reveal if the training provider did not meet the required standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.3.	Is there a process measurement or process measurements that would reveal if the training provider did not have adequate qualified staff to provide the contracted training, testing, and checking?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.4.	Is there a process measurement or process measurements that would reveal if other than qualified personnel provided contracted training, testing, and checking?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.5.	Is there a process measurement or process measurements that would reveal if any training provided was not identical to the certificate holder's approved training program?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.	Is there a process measurement or process measurements that would reveal if the training provider's check airmen/designated examiners/approved evaluators did not use approved testing standards in the conduct of flight checks?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.7.	Is there a process measurement or process measurements that would reveal if the training provider's records were not accurate and complete?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.8.	Is there a process measurement or process measurements that would reveal if	<input type="checkbox"/> Yes

	responsible management personnel were not made aware of audit results?	<input type="checkbox"/> No, Explain
1.9.	Is there a process measurement or process measurements that would reveal if either the certificate holder or the training provider did not have a system to detect and report deficiencies in training programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.10.	Is there a process measurement or process measurements that would reveal if there was not an 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
1.11.	Is there a process measurement or process measurements that would reveal if crewmembers (including pilots, flight engineers, and flight attendants) who received outsource training failed to 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.	Is there a process measurement or process measurements that would reveal if the certificate holder's policy, procedures, instructions, and information were not followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Does the certificate holder document its process measurement results?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder use its process measurement results to improve its programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5,	Does the organization that conducts the process measurements have direct access to the person with responsibility for the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 3 - Process Measurement Attribute Drop-Down Menu</b>
1. No process measurements specified.
2. Documentation for the process measurements does not identify (who, what, when, where, how).
3. Inability to identify negative findings.
4. No provisions for implementing corrective actions.
5. Ineffective follow-up to determine effectiveness of corrective actions.
6. Resources requirements (personnel, facilities, equipment, technical data).
7. Other.

### SAI Section 4 - Interfaces Attribute

**Objective:** Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different areas within the certificate holder's system must be consistent and complement each other. For the interfaces to be effectively managed, the certificate holder's system should identify and document the interfaces.

#### Tasks

	To meet this objective, the inspector must accomplish the following tasks:	
1.	Review the interfaces associated with the Outsource Crewmember Training process that have been identified along with the individual questions in section 1, Procedures, of this DCT.	
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the interfaces that it has documented.	

#### Questions

	To meet this objective, the inspector must answer the following questions: Note: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.	
1.	Does the certificate holder's system properly address the interfaces that are identified along with the questions in section 1, Procedures of this DCT?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder document a method for assessing the impact of any changes to the associated interfaces within the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 4 - Interfaces Attribute Drop-Down Menu</b>	
1.	No interfaces specified.
2.	The following interfaces not identified within the Certificate Holder's manual system:
3.	Interfaces listed are inaccurate.
4.	Specific location of interfaces not identified within the manual system.
5.	Other

### SAI Section 5 - Management Responsibility & Authority Attributes

**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:
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 of the person(s) documented in the certificate holder's manual.
4.	Review the appropriate organizational chart.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder clearly identify who is responsible for the quality of the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
2.	Does the certificate holder clearly identify who has authority to establish and modify the 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 certificate holder's manual include the duties and responsibilities of those who manage the work required by the Crewmember Outsource Training process? SRRs: 121.135(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder's manual include instructions and information for those who manage the work required by the Outsource Crewmember Training process? SRRs: 121.135(a)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Does the certificate holder clearly and completely document the responsibility for this position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
6.	Does the certificate holder clearly and completely document the authority for this position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
7.	Does the certificate holder clearly and completely document its qualification standards for the person having responsibility for the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
8.	Does the certificate holder clearly and completely document its qualification standards for the person having 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

9.	Does the certificate holder clearly and completely document the procedures for delegation of authority for the Outsource Crewmember Training process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
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<b>SAI Section 5 - Management Responsibility &amp; Authority Attributes Drop-Down Menu</b>
1. Not documented.
2. Documentation unclear.
3. Documentation incomplete.
4. Other.