



## **Airport Certification Information Bulletin (ACIB) 11-07**

### **Subject: Training Frequency : 12 CCM per Subject Area**

14 CFR Part 139.303 and 139.319 require that training be completed before initial performance of duties and at a least once every 12 consecutive calendar months (CCM). The purpose of this bulletin is to clarify that the 12 CCM requirement applies to each subject area individually, not a curriculum as a whole. This is to ensure that no more than 12 months will pass between training on any given subject area.

For example:

<b>Subject Area</b>	<b>Last Trained</b>	<b>Due by end of</b>
Airport Familiarization	April 2010	April 2011
Self Inspection	February 2010	February 2011
Notam Procedures	June 2010	June 2011
Firefighting Operations	August 2010	August 2011
Wildlife	May 2010	May 2011

One method for helping to ensure subject areas are not missed is to create an annual training curriculum scheduling each subject area in a specific month. Additional training may occur throughout the year; however, scheduling a subject area for the same specific month each year will help ensure that the 12 consecutive calendar month requirement is not missed. An example curriculum is attached for reference.

[Curriculum example](#)

#### **Personnel Training 139.303 (c)**

Certificate holders must ensure they can demonstrate that each employee has completed training in each subject area (applicable to them) before initial performance of duties and at least every 12 consecutive calendar months. The subject areas include but are not limited to, airport familiarization, procedures for access to and operation in movement areas and safety areas, airport communications, snow and ice

control plan, airport emergency plan, self inspection, fueling fire safety, airport condition reporting / NOTAM procedures, wildlife control and mitigation, and ARFF.

### **Aircraft Rescue Firefighting Training 139.319 (i) (2) and (i) (3)**

Additionally, for Aircraft Rescue and Fire Fighting personnel, certificate holders must ensure they can demonstrate compliance for each of the 11 subject areas listed in the regulation individually as well as the live-fire drill.

## **Recordkeeping**

- Record of training must include at minimum a description and date of training received.
- Records maintained must demonstrate compliance with the requirement for training at least every 12 CCM per subject area. Use of a summary sheet for each individual employee, or an employee group as a whole, may be helpful in demonstrating compliance. Attached are examples of summary sheets for personnel training as well as ARFF training.

### [Summary sheet example](#) (see multiple tabs)

- Logging additional training instances throughout the year (beyond the recurrent month), as well as tracking the number of hours of training, is encouraged as it draws a more complete picture of the level of training being accomplished.
- If an employee is out on leave, deployed, transferred to another airport which is operated by the same employer, etc., the certificate holder must ensure the employee is current on all required training upon their return, before they perform duties. Documenting the time period the employee is away on their training record is helpful in demonstrating that they have not failed to maintain currency. For example, if an employee goes out on leave in March 2010 and is due for recurrent self inspection training in April 2010, it may appear the certificate holder is not in compliance. A note on the training record indicating the employee is out on leave as of March 2010 shows compliance.
- If an employee is no longer employed, however records are still being maintained as required in the regulation, it is helpful to note the date of separation on the record. This preempts any question of whether the employee has missed recurrent training which was due after their employment ended.

## **Examples of non-compliance**

An operations employee received recurrent training for self inspection in April 2009 and then again in June 2010.

An ARFF employee received recurrent training for firefighting operations in May 2008, April 2009, and May 2010. He did not meet the requirement for 12 CCM from 2009 to 2010.

An employee receives airport condition reporting training in March 2009 and goes out on leave in January 2010. He returns to work April 2010 (his recurrent training was due March 2010). He does not complete the recurrent field condition reporting training before performing these duties upon his return.

An employee works for an airport authority that operates two airports in close proximity. The employees have the ability to transfer between airports but do not work at each airport on a day to day basis. The employee receives Airport Familiarization training at Airport A in March 2009. He transfers from Airport A to Airport B in June 2009 and receives the required site specific training for Airport B. He then transfers back to Airport A in June 2010; however, his last training in Airport Familiarization at Airport A was on March 2009.

## **Extensions**

FAA does not have the authority to grant extensions related to any time period driven items in Part 139. Therefore, any incident of an employee not meeting the 12 CCM requirements for each subject area, including the live fire drill requirement, is a violation of part 139. This includes situations involving inability to obtain spots at live fire training exercises. It is imperative that the airport plans accordingly with contingency plans, especially in those cases where outside training is required to meet requirements of Part 139.