
CHAPTER 12. SURVEILLANCE OF A CERTIFICATED FLIGHT INSTRUCTOR

Section 1 Background

1. PTRS ACTIVITY CODE: 1662

3. OBJECTIVE. The objective of this task is to determine whether a Certificated Flight Instructor (CFI) continues to perform to the same standards as for original certification. Completion of this task results in an inspection report with an indication of satisfactory or unsatisfactory.

5. GENERAL.

A. General Process. Although flight instructor certificates are renewed every 24 months, the surveillance of individual flight instructors and their activities should take place on a random basis in the interim. High activity CFI's should receive a higher level of supervision and surveillance since this segment of the CFI population is responsible for a larger percentage of pilot training and certifications. A high activity CFI is one who recommends at least four applicants annually for a practical test. In addition to routine surveillance, an inspector should take appropriate action, documenting those actions on FAA Form 8000-36, if any of the following circumstances exist:

(1) a justifiable public complaint is directed towards a CFI;

(2) a CFI is involved in an accident or incident;
or

(3) a student pilot instructed by the CFI is involved in an accident or incident.

B. Surveillance. Since the flight instructor has a responsibility for aviation safety, an FAA inspector's contacts with the flight instructor provide an opportunity to discuss current regulations, procedures, and techniques for the instructor to use in fulfilling that responsibility. These contacts also provide an opportunity for the inspector to observe the flight instructor conducting instruction.

C. Inspector's Conduct. During surveillance,

interference with the flight instructor's routine should be kept to a minimum. The purpose of the inspector's discussion with the flight instructor is twofold: to inform the flight instructor of changes in regulations and to determine the flight instructor's capabilities.

D. Initiation of Surveillance. There are many circumstances that may result in an inspector initiating the surveillance of a flight instructor. For example, an inspector may initiate surveillance because of observations made during a pilot school inspection. A flight instructor may be subject to an inspection during an inspector's random visit to an airport, or as a result of that instructor's visit to a Flight Standards District Office (FSDO). An instructor may be subject to surveillance because of an accident, an incident, or if deficiencies in the instructor's students become apparent. High activity CFI's should be inspected when applicant failure rates of 30 percent or greater are observed.

7. METHODS OF SURVEILLANCE. The scope and content of the inspection is left to the discretion of the inspector and may be combined with other inspections mandated by National Program Guidelines (NPG). A number of factors need to be considered, including the inspector's personal knowledge of, or previous experience with, the instructor. Instructor surveillance may include a discussion, an observation of performance, an evaluation of observed performance, or any combination of the three methods.

A. Discussion. Discussions held with instructors are comparable to the oral portion of a practical test. Through discussion the inspector determines the instructor's knowledge of current regulations and operational techniques. The discussion also allows the inspector to brief the instructor on the latest FAA policy. As different situations arise, there are other areas that may become necessary to discuss with the flight instructor. If the instructor is employed by a school, the inspector should examine employment records related to avia-

tion activities and note the instructor's performance on school standardization checks and other training. Although uncertificated schools are not required to keep records, the inspector should examine records if they are available.

B. Observation of Performance. The observation of an instructor's performance can be accomplished in several ways.

(1) The inspector may request that the instructor conduct a standardization flight check with the inspector acting the role of a student preparing for a particular certificate or rating. While role playing as a student, the inspector should note both the instructor's teaching technique and piloting skills.

(2) The inspector may conduct spot inspections of the instructor's students. Checking more than one student is advisable to gain better perspective on the instructor's ability.

(a) The inspector can fly with the student and request procedures or maneuvers appropriate to the student's level of progress. The inspector uses the appropriate Practical Test Standards (PTS) to evaluate the student's performance. However, it should be stressed to the student that the flight is not a practical test and that it cannot be passed or failed. This does not preclude the possibility of a re-examination of a pilot whose deficient skills are noted by the inspector.

(b) If the instructor is employed by an approved school, the inspector could conduct a stage test of one of the instructor's students. If the inspector elects to use this form of surveillance, he or she must refer to Volume 2, Chapter 145 of this Handbook.

(c) If applicable, the inspector should ensure that the student records include: the number of students recommended for certificates or ratings, their pass/fail rate, and the number of students endorsed for their first solo or solo cross-country flight. A high failure rate among students recommended for certificates or ratings might indicate weakness in instruction skills and should be discussed with the instructor.

(3) The inspector could observe the flight instructor conducting ground training. The instructor should use acceptable teaching

methods, and the lesson content should conform to acceptable aeronautical information. If the instructor is employed by an approved school, the teaching should adhere to the content of the Training Course Outline (TCO).

C. Evaluation of Observed Performance. An evaluation can take the form of a debriefing of the instructor. The inspector should recognize and congratulate the instructor on outstanding areas. Areas that are marginally acceptable should be discussed, and the inspector should offer suggestions for improvement. Areas that are clearly deficient, revealed either in the instructor's actual performance or in a student's performance, could make the instructor subject to a re-examination or possible enforcement investigation. Consult Volume 2, Chapter 26 or Chapter 182 of this Handbook, as appropriate.

9. SPECIAL EMPHASIS ITEMS. The following paragraphs provide information for inspectors to consider when conducting surveillance of flight instructors.

A. Dangers Associated with Nonstandard, Unstabilized Landing Approaches. Although not a widespread practice, instructors occasionally teach nonstandard procedures. These procedures are considered nonstandard because they do not adhere to the Pilot's Operating Handbook (POH) and/or the Airplane Flight Manual (AFM). This practice contributes to instructional accidents. Witnesses to a recent fatal, instructional accident observed the aircraft on short final approach performing S-turns with bank angles between 30 and 45 degrees. After several such turns, the aircraft nosed down abruptly and struck the ground about 600 feet short of the runway. The instructor had taught the use of S-turns on final approach as a means of increasing the spacing between the aircraft in the traffic pattern. Whereas this is somewhat of a standard procedure, the high bank angles used in this accident could have significantly increased the stall speed. Light aircraft POH's or AFM's include information on the effect of high angles of bank on stall speed, as well as recommended airspeeds for approach and landing. Subsequent investigation disclosed a pattern of the instructor using nonstandard techniques and procedures contrary to safe operating practices.

B. Adherence to Established Procedures. In order to ensure that instructors teach the proper procedures that lead to a safe approach and landing, inspectors should discuss the following areas with instructors:

(1) the importance of adhering to procedures specified in the appropriate POH or AFM;

(2) the importance of properly instructing small aircraft pilot applicants in standard traffic patterns for a stabilized approach and landing; and

(3) ensuring a normal descent to the runway touchdown zone by establishing a stabilized flight path using appropriate power settings, airspeeds, and sink rates.

Section 2 Procedures

1. PREREQUISITES AND COORDINATION REQUIREMENTS.

A. **Prerequisites.** This task requires knowledge of the regulatory requirements of FAR Part 61 and FAA policies, and qualification as an Aviation Safety Inspector (Operations).

B. **Coordination.** This task may require coordination with the operations unit manager or principal operations inspector, the accident prevention program manager, or the airworthiness unit.

3. REFERENCES, FORMS, AND JOB AIDS.

A. References.

- FAR Parts 1, 61, 91, and 141
- FAA-S-8081-7, "Flight Instructor Practical Test Standards"
- Other, appropriate practical test standards
- AC 61-21, "Flight Training Handbook"

B. Forms.

- FAA Form 8000-36, Program Tracking and Reporting Subsystem Transmittal Form

C. Job Aids.

- Flight Instructor Evaluation Job Aid (Figure 12-1)
- Sample letters and forms

5. PROCEDURES.

A. **Schedule Surveillance.** Schedule the flight instructor surveillance.

B. **PTRS.** Open PTRS file.

C. **Arrive for Surveillance.**

(1) If not already done, select the instructor to be surveyed.

(2) Present FAA identification to the instructor. Explain the nature of the surveillance.

D. **Examine Certificates.** Request the instructor's airman, medical, and instructor certificates. Examine them for appropriateness and validity.

(1) The instructor must hold at least a commercial airman certificate with an instrument rating.

(2) The instructor must hold at least a third class medical certificate if the instructor is pilot-in-command (PIC) during instruction.

(3) The flight instructor must hold a flight instructor certificate appropriate to the category, class, and rating of the aircraft used for instruction.

E. Discussion with Instructor.

(1) Discuss areas of special emphasis as directed by headquarters, the regional office or the FSDO. Ask the instructor if any safety problems have been encountered during instruction or other flight. Invite the instructor's comments.

(2) Bring to the flight instructor's attention areas that are above average or outstanding. Cover any areas of unsatisfactory performance.

(3) When a new regulation is implemented or an existing rule is amended, discuss it thoroughly with the flight instructor.

F. **Observation.** Proceed with the surveillance by observing the flight instructor's performance. Determine which method of observation to use: standardization flight check, student flight check, or ground training.

(1) During standardization flight checks, the inspector (acting as a student) should:

(a) discuss with the flight instructor the maneuvers and procedures that will be required during the check; and

(b)) evaluate the instructor's performance, demonstration of flight maneuvers, and ability to discern and correct student errors during the flight. If the instructor performs a nonstandard maneuver or procedure, discuss the correct performance with the instructor.

(c) At the completion of the flight debrief the instructor on any matters that were not discussed during the flight.

(2) During student flight checks, the inspector should:

(a) fly with one or more students, preferably students working on various certificates or ratings, and observe their performance; or

(b) conduct a stage test of one or more students if the flight instructor being inspected is employed by a FAR Part 141 approved school. (See Volume 2, Chapter 145 of this Handbook.)

(c) Request and examine students' records. Note the number of students recommended for a certificate or rating and the number of students who passed or failed. Review the records of first solo flight and first solo cross-country flight students and note any problems the students encountered. Discuss with the instructor how the problems were resolved.

(3) During observation of ground training, the inspector should:

(a) observe the flight instructor's performance;

(b) determine if the instructor at a FAR Part 141 approved school adheres to the appropriate TCO; and

(c) determine if the instructor has adequate knowledge of the subject being taught.

G. *Evaluation.* Evaluate the instructor's performance in a private area after the applicant/student is debriefed.

(1) Indicate "satisfactory" on the Flight

Instructor Evaluation Job Aid (Figure 12-1) if the discussion and observation indicate satisfactory instructional skills.

(2) Indicate "unsatisfactory" on the Flight Instructor Evaluation Job Aid if the discussion and observation indicate unsatisfactory instructional or piloting skills. Refer to Volume 2, Chapter 26 of this Handbook.

(3) Debrief the flight instructor on the results, whether satisfactory or unsatisfactory. Recognize strengths and suggest methods to improve weaknesses. If the inspection was unsatisfactory and the instructor is employed by a FAR Part 141 approved school, inform the school of the results and confirm in writing (Figure 12-2).

(4) File the job aid in the FSDO file.

H. ***PTRS.*** Close PTRS.

7. TASK OUTCOMES. Completion of this task results in one of the following.

A. An indication of satisfactory on the Flight Instructor Evaluation Job Aid.

B. An indication of unsatisfactory on the Flight Instructor Evaluation Job Aid.

C. A letter to an approved school when a flight instructor's performance is unsatisfactory.

9. FUTURE ACTIVITIES.

A. The flight instructor may be subject to a re-examination.

B. The flight instructor may be the subject of future surveillance.

FIGURE 12-1 FLIGHT INSTRUCTOR EVALUATION JOB AID

Instructor's Name	Certificate No.	Expiration Date		
Airport	Company	Approved School No.		
ITEM		N/A	SAT	UNSAT
Discussion with instructor				
Observation of instructor performance				
Standardization flight check with instructor				
Oral				
Teaching techniques				
Piloting techniques				
Student Records				
Number of students recommended for certificate or rating _____ Passed _____ Failed _____ Number of student first solos _____ Number of student solo cross country flights _____				
Student spot check (Flight - Use the practical test standards appropriate for the student and any or all of the following maneuvers to judge the instructor's teaching ability.)				
Preflight operations				
Taxiing				
Radio voice procedures				
Normal takeoffs and landings				
Crosswind takeoffs and landings				
Short field takeoffs and landings				

Figure 12-1 FLIGHT INSTRUCTOR EVALUATION JOB AID (contd)

ITEM	N/A	SAT	UNSAT
Flight at minimum controllable airspeed			
Stalls and stall recoveries			
Emergency operation of equipment			
Turns about a point			
Forced landings			
Gliding spirals			
Eights-on-pylons			
Eight-around-pylons			
Steep power turns			
Lazy eights			
Chandelles			
Cross-country flight			
Cross-country emergencies			
Use of radio aids			
Instrument flight			
Overall student evaluation			
Ground instruction			
Overall instructor evaluation: (Circle one) Satisfactory Unsatisfactory			
Remarks:			
Inspector's signature _____ Date _____			

**FIGURE 12-2 LETTER TO APPROVED SCHOOL CONFIRMING FLIGHT
INSTRUCTOR'S UNSATISFACTORY PERFORMANCE**

FAA Letterhead

[*address of school*]

Dear []

This confirms the results of a flight instructor inspection held at your school on [*inspection date*]. During the inspection we reviewed [*instructors' names*] by [*inspection type*]. We found [*instructor name*] to be deficient in the following areas:

- *Indicate all areas where the flight instructor was deficient.*
- *Suggest how the deficiencies can be corrected.*
- *Indicate if a re-examination is in order.*
- *If the flight instructor is a chief instructor for a course of training, indicate that training in that course can continue for 30 days. After that time, if the discrepancies are not resolved, a new chief instructor must be named.*

If you have any questions concerning this matter, please contact this office at [*telephone number*].

[*signed by the inspector performing the surveillance*]

