

## CHAPTER 14. INSPECT A FLIGHT INSTRUCTOR REFRESHER CLINIC (FIRC)

### SECTION 1. BACKGROUND

#### 1. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODE. 1690

often assigned to monitor a clinic and offer a safety presentation.

**3. OBJECTIVE.** The objective of this task is to determine if a previously approved FIRC is conducted within the guidelines of its approved training course outline (TCO). Successful completion of this task results in an indication of either satisfactory or unsatisfactory performance.

*C. Guidelines.* The following guidelines were developed to minimize the hours required by field personnel to monitor this program. They should not be interpreted as an attempt to restrict FSDO involvement with the flight instruction community. While the actual supervision of the clinics ultimately will become a regional responsibility, it is essential that a single office be responsible for approval of an FIRC to ensure standardized approval procedures.

#### 5. GENERAL.

*A. General Process.* The renewal of an FIRC is done on an annual basis. While the surveillance or monitoring of an FIRC should be done on an annual basis, it is generally done on a more flexible basis and is a process that may develop throughout the year.

(1) Upon approval, each sponsor organization is provided a detailed briefing by the General Aviation and Commercial Division, AFS-800, to define clearly the FAA's and the approved organization's responsibilities. These briefings include discussions on routine questions relating to the Federal Aviation Regulations (FAR). It is expected that the approved sponsor organization will provide the necessary response to any questions asked during the clinic. This paragraph should not be interpreted as an attempt to prohibit involvement by field personnel should questions arise which require further interpretation by the FAA. It is simply an effort to reduce FSDO workload in the event any questions asked require extensive research and/or coordination.

*B. Federal Aviation Administration (FAA) Participation.*

(1) In the past, were conducted solely by the FAA and proved to be beneficial and productive, as well as an effective means of renewing flight instructor certificates. However, because of the Federal Government's policy of placing additional responsibility on industry and in light of human resource and budgetary restraints, a decision was made to withdraw direct FAA participation in the conduct of these clinics and to delegate this important function to industry. Even though the FAA is now indirectly involved in the clinics, the success of the program will only be realized through the full cooperation and support of all FAA personnel. Since the FAA approves the clinics' TCO's, it is also the FAA's responsibility to verify that the organization is conducting its clinics according to the approved TCO's guidelines.

(2) While all sponsor organizations are expected to conduct a quality FIRC renewal program, it is unrealistic to expect sponsor organizations to make changes to approved TCO's as a result of individual preferences expressed by various visiting FAA representatives. Therefore, recommendations for improvement in the quality of an FIRC program should be submitted to AFS-800 through the regional Flight Standards Division manager, unless specifically solicited by the chief instructor of a particular FIRC sponsor.

(2) FAA participation in an FIRC is usually as a result of either a request from the sponsor, a directive from the regional office, or a directive from AFS-800. If the sponsor has contacted the Flight Standards District Office (FSDO) for FAA participation, the FSDO manager may want to combine the clinic monitoring with a presentation from an inspector. In many offices, the Accident Prevention Program Manager is

**7. SCHEDULING OF CLINICS.** Upon approval, each sponsor organization may schedule and conduct FIRC programs as frequently as and wherever that organization may deem appropriate. In order to provide timely notification to FAA for monitoring pur-

poses, the approved organization is required to notify AFS-800 of its intent to conduct such clinics at least 45 days in advance. Upon notification, AFS-800 will advise appropriate regional offices in writing of clinics to be conducted within their region.

## 9. CLINIC MONITORING.

*A. Program Quality.* The key to the quality of the FIRC programs is FAA monitoring. The TCO may be the finest available, but the necessary quality can only be ensured through proper FAA monitoring and control.

*B. Regional Monitors.* Each region shall designate persons who will be responsible for monitoring refresher clinics within that region. These individuals will ensure conformity with the TCO as approved. Each region must forward the names of personnel designated as FIRC monitors to AFS-800.

*C. AFS-800 Participation.* In order to ensure continuity and technical accuracy, the first clinic conducted by a sponsor organization will be monitored by personnel assigned to AFS-800. In order to become familiar with the content of the approved TCO's, regional monitors are encouraged to attend those initial clinics within their region. When major changes are required in a TCO as a result of the monitoring by AFS-800, monitoring of subsequent clinics will be the responsibility of AFS-800 until the problem is resolved. It is expected that subsequent clinics conducted in the region by each approved organization, that are not monitored by regional personnel in coordination with AFS-800, will be monitored by the region on an "as needed" basis to ensure quality and adherence to the approved TCO. This does not imply that the monitor must be present during the entire period of each lesson, but only to the extent necessary to ensure that the intended quality is realized and the clinic is conducted in accordance with the approved TCO.

*D. TCO Review.* Upon notification of proposed clinic dates and once it has been determined that the regional representative will monitor the clinic, the monitor should contact the approved organization and request that a copy of the TCO be available on the site for FAA review.

(1) During the development of the TCO, applicants are encouraged to include new techniques and teaching concepts, as well as diversity in the subjects presented. It is critical that an inspector thoroughly evaluate the TCO before the surveillance. While every attempt is made to ensure the technical accuracy of each lesson's content during the approval process, monitors may occasionally identify subject material being presented that does not represent the

FAA viewpoint. Therefore, monitor duties shall include the following:

(a) Ensure adherence to each TCO. Any deviation from the approved TCO should be brought to the attention of the chief instructor and shall be followed up with a written report to AFS-800 through the appropriate regional Flight Standards Division manager. No attempt shall be made to disrupt or halt the clinic proceedings. In addition, the decision not to renew flight instructor certificates based on the content of the clinic should only be considered when it is evident that no other course of action is appropriate, and only after consultations with both the regional Flight Standards Division manager and with AFS-800.

(b) Ensure that the course content is technically accurate. During the approval process every care is taken to ensure the technical accuracy of the course content. If the monitor detects areas of inaccuracies or positions that do not conform to FAA policy, they should be brought to the attention of the chief instructor at the conclusion of that lesson. In addition, AFS-800 should be notified in writing through the regional Flight Standards Division manager to ensure that appropriate changes are made before scheduling the next clinic. Furthermore, while there will be instances when monitors detect areas where changes could be made that would improve the quality of the clinics, any such suggestions should be offered only if they are specifically solicited by the chief instructor. The monitor's chief concern is that the material being taught is technically accurate and that the approved TCO is being followed.

(2) Since some TCO's are copyrighted, no attempt should be made to reproduce the TCO. Upon conclusion of the clinic, the TCO should be returned to the approved organization, if requested, but a copy of the TCO should be filed in the FSDO for future reference.

**11. FSDO RESPONSIBILITIES.** As part of the approval process, it is made clear to approved organizations not holding associated ACR designations that it is their responsibility to arrange the necessary renewal procedures for successful graduates of their clinics with the appropriate field offices. The final decision on renewal of individual instructor certificates on the basis of the clinic attendance will remain the option of the FAA.

*A. Standardization Flights.* On occasion the FSDO may receive requests from approved organizations to provide standardization flights in connection with the clinic. All approved organizations will be advised that FSDO personnel cannot be devoted to this function unless individual offices determine that it is expedient

to use personnel in this manner and the sponsoring organization and the FSDO have arranged for this in advance of the clinic. Participation by FSDO personnel in industry-conducted FIRC's, for maximum of 2 hours, is permitted at the request of the sponsoring organization and at the option of the FSDO. The decision to participate will be that of the regional or FSDO for each individual request received. The time devoted and subjects covered will be at the discretion of the FSDO after considering the request of the individual organization.

*B. Graduation Certificates.* At the completion of each clinic, the approved organization will issue a printed graduation certificate to each successful graduate. The certificate will be sequentially numbered and contain appropriate information.

*C. Graduation Records.* The approved organization will maintain a record for 12 months of all graduation certificates issued, certificates denied, and the reasons for denial. Therefore, if a certificate is presented to a FSDO as the basis for certificate renewal and there is any doubt as to its authenticity, the inspector may check with the issuing organization. AFS-840, Certification Branch, shall provide names, addresses, and telephone numbers of all approved organizations to all regions and FSDO's upon request.

*D. Human Resource Restrictions in the FSDO.* At the present time 25 organizations are approved to conduct FIRC's. As previously discussed, it is anticipated that there will be limited FSDO participation in the industry-conducted clinics, with the exception of the administrative processing of certificates awarded to clinic graduates. It is clear that this renewal process is creating severe problems for some FSDO's because of human resource restrictions. Several factors in the manner in which industry conducts these clinics are contributing to the problem.

(1) Most clinics are conducted on weekends (Friday, Saturday, and Sunday or Saturday, Sunday, and Monday), which leaves a FSDO only 1 day to process as many as 150 to 200 certificates.

(2) In some highly populated areas, several clinics are being scheduled within a very short timeframe and at more than one location.

(3) In many instances, the clinic locations are a considerable distance from the FSDO having jurisdiction.

(4) Many attendees do not live in the district where the clinic is being conducted.

(5) In view of the above, and in order to best use the most available human resources, the following procedures may be used to renew flight instructor cer-

tificates. Renewal of all certificates should be accomplished in accordance with THE NEXT TWO PARAGRAPHS.

(a) At the discretion of the jurisdictional FSDO, applications may be accepted and processed during the clinic and certificates presented to course graduates at the conclusion of the clinic.

(b) Applications may be accepted by the FSDO at any time during the course of the clinic. Ideally, the organization conducting the clinic will assist in completing the application forms, check them for completeness and accuracy, and accepting them for all attendees at the clinic. At the conclusion of the clinic, the responsible organization will verify successful completion of the course by indicating the graduation certificate number on the appropriate application form. Applications will then be presented to an FAA representative. When possible, FSDO's are encouraged to pick up the applications to preclude possible delay or loss through the postal system. When this is not feasible, the responsible organization will mail the applications to the appropriate FSDO. Once received, each FSDO will attempt to process all applications within 3 working days of receipt and issue temporary certificates by return mail. All applications received with an accompanying certificate dated before the expiration date of the flight instructor certificate will be processed, even if the application is actually received after the expiration date of that certificate.

(c) Some applicants may not possess suitable identification. In such cases, the FIRC may use an alternative method to identify the applicant positively, in a manner acceptable to that FIRC. When applicants for airman certificates present forms of identification that are not acceptable, FIRC's should be alert for any indication of fraudulent or altered forms of identification or any other irregularity or any attempt by the applicant to represent his or her identity falsely. Any indication should be immediately reported to the jurisdictional FSDO. No attempt should be made to detain the applicant. Section 902(b) of the FA Act was amended to make willful or fraudulent misrepresentation for the purpose of applying for any FAA certificate grounds for criminal penalties.

*E. Coordination Between FSDO's.* Coordination with other FSDO's is not required before the renewal of instructors not based in the district where the clinic is conducted. All applications received as a result of clinic attendance may be processed regardless of the applicant's domicile. Consequently, if any FSDO manager wishes to ensure that a particular flight instructor's certificate is not renewed based on attendance at a clinic in another FSDO area, that manager

should notify the manager at the Airmen Certification Branch, AVN-460, to place a stop order on that instructor's certificate renewal. When the instructor's application is received by AVN-460, it will be routed to the FSDO having jurisdiction for final disposition. This procedure will relieve the host FSDO of the need to check with the home FSDO regarding out-of-area clinic attendance.

*F. Unrenewable Instructors.* Instructors who are considered marginal or not renewable through the clinic process should seek renewal by the normal process (i.e., a practical test). The FAA is responsible for ensuring instructor competence at any time it becomes suspect, and should not wait until such a certificate comes up for renewal.

*G. Interpretations.* During the clinic, it is inevitable that questions will arise requiring interpretations of the regulations. Chief instructors for the approved organizations have been briefed on the most frequently asked questions and are expected to answer all

inquiries. To avoid imposing an added workload on district or regional office personnel and to ensure a standardized reply, questions that require further research may be directed to AFS-800 for reply. There is no intent to prohibit monitor personnel from providing interpretations and assistance when they are deemed appropriate. As guidance regarding when it might be appropriate to provide interpretations and assistance, the inspector should bear in mind that the information given must be correct, current, and reflect national guidelines. Only in this manner can it be ensured that the approved organizations will not receive conflicting information from different parts of the country.

**13. CLINIC MATERIALS.** It is expected that all handout materials associated with the conduct of the clinic will be provided by the organization conducting the clinic. While the organization may copy or reproduce official FAA publications, it is not expected that district or regional offices will assume responsibility to furnish material.

## 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 requires coordination with the regional Flight Standards Division, AFS-800, the sponsor organization, and possibly other FSDO's.

### 3. REFERENCES, FORMS, AND JOB AIDS.

#### *A. References.*

- FAR Parts 1, 91, and 183
- Advisory Circular 61-83, Nationally Scheduled FAA-Approved, Industry-Conducted Flight Instructor Refresher Clinics
- PTRS Procedures Manual (PPM)

#### *B. Forms.*

- FAA Form 8000-36, PTRS Data Sheet

#### *C. Job Aids.*

- FIRC Survey/Monitor Job Aid (Figure 14-1)
- Sample letters and figures

### 5. PROCEDURES.

*A. Obtain Schedule.* Depending upon who has requested inspector participation, obtain a schedule of FIRC clinics from AFS-800, the regional office, or the sponsor.

*B. Contact Sponsor.* Contact the sponsor and request a copy of the current, approved TCO. If appropriate, advise the sponsor that the clinic will be monitored. If the sponsor does not provide a copy of the TCO, either ask AFS-800 for a copy or plan to arrive early at the clinic in order to have time to review it before the surveillance.

(1) Determine the exact date, time, and location of the clinic.

(2) Determine what subject matter is to be covered and the proposed length of the clinic.

(3) Determine the name of a person, who represents the sponsor, to contact upon arrival.

(4) Determine how the applications will be received at the FSDO.

#### *C. Date of Surveillance.*

(1) Present FAA identification to the sponsor.

(2) Advise the sponsor that the clinic is being monitored to ensure adherence with the approved TCO.

(3) Assume a seat in the classroom area so as not to disrupt the clinic. When appropriate, ask the instructor for his or her credentials to determine qualification for conducting the clinic.

(4) Observe the conduct of the proceedings and the classroom instruction. During the observation, determine whether:

(a) the TCO is being followed;

(b) the course content is technically accurate;

(c) the facilities are adequate with respect to seating, lighting, and general comfort; and

(d) the organization sees that attendees adhere to attendance requirements and clinic procedures.

(e) the graduation certificate issued is properly numbered and contains the following data:

(i) the full name and address of the organization approved to conduct the clinic;

(ii) the full name and address of the graduate;

(iii) the date of issuance; and

(iv) the signature of the chief instructor.

(5) Determine whether the clinic has been conducted satisfactorily or unsatisfactorily. Proceed with the appropriate steps as follow:

(a) Satisfactory.

(i) Fill out the job aid (Figure 14-1), noting the satisfactory indication.

(ii) File the job aid in accordance with office procedures.

(b) Unsatisfactory.

(i) Fill out the job aid in detail, noting all unsatisfactory areas.

(ii) File job aid in accordance with office procedures.

(iii) Forward a copy of the job aid to AFS-800.

(iv) If the clinic was unsatisfactory to the point that withdrawal of the sponsor's FIRC approval is recommended, record the deficient areas in detail and notify AFS-800 in writing.

*D. PTRS.* Complete FAA Form 8000-36 in accordance with the PPM.

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

A. Unsatisfactory report to AFS-800

B. Satisfactory report to FSDO files

**9. FUTURE ACTIVITIES.**

A. Increased monitoring of future clinics conducted by a particular sponsor may be necessary.

B. Possible withdrawal of the clinic's approval.

C. Possible revision of the sponsor's TCO.

**FIGURE 14-1  
FIRC SURVEY/MONITOR JOB AID**

Name of Sponsor:				
Name of FIRC Approval Holder:				
Date and Location of Surveillance:				
Date of Approved TCO:				
Instructors' Names:				
Start Time:				
Day 1	Day 2	Day 3		
Planned:	Planned:	Planned:		
Actual	Actual:	Actual:		
OBSERVATION OF CLINIC		SAT	UNSAT	N/A
TCO followed				
Course content technically correct				
Facilities adequate				
Seating				
Lighting				
General comfort				
Sponsor ensured attendee compliance with clinic attendance requirements and clinic procedures				
Airman certification representative				
Qualified				
Issued certificates appropriately				

**FIGURE 14-1—Continued  
FIRC SURVEY/MONITOR JOB AID**

GRADUATION CERTIFICATE

Full Name and address of sponsor:

Full name and address of graduate:

Date of issuance:

Signature of chief instructor:

Major Points Covered:

Comments/Notes/Recommendations: