

FAA PROPOSES MANDATORY CRM TRAINING

June 15, 2009

What's at Issue

A Notice of Proposed Rulemaking (NPRM) issued by the Federal Aviation Administration (FAA) would require certificate holders conducting Part 135 operations to implement crew resource management (CRM) training for all crewmembers in Part 135 dual- or single-pilot operations. The new training requirements would apply to Part 135 pilots and flight attendants.

Why It's Important

The changes proposed by the FAA will affect nearly all Part 135 certificate holders and their crewmembers. The NPRM addresses three National Transportation Safety Board (NTSB) recommendations relating to CRM training, including one recommendation on the NTSB's "most wanted" list. It also addresses recommendations made by the Part 135/125 Aviation Rulemaking Committee established in 2003.

Major Provisions

Components of CRM Training

The proposed rule would require initial training, recurrent practice and feedback, and continuing reinforcement of CRM techniques. The FAA has not proposed a minimum number of training hours. Rather, the FAA will consider instructional techniques, use of performance-based scenarios, use of student feedback, and other aspects of training while evaluating and approving a Part 135 CRM training course. The elements of a CRM training course have been outlined in Advisory Circular (AC) 120-51 and AC 00-64.

Credit for Previous CRM Training / Transferability of Training

The FAA may allow credit for some CRM training received by crewmembers prior to the compliance date. Part 135 certificates already utilizing a CRM training program in accordance with AC 120-51 or AC 00-64, as appropriate, are likely to receive credit for training received prior to the required compliance date of this proposed rule.

Also, the FAA recognized in the NPRM that many crewmembers work for several Part 135 operators at different times in their careers. As a result, the FAA would allow credit for initial CRM training completed while working for one Part 135 operator to count toward the initial CRM training required by another Part 135 operator if the crewmember is able to provide appropriate training records to the new employer.

Compliance Date

The FAA has proposed a compliance date two years after the effective date of the final rule. After this date, a certificate holder conducting Part 135 operations would be prohibited from using any crewmember who has not completed an FAA-approved initial CRM course.

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NATA Position

NATA is pleased the FAA has acted upon one of the Part 135/125 ARC recommendations. The association is also supportive of the proposal's acknowledgement of previous training received and the transferability of training received from another Part 135 operator. However, NATA is somewhat concerned about the lack of guidance on the exact requirements of a CRM training program. Existing ACs do not provide clear guidance, particularly for the smallest of operators that are affected by this rule. The association recommends the FAA provide a template training outline for operators without sufficient resources to develop their own training programs.

Status

The NPRM appeared in the *Federal Register* on May 1, 2009. Comments must be received by the FAA no later than July 30, 2009.

[Download the NPRM.](#)

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