NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.14

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8/10/07

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8/10/08

National Policy

SUBJ: Approval of a Repair Station Employee Training Program

1. Purpose of This Notice. This notice provides guidance to aviation safety inspectors (ASI) involved in approving a repair station employee training program required by Title 14 of the Code of Federal Regulation (14 CFR) part 145.

2. Audience. The primary audience for this notice is Flight Standards District Office (FSDO) ASIs, who are involved in approving a repair station employee training program. The secondary audience includes Flight Standards branches and divisions in the regions and in headquarters.

3. Where You Can Find This Notice. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avr.faa.gov. Operators may find this information on the Federal Aviation Administration (FAA's) Web site at: http://www.faa.gov/library/manuals/examiners_inspectors/8900/.

4. Background.

a. To comply with the requirements of part 145, § 145.163, each certificated repair station must have an employee training program approved by the FAA. The program must consist of initial and recurrent training and ensure that each employee assigned to perform maintenance, preventative maintenance, alterations, or inspection functions is capable of performing the assigned task.

b. Since April 6, 2006, each applicant for a repair station certificate has had to submit an employee training program for approval by the FAA. Existing certificated repair stations were permitted to submit training programs in accordance with a staggered deadline schedule based on their original certification date. This transition period has now expired and all certificated repair stations should have training programs submitted for approval.

c. Feedback from FAA field offices indicates that some uncertainty still exists concerning the minimum requirements for an approvable program, which may cause delays in processing the approval.

5. Discussion.

a. A well designed training program covering all repair station employees who perform maintenance, preventative maintenance, alterations, or inspections will enhance aviation safety by ensuring those employees are fully capable of performing the assigned work. To ensure that

the training program is appropriate and tailored to the individual repair station, the FAA will review and approve each program.

b. The training program must be appropriate for the repair station and may vary depending on the size of the repair station and the nature of the work performed. A small repair station consisting of one or two employees performing only altimeter, static system, and altitude reporting equipment tests and inspections could effectively document its training program using only a few pages. In contrast, a large repair station employing several hundred technicians and utilizing an in-house training department may require thirty or more pages to effectively document its training program.

c. A program can be defined as a plan of action to accomplish a specified end. The FAA is only required to approve the program, or the plan of action to accomplish the training, not the curriculum, specific courses, instructors, training sources, or methods of instruction, etc.

d. In situations where the repair station chooses to develop a comprehensive training manual which includes curriculum, specific courses, training sources, instructor names, etc., the repair station should segregate the training program section from the other contents. If this is impractical, the repair station may develop a matrix or similar method to identify each paragraph or page of the training program. Regardless of the method selected, the training program must contain all required elements.

6. Action.

a. ASIs must ensure that each training program is in compliance with all applicable regulatory requirements. While certain elements are required in each program, the method of achieving the requirement may be different depending on the repair station's needs. ASIs are encouraged to use the attached expanded checklist to assist in establishing a basis for approval. The checklist identifies all required program elements and includes several recommended elements. This checklist is intended to replace the checklist contained in FAA Order 8300.10, Volume 2, Chapter 160, Review and Approve a Part 145 Repair Station's Training Program Figure 160-2.

b. FAA approval will be indicated by stamping "Approved" on the List of Effective (LOE) pages. The approving inspector will also enter the date, office identification, and their signature. If the program does not include LOE pages, approval will be indicated on each page of the document. If a matrix was used to define the program, FAA approval will be indicated on each page of the matrix. A letter indicating the effective date of the approval should be provided to the repair station. This is particularly important for programs submitted electronically which may preclude the use of an approval stamp and signature.

7. Disposition. We will permanently incorporate the information in this notice in FSIMS before this notice expires. Direct questions concerning this notice to the Repair Station Branch, AFS-340, at (210) 308-3378.

James J. Ballough
Director, Flight Standards Service

Appendix A. Checklist to Facilitate Training Program Approval

Repair Station Name: _____ Review Date: _____

Source	Program Elements	Required	Recommended	Verified
	Title Page - Is the program identified? Does the program contain the company name, address, and certificate number, or another acceptable method to identify the applicable repair station?	X		
145.163(d) 145.209(e)	**Revision Procedure** - Does the Repair Station Manual or the training program document contain procedures for revising the training program and procedures for submitting revisions to the certificate-holding district office for approval?	X		
145.209(k)	**Record of Revisions** - Does the program document contain a record of revisions or another method to clearly indicate the revision status?	(Note 1)	X	
145.209(k)	**List of Effective Pages** - Does the program document contain a list of effective pages? FAA approval will be indicated on the list of effective pages. If the program does not include a list of effective pages, FAA approval will be indicated on each page of the document.	(Note 1)	X	
	Table of Contents - Does the document contain a table of contents?		X	
145.209(k)	**Document Control** - Are there adequate procedures for controlling the training program document? Document control may include distribution, assignment, procedures to maintain currency, revision responsibility, identification of uncontrolled copies, etc.	(Note 1)	X	
	Distribution List - Does the control system include a distribution list identifying each copy and the location or person assigned? The distribution list may be maintained as a separate document.		X	
	Definitions and Acronyms - Does the document contain a definitions and acronyms section applicable to the contents of the document?		X	

Source	Program Elements	Required	Recommended	Verified
	Responsibility - Does the training program specify who is responsible, by title, for maintaining the program and the required records?		X	
145.163(a)	**Initial and Recurrent Training** - Does the training program contain provisions for both initial and recurrent training? The program may also contain provisions for indoctrination training, specialized training and remedial training.	X		
145.163(c)	**Training Records** - Does the program contain procedures to document each individual employee's training in a format acceptable to the FAA?	X		
145.163(c)	**Record Retention** - Does the program require individual employee training records to be maintained for a minimum of two years?	X		
145.163(b)	**Repair Station Needs Assessment** - Does the program contain provisions for evaluating the repair station's overall training needs? This assessment should be performed periodically and will evaluate the training needed based on the type of work performed. It will enable the repair station to identify training requirements based on job positions, duties and/or tasks. A change in the repair stations work scope will usually require a new training needs assessment.	X		
145.163(b)	**Employee Needs Assessment** - Does the program contain provisions for evaluating and identifying the training needs of each individual employee assigned to perform maintenance, preventative maintenance, alterations, or inspection tasks? This assessment should evaluate the employee's current knowledge and skill as compared to the knowledge and skill necessary to perform their assigned duties.	X		
145.163(b)	**Individual Training Requirements** - Does the program contain provisions to document the individual training needs of each employee assigned to perform maintenance, preventative maintenance, alterations, or inspection tasks? Each employee must receive training to bridge any gap between the employee's current knowledge and skill, and the knowledge and skill required to perform their assigned duties. A program requirement to document each individual employee's training needs, which includes maintaining a list of all training not completed for each employee, is acceptable.	X		

Source	Program Elements	Required	Recommended	Verified
	Instructors - Does the training program contain procedures for evaluating and selecting qualified instructors, when appropriate?		X	
	Training Methods - Does the training program identify the training methods used by the repair station? Training methods may consist of classroom training, on the job training, computer based training, etc.		X	
	Training Sources - Does the training program contain procedures for selecting training sources? Training sources may include other repair stations, original equipment manufacturers, aviation maintenance technician schools, in-house training, etc.		X	
145.163(b)	**Interim Employees** - Does the program contain provisions for training temporary, contract, or interim employees assigned to perform maintenance, preventative maintenance, alterations, or inspection functions? This element is required only if the repair station uses or intends to use personnel on a temporary or contract basis.	X		
145.163(b)	**Periodic Review** - Does the program contain a requirement for a periodic review? Over a period of time, subtle changes in ratings, work scope, customers, equipment, etc. may be cumulative thus reducing overall program effectiveness.	X		
145.205	**Air Carrier Requirements** - Does the program contain specific training requirements for employees assigned to perform maintenance, preventative maintenance, alterations, or inspection functions for part 121, 125, 129 or 135 operators? Repair Stations performing work for these operators must ensure assigned employees receive training specific to the air carrier or operator's requirements.	X		
145.165	**Hazardous Materials** - Does the program include hazardous materials training? This training is only required for repair stations that meet the definition of a hazmat employer. Hazmat employer is defined in 49 CFR § 171.8.	(Note 3)		

Source	Program Elements	Required	Recommended	Verified
EASA MIP-G	**Human Factors** - Does the training program include human factors training?	(Note 2)	X	
	Airport Operations - Does the training program include a requirement for airport operations training? This is applicable when maintenance personnel are engaged in towing or taxiing aircraft. These employees should be familiar with airport procedures, pavement markings, signs, and radio communications, as appropriate.		X	
	Training Effectiveness - Does the program contain a method to measure the effectiveness of the employee training?		X	
	Forms - Does the program contain sample forms and instructions for their use?		X	
145.163(b)	Does the training program ensure that each employee assigned to perform maintenance, preventative maintenance, alterations, or inspection functions is capable of performing the assigned task?	X		

Notes:

Note 1 - This element may become a required element when the training program is contained within the Repair Station Manual.

Note 2 - Human factors training is required for repair stations that also hold an EASA 145 certificate.

Note 3 - A hazardous materials training program is required by § 145.165. It is not required to be included in the FAA-approved training program required by § 145.163.