



News from the Hill

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Training Program Frequently Asked Questions

The FAA published a rule that requires repair stations to have training programs. This article answers some of the frequently asked questions about training programs and it also directs you to resources designed to help you prepare your training manual.

For more information about training programs, please see the FAA's relevant Advisory Circular 140-10 (available on the AEA website), which is aptly titled "Repair Station Training Program. (RSTP)" The FAA has also published HBAW 05-03, a handbook bulletin that provides guidance to the FAA inspector force about how to approve repair station training programs.

Who Can Perform Training?

The standard for who can perform training is fairly loose, yet effective. The handbook bulletin reiterates that instructors must be competent in training methods as well as in the subject matter. Ultimately, this simply means the instructor must know what he or she is talking about, and must also know how to effectively convey the information. There is no limit on the teaching methods used by the instructor—even on-the-job training is considered to be an adequate method for performing training. So a manager who effectively can demonstrate how to perform tasks in an apprenticeship-style program may be perfectly adequate to meet the FAA's requirements.

What Sort of Instruction is Adequate?

Any reasonable pedagogical method (teaching or training method) is considered to be fair game.

On-the-job training, formal classroom training, computer-based training, distance learning, self-study, case-study, seminars, and even embedded training (like the tutorials and help files found in robust modern software packages) are all examples of acceptable methods of study.

What Sort of Topics Should be Covered in My Training Program?

Your training should also be based upon the needs assessment that is performed to identify the training needs of the employees.

Here are just a few items that should be included in a basic indoctrination course:

- 1) What is your repair station allowed to do?
- 2) Certificate ratings.
- 3) Operation specifications.
- 4) What are the legal requirements (e.g. the regulations) that most directly apply to the way you do business?
- 5) What safety requirements apply to the business (depending on its scope, such training may also satisfy certain OSHA and/or hazmat training requirements)?
- 6) What mistakes should employees avoid, and what actions does the busi-

ness take to help prevent human error (Maintenance Human Factors)? Sample human factors topics might include: human performance and limitation, vision, hearing, stress, situational awareness, and workload management.

You should also consider what technical training and specialized training is needed by your employees to accomplish their duties.

Needs Assessment? What is That?

In order to identify the relevant topics of training for your company's employees, you ought to perform a needs assessment that identifies the things your company does, what skills need to be learned to accomplish those tasks, and who needs to know those skills in order to continue doing business.

The FAA would like to see each repair station develop a defined process that can objectively assess the company's training needs.

The company should undertake an overall repair station needs assessment (e.g. customer requirements, expected scope of work) to identify the plans of the business, which should, in turn, identify what the employees need to know to complete the business of the repair station.

The repair station should review the overall training needs of the organization, and identify the require-

ments of specific individuals in relation to the tasks to be performed within the repair station environment.

The training program's purpose is to ensure that the employees are capable of performing their work. Therefore, you need to identify the deficiencies of the employees that make the employees unable to perform their work – this is a critical element of the needs assessment.

Issues to consider include:

- The tasks associated with each position responsible for performing maintenance, preventive maintenance or alteration.
- The skills, experience and training of new and current employees.
- How assessments will be made of employees being assigned new tasks.
- The return of an employee to tasks after an extended period.
- The introduction of new regulations, procedures, equipment or recordkeeping requirements.
- Preparing for a change in the nature of basic repair station capability.

For more information on developing and implementing a needs assessment, please make sure you review Ric Peri's October 2005 article in *Avionics News*.

How Often do I Need to Repeat this Assessment Process?

The process only needs to be repeated when significant changes make the prior assessment obsolete. In order to make the program meaningful, though, an obsolete prior assessment ought to be superseded.

New regulations for example, may generate a requirement to train the employees on compliance. New customers with particular requirements may require new training on the regulatory needs and commercial desires of that customer. New capabilities may generate a need to train the employees on

the tooling, equipment and tasks (etc.) associated with the new capabilities. These are just a few examples of new training needs that may have to be identified in a subsequent assessment.

Can I Have an Employee Who is Not Fully Trained?

Yes! The FAA guidance suggests that employees who do not have adequately training must be adequately supervised to make sure that the training deficiencies do not adversely affect the work product.

This means that an employee can work while only partially trained—performing the tasks for which he or she has not received training under adequate supervision (which can reflect on-the-job training ... be sure to document this properly).

What Should Your Training Program Contain?

AEA has developed a template training program. If you log onto AEA's Resource One (AEA Membership and registration required) at www.aea.net/R1/Training, then you only need to enter the answers to the following questions:

- What is the name of your company?
- Who makes training decisions?
- Do you have air carrier customers (121, 125, 129, 135—if so then your manual must address these issues)?

The on-line program will automatically generate a training program that is based on the FAA's templates. This service is free of charge to AEA members.

Once My Program Manual is Complete, Am I Done?

No! The manual is the easy part. Once the manual is complete, though, the repair station needs to follow the training program and actually obtain training!

There will be a wide variety of training programs available through trade associations and private organizations. AEA has committed to providing the training its members need. While AEA will not be able to train your employees in how your business operates, much of the technical and regulatory training will be offered through AEA in a variety of formats.

In addition to training as an ongoing project, needs assessments will be repeated as necessary, and the program updated based on the needs assessments.

What Training Resources is AEA Providing?

- *Avionics News* Annual Training Exam
- Annual Convention
- Regional Meetings
- Partnerships with other organizations (e.g. the Washington Aviation Group and Global Jet Services partnerships that provide training to AEA members at a discount price)
- Training templates, manuals, videos and other publications

AEA has made a commitment to use its training mechanisms to (1) support members in learning how to manage a training program and (2) providing members with support to implement and maintain their training program.

AEA is also working on developing mechanisms for helping the members to efficiently track their training records. More news on this will be forthcoming in future issues of *Avionics News*!

What if My Questions Weren't Answered in this Column?

Of course, you can always contact the Association! AEA's Director of Training, Mike Adamson is spear-

Continued on following page

NEWS FROM THE HILL

Continued from page 31

heading all of AEA's training products. AEA's government affairs team, Vice President for Government Affairs Ric Peri and Washington Counsel Jason Dickstein are also here to help you!

What is on Tap for Next Month?

You may have noticed that Ric Peri's column this month mentions the FAA's new false and misleading rule (FAR 3). In next month's issue, we will tackle that new rule, and discuss what it means to the typical AEA member. □