

# IEP CHECKLIST

A SAFETY ASSURANCE COMPONENT OF YOUR SMS

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JUNE 2025

## OPERATIONS 4.

Pilot Records (PART 135)

### Pilot Records:

Records should be audited with an established frequency. The records should be well organized and thorough, and reflect a pilot's current experience, qualifications, and medical status. Many scheduling software programs available today can keep track of pilot times and training cycles but must be backed up in case of a computer malfunction resulting in a loss of data. The person responsible for the records must be given the time and resources to assure the records are up-to-date and complete. Pilot records must be stored with appropriate security, and access restricted.



# PART 135



**1. Is each company pilot limited to currency in no more than two types of company aircraft (for professional purposes)?**

(ARGUS Platinum 4.5.2; NBAA Management Guide 2.1.3)

(Policy) Pilots should be limited to currency in no more than two types of company aircraft to prevent the possibility of interference learning and confusion related to specific aircraft operating procedures, limitations, and systems. (This does not include any recreational flying.)

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**2. Are pilot records kept in a secure location, and free of any extraneous documents?**

(IS-BAO 8.5; ARGUS Platinum 4.2; NBAA Management Guide 1.3.4)

(Documentation) Pilot records' contents should be kept standardized and maintained in an organized fashion that makes it easy to identify and retrieve specific records. This not only allows for effective review, it also eases the process of tracking data and reduces unintended errors and omissions. All records kept by a flight operation, including pilot records, should be complete and purged of any outdated material. If pilot records are kept electronically, there must be a backup system approved as per operations specification A-025. In all cases, these sensitive documents must be kept secure (either password protected if electronic or in locked fireproof file cabinets.)

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**3. Are pilot records kept in accordance with Title 14 CFR Part 135.63(a)(4)? Information below.**

(FAR 135.63(a)(4); IS-BAO 8.5; ARGUS Platinum 4.6.2-4.6.7; NBAA Management Guide 1.3.4)

(Documentation) To comply with CFR 135.63(a)(4) an individual record of each pilot used in your operation must contain at the minimum the following 10 items: 1) The full name of the pilot. 2) The pilot certificate (by type and number) and ratings that the pilot holds. 3) The pilot's aeronautical experience in sufficient detail to determine the pilot's qualifications to pilot company aircraft in operations under Part 135. 4) The pilot's current duties and the date of assignment to those duties. 5) The effective date and class of the medical certificate that the pilot holds. 6) The date and result of each of the initial and recurrent competency tests and proficiency and route checks required by Part 135 and type of aircraft flown during that test or check. 7) The pilot's flight time in sufficient detail to determine compliance with the flight time limitations under Part 135. 8) The pilot's check pilot authorization, if applicable. 9) Any action taken concerning the pilot's release from employment for physical or professional disqualification. 10) The date of the completion of the initial phase and each recurrent phase of training required under Part 135.

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**4. Do the operation's records contain adequate pilot background information?**

(FAR 135.63(a)(4); IS-BAO 8.5; FAA Order 8000.88; AC 120-68J; ARGUS Platinum 4.6; NBAA Management Guide 1.3.4)

(Documentation) Flight crew qualification history should be well documented to allow consistent verification of qualification for assignments. Adequate Background information includes: The pilot's resume, a TSA background check, and a complete pre-hire (PRIA) check. PRIA records should be stored separately from the pilot training records. Records obtained through a PRIA request or required to be provided in response to a PRIA request should be maintained for the length of the pilots' employment and for at least five years after the termination of the pilots' employment.

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**5. (International Operations) Are pilots' licensing complete, accurate and validated to ensure ICAO requirements are met, as required?**

(ICAO Annexes; FAR 135.43; IS-BAO 8.5.1, 13.4.2[d]; ARGUS Platinum 7.14.6; NBAA Management Guide 2.2.5)

(Documentation) When operating out of U.S. airspace, pilot licensing compliance must be verified for ICAO requirements. Many countries require pilots perceived as commercial to have a 1st Class medical. Language proficiency documentation, and age limitations (ICAO Annex 1, Chapter 2, para 2.1.10) also apply.

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**6. Do pilot records accurately track all initial and recurrent training required by the organization? Are records maintained for all employees (part-time, contract, and full-time)?**

(FAR 135.63(a)(4), 135.507; IS-BAO 8.1.1, 8.1.3, 8.5; ARGUS Platinum 4.6.2-4.6.7; NBAA Management Guide 1.3.4)

(Documentation) All required training should be documented in an individual pilot's training record. Training records may be paper based or electronic with requisite documentation attached. Required organizational training might include: Emergency Procedures, Hazardous/Dangerous goods recognition and/or carriage, Crew Resource Management (CRM), Safety Management System familiarization, Emergency Response Plan duties, Aircraft Servicing and Ground Handling, Aircraft Surface Contamination (De-icing, etc.), etc. Records should clearly document training dates and methods. Training records should be kept for all members of the organization including part-time and contract pilots.

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**7. Does the training record keeping system provide prompt and accurate notification of impending pilot expiration and due dates?**

(ARGUS Platinum 4.6.5)

(Programs/Procedures) Relying exclusively on individual pilots to track their own due dates for training and medical expiration is insufficient oversight. Processes should be in place to identify and announce currency/qualification gaps and prevent the scheduling of any pilot who has an expired qualification or training date. A method that provides automatic notification and maximum visibility is the most effective error prevention.

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**8. Does the flight time tracking system ensure pilots log all flight time, including flights outside of the organization?**

(FAR 135 Subpart F, FAR Part 117; ARGUS Platinum 4.6.5.a)

(Programs/Procedures) There should be a process to track and maintain records of a pilot's participation in all flight activity. If a pilot flies with another operator or privately for compensation; that flight time should be included in the pilot's flight activity records maintained by the operation. Managers should consider all a pilot's flight activity (internal and external) when scheduling trips.

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**9. Is the pilot record keeping system audited at an appropriate frequency interval?**

(IS-BAO 3.3.3; ARGUS Platinum 1.7.4-1.7.7)

(Quality Assurance) A manager should periodically check pilot records to insure they are accurate and complete. It is recommended this be done at least every year, with any changes and corrective actions executed and documented. If the organization contains more than 10 pilots, a sample review of records examining at least 33% is appropriate. Smaller organizations should review every pilot record annually, as a minimum.

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**10. Examine all pilot records for any expirations, or “grounded” periods because of qualification or training lapses. Verify no flight time was logged during these periods.**

(PRISM Recommended Practice)

(Quality Assurance) A thorough examination in this area will validate the quality control processes involved in crew scheduling over the past 24 months. How are grounded pilots identified and prevented from being scheduled? Some documentation for scheduling reference should exist describing the grounded period. Are there any evident weaknesses in the current process?

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**11. Verify pilot instrument proficiency check flights are performed in the type aircraft to which the pilot is assigned.**

(FAR 135.297; IS-BAO 13.4.2[d][iii])

(Training) If the PIC is assigned to one aircraft type then the instrument proficiency check must be conducted in the aircraft type. If assigned to more than one aircraft type then the pilot must take the instrument proficiency check required by paragraph (a) of section 135.297 in each type of aircraft to which that pilot is assigned, in rotation, but not more than one flight check during each period described in paragraph (a) of 135.297.

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**12. For applicable aircraft, is right seat landing currency tracked for both PIC and SIC qualified pilots??**

(IS-BAO 8.1.3.4; ARGUS Platinum 4.6.6)

(Training) Right seat landing and takeoff currency and training should be recorded and tracked for each pilot who may be scheduled to fly and potentially land the aircraft from the right seat.

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### 13. Is all duty time tracked as a part of the operation's Fatigue Risk Management System (FRMS)?

(FAR 135.273; IS-BAO 12; ARGUS Platinum 4.6.5.b; NBAA Management Guide 2.1.6)

(Fatigue Management) Flight and duty limitations should be established to help prevent pilot fatigue. Maintaining a record of flight and duty times are integral to ensuring pilots are not exceeding flight and duty time limitations. A duty day begins when the pilot enters company premises and ends when the pilot leaves the premises. Duty time should include the overall time required to prepare, perform, and conclude a scheduled flight as well as the time needed for administrative functions, training, meetings, and any other duties not related to a flight.

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