

IEP CHECKLIST

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JUNE 2025

OPERATIONS 4.

Pilot Records (PART 91)

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 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 assigned responsibility 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 91



1. Are company pilots limited to currency in no more than two types of company aircraft (for professional purposes)?

(NBAA Management Guide 2.1.3)

(Policy) Consider limiting pilots 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 the company's pilot records kept in a secure location, and free of any extraneous documents?

(IS-BAO 8.5; NBAA Management Guide 1.3.4)

(Documentation) Pilot records' content should be 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 All records kept by a flight operation, including pilot records, should be complete and purged of any outdated material.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 should be a backup system that precludes complete data loss. 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 records kept for all pilots (including contract pilots), and do they include all necessary information?

(IS-BAO 8.5; NBAA Management Guide 1.3.4)

(Documentation) As an industry best practice for each individual pilot record should contain at minimum the following 9 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 qualifications to pilot company aircraft in operations under Part 91. 4) The pilot's current duties and the date of the 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 accomplished initial and recurrent training and proficiency checks, and equipment used for training and proficiency checks. 7) The pilot's flight time in sufficient detail to determine compliance with the flight time limitations. 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 satisfactory completion of initial, transition, upgrade, and differences training and each recurrent training phase required under Part 91. For each pilot in the organization records shall be retained for at least three years.

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4. Do the records contain adequate pilot background information?

(FAA AC 120-68J; IS-BAO 8.5; NBAA Management Guide 1.3.4)

(Documentation) Flight crew qualification history should be well documented to allow consistent verification of qualification for assignments. Background information may include: The pilot's resume, a pre-hire check, or any drug and alcohol history or FAA enforcement action. Although part 91 operators are not required to maintain pilot records under PRIA, they may still be required to respond to a PRIA request concerning a former employee as outlined in AC120-68G.

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

(ICAO Annexes; IS-BAO 8.5.1, 13.4.2[d]; 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 the initial and recurrent training required by the organization? Are records maintained for all pilot employees (part-time, contract, and full-time)?

(IS-BAO 8.1.1, 8.1.3, 8.5; NBAA Management Guide 1.3.4)

(Documentation) All required training should be documented in an individual pilot's training record. 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.), MEL knowledge, RVSM training, 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?

(PRISM recommended practice)

(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?

(PRISM Recommended Practice)

(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 that flight time should be included in the pilot's flight activity records maintained by the operation. Managers should consider all of 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)

(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. Managers of 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. For applicable aircraft, is right seat landing currency tracked for both PIC and SIC qualified pilots?

(IS-BAO 8.1.3.4)

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

(PRISM Recommended Practice)

(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 or begins conducting company business; and ends when the pilot leaves the premises or ceases activity for the company’s benefit. 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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