

IEP CHECKLIST

A SAFETY ASSURANCE COMPONENT OF YOUR SMS

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OCTOBER 2025

OPERATIONS 6.

Pilot Training (PART 135)

Pilot Training:

The flight crew training program is designed specifically to comply with regulations and meet the needs of the operation. Training requirements are dependent not only on aircraft type but also the operating characteristics and demands of the organization. It is the responsibility of management to monitor training effectiveness and provide guidance and adequate training for flight crew members to ensure sufficient preparation and proficiency. Training should also encourage positive team building behaviors and personal development. Continual evaluation of training design and content, and validation of conducted training is a critical component of ensuring flight crew preparedness. Change management is employed to consider the effects of change on existing training requirements.



PART 135



1. **Are the training center(s) utilized by your organization audited on a bi-annual basis to ensure training consistency using a company prescribed syllabus and specific company procedures? Is there a formal process in place to review these audits and verify they are completed as required?**

(FAR 135.324; IS-BAO 7.8; ARGUS Platinum 5.2.5[f]; NBAA Management Guide 2.1.3)

(Program/Procedures) Bi-annual audits of training facilities should be thoroughly reviewed to ensure pilots are trained IAW your company procedures, to strengthen standardization and maximize training accuracy. The process to ensure the audits are carried out on time should also include procedures for addressing the necessary corrective actions that must be accomplished after discovering a discrepancy. Examine the audit forms for sufficient completion. This training center audit is an Opspec A031 requirement.

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2. **Is the company training manual and curriculum reviewed and kept up to date to ensure it contains training guidance on new equipment subject matter, new procedures, and applicable regulations? Are training materials up to date and reviewed for accuracy?**

(FAR 135.327; IS-BAO 8.1.1, 8.1.3, 8.4.1; ARGUS Platinum 5.1.1, 5.1.3)

(Program/Procedures) The materials/curriculum review requirements should be clearly defined and assigned in a company manual. Along with training subjects required by Part 135 regulation, the training curriculum should also contain company policy topics such as circuit breaker reset guidance, runway line-up checks, CVR/FDR preservation procedures, GPWS/TCAS RA guidance, CRM Crew Resource Management, CFIT escape maneuvers etc. A training program needs to respond to emerging changes to ensure crews are provided with the necessary training. Emerging items like EFBs must have training materials available to ensure proper use.

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3. **Is SMS training a part of your flight crew training program and reflective of current organizational practices?**

(IS-BAO 3.4.1; ARGUS Platinum 1.8.1; NBAA Management Guide 1.1.4.2)

(Program/Procedures) Training should keep pilots aware of company SMS policies and procedures, covering topics such as: hazard reporting, the company non-reprisal policy, operational risk management, company risk assessment procedures, the need for a strong safety culture etc. This training must be kept up to date as the company's SMS evolves. SMS performance will improve with effective training.

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4. **Is the training manual a controlled document with revision tracking and an approved, up-to-date list of effective pages? Who is assigned to keep the manual in proper format?**

(FAR 135.21; IS-BAO 6; ARGUS Platinum 3.1.2 & 5.1.2)

(Program/Procedures) Training is constantly evolving and the operation's guidance material should accurately reflect current needs and requirements. As content is changed or updated in the training manual, the applicable pages should be updated or replaced. A list of effective pages should be maintained in the front of the manual, and a system should be in place to ensure all manuals are kept current.

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5. Is there a formal new pilot indoctrination training program? How are flight crew members' basic indoctrination ground training tracked? Are the training materials current?

(FAR 135.329; IS-BAO 8.1.1, 8.1.3.1, 8.5; ARGUS Platinum 3.1.2, 4.5.2, 5.1.1[a & b], 5.2.1, 5.2.2, 5.2.3, 5.2.7, 5.3.1-5.3.3, 6.1.1[b], NBAA Management Guide 1.3.7, 2.1.3, 2.1.4)

(Program/Procedures) FAR 135.329 outlines the requirements for this training. Ensure this training is properly tracked and completed within a reasonable time period after employee hire. How are training materials kept up to date? Is there a scheduled periodic review of materials, and who is responsible? A defined training syllabus of some type should be used to standardize the training each new flight crew member receives.

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6. Examine the flight instructor or check airman program to ensure each instructor has completed the required training for simulator or in-flight instruction. Are the training materials current? Is there a formalized company procedure to select pilots to become check airman?

(FAR 135.339, 135.340; ARGUS Platinum 4.5.4[a & b], 5.1.1[b]; NBAA Management Guide 2.1.3)

(Program/Procedures) FAR 135.339 outlines the requirements for check airman training. The company should also define criteria for selecting pilots as check airmen. Items such as total flight time, time in model, previous qualification, and others should be clearly defined in company policy to establish a baseline minimum requirement for selection.

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7. Is there a crew resource management (CRM) and Human Factors training program and have all flight crew members received training? Do schedulers, dispatchers, and any others connected with the flight planning receive appropriate Human Factors training as well?

(FAR 135.330; IS-BAO 8.2; ARGUS Platinum 4.5.4[c], 5.2.4[c], 5.5.2; NBAA Management Guide 2.1.4)

(Program/Procedures) This should be a formalized and well-constructed part of the flight crew training program. Effective standardization and continuity depend upon solid crew coordination. Training materials on these subjects should be continuously available and kept current. Formal instruction from training providers should also be seriously considered.

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8. Is there an established fatigue management system that includes fatigue training for all flight crew members? Do schedulers, maintenance personnel, and any others connected with the flight operations receive appropriate fatigue training as well?

(FAR 135.330a(6); IS-BAO 12.1.1[b]; ARGUS Platinum 5.4.1, 6.1.1[b]; NBAA Management Guide 2.1.4 & 2.1.6)

(Program/Procedures) A fatigue management system should be developed and implemented across all parts of the training program and company operating manuals. According to FAR 135.330a, the effects of fatigue on performance, avoidance strategies, and countermeasures are required training topics. A fatigue management system would include training on flight and duty time limitations, as well as deviation procedures and approval processes.

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9. Are pilot training requirements assessed as part of company change management activities when situationally appropriate?

(PRISM recommended practice)

(Program/Procedures) When significant organizational and flight operations changes are initiated their effect on pilot training requirements must be evaluated. A component of the change management process would evaluate and presciently make necessary modifications to ensure pilots are properly trained for assignments. For example, change management should be utilized when transitioning to a new aircraft FMS; pilot training requirements would be addressed in detail and tracked as part of the FMS change management project.

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10. How well does the training program prepare pilots for the specific operational needs of the operation?

(FAR 135.329e; IS-BAO 8.1; ARGUS Platinum 5.1.1; NBAA Management Guide 2.1.3)

(Program/Procedures) Each flight operation has unique challenges and operational issues that should be addressed in training. Line Oriented Flight Training (LOFT) is a valuable training tool that can simulate common hazards most prominent between frequently flown city pairs. Consider a special airport qualification program for areas with unique hazards, for example: mountainous terrain, short runways, and non-standard approaches. If your company uses a Risk Profile, examine how training is used as mitigation for identified risks. Data from a flight risk analysis tool (FRAT) or flight data analysis (FDA) can also be used to identify risks that can be mitigated with training solutions.

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11. Do flight crews and cabin crews participate in applicable emergency training together?

(FAR 135.331; IS-BAO 8.1.3.1[b], 8.1.4.1[b], 8.1.4.2[c]; ARGUS Platinum 5.2.3[h]; NBAA Management Guide 2.1.4)

(Program/Procedures) Ensure every crewmember is trained on general aircraft emergency procedures. All crewmembers should be familiar with company procedure and capable of performing their duties in coordination during such events as emergency evacuations, ditching, smoke/cabin fire, bomb threats, medical emergencies etc. Training as a team can enhance response during an actual emergency event, and increase coordination.

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12. Is there a high-altitude training program that is specific to each aircraft type? Are stalls included in the training?

(FAR 135.345(a)(3), IS-BAO 8.1.3.1[c]v, 8.1.4.3; ARGUS Platinum 5.2.3[d], 7.10.8; NBAA Management Guide 2.1.3 & 2.1.4)

(Training) Training that keeps flight crews familiar with the insidious effects of hypoxia can prevent an aircraft accident. Type specific training can ensure crews are familiar with the exact oxygen/pressurization system each aircraft uses. Altitude chamber training is available from training providers and should be considered for flight crews at extended time intervals; for example, once every five years. Differences between an approach to stall recovery and recovery from a stall at high altitudes should be emphasized. Pilot simulator training should review the differences between high and low altitude stall dynamics.

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13. Is aircraft surface contamination training being completed annually by all cabin and flight crewmembers? Are the most recently published holdover tables being utilized?

(FAR 135.345b; IS-BAO 8.1.3.1[b]ii, 8.1.4.1[b]iii, 8.1.4.2[c]iii, 13.3.2; ARGUS Platinum 5.2.2[b], 5.3.3[b]; NBAA Management Guide 2.1.4)

(Training) As a part of winter operations training, pilots must review various procedures and policies, including aircraft surface contamination training. Cabin crew along with flight crew should accomplish this training, maintaining familiarity with inspection procedures, de-icing/anti-icing procedures, and the effect of contamination on critical surfaces.

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14. Is training appropriately documented in organized records to verify it is completed as required in the training manual/OpSpecs?

(FAR 135.63a[4]; IS-BAO 8.5; ARGUS Platinum 4.5.2, NBAA Management Guide 1.3.4)

(Training) Training records should be maintained in a secure location with controlled access. Well organized documentation is essential. A list of all types of initial and recurrent training should be available. The process/format for documenting training should be clearly defined in the training manual.

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15. Are special authorizations such as RVSM, ILS Cat II/III, defined in the training manual? Is this training being conducted as required?

(FAR 135.329e; IS-BAO 13.2.13.1 & 13.5.4[b]; ARGUS Platinum 7.5.1[b] & 7.6.1[c]; NBAA Management Guide 2.1.3 & 2.1.4)

(Training) Defining company specific procedures to comply with requirements in the manual will help prevent omissions in training, and allow review of the material on a continuous basis. For example, who is responsible for maintaining a current list of Cat III qualified pilots? How is the list verified.

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16. As a component of the security program, is adequate training pertinent to company facilities, ramp operations and TFSSP procedures provided for flight crews?

(FAR 135.125; IS-BAO 5.1.2[d]; ARGUS Platinum 5.5.1; NBAA Management Guide 2.1.4)

(Training) The identified ground security coordinator and an in-flight security coordinator for each flight should have documented training indicating their understanding of the responsibilities assigned. Alternate contacts for the TFSSP program should also have current and documented training. In addition to the identified coordinators, all applicable personnel should have up-to-date training on TSA no-fly-list procedures.

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17. Does the company training program ensure all flight crew members receive the applicable hazmat initial and recurrent training for “Carry” or “Will not carry” as required by regulation?

(FAR 135.503; IS-BAO 8.1.3.1[b]iii, 8.1.4.1[b]iv, 8.1.4.2[c]iv, 9.1.1[e], 11.2.2; ARGUS Platinum 4.5.4[d], 5.2.2[c]; NBAA Management Guide 1.1.4.1 & 2.1.3)

(Training) Operators who identify themselves as a “will-not-carry” operation must verify that initial hazmat recognition training (14 CFR 135.503) recurrent training is carried out as approved by the Principal Operations Inspector on a timely basis. A person within the organization should be given the responsibility of monitoring recurring training requirements. The DOT training modules located on the PRISM website can be used to fulfill the general portion of this requirement; crews must also be trained in company specific hazmat procedures to complete the requirement.

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18. Is First Aid training provided to all crew members and offered to any other interested company employees?

(FAR 135.331, IS-BAO 8.1.3.2, 8.1.4.1[b]ii, 8.1.4.2[c]ii; ARGUS Platinum 5.2.2[a], 5.3.3[b]; NBAA Management Guide 2.1.4)

(Training) Each crewmember should be given first aid, CPR, and AED training. This training needs to meet local and state guidelines and should be conducted by a nationally recognized CPR/AED program, such as the American Heart Association or American Red Cross. Crewmembers need appropriate training for the aircraft first aid equipment onboard.

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19. Is water survival training accomplished with qualified instructors in an actual water environment?

(PRISM recommended practice)

(Training) Training for water survival in a water environment provides crewmembers with realism and allows them to see how some of the survival gear will react as well as how they will react. Ditching & egress, flotation & swimming, raft boarding & righting, and rescue (pick-up) devices can be included in the training. This type of realistic training will help them to be better prepared for an actual water survival situation and increases chances of survival. For RW operations, Helicopter Underwater Escape Training (HUET) should be required for personnel conducting over water helicopter operations (IS-BAO 8.1.3.7; ARGUS Platinum 5.2.9).

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20. (For operators conducting international operations) Are flight crews appropriately trained to conduct international operations?

(IS-BAO 8.1.3.1[c]vii; ARGUS Platinum 5.2.3[g], 7.14.10; NBAA Management Guide 2.1.4, 2.2.10)

(Training) International operations require additional procedures and vigilance above what is required for domestic operations. Flight crews need to be familiar with national, regional, and international air navigation procedures and associated requirements prior to the commencement of flight into such airspace. A training program must address topics specific to international operations procedures.

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21. If pilots fly from both left and right seats, are they properly trained to do so? Does the operation have specific proficiency requirements for monitoring left and right seat performance?

(IS-BAO 8.1.3.4, 8.1.3.5(H); ARGUS Platinum 4.5.6(Airplane), 4.5.7(Helicopter))

(Training) If standard operating procedures allow the PIC and SIC to fly from the left or right seat, pilots should receive training and maintain proficiency in take-offs and landings from the left and right seat also demonstrate proficiency in all areas of aircraft handling and operations from both seats. SOPs should define left/right seat proficiency requirements and operations should have formal methods of tracking these requirements.

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22. Is there upgrade training for SICs becoming first time PICs?

(FAR 135.329, 135.341[b], 135.345, 135.347; IS-BAO 8.1.3.1[d]; ARGUS Platinum 5.2.4; NBAA Management Guide 1.3.2.21)

(Training) There should be appropriate training and flight evaluations for up-grading Captains with a concentration on adherence to good CRM practices, safety procedures, responsibilities, and authority. When selecting pilots to upgrade to captain, consideration should be given to experience, decision making, and CRM. The selection process should also include pilot performance assessments obtained from the operator's Line Captains. This should be part of an on-going flight crew evaluation program.

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23. Are training requirements formally reviewed periodically to ensure pilots maintain competency in key safety areas such as: automation management, upset prevention and recovery, runway excursion prevention, and manual flying skills?

(FAA SAFO 17007; AC 120-123; IS-BAO 8.1.3.6; ARGUS Platinum 5.2.10; NBAA Management Guide 2.1.4)

(Training) Training focus areas must adapt to emerging situations and identify new requirements. With advanced cockpits and upgraded avionics, training programs should include guidance on managing automation to ensure flight crews do not become distracted or overloaded from the flight management systems. Basic manual and cognitive flying skills can decline because of lack of practice and feel for the aircraft due to continuous use of autoflight systems; therefore, pilots should practice manual flying and upset prevention and recovery during initial, upgrade, and recurrent training. Additionally, pilots are encouraged to manually fly the aircraft when conditions permit, including at least periodically, the entire departure and arrival phases, and potentially the entire flight, if/when practicable and permissible.

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24. Are approved flight training devices or motion-based simulators used to maintain currency?

(FAR 135.247(a)(3)(ii)(D), 135.321, 135.323, 135.335, 135.347; IS-BAO 8.1.3.3; ARGUS Platinum 5.2.5[a-f]; NBAA Management Guide 2.1.3, 2.1.4)

(Equipment) Pilots should utilize flight training devices (if available) at least annually to maintain currency for each aircraft that requires a type rating and/or uses turbine engines for propulsion. The use of approved Training Centers for simulator training shall be authorized by the appropriate CAA agencies. It is industry best practice to use flight simulators for flight training to the maximum degree practicable.

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25. Is there a formal policy that does not allow simulated training for emergencies or abnormal situations to be conducted while passengers are being carried during flight?

(IS-BAO 8.1.2; ARGUS Platinum 5.2.8)

(Policy) A formal policy should be written in the training requirements regarding the prohibition of simulated emergency scenarios during flight with passengers. This policy should be clear and understood by all pilots.

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