

FLIGHT INSTRUCTOR UPDATE: CHANGE IS UPON US

Any regulatory change takes time, and this certainly applies to the Federal Aviation Regulations we live by. While frustration looms as the regulatory change process unfolds because of the time it takes, we must remember that it is an unfolding process and at least be thankful that the process allows and considers input. It's also worth remembering that at the end of the day, everyone isn't going to be made happy with the changes. Such is life.

A good example is the recently issued FAA Final Rule regarding the removal of expiration dates on a Flight Instructor Certificate. While removing the expiration date on the Flight Instructor Certificate has been in the works for a while now, this new change also includes other changes such as new pathways for CFIs to provide training for other applicants pursuing their initial CFI ratings. Additionally under the new rules, there are various options for "staying current" with regard to CFI certificate holders. Let's dive in...

It should be noted that the publication date of the new rules was on the 1st of October and became effective on Dec. 1, 2024. So, by the time you read this column, the rules will be in effect! I strongly recommend you take the time to read section 61.197 of the Federal Aviation Regulations for a complete overview, as I have heard numerous misconceptions during the infancy of the recently published update. Just because your CFI will not have an expiration date listed, CFIs will still need to keep up their recency of experience so their privileges stay current.

First, flight instructor certificates issued after Dec. 1, 2024, will be issued without an expiration date (see 61.19). Those receiving their certificates (cards) after this date will no longer receive a new certificate (card) in the mail every 24 months after renewing. Expectedly, there will be some cost savings on the printing and mailing end of this change. Those CFI certificates issued before Dec. 1 will still show an expiration date. When you renew the next time, the certificate you receive in the mail will not include an expiration date. As you can imagine, a few different sections will reflect wording changes due to this change. Take 61.51 as an example; paragraph (h) (2)(ii) is being amended to read as follows:

"include a description of the training given, the length of the training lesson, and the authorized instructor's signature, certificate number, and certificate expiration date OR recent experience end date, consistent with the requirements of 61.197."

As you peruse 61.197, you will see the various ways in which a flight instructor may establish recent experience, such as an 80% pass rate for at least five applicants, serving as a company check pilot, a FIRC, and passing an instructor practical test. These options will look familiar; it is simply no longer being called a renewal but instead a fulfillment of the recent experience requirements. Unlike the flight review to keep the pilot certificate current by use of an endorsement in the logbook, the CFI recent experience requirement will be documented "in a form and manner acceptable to the administrator," or said another way, via IACRA. (There is a new option that involves serving as a flight instructor in an FAA-sponsored pilot proficiency program, and there are some specifics, so read up on 61.197!)

Something new is a "grace period," which gives CFIs three months after their experience end date to complete a FIRC to stay "current." However, note that no instruction can be given until you complete it. If you go past these three months, you will need to complete a practical test for reinstatement of flight instructor privileges. See 61.199 for details on the grace period and reinstatements.

Another notable change is related to the training of initial CFI applicants. While the old pathways still exist and the requirements of 61.183 must be met, we now have a couple of new pathways. One is activity-based, defined as:

"Have trained and endorsed, during the preceding 24 calendar months, at least five applicants for a practical test for a pilot certificate or rating, and at least 80 percent of all applicants endorsed in that period passed that test on their first attempt."

Another pathway concerns itself with a newly created part of the regulation that refers to a "flight instructor enhanced qualification training program." However, as you read the regulation, you will see that a flight instructor enhanced qualification training program must be approved and conducted under Part 141 or 142 standards.

As you can see, there are a few things to digest with the new rules. Like anything else with change, it will become old hat before you know it.



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