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Office of Aviation Services
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DOI OPERATIONAL PROCEDURES MEMORANDUM (OPM) - 22

Subject: Crewed Aircraft, Pilot - Training Program

Effective Date: January 1, 2025

Last Updated: December 14, 2023

Expiration Date: December 31, 2025

1. **Summary of Changes.** The Executive Aviation Subcommittee (EAS) reviewed and concurred with the following changes.
 - Added Appendix 3 language to permit night currency flights.
2. **Purpose.** This OPM establishes the Interior Crewed Aircraft Pilot Training Program as called for in Departmental Manual 112 DM 12. This document identifies minimum pilot training requirements for all pilots operating Department of the Interior (DOI) crewed aircraft. This OPM also establishes policy for creation of developmental pilot training programs for individuals not meeting the requirements of 351 DM 3.
3. **Introduction.** Within the body of this document, the use of the term "bureau" is intended to represent all Interior entities such as service, office, and survey, etc.
4. **Authority.** This policy is established by the Director, Department of the Interior, Office of Aviation Services (OAS) in accordance with the provisions of Departmental Manual 112 DM 12, 350 DM 1 and Secretarial Order 3322 dated August 23, 2012.
5. **Responsibilities.** The education and training of DOI pilots is the responsibility of bureau management. Oversight of pilot training requires a balanced partnership between the OAS and bureau management.
 - A. **Bureau Responsibilities.** Heads of bureaus are responsible for ensuring that all employees involved in piloting aircraft receive an appropriate level of aviation training. The education and training listed in the appendices are the minimum requirements for promoting aircraft accident prevention and developing operational skills. Bureaus are encouraged to develop training programs unique to their specific needs to satisfy the 30-credit requirement as specified in Appendix 2.

Managers shall:

 - 1) Ensure pre-employment and entry to flight duty processes are complete (Appendix 1)
 - 2) Provide adequate resources and time for employees to effectively perform their aviation duties in a safe and professional manner.
 - 3) Ensure that the appropriate employees attend required training.
 - 4) Manage bureau pilot training to ensure that Departmental and bureau-specific training needs are addressed.

- 5) Provide OAS Headquarters, Technical Services, with documentation of completed pilot training, to be documented on an OAS-50 Series or equivalent bureau approved document, for retention in the master pilot files.
 - 6) For pilots not meeting the requirements of 351 DM 3, develop individual training programs in accordance with Appendix 4. These training programs require the pilot's supervisor's approval and the bureau's National Aviation Manager's approval before forwarding to the OAS.
- B. Office of Aviation Services Responsibilities. OAS has oversight of DOI pilot education and training programs in support of natural resources, wildland firefighting, and other DOI aviation missions. Training records specific to each pilot will be maintained at OAS Headquarters, Technical Services. OAS will participate in the development of individual training programs for bureau pilots that do not meet the requirements of 351 DM 3.
6. **Required Training for DOI Pilots.** Initial pilot training requirements are listed in Appendix 1. Additional training and currency requirements are listed in Appendix 2 through Appendix 4.
 7. **Equivalencies and Exceptions.** Requests for equivalencies and exceptions will be in writing and routed through the bureau National Aviation Manager and Bureau Regional/State Aviation Manager to OAS. Exceptions to policy will be approved by the OAS Director.

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Director, Office of Aviation Services

Attachments:

- Appendix 1: Initial Pilot Training
- Appendix 2: Pilot Recurrent Training
- Appendix 3: Pilot Flight Currency
- Appendix 4: Developmental Pilot Training Program
- Appendix 5: Instructor Pilot Qualification and Currency

Appendix 1

Initial Pilot Training

1. Pre-Employment Screening

Before an offer of employment is finalized for a DOI government pilot position, or a current employee is entered into the Developmental Pilot Program per Appendix 4, the respective bureau per 351 DM 3:

- A. Shall check the FAA database for accident/incident/violation history and/or a military pilot records verification.
- B. Conduct pre-employment flight evaluations (optional per bureaus discretion).
 - 1) Must be performed by an OAS Pilot Inspector, Designated Pilot Inspector, or current Bureau Instructor Pilot.
 - 2) OAS must provide written approval, per 351 DM 1, for the tentative selectee to manipulate the controls of a DOI aircraft.
 - 3) No special use tasks will be performed unless approved by OAS.
 - 4) Simulator may be used in lieu of a DOI aircraft.

2. Entry to Flight Duty

Prior to training, orientation, or evaluation in a DOI aircraft, bureau managers and OAS will ensure a DOI Pilot Records Folder is established with OAS. At a minimum the following documentation shall be included.

- A. FAA database check and/or military pilot records verification findings.
- B. Copies of pilot certificate and current medical.
- C. OAS issued approval to manipulate the flight controls.
- D. FBMS pilot number request.

Email documentation for DOI Pilot Records folders to OASFleetManager@ios.doi.gov

3. Ground Training

- A. All DOI pilots will be entered into a pilot training program approved by the bureau National Aviation Manager.
- B. All DOI pilots must successfully complete the following training prior to receiving flight authority and participating as a Pilot on DOI missions:
 - A-100 Basic Aviation Safety
 - A-110 Aviation Transport of Hazardous Materials
 - A-112 Mission Planning and Flight Request Process
 - A-115 Automated Flight Following

These Interagency Aviation Training (IAT) modules are available online at: <https://www.iat.gov> Modules can also be completed at an IAT venue.

C. Initial training required within 12 months of employment as a pilot:

A-200	Mishap Review
A-202	Interagency Aviation Organizations
A-205	Risk Management I
A-208	Aircraft and Pilot Approval
A-302	Personal Responsibility & Liability
A-303	Human Factors in Aviation
A-305	Risk Management II
A-307	Aviation Policy and Regulations II
A-310	Overview of Crew Resource Management
A-312	Water Ditching and Survival (must be completed before overwater flight)

Module requirements may be met by OAS approved equivalent courses or experience. Requests for equivalencies will be in writing and routed through the bureau National Aviation Manager or bureau Regional/State Aviation Manager to OAS.

D. Flight Training

- 1) Local Area Orientation Requirement: A DOI pilot permanently assigned to a new base, must receive a local area orientation flight and ground instruction prior to acting as a Pilot-in-Command (PIC) conducting flight operations in that area. A DOI pilot who is knowledgeable and experienced in that geographic area will administer the Local Area Orientation instruction. The orientation will be documented on an OAS-50 Series or bureau approved document.
- 2) Upset Prevention and Recovery Training (UPRT): All DOI pilots operating fixed wing aircraft are required to receive UPRT within the first 12 months of employment. UPRT must be completed prior to approval to fly low-level flight activities. DOI pilots operating low-level shall receive UPRT again within 24 months. Instructors and vendors will provide an UPRT course syllabus. Approval of this training will be provided by OAS and the bureau National Aviation Manager.
- 3) Technically Advanced Aircraft (TAA) Training: All DOI pilots operating TAA with multi-function displays, such as the Garmin 1000, must participate in training prior to operating the aircraft as a PIC. This training can be received as part of a factory aircraft qualification course, vendor-training course, software program meeting FAA/Industry Training Standards (requires a certificate of completion), or from a DOI instructor pilot.

- 4) Additional aircraft make and model training: DOI pilots in possession of a current DOI pilot card may receive instruction and manipulate the flight controls of any make and model aircraft without attaining a letter to manipulate the flight controls. Training must be provided by a DOI approved IP and follow a formal training plan and be endorsed by bureau RAM/SAM (or equivalent). Upon completion of make and model training, an initial evaluation (OPM 16 4. Policy Clarifications, E., 1.) is required.
- 5) DOI pilots must conduct Inadvertent IMC recovery training annually, commensurate with the equipment capability of their primary aircraft. Training must incorporate a vision restricting device and a safety pilot.
- 6) DOI pilots operating aircraft in multiple configurations: (e.g. tundra tires, wheel skis, skis and floats) are required to receive training in that configuration.

4. DOI Pilots Returning to Flight Status

DOI pilots returning to flight status, after a lapse in DOI pilot authorization greater than 36 months, must re-accomplish the requirements of Appendix 1, with the exception of UPRT (paragraph 3(B) above). Pilots operating fixed-wing aircraft are required to receive UPRT once within the first 12 months of re-instatement of DOI pilot authorization. UPRT must be completed prior to approval to fly low-level flight activities.

This requirement may be satisfied by OAS-approved equivalent courses or through experience. Requests for equivalencies will be in writing and routed through the bureau National Aviation Manager or bureau Regional/State Aviation to OAS.

Appendix 2

Pilot Recurrent Training

1. Annual Continuing Education Units (CEUs) Requirement

All DOI pilots must obtain 30 Continuing Education Units (CEUs) of aviation-related training in the previous thirteen months prior to their annual flight evaluation. One hour of flight, classroom, or online training equals one CEU. See 1C for acceptable CEU examples.

- A. A minimum of 5 of the 30 CEUs must be logged as flight instruction received from a Certified Flight Instructor (CFI) in an aircraft or a FAA approved flight simulation training device (FSTD).
- B. All training completion records or certificates must include the hours of training completed.
- C. CEU Training Examples:
 - 1) Flight clinics: ski, float, off airport, low-level, LE/resource, etc. (3-day minimum)
 - 2) Upset Prevention and Recovery Training (UPRT)
 - 3) Flight Instructor Renewal Clinic, classroom or online equivalency, with Certificate of Completion
 - 4) FAA safety seminar
 - 5) Flight review (14CFR 61.56)
 - 6) Pilot Safety Course
 - a. Accredited college aviation course
 - b. Water Ditching and Survival training
 - c. Survival Training, cold or hot weather school
 - d. Interagency Aviation Training Workshop
 - e. Controlled Flight Into Terrain (CFIT) Avoidance (Medallion)
 - 7) Flight hours (flight evaluations not included)
 - a. Receiving training from a CFI. Logbook entry required and copy provided to OAS Headquarters.
 - b. Giving training to a DOI pilot (credit per flight hour). Logbook entry required and copy furnished to OAS Headquarters.
 - 8) IFR training
 - a. Flight simulator class (Part 141 certificated or approved by OAS. Flight Safety, SimCom, etc.)
 - b. Simulated IFR or IFR flight with a safety pilot (credits per flight hour)
 - c. FAA approved Advanced Aviation Training Device (AATD), or commercial training accepted by aviation insurance provider

- 9) Manufacturers' ("Factory") schools (e.g. Bell, Cessna, Flight Safety, SimuFlite, SimCom)
- 10) Make and model ground refresher (One credit per hour, max 10)
- 11) OAS approved bureau pilot ground school (3-day minimum)
- 12) IAT or other (such as FAA or AOPA) aviation online training modules.

2. Recurrent Ground Training

- A. Complete the most current available A-200 Annual Mishap Review every 12 months. This module is available online at: <https://www.iat.gov>, or can also be taken at an IAT training venue.
- B. Complete A-110 Transportation of Hazardous Materials, every 36 months.

3. DOI National Pilot Ground School (NPGS)

DOI Pilots must attend a DOI NPGS, or preapproved equivalent, every other year. OAS is responsible for coordinating the DOI NPGS. The NPGS location will alternate every other offering between Alaska and the Lower 48. Attendance will be documented in writing and records forwarded to OAS Headquarters.

The NPGS requirement may be met with a preapproved equivalency school (see 3C, below). Requests for equivalency ground schools will be in writing and routed through the bureau's National Aviation Manager or bureau Regional/State Aviation to OAS. The equivalency request shall contain course objectives and address areas of special emphasis (see 3C.). Granting of any equivalency will be based on a comparison of the NPGS agenda and the learning objectives submitted in advance by the requesting bureau. Requests for IAT course equivalencies will be processed as per OPM-4 and the IAT Guide prior to the ground school. OAS and the bureau National Aviation Manager will agree on the equivalency determination.

- A. NPGS or approved equivalent will include a minimum of 24 hours of instruction.
- B. Based on bureau input, topics will be tailored to specific DOI fleet pilot needs.
- C. NPGS or approved equivalent should include areas of special emphasis such as evaluation ride areas of emphasis, policy changes, AMRB recommendations, and SAFECOM reporting, airspace, weather, CRM, Human Factors, Risk Management, Emergency training, FAA current special concerns, radio communications, AFF/flight following, policy and regulations.
- D. NPGS or approved equivalent attendance rosters to include IAT course equivalencies, will be entered into the IAT database to assure that the records are in the individual pilot's transcript.

4. Recurrent Flight Training

- A. DOI pilots that operate aircraft in multiple configurations (e.g. wheel skis and floats) are required to complete 24 CEUs every 36 months via an OAS approved flight clinic or equivalent. If a pilot adds a configuration qualification, the pilot will attend a flight clinic for the new configuration within 24 months.
- B. DOI pilots must conduct Inadvertent IMC recovery training annually, level of training will be dependent on the configuration of their primary aircraft and/or availability of a simulator. Flight training must incorporate a vision restricting device and a safety pilot.

5. IAT Instructor Equivalency

DOI pilots who are qualified as an IAT instructor and who have taught a course within the last 36 months, meet the recurrence requirement for that course.

Appendix 3

Pilot Flight Currency

The following apply to all DOI PICs depending on the type of aircraft and operation to be flown:

1. DOI PIC Recent Flight Experience

Except as provided in E of this section, no person may act as PIC of a DOI aircraft unless that person has:

- A. 24 hours as PIC in the last 12 months in category, including 6 hours as PIC in the last 6 months in category.
- B. 5 hours as PIC in the last 12 months in like make and model.
- C. 1 hour in the last 90 days in make, model, and configuration.
- D. Recent flight experience in accordance with 14 CFR 61.
- E. For the purposes of maintaining night currency, a person may act as PIC of a DOI aircraft at night provided:
 - 1) The aircraft is certified for night VFR in accordance with 14 CFR 91.205 (C) and equipped with basic attitude instrumentation (attitude indicator or equivalent).
 - 2) The flight remains within 20nm of a lighted airport.
- F. For the purpose of meeting the requirements of A-E above, a person may act as PIC of a DOI aircraft provided no persons are carried onboard the aircraft other than required flight crew for the conduct of the flight, and no special use missions are performed.
- G. As an alternative to the hourly requirements above, a successful flight evaluation from an OAS Pilot Inspector or Designated Pilot Inspector (if requested by OAS) regains currency for a DOI pilot. Under extenuating circumstances, bureaus may request an exception from the OAS Director.
- H. If a DOI pilot has not flown a specific make and model (and series for helicopters) in the last 12 months, a satisfactory dual instruction period with a CFI or DOI instructor pilot is required in that make and model (and series for helicopters) before operational missions can resume (see OPM-23 "DOI Make and Models" grouping list).

Appendix 4

Developmental Pilot Training Program

The intent of the Developmental Pilot Training Program is to provide training to a DOI employee who does not meet the requirements of 351 DM 3 with a reasonable expectation that the employee will be assigned duties as a DOI pilot at the completion of the training.

1. Developmental Pilot

- A. Developmental pilots must be approved in writing by the bureau's national aviation office. A copy of the approval(s) must be submitted to OAS and placed in the pilot's file.
- B. Developmental pilots must possess:
 - 1) A current FAA Medical Certificate Second Class or higher.
 - 2) At least a FAA Commercial Pilot Certificate with appropriate category and Instrument rating.
 - 3) Completed FAA accident/incident/violation history and/or a military pilot records verification.
 - 4) Letter of Authorization per 351 DM 1 from the OAS Regional Director to manipulate the flight controls of DOI aircraft.
- C. The Bureau must develop a training program syllabus for the developmental pilot.

2. Stage 1 Initial Training

The primary objective of this stage is to gain proficiency in the aircraft. The secondary objectives are to learn DOI aviation policy, bureau policy/procedures, and to introduce bureau missions.

- A. Stage 1 Developmental Pilot Privileges and Limitations:
 - 1) May manipulate the controls of DOI aircraft when accompanied by a current DOI Instructor Pilot who is qualified and current in the aircraft and has access to full dual flight controls.
 - 2) May not act as the PIC of a DOI aircraft, however in accordance with 14 CFR 61, they may log PIC time as sole manipulator of the controls.
 - 3) Are limited to flight crew only, no aircrew members or passengers are allowed.
- B. Stage 1 Completion Standard: Upon written recommendation from DOI Instructor Pilot, pass an OAS flight evaluation for SIC and/or solo privileges as appropriate for the aircraft. Upon completion of Stage 1, OAS-30 will be issued with appropriate limitations noted.

3. Stage 2 Advanced Training

The primary objectives of this stage are to increase pilot skill, knowledge and proficiency; and learn the Bureau mission(s).

- A. Stage 2 Developmental Pilot Privileges and Limitations:
 - 1) Under the supervision of a DOI Instructor Pilot, may fly solo flights, no aircrew or passengers authorized.

- 2) During solo flights, point-to-point flights, and operations to and from the same airport are allowed.
 - 3) Special use missions are limited to mountainous terrain if endorsed on the DOI pilot card.
 - 4) With a DOI Instructor Pilot on board who is qualified and current in the aircraft and special use mission and has access to full dual flight controls, may carry aircrew, passengers and perform special use missions.
 - 5) May not act as SIC of DOI aircraft when a SIC is required by the FAA or DOI policy, unless qualified in-accordance-with 351 DM 3.2H.
- B. Stage 2 Completion Standards: Meet the standards required to qualify as a DOI pilot. Written DOI Instructor Pilot recommendation is required to advance from Stage 2.

4. Initial Flight Evaluation

- A. The candidate pilot is the PIC of a DOI aircraft for the purpose of a flight evaluation(s) to qualify as a DOI pilot.
- B. The final evaluation will be conducted by an inspector pilot not associated with the training or interim evaluations.
- C. Completion Standard: Pass the required flight evaluation(s).

Appendix 5

Instructor Pilot Qualification and Currency

The intent of this document is to clarify and standardize Departmental Policy and Procedures regarding Department of Interior Aviation Instructor Pilots (IP) and the utilization of commercial vendor FAA Certified Flight Instructors (CFI). The term IP is purposely used throughout to distinguish between FAA qualified CFI's and DOI approved Instructor Pilots.

1. Applicability

- A. Aircraft ground and flight operations that are under the operational control of the Department of Interior, including any bureaus or agencies therein.
- B. Operations in Department owned, leased, commercial contract vendor, or Cooperator aircraft—that may be staffed with flight crew consisting of Department employees, commercial contract vendor, or Cooperator personnel.
- C. This Appendix is **not applicable** to aircraft ground and flight operations that are not under the operational control of the Department of Interior. Examples of this would be training given by a commercial FAA Certified Flight Instructor that is conducted in the instructor/company aircraft with the company personnel utilizing the company training program (e.g. UPRT).

2. DOI Instructor Pilot (IP)

DOI Instructor Pilots are defined as Department of Interior employees, or contract employees who meet the qualifications outlined in Section 3 of this document. This privilege, extended to experienced pilots within the Department, will address the Department's unique requirement to train pilots to fly special use missions (Special Use Activities for Crewed Aircraft, OPM-29) as this expertise and training is not readily available in the commercial aviation flight instruction sector.

Shall act as the PIC of the aircraft when evaluating or providing authorized instruction and is expected to manipulate the controls during the flight.

- A. DOI Instructor Pilots are authorized to provide written endorsements (e.g. in the pilot's logbook and/or on OAS Forms 50/51).

3. DOI Instructor Pilot Qualifications

- A. Hold a current FAA Certified Flight Instructor pilot certificate with appropriate ratings.
- B. Have at minimum 24 months experience as an authorized DOI pilot. (Developmental pilot time does not count.)
- C. DOI authorized and current in make model and configuration.
- D. DOI authorized for the specific special use mission training to be conducted.
- E. Recommended in writing by the NAM (or equivalent) for designation as an IP and provided to OAS for inclusion in the pilot's permanent record.

F. Successfully complete an initial (one time) OAS flight evaluation while acting as PIC in the Instructor Pilot seating position. The evaluation will be conducted as part of the DOI pilot's normal evaluation schedule, not in addition to the normal evaluation unless specifically requested. This will require a separate flight evaluation for Right Seat PIC in side-by-side aircraft and Rear Seat PIC in tandem aircraft.

G. Be endorsed Instructor Pilot "IP" on OAS 30D (DOI pilot card).

4. DOI Instructor Pilot Privileges, Limitations and Waivers

A. The DOI instructor pilot is authorized to:

- 1) Provide initial flight and ground training to DOI pilots who are not currently carded in the aircraft.
- 2) Provide recurrent flight training to DOI pilots to meet any OPM-22 or bureau currency requirements.
- 3) Provide DOI Special Use (OPM-29) mission training.
- 4) Provide written endorsements and/or recommendations for DOI pilots to receive initial and additional authorization OAS aircraft flight evaluations (e.g. in the pilot's logbook and/or on OAS Forms 50/51).
- 5) Instruct OAS-approved pinch-hitter courses in accordance with DM 351 1.2(B) (1).
- 6) Perform flight reviews of DOI pilots to satisfy the requirements of 14 C.F.R. § 61.56.
- 7) Perform pre-employment flight evaluation (See Appendix 1, Section 1).
- 8) Requests for additional IP privileges will be routed through the NAM (or equivalent) to OAS for approval.

B. DOI Instructor Pilot Renewal, Reinstatement, and Suspension/Revocation

- 1) DOI Instructor Pilot designation is valid until the expiration date of the Instructor pilot's FAA CFI Certificate. Upon successful renewal of the FAA CFI certificate and verification of a current Letter of Recommendation from the sponsoring Bureau, the IP authorization will be renewed administratively by OAS.
- 2) DOI Instructor pilots whose designation has lapsed or been suspended, and are reapplying, shall meet the requirements of Paragraph 3 (A–G) of this Appendix prior to reauthorization.
- 3) Bureau/Agency National Aviation Managers (or equivalent) have the authority to suspend or revoke Instructor Pilot designation.

C. Waivers

The 24 month experience requirement may be waived by the Bureau/Agency National Aviation Manger (or equivalent) upon recommendation of the Regional Aviation Manager (or equivalent).

5. Commercial Vendor FAA Certified Flight Instructors

The use of commercial vendor FAA Certified Flight Instructors who are not DOI Designated Instructor Pilots is permitted in DOI owned or leased aircraft provided the following is observed:

- A. Must meet the requirements listed DM351.2(A).
- B. A Letter of Authorization is signed by the OAS Director or Regional Director to manipulate the flight controls when providing flight instruction in a DOI aircraft. This Letter of Authorization is required regardless of the type of instruction to be given, or any intent to manipulate the flight controls.
- C. Will not act as PIC during Special Use flight operations (as defined in OPM 29).
- D. Only those maneuvers included in current FAA Commercial Pilot Airperson Certification Standards (FAA-S-ACS-7), (FAA-S-8081-16B Rotorcraft PTS) and Instrument Airperson Certification Standards (FAA-S-ACS-8A), as applicable, may be conducted.
- E. Approval by Bureau/Agency National Aviation Manager (or equivalent).