

# **Attention ALL CAP Instructor Pilots and Check Pilots**

## **TSA Security Awareness is now in Ops Quals**

Civil Air Patrol Ops Quals has added the TSA training requirements under the FAA tab for Pilot Qualifications. This TSA training required by [49 CFR 1552.23](#) can now be uploaded and validated. The item now shows as a requirement to hold (and continue to hold) a CAP Instructor Pilot qualification and can be found in the **What Do I Need** for a CAP Instructor Pilot - **Airplane**. ALL ACTIVE **AIRPLANE** CAP INSTRUCTOR PILOTS MUST HAVE THE TRAINING CERTIFICATION DOCUMENT OR COURSE COMPLETION CERTIFICATE UPLOADED AND VALIDATED BY **01 APRIL 2024**.

### **What's the background here?**

[49 CFR Part 1552](#) sets out the requirements by the Transportation Security Administration (the "TSA") for flight schools. It addresses matters in two subparts: (A) Flight Training for Aliens and Other Designated Individuals and (B) Flight School Security Awareness Training.

This CAP initiative is focused upon Subpart B.

### **How do the regs apply to CAP and CAP instructor pilots?**

The regulations apply to "flight school employees."

The definition of "flight school employee" (and, for that matter, the definition of "flight school") is very broad. Although CAP is not a flight school in the usual sense of the phrase (and CAP instructor pilots are not employees or even independent contractors in the usual senses of those phrases), CAP will begin tracking compliance by CAP instructor pilots with TSA training requirements and time-limiting instructor privileges in Ops Quals according to TSA training recurrency requirements.

Note that any person or entity (including an individual, independent flight instructor) that provides instruction in the operation of any aircraft or aircraft simulator is a "flight school" under 49 CFR § 1552.1(b) and already themselves subject to the requirement.

### **Are other CAP members covered?**

They might be. In the CAP context, covered "flight school employees" could include – in addition to instructor pilots – FAA-certificated ground instructors or any other person "employed by a flight school, including an independent contractor, who has direct contact with a flight school student."

Individuals other than flight instructors who fall within the defined scope should obtain and maintain the required training.

That said, CAP has no present plans to require any personnel other than instructor pilots to upload and maintain their security training records in Ops Quals.

Directors of more formalized training events like flight academies and flight-related NCSAs should consider whether to require relevant non-flight-instructor staff to receive and maintain the security training.

### **What If I'm an instructor but I don't instruct for CAP?**

If you don't instruct for CAP and don't have, or don't want to maintain, a CAP instructor pilot qualification in Ops Quals, you don't need to do anything under the new policy. Understand,

though, that any existing CAP instructor qualification that extends beyond 01 April 2024 will instead end on 01 April 2024.

### **What if I opt out but later decide that I want to instruct for CAP?**

Just obtain the training and upload the certificate or other evidence of training to Ops Quals and get it validated. Note that all other CAP requirements (CAPF 5, etc.) continue to apply.

### **Is this a CAP-specific requirement?**

No. In fact, the requirement already applies to any US flight or ground instructor “that provide[s] instruction . . . in the operation of aircraft or aircraft simulators.” See 49 CFR § 1552.1(b) for the definition of “flight school” (which includes individual instructors) and other useful definitions.

If you’re an instructor who provides instruction, whether through CAP or otherwise, you’re already subject to the requirement. CAP is simply documenting and tracking CAP instructor pilot compliance with the requirements that likely already apply to them.

### **How often do I need to get recurrent training?**

49 CFR § 1552.23(d)(1) requires that “each flight school employee [receive] recurrent security awareness training each year in the same month as the month the flight school employee received initial security awareness training in accordance with this subpart.”

Note that the regulation requires recurrent training (a) *each year* and (b) *in the same month as the month in which the initial training occurred*. The TSA has given an exemption ([Docket No. TSA-2004-19147, dated 08 July 2007](#)) that also allows the recurrent training to take place in the calendar month before or the calendar month after the month in which the person received the initial training. This same-month(s) requirement is unique in all of the regulations. A literal reading suggests that a person could not take recurrent training early to reset currency or revive currency by taking the recurrent training in a calendar month outside that three-calendar-month period.

Notwithstanding the above, Ops Quals will refresh currency in Ops Quals for one year each time new evidence of training is uploaded and validated. For example, if the first-uploaded evidence of training shows that training was accomplished in August 20X1, that training will remain current for Ops Quals purposes through the end of August 20X2. If recurrent training later takes place, Ops Quals will recognize that currency beginning with the calendar month in which the recurrent training occurred and continuing until the end of the same calendar month in the next calendar year.

If the TSA opines that a different treatment is required, CAP will work to clarify the matter.

In any case, covered CAP personnel are encouraged to time their recurrent training to fall into the TSA-stated period.

### **Where can I get the required training?**

You have several FREE options to fulfill requirements for recurrent security awareness training.

AOPA online General Aviation Security course

[www.aopa.org/securitycourse](http://www.aopa.org/securitycourse)

King Schools

[TSA Recurrent Security Awareness Training for CFIs](#)

Gleim Aviation

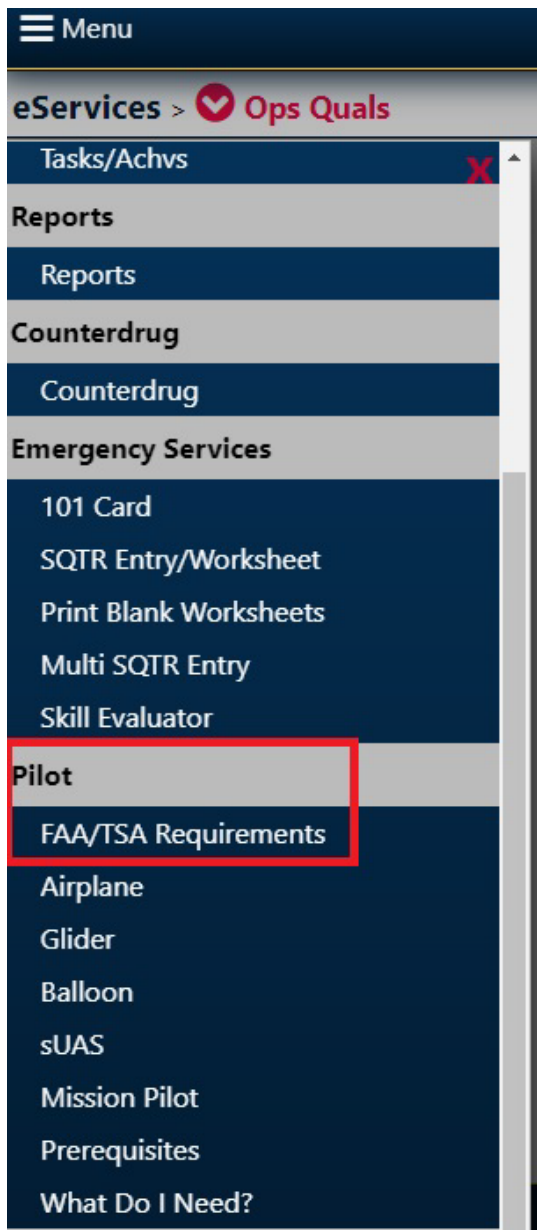
[TSA Security Awareness Training Course](#)

**Where can I find additional information about TSA regulation as is applies to flight training?**

More information can be found at [AOPA'S GUIDE TO TSA'S NON-U.S. CITIZENS AND NON-U.S. NATIONALS FLIGHT TRAINING/CITIZENSHIP VALIDATION RULE](#)

**Where can I upload my evidence of training for validation?**

The following screenshots will guide you through the process.



**Instructor Pilot TSA Training IAW 49 CFR 1552.23**

**TSA Training**  
None.

**Instructor Pilot TSA Training**

**Upload Instructor Pilot TSA Training Certificate**  
 [Click to Upload Instructor Pilot TSA Training Certificate](#)

**Submit** **Clear Selected**

Select CAP Qualification  
Instructor Pilot - Airplane

✔ = Complete    ✘ = Not Complete

Instructor Pilot - Airplane		
Qual/Task Name	Completed Date	Expiration Date
✔ - CFI/CFII - Number of Required Tasks - 1		
<a href="#">FAA CFI MEL</a>		
<a href="#">FAA CFI MES</a>		
<a href="#">FAA CFI SEL</a>	31 Jul 2022 - (Active)	31 Jul 2024 - (Active)
<a href="#">FAA CFI SES</a>		
<a href="#">FAA CFII</a>	31 Jul 2022 - (Active)	31 Jul 2024 - (Active)
✔ - CAP Airplane Pilot - Number of Required Tasks - 1		
<a href="#">VFR Pilot</a>	22 Oct 2023 - (Active)	31 Mar 2024 - (Active)
✔ - Flight Check Requirement - Number of Required Tasks - 1		
<a href="#">Instructor Pilot - Airplane</a>	18 Oct 2023 - (Active)	31 Oct 2024 - (Active)
✔ - Instructor Pilot TSA Training - Number of Required Tasks - 0		
<a href="#">Instructor Pilot TSA Training</a>	09 Oct 2023 - (Active)	31 Oct 2024 - (Active)
✔ - Appointment - Number of Required Tasks - 1		
<a href="#">Instructor Pilot - Airplane</a>	22 Oct 2023 - (Active)	31 Mar 2024 - (Active)

**I have more questions. Who do I contact?**

Start with your wing DO or Stan/Eval Officer. Those personnel have been briefed and can forward any questions.

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**DEADLINE is 01 APRIL 2024**