

Describe the Proposed Change:

Remove A-107 Aviation Policy I Interagency Aviation Training course as a requirement for the following positions:

IAT: Aviation Dispatcher, Aviation Manager, Flight Follower, Helicopter Manager-Resource, Project Aviation Manager

NWCG 310-1 (2020) and **FSFAQG** (2019): Aircraft Timekeeper (ATIM) and Ramp Manager (RAMP)

FWFQS (2021): Aerial Observer (AOBS) per NPS and USFS Only

DOI OEM-IPQG (2021): All-Hazards Helicopter Manager (HEAM)

Note: The above Policy training documents are fully spelled out below and in the "Systems Affected by Change".

Description of the Issue/Reason for Change:

A-107 Objectives are duplicated in current A-100 Basic Aviation Safety (Revised 2020) and A-307 Aviation Policy and Regulations II course content. The only IAT position which requires both A-100 and A-107, but not A-307 is Flight Follower (See IAT Position Matrix below) or the following link: https://www.iat.gov/docs/IAT_Requirements_Matrix.pdf

The 2020 A-100 revision incorporated "Understanding Aviation Policy" into its Unit 1 objectives. This addition – not previously part of the former class eliminates the need for A-107 Aviation Policy. (See See Course Objectives Matrix below). The A-107 revision working group reviewed the current A-100 (Revised 2020) and it was determined that A-100 adequately covers aviation policy for the Flight Follower position and more in-depth content is provided to the remaining positions via A-307.

The ATIM and RAMP positions listed in the **NWCG Standards for Wildland Fire Position Qualifications, PMS 310-1 and FSFAQG** Chp. 2 Part 1 include A-107 as required training. The RAMP position already includes the training requirement of A-100, however the ATIM position does NOT include A-100.

Note: A-100 may be included as required training for ATIM position. This recommendation increases ATIM training requirements by six hours.

This RFC does NOT address FOREST SERVICE OTHER TRAINING WHICH SUPPORTS DEVELOPMENT OF KNOWLEDGE AND SKILLS in the **FSFAQG**.

The Federal Wildland Fire Qualifications Supplement (FWFQS) requirement of A-107 is Agency-Specific for NPS and USFS employees for Aerial Observer. This position already requires A-100, which satisfies the learning requirement of this position.

DOI OEM-IPQG (2021): All-Hazards Helicopter Manager (HEAM) required training A-107; A-100 (Triennial)

Appendix 2—

**Interagency Aviation Training (IAT)
Position Requirements Matrix**

		POSITION														
		Course Length (Hours)	Aircrew Member	Aviation Dispatcher	Aviation Manager	Fixed-Wing Flight Manager	Fixed-Wing Flight Manager—Special Use	Flight Follower	Helicopter Flight Manager (DOI)	Helicopter Manager—Resource	Line Manager (DOI)	Project Aviation Manager	Supervisor (DOI)	Supervisor (FS)	DOI Remote Pilot (UAS)	USDA-FS Remote Pilot (UAS)
<p>YELLOW = OPM-04 identifies five positions which have required training for DOI and other personnel participating in manned aircraft activities. Aircrew member, Aviation Manager, Flight Follower, Line Manager, and Supervisor</p> <p>BOLD/Italics Course Title = Available Online X = Requires Completion Once 3 = Requires initial completion, and every 3 years</p>																
CODE	COURSE TITLE															
A-100	<i>Basic Aviation Safety</i>	5	3	3	X	3	3	3	3	3		X			3	3
A-107	<i>Aviation Policy & Regulations I</i>	1		X	X			X		X		X				
A-307	<i>Aviation Policy and Regulations-II</i>	4		X	X					3		X				

Applicable Course Objectives Matrix

A-100 Basic Aviation Safety (2013)	A-107 Aviation Policy and Regulations I (Proposal to Remove this Course)	A-100 Basic Aviation Safety (2020) *	A-307 Aviation Policy and Regulations II
Identify the requirements for Pre-mission planning	A basic overview of agency aviation policy and standards and where to find them. Covers agency and interagency manuals, handbooks and guides as well as a brief summary of the Federal Aviation Regulations (FARs).	Locate Aviation Policy for your Bureau or Agency	Identify the specific Federal Aviation Regulations that affect aviation operations within the Department of the Interior and Forest Service.
Identify the approved methods of aircraft procurement	Identify the aviation user’s responsibility for obtaining and understanding information regarding aviation policy and procedures	Identify the Elements required for Mission Planning	Identify the specific parts of Departmental Manual 350- 354
Identify the four principles of risk management	Understand the basic structure of the aviation policies of the Department of the Interior and USDA - Forest Service.		Identify the 3 broad chapters of the Forest Service Manual 5700

*Unit 1	Apply a risk management process to a given scenario	Identify the relationship of agency policies to the Federal Aviation Regulations.	Identify guides that both the Forest Service and your bureau have adopted as policy	of A-100
	Identify the purpose of a mishap response plan and when it's required		Identify the DOI and Forest Service policies that apply to cooperator, affiliate, associate, and other government aircraft within each agency	
			Identify how the OMB Circulars A-76 and A-126 affect the acquisition of aircraft for government use	

specifically addresses the elements in A-107: DOI & FS Policies/Hierarchy, CFRs/FARs (Parts 91,107,135), Policy Action Verb Description (shall, must, etc.), Departmental Manual (DM) Parts 350-354, Operational Procedures Memoranda (OPM), Forest Service Manual (FSM 5700), Forest Service Handbook (FSH 5709.16), Guides, Handbooks, Standards, Aviation Plans (National, Regional/State, Unit, Project/Mission), OPM-06 Aviation Management Plans and OPM-11 DOI Use of Unmanned Aircraft Systems (UAS).

Systems Affected by Change:

- DOI-OPM-04 Aviation User Training program
- Interagency Aviation Training (IAT) Guide; IAT Website
- National Wildfire Coordinating Group (NWCG) Standards for Wildland Fire Positions Qualifications (PMS 310-1) Oct 2020 / Oct 2021 <https://www.nwcg.gov/positions>
- Aircraft Timekeeper (ATIM), Ramp Manager (RAMP)
- Federal Wildland Fire Qualifications Supplement 2021 (FWFQS) https://iqcsweb.nwcg.gov/sites/default/files/inline-files/FedSupplement_2021.pdf;
- Office of Emergency Management (OEM) Incident Positions Qualifications Guide March 2021 (IPQG) <https://www.doi.gov/emergency/plans-and-policies>;
- Forest Service Fire and Aviation Qualifications Guide 2019 (FSFAQG) Chapter 2 Part 2- Qualifications Certification, decertification and fitness https://www.fs.usda.gov/sites/default/files/2019-10/fsfaqg_9_october_2019_final_0.pdf

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Rationale: 10 IATS Members