FAA Designated Pilot Examiner System Insights

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The process of attaining a pilot certificate culminates with a practical test that includes an oral and a flight portion. Administration of this practical test is a function of the Federal Aviation Administration (FAA), however the FAA designates examiners who in most cases conduct these tests. Designated Pilot Examiners (DPEs) are individuals who serve as contractors for the FAA to relieve their burden of performing the practical tests. DPEs are aviation professionals who may or may not have part time or full-time jobs other than their duties as pilot examiners. According to Part 14 CFR 183.23, DPEs are authorized to accept applications for flight tests, conduct these tests, and issue temporary pilot certificates to qualified applicants (Aeronautics and Space, 2022).

FAA Order 8900.2C is titled the General Aviation Airman Designee Handbook and it delineates all the information a DPE needs from application for designation as a DPE, to oversight, privileges, and responsibilities of the DPE position, to actually conducting specific practical tests (Federal Aviation Administration [FAA], 2018). According to this handbook, to apply to the FAA for a DPE position, the candidate must submit an application to the National Examiner Board. The general eligibility requirements for a DPE applicant includes stipulations such as minimum age, personality traits, training requirements, knowledge of guidance materials, English language proficiency, objectivity requirements, aviation industry record, and access to appropriate technology to support check ride processing activities.

Order 8900.2C further indicates that meeting the eligibility requirements does not mean appointment as a designee will be granted. Instead, each managing FAA office must determine the need for DPEs in their area of geographic responsibility along with their ability to manage each additional designee. The determination of need is made by examining the level of activity of all other DPEs within that particular FAA office, the ability of those DPEs to provide check rides within "a reasonable period of time," and the number of complaints received from the public regarding the lack of availability of DPEs for check rides (FAA, 2018). The ability to manage additional DPEs is determined by the effect on the workload of inspectors and the funding needed to provide oversight. Until 2018 DPEs were generally restricted to conducting practical tests within their managing office area of jurisdiction. However, a pilot applicant could choose to travel to a DPE in another geographic region to complete a practical test. In 2018, the FAA removed this restriction and now DPEs may travel to any part of the United States to conduct a practical test (FAA, 2018).

The scope of flight training and airman certification in the US is quite large, with approximately 105,000 pilot or flight instructor certificates issued in 2021 (FAA, 2022b). Of that number, approximately 94,000 were for the Airplane SEL/MEL Private Pilot, Commercial Pilot, Instrument Rating, the Certificated Flight Instructor (CFI)-Airplane, CFI-Instrument, or CFI-Multiengine certificates.

In January of 2022, the FAA DPE Locator website listed 851 DPEs with authorization to conduct practical tests for these pilot certificates and ratings (FAA, 2022a). DPEs performed approximately 91,000 (87%) of the practical tests conducted in 2021, while FAA Inspectors performed approximately 700 (0.67%) of those tests (FAA, 2022b). Given the 91,000 certifications by DPEs and 851 DPEs authorized to perform those practical tests results, approximately 107 pilot certificates or ratings were issued per DPE in 2021.

Beyond a practical test by a DPE or FAA Inspector, a third alternative for certification exists as well, in the form of 14 CFR Part 141 Flight School examining authority. However, relatively few Part 141 Flight Schools are currently granted this authority. A review of the Aircraft Owners and Pilots Association (AOPA) Flight School Finder website in January of 2022 showed 2,200 flight training providers in the US (AOPA, 2022). Of that number, 877 are Part 141 approved flight training providers, and only 58 of those schools have been granted examining authority. In terms of check rides conducted, of the 105,000 performed in 2021, only approximately 14,000 (13%) were performed by Part 141 Approved Flight Schools with examining authority (FAA, 2022b).

DPE Reforms Working Group

In response to public comment regarding airman check ride availability, as part of the FAA Reauthorization Act of 2018 (P.L. 115-254) Congress charged the FAA Administrator with reviewing all of the agency's regulations and policies related to DPEs including selection, training, and deployment, in order to ensure an adequate number of DPEs are available (FAA, 2019). In response to this mandate, in 2019 the FAA's Aviation Rulemaking Advisory Committee (ARAC) formed the Designated Pilot Examiner Reforms Working Group (DPERWG) which was tasked to provide recommendations to the ARAC. These recommendations were to include "areas of needed reform with respect to regulatory and policy changes necessary to ensure an adequate number of designated pilot examiners are deployed and available to perform their duties to meet the growing public need" (FAA, 2019, p. 2). Congress also mandated that the Administrator must act, as deemed appropriate, on the recommendations from the DPERWG within one year of receiving the recommendations.

The DPERWG delivered 12 recommendations in a report to the FAA on June 17, 2021 (FAA, 2021). These recommendations fell under the broad categories of selection of future DPE candidates, training and mentorship, and deployment and oversight of the workforce. The two recommendations regarding the selection of future DPE candidates included the establishment of a standardized and structured flow for DPE selection and the implementation of an updated and enhanced criteria set. Under the DPE training and mentorship category, five recommendations were put forward. These included 1) the development of an FAA-issued, standardized tool to promote efficiency and accuracy in the DPE process,

2) deployment of an automated survey system to more quickly and accurately track DPE performance and merit, 3) reducing inconsistencies in designee guidance, 4) allowing DPEs with medical disqualifications to perform non-flight practical tests, and 5) applying the existing ATP segmented examination concept to differentiate between ground and flight testing for all practical test scheduling. The five recommendations addressing issues related to the deployment and oversight of the work force included: 1) developing a formal mentorship program, 2) developing and implementing a national level oversight structure that focuses on the selection, training, deployment, and oversight of DPEs, 3) improving, enhancing, and promoting the FAA Designee Locator website, 4) allowing equivalent pilot-in-command medical requirements for DPEs, and 5) categorizing and limiting examinations to six testing events per day (FAA, 2021). For a comprehensive understanding of the DPE Working Group's findings, it is strongly recommended that the Report be read in full.

Statement of the Problem

For a number of years, anecdotal evidence from multiple collegiate flight training programs has suggested that a lack of DPE availability leads to wait times for practical tests that are problematic for pilot applicants. Public comments over the perceived general lack of DPEs nationwide led to Congressional involvement through P.L. 115-254 in mandating that the FAA examine its DPE processes and procedures. The wait times experienced have historically caused some pilot applicants to travel to another geographic region to find a DPE who is available in a more reasonable time after the applicant had finished flight training. Since the FAA guidance change of early 2019 regarding DPE travel in reaction to P.L. 115-254, the imbalance of supply and demand across the nation has also caused many DPEs to travel outside of their FAA oversight office's geographical region to conduct check rides. Travel practices by both parties increase the associated cost of the practical test, and while this travel has resulted in some relief in timeliness for pilot applicants, discontent with the wait times for check rides has continued. The DPERWG was tasked by the ARAC with examining the DPE situation nationally to make recommendations for improvement and did so based on the expertise and experience of the members of that Group. However, no systemic national research was conducted to determine the perceptions of stakeholders on the current state of the DPE system prior to the generation of those recommendations, and further, there was no plan indicated by the FAA for stakeholder perception to be solicited regarding the recommendations that were made by the DPERWG. Given the importance of this topic and the need for moving forward appropriately with the recommendations made by the DPERWG to effectively improve the DPE system, this study examines these stakeholder perceptions.

Methodology

The two stakeholder groups identified to provide perceptions were the existing nationwide cadre of DPEs and flight training providers. The FAA was also identified as a significant stakeholder, but conversations with that agency regarding potentially surveying the personnel who oversee DPEs revealed a reluctance for participation of these individuals, so that population was not included. As indicated above, the primary research questions for the study were:

1. What is the perception of DPEs and flight training providers of the current state of the DPE system?
2. What is the perception of DPEs and flight training providers of the major recommendations made by the DPERWG?

To answer these questions, electronic survey instruments were developed for dissemination. Two surveys were produced, one for DPEs and one for flight training providers. While there was significant overlap of the questions used on both instruments, some items were specific to the population targeted. During the development of the surveys, they were reviewed by five individuals in relevant positions and with appropriate knowledge to check face validity. As a human research study, university Institutional Review Board (IRB) approval was required and was received by the research team.

To obtain the appropriate participants for the study, DPE email contact information was downloaded from the FAA Designee Locator website, with 851 DPEs identified as the target population for the DPE survey. This group of DPEs received a direct email from the primary study investigator requesting their participation and providing a link to the DPE electronic survey.

For the flight training provider participants, multiple approaches were used to solicit participation. Primarily, the online Aircraft Owners and Pilots Association (AOPA) Flight School Directory member list was accessed, with the publicly available contact information provided by these websites utilized to generate an email list. Of the approximately 2,200 schools listed on the AOPA website in January of 2022, valid e-mail addresses were obtained for 1,890 schools. These contacts also received a direct email from the primary investigator requesting their participation and providing a link to the appropriate survey. In addition, a number of organizations advertised the survey to flight training providers through e-mails and newsletters. These organizations included AOPA, University Aviation Association (UAA), Aviation Accreditation Board International (AABI), Flight School Associations of North America (FSANA), Society of Aviation and Flight Educators (SAFE), and National Association of Flight Instructors (NAFI).

The two versions of the survey, as appropriate, were made available to all participants using the Qualtrics XM online survey software. The surveys began with demographic information, which varied for DPEs and flight training providers. DPEs were asked to provide their years of service as a DPE, whether they served

as a DPE in a part-time or full-time capacity, the number of practical tests they performed in a month, and the Flight Standards District Office (FSDO) providing their oversight. The flight training providers were surveyed for demographic information relating to the flight training courses provided, the number of flight instructors employed by the school, the size of the fleet used for flight training, and the FSDO district in which they are located.

The surveys for both sets of stakeholders then moved on to questions related to the wait times for practical test scheduling, perceptions of staffing levels of DPEs in their FSDO area, and questions related to travel by DPEs and pilot applicants to practical tests. Finally, the questions regarding feedback on selected DPEWRG recommendations were presented in a Likert-type scale format. These recommendations included participant perception on the implementation of a confidential survey applicant feedback system, the possibility of moving to a national oversight model for the DPE system, the perceptions of and improvements seen as necessary for the current FAA DPE locator website, the possibility of treating oral and flight exams as separate events and changing medical certificate requirements for DPEs.

Results

Valid responses were received from 306 DPEs, providing a response rate of 36%. DPE respondents indicated oversight by 68 of the 77 FSDOs nationwide. Responses to the flight training provider survey were received from 773 flight training providers, providing a response rate of 41%. Flight training providers were located in all 77 FSDO offices nationwide.

Demographics

When asked about the length of time they had served as a DPE, 81% of responding DPEs indicated three or more years of service with 45% indicating they had been a DPE for more than 10 years. While 18% of responding DPEs reported full-time DPE service, the majority (67%) reported part-time DPE service due to other part-time or full-time work commitments. Only 15% were part-time DPEs with no other work commitments.

The average number of practical tests conducted by the respondents was 11.6 per month (SD 8.27) and the median was 10 per month. The minimum testing activity reported was 0.25 tests per month with the maximum testing activity reported as 70 tests per month (see Figure 1). Of the responding DPEs, 54% indicated doing 10 or less tests per month, while 46% reported doing 11 or more a month. When asked their perception of their workload, 92% of respondents reported doing approximately the number of tests they want each month.

Figure 1
DPE Reported Average Number of Check Rides Per Month
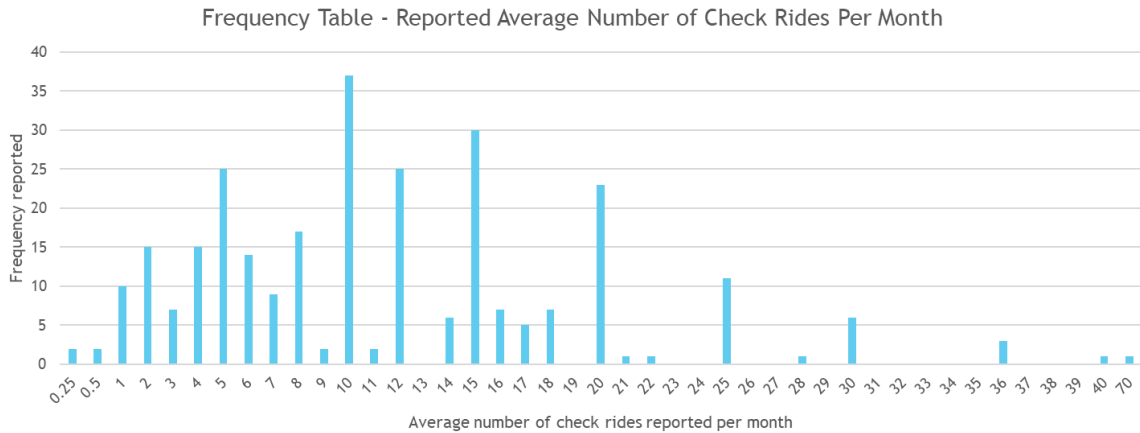
Flight training providers reported an average fleet size of 10.2 aircraft with a minimum of one aircraft and a maximum of 100 aircraft, and an average number of flight instructors of 11.4, with a minimum of one instructor and a maximum of 250 flight instructors. The flight training provider respondents were asked to identify their position within their organization, and these responses can be seen in Table 1.

Table 1
Flight Training Provider Responding Personnel Organizational Position

Position Title	Percent
Director of Operations	15.5%
Chief Instructor	27%
Assistant Chief Instructor	7%
Line Instructor	32%
Training Support Personnel	2%
Other*	17%

*Note – "other" was most frequently indicated to be
        owner/founder/President/CEO

Current State of the DPE System

Respondents in both groups were asked about their perception of wait time to schedule a practical test. The survey question was phrased to elicit a response about the initial scheduling attempt, with no regard to weather or other subsequent delays. Of the DPE respondents, 79% reported a two week or less wait time, with 21% indicating a three week or more wait time. Flight training providers' response

to this question resulted in 40% indicating a wait time of two weeks or less, with 60% reporting a three week or more wait time.

Flight training providers were asked about their overall perception of the availability of DPEs to conduct practical tests for their flight students. Only 15% of responding flight training providers indicated DPE availability was appropriate with 1% indicating an excess of available DPEs. DPE availability was indicated as either somewhat of an issue (35%) or a significant issue (49%) for their students.

When asked about the perception of the number of DPEs within their FSDO geographic area of responsibility, the majority (73%) of responding DPEs indicated the right number in their area, with 21% indicating there were too few and 6% reporting that there were too many. Of the flight training provider respondents, 83% indicated that there were too few DPEs in their region, with 16% responding that there were the right number and 1% indicating there were too many (see Figure 2).

Figure 2

*Contrasting Perceptions of DPEs and Flight Schools Regarding DPE Availability*
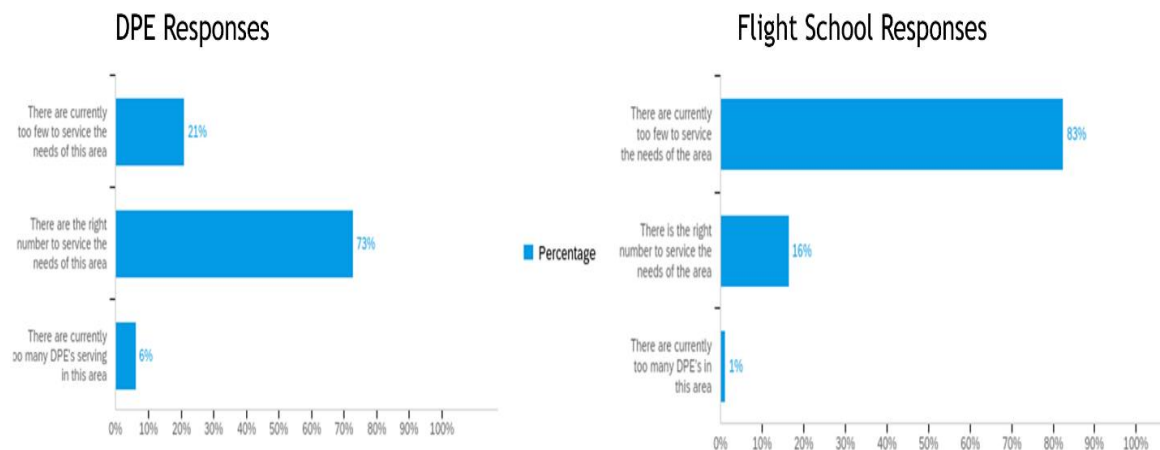
DPEs were asked about travel issues associated with scheduling and conducting practical tests. Of the responding DPEs, 73% indicated that they travel to geographic areas outside their oversight FSDO. When asked about applicants traveling to the DPE for a practical, 83% of responding DPEs indicated that less than 40% of applicants traveled to them from outside their managing FSDO's geographic area of responsibility. Flight training providers were asked similar questions. A significant majority (76%) of these providers indicated that less than 40% of their students travel to a DPE outside of their geographic region. DPEs were brought in for a practical test from other geographic regions by 36% of responding training providers.

**Perceptions of Selected DPERWG Recommendations**

One recommendation from the DPERWG was the development of a confidential survey feedback system, administered by the FAA, by which applicants are encouraged to complete a survey regarding their practical test experience. Of the responding DPEs, 56% indicated being in favor (34%) or strongly in favor (22%) of a feedback system. Approximately a third (35%) indicated no preference. Of responding training providers, 82% indicated being in favor (32%) or strongly in favor (50%) of such an applicant feedback system (see Figure 3).

Figure 3

Perception of the Development of a Confidential Survey Feedback System to be Administered by the FAA
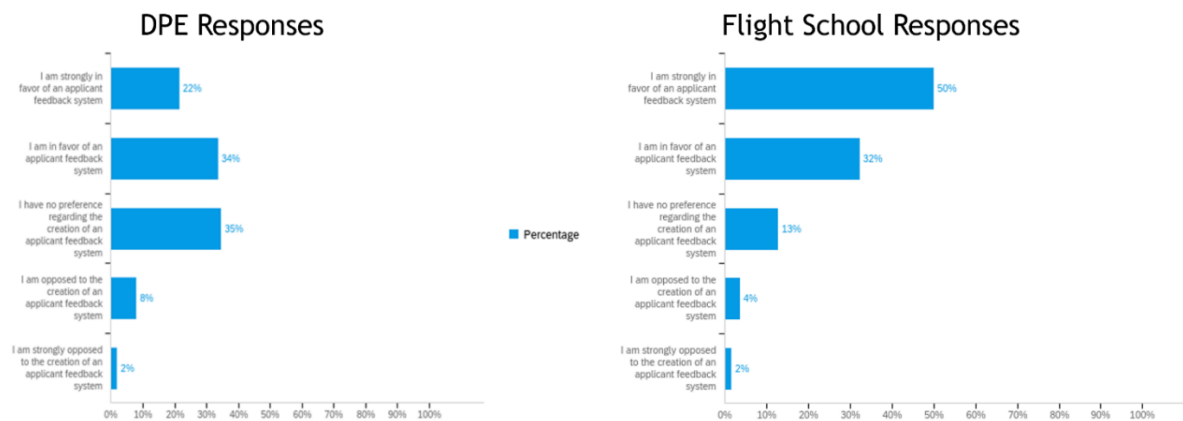

Another DPERWG recommendation was that the FAA develop a centralized national oversight model of the DPE system versus continuing with the existing local FSDO oversight of DPEs. While 44% of DPEs believed (24%) or strongly believed (20%) a national oversight model for DPEs would be detrimental, the most selected response (36%) was, "not sure if this would be beneficial or detrimental." Results from the flight training providers showed that 41% somewhat believed (18%) or strongly believed (23%) a national oversight model would be beneficial. Again, the most selected response (43%) was "not sure if this would be beneficial or detrimental," (see Figure 4).

Figure 4

Perception of Moving to a National Oversight Model for DPEs
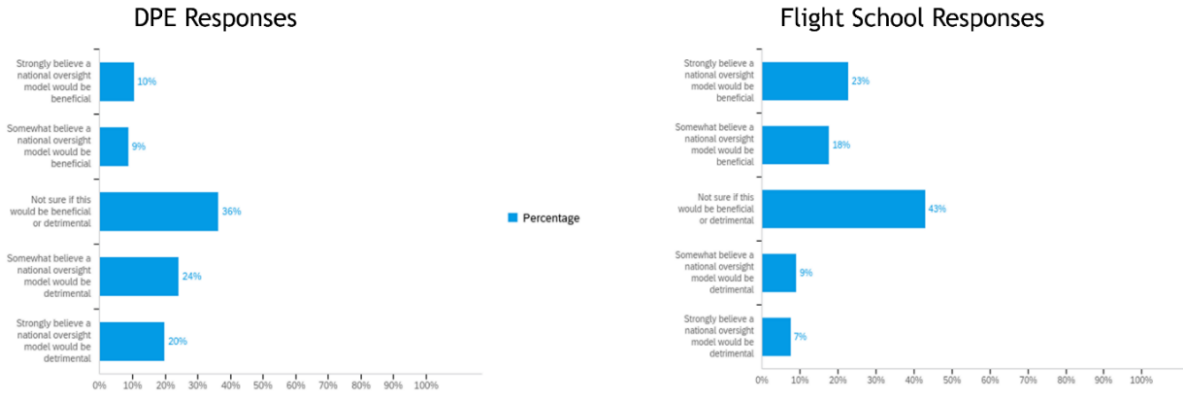
Respondents were asked about their perception of the effectiveness of the current DPE locator function provided on the FAA website. DPEs responding indicated (55%) a perception that the function is very or somewhat effective, while 27% believed it was ineffective or very ineffective. Training providers (57%) believed the DPE locator website is very or somewhat effective, while 19% believed it was ineffective or very ineffective (see Figure 5). A follow up question asked for specific comments regarding how to improve the website functionality, and these comments will be discussed in the Conclusions section below.

Figure 5

Perceptions of Effectiveness of FAA's DPE Locator Website
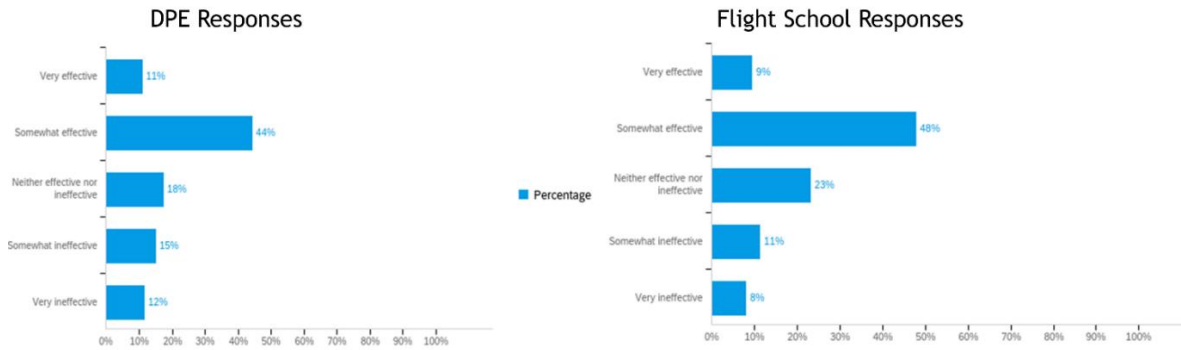
Strong agreement between responding DPEs and flight training providers existed regarding the DPERWG recommendation that an oral test be allowed to proceed even if it seemed likely that weather or maintenance issues would prevent the conduct of the flight portion of the test on the same day. Of the responding DPEs, 86% felt it would be beneficial to be able to conduct an oral test even if it

was unlikely a flight test could proceed after successful completion of the oral portion. The large majority (86%) of flight training providers also believed it would be beneficial to be able to conduct an oral test even if it was unlikely a flight test could proceed after successful completion of the oral portion (see Figure 6).

Figure 6

Perception of Allowing an Oral Exam to be Conducted Even if the Flight Test is Unlikely That Day
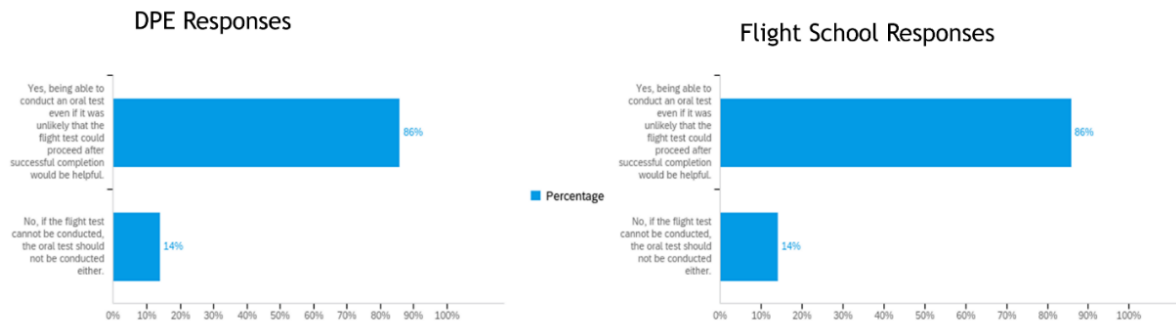
A related DPERWG recommendation was to separate the oral and flight portions of the practical, allowing an applicant who failed the oral to still be able to attempt the flight portion of the test. A large majority (81%) of DPEs believed that a flight test should not be given if the applicant failed to successfully complete the oral portion. Of responding flight training providers, 59% believed a flight test should not be conducted if an oral test was not successfully completed (see Figure 7).

Figure 7

*Perception of Allowing a Flight Test Following Failure of an Oral Exam*

Another DPERWG recommendation was revising the medical certificate requirements for DPEs to be in line with the aircraft and operating requirements necessary for the check ride they are conducting, versus continuing to require a minimum of a third class medical for all DPEs. This would provide the opportunity

for DPEs to use the provisions of BasicMed, as appropriate. There was support or strong support (79%) by DPEs for allowing the conduct of check rides under the provisions of BasicMed. That support was echoed by flight school respondents, with 81% indicating support or strong support of the use of BasicMed as appropriate (see Figure 8).

Figure 8

Perception of Allowing DPEs to Conduct Check Rides Using BasicMed as Appropriate Versus Requiring a Minimum Third Class Medical for DPEs
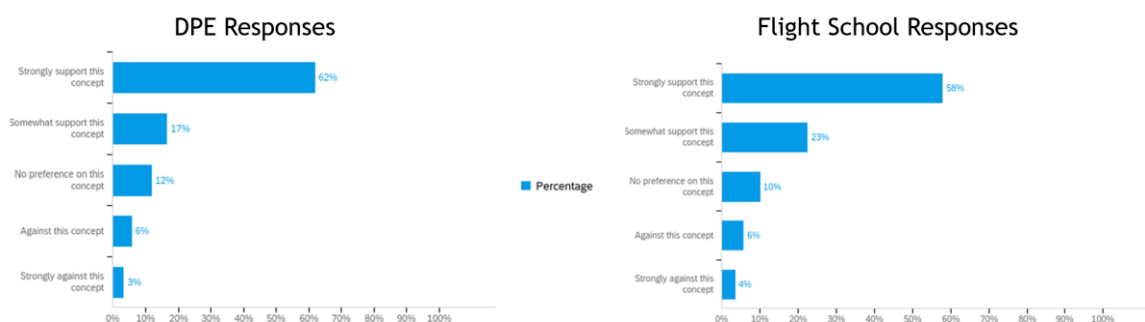
A related recommendation was that DPEs who are no longer able to maintain their medical be allowed to conduct oral tests. For the DPE respondents, 46% strongly or somewhat supported the concept, while flight school respondents were more strongly in favor of the concept, with 62% indicating support or strong support for the idea.

Conclusions

Based on both the reported wait times for check rides and the perceived availability of DPEs within a geographic region, the results of this study indicate significant differences in perception regarding DPE availability between DPEs and flight training providers. Specifically, DPEs perceive less wait times and greater availability of check rides than do flight training providers. This mismatch between perceptions may be the result of flight training providers having to contact multiple DPEs to determine schedule availability, and the frustration that likely stems from repeatedly finding longer wait times than hoped during that search. Flight training providers indicated a significant amount of time is spent trying to locate a DPE with availability within a two-week timeframe.

Conversely, DPEs considering their specific individual availability and schedule may not perceive overall availability as an issue. In some cases, there appears to be a communication breakdown between applicants needing check rides and DPEs able to provide those check rides, resulting in DPE availability going unused while applicants endure long wait times. In qualitative survey comments and during follow up conversations with the primary investigator which were

initiated by a number of DPEs, frustration was expressed with the scheduling of practical tests by applicants who anticipate finishing a course of training at a particular time but who are subsequently unable to meet that deadline. This results in cancellations on short notice which DPEs are then in large part unable to fill. Like flight training providers, DPEs also report a large administrative burden associated with scheduling, cancellations, and rescheduling of applicants. The key to effectively mapping applicants to check ride availability may lie in the FAA providing a more efficient tool for applicants and DPEs to use which could assist in maximizing the utilization of the available check ride slots.

Recommendations

DPE Locator Website Improvement

The logical tool through which to improve scheduling efficiency would seem to be the FAA DPE Locator website. As indicated in the Results section, 27% of DPEs and 19% of flight training providers felt that the DPE Locator website is either ineffective or very ineffective. Respondents were provided open-ended questions allowing them to provide feedback about the functionality of the FAA website. From the DPEs, 84 specific suggestions were made to improve the Locator function, with major themes including:

1. Make the Locator more user friendly, especially with regards to authorization types and more search parameters (24 comments).
2. Allow a geographic search within a radius of a zip code versus search by city; provide a map (19 comments).
3. Keep it current and updated (16 comments).
4. Advertise it and make it more accessible (13 comments).

There were 188 specific flight training provider suggestions made to improve the Locator function, and these included the following most frequent themes:

1. Keep the site updated. Remarks indicated that some DPEs listed are inactive and some newer DPEs are not reflected. (48 comments).
2. Provide maps/zip code search/search by radius (30 comments).
3. Add DPE availability and scheduling functions (28 comments).
4. Advertise it. Many training providers were not aware the Locator function existed. (22 comments).
5. Identify which DPEs are authorized for which practical tests in plain language (13 comments).

It is worth noting that four of the top five suggestions made by flight training providers overlap with the top four suggestions made by DPEs. The one that flight training providers requested but that was not identified by DPEs is the idea of adding DPE availability and scheduling functions on the DPE Locator website. Given the technology readily available today, centralizing check ride scheduling by allowing applicants to find the nearest, earliest available appropriate slot and

schedule themselves for it electronically seems a reasonable goal for the FAA to aspire to. As issue not examined as part of this study but which would need to be incorporated into a Locator function that allowed actual check ride scheduling would be the check ride rate information for each DPE. Given the difficulties the agency has had with producing user-friendly interfaces for other software applications, contracting this task to an appropriate organization with the expertise to do it well would likely be the best path forward.

Traveling for Check Rides

It is encouraging that a majority of both DPEs and flight schools indicate that less than 40% of applicants travel outside their geographic region for a check ride. However, even if a conservative 10% of applicants are estimated to travel, given 94,000 check rides conducted by DPEs in 2021, this would mean over 9,400 applicants traveling outside their geographic area. While it was not possible to determine how far an average applicant traveled for a check ride from the survey data, at a conversative estimate of $400 of travel expenses per check ride (i.e., rental of aircraft for one hour flight to a DPE both ways), this equates to an annual total cost of $3.76M to applicants.

On the other side of the travel equation, 73% of responding DPEs indicate they now travel outside their geographic area to conduct check rides, but only 19% report traveling outside their geographic area for more than 40% of their check rides. For flight schools, 62% report less than 40% of their students' check rides done by DPEs coming in from other geographical regions. While this data is also encouraging, if once again a 10% DPE travel rate is assumed, 9,400 check rides in 2021 would have also done by DPEs who traveled outside their geographic area. Whether DPEs absorb the cost of their travel by reflecting it in their check ride rates or applicants or flight schools pay the travel expenses, if a conservative $200 estimate of travel costs per check ride is utilized, this results in another $1.88M in travel costs experienced annually by the flight training industry. Given the costs associated with travel, matching the local demand for check rides with the local supply of DPEs should be a high priority for the FAA. While eliminating the travel restriction for DPEs was a good stop-gap measure and should be continued so maximum flexibility is assured, this should not be viewed as the optimal long-term solution. Developing data collection and analysis methods to ensure the proper alignment of DPEs to areas of demand is the next step to ensuring costs to applicants are minimized.

DPERWG Recommendation Perceptions

DPEs and flight training providers demonstrated consensus on four of the DPERWG recommendations for which responses were solicited. These were:

> 1. Implementation of an applicant feedback system. Because 91% of DPEs indicated being in favor, strongly in favor, or having no preference

regarding such a system, and 95% of flight training providers indicated the same, it appears such a system should be implemented.

2. Allowing oral tests to be conducted even if weather or mechanical issues will likely prevent conduct of the flight test on the same day. Both 86% of DPEs and training providers indicated their support or strong support.

3. Allowing DPEs to conduct practical tests under the provisions of BasicMed as appropriate by aircraft and operating requirements. Both DPEs (79%) and flight training providers (81%) indicated support or strong support.

4. Not allowing a flight to be conducted if an oral test was failed on the scheduled test day, with 81% of DPEs and 59% of flight training providers agreeing this was not a concept which should be implemented.

While respondents had distinct views, either positive and negative, on every other item in this study, one DPERWG recommendation on which both DPEs and training providers indicated a lack of ability to form an opinion was on the "potential benefit of moving to a centralized national oversight model for the DPE system." Both responding DPEs (35%) and flight training providers (41%) indicated they were not sure if this would be beneficial or detrimental. This lack of a position is likely the result of not knowing what this system would look like and or how it would operate. Before moving forward with such a plan, the FAA should communicate more clearly the policies and procedures which would accompany such a change so stakeholders can provide appropriate feedback.

FAA Responses to the DPERWG Recommendations

While the results of this survey were shared with the FAA in the early spring of 2022, it is likely the agency response to the DPERWG was in large part already formulated by that point. In June of 2022 the FAA published their response to the 12 DPERWG recommendations. Five responses are specifically relevant to the survey responses from this study and were essentially in line with the data collected. These include:

1. The FAA agreed with the DPERWG recommendation that the designee locator should be improved, acknowledging that the current locator is not user friendly and has limited functionality. This recommendation was listed in the "implemented or in process" state in the agency response. The FAA further indicated that a list of potential improvements continues to be developed and implemented as resources allow. It additionally stated that a national oversight model for the DPE system would assist with collection of data to make the site more useful.

2. The FAA accepted the recommendation that an applicant survey system, possibly integrated with the current Designee Management System (DMS), would be beneficial as a supplement to the current indicated procedure of interviewing a sample of recently tested airmen for feedback. However, the

agency further stated that implementation of such a system would require additional funding approval.

3. The FAA accepted the recommendation that DPEs should only be required to obtain the medical eligibility necessary to act as Pilot-in-Command (PIC) for the operation being conducted during a practical test. It indicated regulatory amendments would be required to allow this and cited that time would be needed to accomplish it.

4. With regards to the segmentation of the oral and flight portions of practical tests, the FAA acknowledged the scheduling benefit which could be realized by DPEs being able to conduct an oral exam even if a flight portion was not likely to be completed the same day. The agency further stated its belief is that this can be accomplished by modifying current policy within the current regulations, and agreed the integrity of the test would not be impacted by accomplishing the two portions on different days.

5. With regards to the other potential segmentation of oral and flight DPERWG recommendation, the FAA strongly opposed allowing an applicant who has failed the ground portion of a practical test to advance to the flight portion. The agency indicated this would not be in support of the ACS concept which integrates knowledge, risk management, and skill into the standards. The recommendation of having DPEs who only conduct oral exams due to not being able to hold a medical was also addressed in this response, with the agency reiterating its stance that the oral and flight must be integrated.

National Oversight Recommendation

One recommendation made by the DPERWG which was conceptually supported by the FAA in its response but that was not positively supported by the responding DPEs, and flight schools was the development and implementation of a national level oversight structure for the DPE system. In its response to this particular recommendation, the FAA indicates that the feasibility of such a change in structure must be further investigated before it can commit to such a concept. However, it is worth noting the agency references the possibility of establishing a DPE national oversight model in its responses to five other DPERWG recommendations, in addition to the specific recommendation about a national oversight model. Given this frequency of mention and positive response to the actual recommendation about national oversight, it appears the agency is enthusiastic about this potential approach. While clearly in the earliest stages of consideration, given the majority of survey respondents were neither positive nor negative in their response regarding this recommendation, it is clear the ability for all stakeholders to provide input on any forthcoming movement in this direction should be a top priority of the agency. While some of the recommendations made by the DPERWG would require regulatory changes, and thus industry awareness

of these proposed changes would occur through the Notice of Proposed Rulemaking (NPRM), other changes that have been proposed would simply be internal FAA policy and would require no public input. Given the potential impact of any changes, FAA solicitation of feedback from a wide representation of constituents should be considered best practice by the agency.

Future Research

The results described above are limited to a descriptive analysis of the Likert-type scale survey questions which were presented to DPEs and flight schools nationwide. While the response rates were very strong for a survey methodology, it is worth noting there may have been more impetus for those who are currently dissatisfied with the DPE system to respond versus those who do not see issues with the system.

A more detailed analysis of additional items asked on the surveys such as the DPE reported length of check ride testing time required for various certificate and ratings, as well as a more nuanced approach to looking at subsets of the data, will be the next step. For instance, the difference in responses between various geographical areas may be useful in determining where there is the greatest need for additional DPEs versus where adequate DPE resources currently exist. In addition, the variation in responses between small flight schools and larger ones, and between DPEs who conduct a large number of check rides per year versus a minimal number, may also reveal differences in perceptions that could lead to a more nuanced approach to improving the DPE system.

In addition, as the FAA moves forward with further consideration and implementation of the DPERWG recommendations, it is suggested that additional surveys to garner stakeholder input be conducted. As mentioned previously, the FAA personnel who provide oversight of DPEs were not able to participate in this study but providing a mechanism for these individuals to share their perceptions of the DPERWG recommendations would likely provide valuable insights. A final area which bears more investigation is the relatively small number of Part 141 schools who have been granted examining authority. It is unclear whether a number of such schools have requested examining authority and been denied, or if schools have simply not applied for this authority. In either case, increasing the use of this alternative method for airman certification should be examined in parallel with the effort to improve the DPE system. Improving the FAA certification process in terms of both effectiveness and availability of check rides is a cornerstone of ensuring the continued safety and success of the aviation industry.

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