



Federal Aviation Administration

Memorandum

Date: June 5, 2023

To: All General Aviation Division Managers (AFG-100 – AFG-800)

From: Robert Reckert, Manager, Air Transportation Division, AFS-200

Subject: Policy Deviation – Circling Approach Approval Process for Part 142 Training Centers

The Air Transportation Division (AFS-200) received a Memorandum dated April 20, 2023, from the 142 Certificate Management Office (CMO). The 142 CMO requests a policy deviation from FAA Order 8900.1, Volume 3, Chapter 54, Section 6, Paragraph 3-4533. The purpose of the deviation is to authorize inspectors to utilize the criteria found in the Airline Transport Pilot and Type Rating for Airplane - Airman Certification Standards, (ACS) instead of the current FAA Order 8900.1 policy for approving circling approaches. The 142 CMO requests that the deviation be approved for all FAA offices with part 142 training center certificate management responsibilities.

The circling approach criteria in the ACS was updated in 2019. However, the inspector guidance for approving circling approaches for part 142 training centers in FAA Order 8900.1 has not yet been updated to harmonize with the ACS change. A revision to FAA Order 8900.1 Volume 3, Chapter 54, Section 6 paragraph 3-4435 is in progress that will harmonize the inspector guidance with the ACS. The proposed deviation would allow for immediate alignment with the current ATP ACS standards found on page A-24 of Appendix 7, which states:

Task G. Circling Approach

The approach and landing scenario must include visual maneuvering from the final approach course to a base or downwind leg, as appropriate, for the landing runway. The applicant may circle to land on a runway that is less than 90-degrees offset from the final approach course provided the applicant makes at least 90 degrees of total heading change(s).

The policy deviation will allow for approval of circling approaches that would meet current ATP ACS testing criteria until FAA Order 8900.1 guidance can be updated. Specifically, it would allow inspectors to approve circling approach procedures based on a deviation to FAA Order

8900.1 Volume 3, Chapter 54, Section 6 paragraph 3-4435, (C)(2) note and (C)(2)(a)(2). The current guidance states:

(C)(2) - NOTE: Circling approaches approved for use in a part 142 training program must have a minimum of 90 degrees between the approach course and the landing runway heading.

(C)(2)(a)(2) - Only IAPs with a landing runway heading that is at least 90 degrees from the final approach course may be approved for use.

The 142 CMO states that the deviation has considerable benefits. Among those benefits are the opportunities to train and evaluate a larger variety of circling approaches which will enhance a pilot's exposure to circling approaches. AFS-200 agrees that the deviation will enhance safety because it will create the opportunity for part 142 training centers to utilize circling approaches that more realistically replicate "real-world" scenarios that students will encounter in operations. AFS-200 notes that the current requirement for inspectors to evaluate each proposed circling approach remains unchanged and the deviation only alters the criteria inspectors will utilize for the approval of circling approaches. Therefore, AFS-200 agrees that the deviation will not present any additional risk by allowing inspectors to approve circling approaches for use in part 142 curriculums that align with the requirements of the current ACS.

The 142 CMO requests that the deviation be extended to "all FAA offices responsible for part 142 training center certificates nationwide to address the common challenge." AFS-200 agrees that it is appropriate to include all FAA offices with part 142 training center oversight responsibilities in this deviation. Therefore, AFS-200 agrees with the 142 CMO's policy deviation request and that the deviation be extended to all FAA offices with part 142 training center oversight responsibilities subject to the following conditions and limitations:

To align with current ACS standards for circling approaches, inspectors are authorized to approve a circling approach if the following standards are applied:

1. Circling approaches approved for use in a part 142 training program must require that the pilot make a minimum of 90 degrees heading change for the approach procedure to be approved.
2. IAPs may be approved with less than a 90-degree offset from the final approach course when the execution of the circling procedure would normally expect the pilot to make at least 90 degrees of total heading change(s).

If you have any questions, please contact Chris Hammon, manager, Training and FSTD Policy Development, Training and Simulation Group, AFS-280, at (314) 737-0963.