

# Instrument Currency: Proficiency versus Incompetence

Why the IPC should matter to ALL instrument pilots.

by Matt McDaniel

**W**hen I earned my instrument rating 20-something years ago, there were questions on the written exam about instrument currency and how to maintain, lose, and regain it. Similar questions were posed by the examiner, within carefully crafted scenarios, during the oral exam. The FAA has generally taken instrument currency quite seriously; they recognize that instrument flying skills erode rapidly and can even be perishable.

## Exactly the Same, but Different

Back then, if one allowed their instrument currency to lapse, you had six months to take advantage of a grace period for regaining it. During the six-month grace period, the pilot could acquire the necessary recent experience to become current again (via any combination of flying with an appropriately rated safety pilot or qualified instructor). If the grace period was also allowed to lapse, there were only two ways available to become instrument current and legal again.

One option was to retake your instrument checkride! An option I believe was rarely exercised. The second option was to pass an Instrument Competency Check (ICC) with a CFII. In the early 1990s, the ICC was re-branded as an Instrument Proficiency Check (IPC), but the requirements remained largely identical. I don't claim to know the reason(s) for the semantics change; however, I've always wondered if it was partly driven by political correctness. After all, doesn't it seem kinder and gentler to say an instrument pilot is not proficient than to proclaim them incompetent?

## Clearly Ambiguous

More recently, there have been multiple gaffes concerning the regulations governing instrument currency and

proficiency [specifically, FAR 61.57(d)]. In 2009, in an apparent attempt to clarify precisely when an IPC was required to act as PIC under IFR, the FAA revised FAR 61.57(d). The revision created further confusion and the regulation was restored to its previous wording via a technical correction. In late 2011, another attempt at clarification was made. The results were similar, in that confusion again swirled around exactly what 61.57(d) was saying. For a few months, most industry "experts" believed that the revision had effectively eliminated the six-month grace period for regaining instrument currency, requiring an IPC anytime instrument currency lapsed (assuming PIC operations under IFR were necessary).

This was seen by many as a major step backwards by eliminating alternatives to regaining instrument currency; and caused the various aviation advocacy groups to react negatively to the new perceived meaning of 61.57(d) and to pressure the FAA to issue an official interpretation of the new wording. The FAA's reaction was to say that the rewrite of 61.57(d) was never meant to eliminate the IFR currency grace period. Rather, they said, it was meant to make it more clear when an IPC would be *required*. Unfortunately, that just wasn't the case. On Feb. 28, 2012, the DOT/FAA's Office of Chief Counsel issued an official interpretation of the Dec. 16, 2011 rewrite of FAR 61.57(d).

That letter of interpretation says, in part, "...a pilot must perform the instrument recent flight experience required by 61.57(c) within 12 months of the last date that the pilot was able to act as PIC under IFR or weather conditions less than the minimum prescribed for VFR. If a pilot fails to meet the recent flight experience within this 12-calendar-month period, then the pilot must pass an IPC in order to act as PIC under IFR or in weather conditions less than the minimums prescribed for VFR."

Simplified, the IPC is only *mandated* if an instrument pilot allows their six-month instrument currency to lapse *and* does not regain that currency in an acceptable manner in the subsequent six-month period. So, at the heart of the matter, 61.57(d) remains pretty much the same as it has since the ICC became the IPC. That is the legal and textbook discussion of IPCs, let's get to the practical side of this discussion.

### The IPC: Unfairly Perceived?

We've established when you *must* pass an IPC, but, does that mean you should only take an IPC when it is mandated by the FARs? Certainly, it does not. If you have bothered to read this far, you have gotten to my real motivation for writing this article – to change the perception of the IPC. An IPC does not have to be a reliving of your instrument checkride. Yes, it is an event that requires the pilot to perform to specific standards. Yes, it can be passed or failed, but failure of an IPC should not be viewed so harshly. Such "failures" are not grounds for any sort of "pink slip" issuance, FAA notification, or even a negative logbook entry. An IPC, taken with your typical CFII, definitively has performance

standards you must demonstrate. While the failure to do so would prevent you from passing the IPC, such a flight would simply become an instructional event and could be logged as such. An IPC should be seen as an opportunity to become better acquainted with your instrument flying strengths and weaknesses. From that, one can devise better training and practice regimens. Developing such routines can foster an acute self-awareness which will help you to recognize mistakes in the present, rather than only in hindsight, and deal with them accordingly.

I believe the IPC has a conflicted existence amongst the ranks of instrument pilots. I further believe the blame for that lies squarely within the ranks of CFII's. While there are many ways to conduct an IPC and to be creative in doing so, there is no way around the testing requirements or performance standards. I think this is where some CFII's create confusion. They either don't ask their client to perform all maneuvers required by an IPC or they don't require the specific performance standards to be met, or both. The IPC is less open-ended than a BFR and must be treated differently. Yet, many instructors I have known treat them equally, and are reluctant to tell a client that their performance is not up to par. This not only creates a false sense of security for the client, it destroys any opportunity for that client to develop a true understanding of their skill level, their weaknesses, and their strengths. Some might say that many IPCs are "pencil whipped." I'd agree with that, but that doesn't mean that they are necessarily given at the airport café over a coffee and slice of pie, as such a description might imply. Any IPC that is issued by the CFII after less than the required maneuvers were

*The author and fellow CSIP, Bill Frank, flying the ILS 10 at Waukesha, Wis. (KUES) in an Avidyne R9-equipped Cirrus in actual instrument conditions. They've just broken out of the rainy overcast at around 600 feet AGL and the runway lights are visible 1.5 miles ahead.*



performed, or less than minimum levels of performance were demonstrated, could be viewed as pencil whipped; and that is a true disservice to the pilot being evaluated.

How do you, as the instrument pilot, use this information? That is simple. Stop viewing the IPC as an ultimatum and begin viewing it as an opportunity. Consider making the IPC a routine component of your instrument practice/training plan. Take one every six months to a year, whether you legally need one or not. Not only will a passing performance reset your instrument currency, your performance (good or bad) will reveal things about your abilities that you probably didn't realize. Things that you can train away or embrace, and things that even your trusted CFII may have never seen or known about you before. An IPC, when conducted by the book, is one of the very best tools to opening a pilot's eyes about their abilities, their rust, and their habit patterns that I (as an experienced CFII) have found.

### IPC Requirements: Hiding in Plain Sight

While it might be tough for many of us to admit, there are undoubtedly going to be a number of pilots reading this that have passed many IPCs, yet have no idea what is really required by an IPC (in maneuvers or standards). Many CFII's giving those same IPCs are equally uninformed. Exactly what *is* required on an IPC and where can you find that information?

Most pilots are familiar with the Practical Test Standards (PTS) that exist for each certificate and rating. Each PTS outlines *exactly* what knowledge areas may be tested (and which *must* be tested) during both oral and flight exams. These are separated into "areas of operation" and further divided into "tasks" within each area. Also detailed are the *exact* minimum performance standards required for each task. What many don't realize, is that the Instrument Pilot PTS also outlines those same requirements for IPCs. Within the Instrument Pilot PTS is a Ratings Task Table (shown in Figure 1). This table details which areas of the PTS are required elements for the various types of instrument ratings (airplane, helicopter, powered lift), as well as IPCs. Specifically, the table notes that an IPC in a single-engine, fixed-wing aircraft must include the following, at a minimum:

- Holding Procedures (Area III.C)
- Recovery from Unusual Flight Attitudes (Area IV.B)
- Intercepting and Tracking Navigation Systems and DME Arcs (Area V)
- Precision and Non-Precision Approaches (Area VI.A & B)
- Missed Approach (Area VI.C)
- Circling Approach (Area VI.D)
- Landing from a Straight-In or Circling Approach (Area VI.E)
- Approach with Loss of Primary Flight Instrument Indications (a.k.a., "Partial Panel") (Area VII.D)
- Post Flight Procedures (Area VIII)

Within each of the above *areas* are multiple *tasks* and specific performance standards are included for each.

Based on this, no IPC should include any real surprises and no standard that you are held to should be a mystery. If either is the case, ask for a thorough explanation from your CFII. If you are not satisfied with the answers, challenge them. That is your right as their client. Your CFII should be creative enough to find unique ways to incorporate the required elements into your IPC, while keeping it fresh and challenging each time around.

### Random Exclusion: The IPC's Missing Links

I've given hundreds of IPCs over the years. In doing so, I generally look over the client's logbook for evidence of their instrument activity in the preceding year and/or previous IPCs. One of the things I see most is previous IPCs that were technically incomplete (judging by the list of maneuvers logged by the CFII). During or after the IPC, I often hear the client say, "I never had to do a [insert required maneuver] on an IPC before!" Nearly every IPC includes precision and non-precision approaches, at least one missed approach, and some amount of partial panel work. All other required tasks are subject to random

RATING TASK TABLE				
ADDITIONAL INSTRUMENT RATING DESIRED				
Area of Operation	Required TASKS are indicated by either the TASK letter(s) that apply(s) or an indication that all or none of the TASKS must be tested.			
	IA	IH	IPL	IPC
I	NONE	NONE	NONE	NONE
II	A, C	A, C	A, C	NONE
III	NONE	NONE	NONE	C
IV	ALL	ALL	ALL	B
V	NONE	NONE	NONE	ALL
VI	ALL	ALL	ALL	ALL*
VII	ALL**	ALL**	ALL**	B, C, D**
VIII	ALL	ALL	ALL	ALL

**LEGEND**  
**IA** Instrument—airplane  
**IH** Instrument—helicopter  
**IPL** Instrument—powered lift  
**IPC** Instrument—proficiency check

**NOTE:** Except as noted, all TASKS are required for *initial issuance* of an instrument rating.

\* TASK D, Circling Approach, is applicable *only* to the *airplane* category.  
 \*\* TASKS B and C are applicable *only* to *multiengine airplanes*.

Instrument Proficiency Check. 14 CFR part 61, section 61.57(d), sets forth the requirements for an instrument proficiency check. The person giving that check shall use the standards and procedures contained in this PTS when administering the check. A representative number of TASKS, as determined by the examiner/instructor, must be selected to assure the competence of the applicant to operate in the IFR environment. As a minimum, the applicant must demonstrate the ability to perform the TASKS as listed in the above chart. The person giving the check should develop a scenario that incorporates as many required tasks as practical to assess the pilot's ADM and risk management skills during the IPC.

1-vii FAA-S-8081-4E

Figure 1: The Rating Task Table from the most recent revision (FAA-S-8081-4E) of the Instrument Pilot Practical Test Standards. The "IPC" column on the far right details the minimum required tasks to be successfully completed to qualify for an IPC. The asterisks and expanded notes at the bottom offer additional details.

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exclusion based on my investigations. Here are some thoughts on why I think that is:

**Holding Procedures:** Depending on where you fly the most, holds may be something you rarely, if ever, encounter. Therefore, holding practice and training often get set aside after acquiring an instrument rating (in spite of the currency requirement regarding them). Regardless, holding proficiency is critical to safe instrument flying. They can be truly challenging – ATC can issue one anytime/anywhere, and one is included in nearly every published missed approach procedure. Today's FMS and GPS units generally include published holding patterns (affiliated with an instrument approach) in their databases. This eases the mind of many instrument pilots and makes many CFIs feel that holding training has become almost superfluous. However, en route and non-published holds are *not* in the majority of GPS/FMS databases. Nor do many such units have the ability to build them. Even those that do have such capabilities require practice to deftly utilize such advanced features. While the PTS technically allows the CFI to choose which type(s) of holds to be demonstrated, a thorough IPC would include both published and non-published holding, with both standard and non-standard holding entries.

**Recovery from Unusual Flight Attitudes:** In Cirrus aircraft, I think this is eliminated often because of the Cirrus/COPA community's focus on CAPS procedures and the early utilization of CAPS in such situations. Nonetheless, they are a required IPC maneuver and one that I see executed terribly on many IPCs (almost certainly due to lack of practice).


**DME Arcs:** I believe this is the most commonly overlooked IPC requirement. DME arcs have fallen out of vogue and are seen less now in "real world" operations. However, there are still many published arcs to be found in conjunction with Terminal Procedures and ATC still has the power to issue non-published DME arcs when and how they choose. Most published arcs affiliated with instrument approaches are within the databases of modern GPS and FMS units. Thus, they are relatively simple procedures if you understand how to manipulate your avionics properly. Non-published arcs, on the other hand, still require an acute situational awareness that many instrument pilots have forfeited to their moving maps! Unfortunately, the same avionics that give us so much information often cause the pilot's ability to visualize a non-published procedure to vanish. Non-published means it's not going to be drawn on the moving map(s) and you're going to need to be able to see it in your mind.

Let me give you a real-world example that happened to me while teaching in a Cirrus. The conditions were IMC with a low-overcast and rain, but otherwise benign. Armed with an IFR takeoff clearance, we launched off of Runway 14 at Rapid City, S.D., entered the overcast at about 600 feet AGL, and checked in with Departure. We then received this rapid-fire response, "Cirrus 12345, our primary radar has failed, fly heading 170, intercept and track the Rapid City 180 radial to the one-zero-mile DME arc and arc

west. Report established on the arc." Surprise was certainly our initial reaction, but we were able to comply with the clearance without difficulty. Would you have been able to?

**Circling Approaches:** This often neglected instrument procedure is becoming less and less common as GPS approaches are certified into an ever-increasing number of runways. This means we usually have an option of a straight-in approach that's at least somewhat into the wind. But, alas, there will always be airports that cannot support straight-in approaches to every runway due to terrain, airspace, or obstruction limitations. Therefore, requiring proficiency with circling maneuvers is unlikely to ever go away.

### The Person in the Mirror

Are you as good of an instrument pilot now as you were on the day of your checkride? Have your skills and knowledge atrophied? Maybe your acquired experience has actually improved them? Are you up to date on the latest developments in instrument procedures and regulations, or are you still doing things exactly as you learned them originally? Either way, you will never know if you don't routinely put yourself to the test while under the watchful eye of someone who knows the differences between average, excellent, rusty, and complacent. Trust a CFII who can see both your attributes and deficiencies, and who has the fortitude to be forthright with you about each. Seek out a reputable CFII, ask for a full blown IPC, and find out if you are proficient or incompetent. 



An R9's Integrated Flight Display, installed in an SR22 G2, passing near South Bend, Ind. (KSBN).

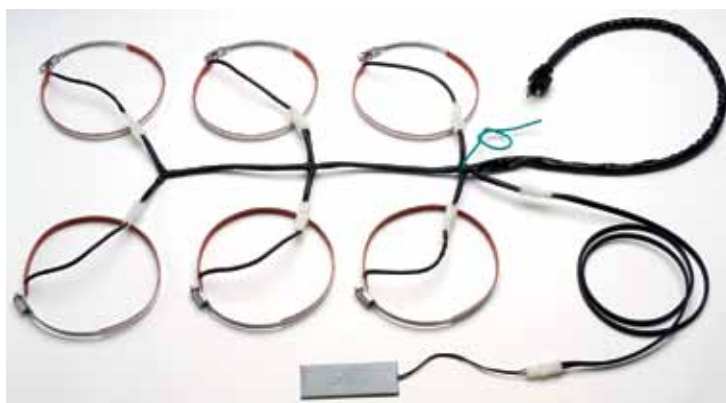
About the Author: *Matthew McDaniel is a Master and Gold Seal CFII, ATP, MEI, AGI, and IGI and Platinum CSIP. In 21 years of flying, he has logged over 12,000 hours total, over 4,500 hours of instruction-given and over 3,500 hours in all models of the Cirrus. As owner of Progressive Aviation Services, LLC (www.progaviation.com), he has specialized in Technically Advanced Aircraft and Glass Cockpit instruction since 2001. Currently, he also flies the Airbus A-319 and A-320 for an international airline and holds six turbine aircraft type ratings. Matt is one of only 26 instructors in the world to have earned the Master CFI designation five consecutive times. He can be reached at: matt@progaviation.com or (414) 339-4990.*

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