

MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

MOSAIC: A New Horizon for Sport Pilots and Flight Training

The FAA's MOSAIC rule decouples aircraft certification from pilot privileges, expanding types of aircraft and creating new training pathways with operational limitations based on performance.

Expanded Pilot Privileges & Training



Night Operations Authorized

Sport pilots may fly at night after receiving specific training and medical endorsements.



Advanced Aircraft Endorsements

Pilots can now qualify to operate aircraft with retractable gear and adjustable-pitch propellers.



Accelerated Sport Pilot CFI Path

Instructors can build time and teach without requiring commercial or instrument ratings first.



Oct 22, 2025
Pilot rules, privileges, and maintenance rules become effective.



July 24, 2026
Removal of traditional "Light-Sport" definition; airworthiness changes start.

Modernized Aircraft Eligibility

59-Knot Stall Speed Limit

Aircraft eligibility is now determined by a clean configuration stall speed (V_{S1}) of 59 knots.



Legacy Aircraft Integration

Common four-seat trainers like Cessna 172s may now be operated by sport pilots.



Simplified Flight Controls (SFDC)

New certification for highly automated systems, preparing for future eVTOL and power-lift vehicles.



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MOSAIC:

Flight Training, Practical Testing and Pilot Privilege Effects

Discussing how MOSAIC rule changes
effect flight training, pilot privilege options,
and practical testing considerations.

Publication and Effective Dates

MOSAIC final rule was published on July 24, 2025, with two effective dates:

October 22, 2025 (90 days after publication)

- Pilot training and certification rules and privileges
- Repairman certification, maintenance rules, and tow-hitch installation
- Class G airspace and right-of-way rules

July 24, 2026 (365 days after publication)

- Removal of "light-sport aircraft" definition from 14 CFR § 1.1
- Airworthiness certification requirements
- Changes in operations, including operating limitations



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What opportunities / challenges does MOSAIC provide for flight training providers?

- New customer base for sport pilot seeking pilots
- Pilots may fly aircraft as “sport pilots” that they couldn’t previously fly
- Lower level Sport pilot CFIs? (lower hours)
- Potential utility of LSA aircraft in the future with higher gross weights



MOSAIC Final Rule Pilot Certification Provisions (14 CFR Part 61)

- This rule separates light sport category aircraft certification requirements from the sport pilot certification requirements and removes the former § 1.1 light-sport aircraft definition.
- Additionally, the rule expands what aircraft sport pilots can operate and adds operational privileges that require additional training and qualification.
- The rule also adds make and model specific training and endorsement requirements for pilots seeking to act as PIC of aircraft with the simplified flight controls designation [SFDC].



What is a SFDC aircraft?

- Not going to be applicable to most of us...
- Preparatory regulatory language for “what might be coming soon...”
- Simplified Flight Controls refer to a modern category of aircraft flight control systems introduced under the FAA's MOSAIC rule, primarily for light-sport aircraft (LSA) and certain other categories like helicopters or powered-lift vehicles.
- These are highly automated flight control systems where **the pilot does not directly manipulate individual control surfaces (like ailerons, elevator, rudder) or engine power** through traditional mechanical inputs (yoke/stick and rudder pedals).
- Think eVTOL aircraft that are being developed.



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Who is a Sport Pilot?

- Anyone who is certificated as a **Sport Pilot** by the FAA
- Anyone who has a pilot certificate at a higher level such as a **Private Pilot, Commercial Pilot, or ATP pilot**.

Who is a 'Sport Pilot'?

The Certificate Holder

Holds a standalone "Sport Pilot" certificate.

Uses a valid U.S. Driver's License in lieu of a medical.

The Privilege Exerciser

Holds a Higher Certificate (Private, Commercial, ATP).

"Downgrades" to Sport Pilot privileges for medical flexibility.

Crucial Distinction: Pilots may be "acting as" a Sport Pilot without being solely certificated as one.



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Pilots with Higher-Grades of Certificates:

There is a difference between “acting as a sport pilot” and being solely “certificated as a sport pilot.”

A pilot with higher level certifications may “exercise the privileges of sport pilot” if they are not qualified to exercise higher level privileges.

A **sport pilot certificate is a standalone pilot certificate** that requires using only a valid U.S. driver's license in lieu of an FAA medical certificate.

Exercising sport pilot privileges refers to a pilot who holds a higher certificate (private, commercial, or ATP) chooses to fly under sport pilot rules—typically to use a driver's license as medical qualification instead of maintaining a current FAA medical—while complying with sport pilot limitations.

The key difference is the certificate level: one is a separate certification level; the other is a temporary "downgrade" of privileges by a more qualified pilot for medical flexibility.



New Aircraft Limitations for Sport Pilots

The MOSAIC final rule removes “light-sport aircraft” definition from 14 CFR part 1.1. Revised aircraft design and performance limitations for sport pilots are listed in the new 14 CFR § 61.316. Here are some of the changes to the aircraft limitations:

- Removal of the aircraft weight and speed limitation
- Use of any powerplant type except turbo-jet
- New maximum **Vs1 stall speed of 59** knots CAS for airplanes [flaps retracted]
- Allows use of 4 seat airplanes, but retains **2 occupant limitation**
- Can operate aircraft with a **retractable gear**
- Can operate airplanes with **manual controllable pitch propeller**
- New rotorcraft-helicopter privilege (only those equipped and certificated with the simplified flight controls designation)



New Aircraft Limitations for Sport Pilots

§ 61.316(a) If you hold a sport pilot certificate [or are acting as a sport pilot], you may act as pilot in command of an aircraft that, **since its original certification...**

“Since Original Certification” requirement:

- Modifications to aircraft to reduce the V_{s1} speed *after* its original certification cannot qualify an airplane for sport pilot use.
- Modifications to reduce seating capacity *after* its original certification cannot qualify for sport pilot use.



Sport Pilots and LSA No Longer the Same Thing

- **MOSAIC separates pilot certification and operational requirements from aircraft certification.** This briefing focusing on sport pilot certification and privileges and, as discussed, § 61.316 establishes performance and design requirements for the aircraft sport pilots may operate. It is important to understand that for the purposes of **light sport aircraft certification**, different criteria area used due to different priorities in aircraft certification. Specifically, § 22.100 uses V_{so} of 61 knots.
- **Sport pilots are no longer limited to operating “light-sport aircraft” but similarly, not all newly certified light-sport aircraft will meet § 61.316 to be eligible for sport pilot operations** because of this separation between pilot requirements and aircraft certification requirements. A light-sport airplane with a V_{S1} greater than 59 knots could not be operated using sport pilot privileges.



Separate Stall Speed Limitations

- The pilot certification section of the final rule established a maximum V_{s1} CAS stalling speed of 59 knots under **§ 61.316**, to *indirectly* limit the weight and cruise speed for **airplanes** that a sport pilot can operate without using a prescriptive weight limit.
- The aircraft certification section adopted an independent 61 knot V_{so} maximum stalling speed limit for the certification of light-sport aircraft under **§ 22.100**. This allowed for a significant expansion of what aircraft can be certificated using consensus standards under part 21.

The MOSAIC rule removes arbitrary weight limitations. The new defining constraint is Clean Stall Speed (V_{s1}). V_{s1} cannot exceed 59 knots CAS (flaps retracted).



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Notes:

- All speeds are in calibrated airspeed (CAS).
- Aircraft can't be certificated to carry more than four occupants total.
- No horsepower limits—powerplants must simply ensure safe performance, as verified through approval processes.
- For multi-engine LSAs, new standards cover airspeeds and emergency procedures to maintain safety.

These criteria ensure LSAs remain forgiving for less-experienced pilots while accommodating advanced features.

If these get made...not currently applicable

- Can't have been denied last medical
- Need only have a current driver's license
- CFI's can provide sport pilot training in traditional aircraft for sport pilot certificates
- Common planes such as C172, Piper Warrior and Cherokee, Stinson, etc. now can be flown under the Sport Pilot Category of aircraft (14 CFR 61.314)
- Sport pilot CFI certification possible with just a Sport or higher level pilot certificate (don't need to get instrument and commercial first)



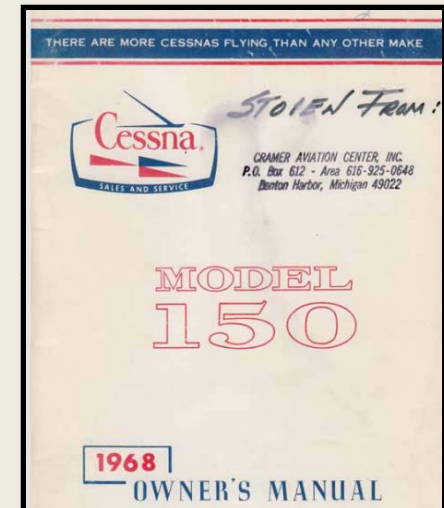
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A handwritten signature in white ink, appearing to read "Jason Blair".

Vs Speed Determination

- Review the aircraft type certificate data sheet (TCDS) or flight manual for the stall speed at the time of aircraft certification.
- Vs1 cannot be more than 59 knots CAS.

Note: To find the TCDS, go to [drs.faa.gov](https://www.faa.gov/drs) and type in TCDS in the search bar on left side. Pick the aircraft manufacturer and type of airplane.



**Vs1 =
CLEAN CONFIGURATION**

56mph = 48.662knots

AIRSPPEED LIMITATIONS.

The following are the certificated calibrated airspeed limits for the Cessna 150:

| | |
|-----------------------------------------------|--------------------------|
| Maximum (Glide or dive, smooth air) | 162 MPH (red line) |
| Caution Range | 120-162 MPH (yellow arc) |
| Normal Range | 56-120 MPH (green arc) |
| Flap Operating Range | 49-100 MPH (white arc) |
| Maneuvering Speed* | 109 MPH |



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Be careful of different models of an aircraft having different Vs speeds

CESSNA 1964
MODEL
172
AND
SKYHAWK

AIRSPEED LIMITATIONS.

| | |
|----------------------|-------------|
| RED LINE | 174 mph |
| YELLOW ARC | 140-174 mph |
| GREEN ARC | 59-140 mph |
| WHITE ARC | 52-100 mph |

| | | |
|---------------|---|---------|
| 59 | = | 51.2696 |
| Mile per hour | | Knot |

The Cessna Aircraft Company

Model 172S

STALL SPEED:

| | |
|---------------------------------|---------|
| Flaps Up, Power Off | 53 KCAS |
| Flaps Down, Power Off | 48 KCAS |



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It may be possible for models of the same aircraft may or may not apply for sport pilot category flight privileges.

One example of a single-engine aircraft with a fixed-pitch propeller and a stalling speed (V_{so} , clean configuration or with flaps as specified) greater than 59 knots is the early Rockwell Commander 112 (1972-1973 models).



X11 5

AIRSPEED

| | | |
|--------------|------------|----------------------------------------------|
| 54-109 KCAS | White Arc | FLAP OPERATING RANGE (20 Deg. to 25 Deg.) |
| 61-143 KCAS | Green Arc | NORMAL OPERATING RANGE |
| 143-180 KCAS | Yellow Arc | CAUTION RANGE (Smooth Air Only) |
| 180 KCAS | Red Line | NEVER EXCEED |



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New Sport Pilot Night Operations Privilege § 61.329

Sport pilots can now conduct night operations after obtaining additional category and class specific night training experience.

- 3 hours of night flight training in the specific category and class from an authorized instructor that includes-
 - At least one cross country with a landing at least 25 nm from departure point
 - 10 takeoffs and landings to a full stop at night

Sport pilots are required to have at least a valid third-class medical certificate or meet the requirements of Basic Med (§ 61.23(c)(3)) to operate at night.

Must receive a logbook endorsement from an authorized instructor certifying that they meet training requirements in specific category and class.

** A private pilot or higher may count night experience but will still need instructor endorsement under § 61.329(c) when acting as a sport pilot at night.*



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Night Flying and Pilots with Higher-Grades of Certificates:

The MOSAIC final rule preamble addressed the scenario of a pilot with a higher-grade pilot certificate who chooses to exercise sport pilot privileges and wishes to conduct the optional night privileges. The FAA clarified that a person who holds a private pilot certificate (or greater) may apply their previous night training experience to meet the training requirements in § 61.329(a).

However, when exercising the privileges of a sport pilot certificate and operating at night, they must have obtained the requisite endorsement under § 61.329(c) even if the pilot holds a higher grade of pilot certificate. Additionally, they must still meet the medical requirements of § 61.329(b) to exercise night privileges.



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New Sport Pilot CFI Night Operations Privilege § 61.415(n)

Qualifications to provide night flight training to sport pilots:

- **Any subpart H (regular) flight instructor**
- **Any subpart K (sport pilot) flight instructor** who has completed the required training and receive the § 61.329 endorsement in specific category and class.

A subpart K instructor can receive training from a subpart H instructor or another subpart K instructor that is qualified



NEW TRAINING OPPORTUNITY

**2.5 hours of AATD and FSTD training
may be credited towards the
requirements for sport pilot training**

- **Must match appropriate category and class of aircraft**
- **Must have a valid Letter of Authorization listing the sport pilot training regulation**



New Operational Privileges for Sport Pilots

- Aircraft with a **retractable landing gear**;
- Airplanes with **manual adjustable pitch propeller**; and
- **Night operations** using Basic Med or FAA medical qualification requirements.

Note: Additional training and instructor qualifying endorsements are required for these additional (but optional) sport pilot operating privileges.

Regulations: § 61.316(b), § 61.331, § 61.329

(NOTE: THIS IS NOT 61.31)



New Sport Pilot Retractable Gear Operations Privilege

A sport pilot may operate an aircraft with retractable gear by either:

- 1) Satisfying the § 61.31(e) complex airplane training and endorsement. This may be accomplished in an aircraft that meets the § 61.1 definition of a complex airplane (i.e., an airplane that has a retractable landing gear, flaps, and a controllable pitch propeller); or
- 2) Receive and log ground and flight training from an authorized instructor in an aircraft that has retractable landing gear and receive an endorsement from the instructor certifying that they are proficient to operate the aircraft (§ 61.331(a)(2)). **This option accommodates privileges in aircraft that do not meet the full definition of “complex airplane.”** It applies to any aircraft with retractable landing gear.

Regulations: § 61.316(b), § 61.331(a)



New Operational Privileges for Sport Pilots

New Sport Pilot Manual Controllable Pitch Propeller Privilege

- MOSAIC permits sport pilots to act as PIC of an **airplane** with a manual controllable pitch propeller. Pilots are required to have specific training and endorsement requirements prior to operating an airplane with a manual controllable pitch propeller.
- Sport pilots have two options to comply with these requirements:
 - A sport pilot may satisfy the training and endorsement requirements required for operating complex airplanes as specified in § 61.31(e); or
 - A sport pilot may receive and log ground and flight training from an authorized instructor in an airplane that has a manual controllable pitch propeller and receive an endorsement from the instructor certifying that they are proficient to operate the airplane.

Regulations: § 61.316(b), § 61.331(b),



Can a Sport Pilot (or pilot acting as one) fly a constant speed propeller equipped aircraft?

Probably yes....

An endorsement to fly an aircraft with a controllable pitch propeller is not the same thing as a complex endorsement

A.28 To act as PIC in an airplane with a manual controllable pitch propeller: 14 CFR § 61.331(b).

I certify that [First Name, MI, Last Name], [certificate number], has received the required training of 14 CFR § 61.331(b) in an airplane with a controllable pitch propeller. I have determined that they are proficient in the operation of an airplane with a controllable pitch propeller when exercising their sport pilot privileges.

*Source:
MOSAIC
Webinar Q&A*

Do manual controllable pitch propellers include regular CS propellers?

Yes, if the airplane has a propeller control on the flight deck that allows the pilot to manually select the desired RPM during flight operations. Constant speed propellers are often a manually controllable pitch propeller that can be operated by the pilot to select a specific RPM speed during flight operations.



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Is the “manually controllable propeller” mean a “constant speed” propeller (which is typical), or one of the old-fashioned pitch change propellers?

A manually controllable pitch propeller is a “constant speed propeller”. If an airplane is equipped with a propeller RPM control on the flight deck, and the pilot can manually select a desired propeller RPM during flight operations, this is often referred to a constant speed propeller design.

Is there a pathway for sport pilots to operate aircraft with "traditional" CS propellers?

Yes. If the airplane has a manual propeller control on the flight deck that allows the pilot to select the desired RPM during flight operations (often described as airplane with a constant speed propeller), a sport pilot would need to get the training and instructor endorsement described in § 61.331.

Source: MOSAIC Webinar Q&A



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What is the difference between a “Manual Controllable Pitch Propeller” and a “Constant Speed Propeller”?

14 CFR § 61.331 (How do I obtain privileges to operate an aircraft with retractable landing gear or an airplane with a manual controllable pitch propeller?): This section directly addresses training and endorsements required for operating an airplane equipped with a **manual controllable pitch propeller**. It distinguishes this from automated systems (e.g., constant-speed propellers with governors or FADEC-controlled props).

Advisory Circular (AC) 61-146 (Pilot Certification and Operations for Sport Pilots and Simplified Flight Controls): Section 3.5 specifically discusses "Airplanes With a Manual Controllable Pitch Propeller," providing guidance on training and operations. This AC was updated in alignment with the MOSAIC (Modernization of Special Airworthiness Certification) rule changes effective in 2025.

A constant-speed propeller is a controllable-pitch propeller whose pitch is **automatically** varied in flight by a governor maintaining constant rpm despite varying air loads.

FAA-H-8083-25C



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A handwritten signature in white ink, appearing to read "Jason Blair", set against a black background.

Why so many slides on the “Manual Controllable Pitch Propeller” and a “Constant Speed Propeller” Question?

Because it was causing confusion...

and...

The guidance we have gotten so far means that any **aircraft with FADEC CS props are likely eligible for Sport Pilots to fly.**

(and no endorsement would be required)

What is FADEC?

- **Digital electronic engine control system**
 - Autonomous engine control
 - Throughout engine operating range
 - Includes starting & stopping
 - Self monitoring
 - Self operating
 - Redundant



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If you have a complex endorsement, you can fly a CS prop under sport pilot privileges if you are certificated a higher level (PP, COM, ATP)

If you have a tailwheel endorsement, you can fly a tailwheel aircraft under sport pilot privileges if you are certificated a higher level (PP, COM, ATP)

If you have a high-performance endorsement, you can fly a HP aircraft under sport pilot privileges if you are certificated a higher level (PP, COM, ATP)

If you are a SPORT PILOT, you need the 61.31 endorsement from a "regular CFI" or an endorsement from a Sport Pilot CFI that covers the specific skill under 61.331

§ 61.331 How do I obtain privileges to operate an aircraft with retractable landing gear or an airplane with a manual controllable pitch propeller?

- (a) If you hold a sport pilot certificate and seek privileges to operate an aircraft with retractable landing gear, you must either—
 - (1) Satisfy the training and endorsement requirements specified in § 61.31(e), or
 - (2) Receive and log ground and flight training from an authorized instructor in an aircraft that has retractable landing gear and receive an endorsement from the instructor certifying that you are proficient to operate the aircraft.
- (b) If you hold a sport pilot certificate and seek privileges to operate an airplane with a manual controllable pitch propeller, you must either—
 - (1) Satisfy the training and endorsement requirements specified in § 61.31(e), or
 - (2) Receive and log ground and flight training from an authorized instructor in an airplane that has a manual controllable pitch propeller and receive an endorsement from the instructor certifying that you are proficient to operate the airplane.
- (c) The training and endorsement required by paragraph (a) of this section is not required for pilots seeking to operate aircraft intended for operation on water with retractable landing gear if the person logged pilot-in-command time in such an aircraft before October 22, 2025.



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Trick question time...

Would a C177RG be able to be flown by a sport pilot?

TYPE CERTIFICATE DATA SHEET NO. A20CE

I. Model 177RG, Cardinal RG, 4 PCLM (Normal Category), approved August 11, 1970

A20CE
Revision 25
Textron Aviation
177RG
January 27, 2025

(7) On airspeed indicator:

| | |
|---------------------------------------------------|---------------------|
| a. S/N 177RG0001 thru 177RG0787, except 177RG0419 | |
| Radial red line | 195 mph (CAS) |
| Yellow arc | 160-195 mph (CAS) |
| Green arc | 70-160 mph (CAS) |
| White arc | 60-110 mph (CAS)" |
| b. S/N 177RG0419, 177RG0788 and On. | |
| Radial red line | 174 knots (IAS) |
| Yellow arc | 142-174 knots (IAS) |
| Green arc | 59-142 knots (IAS) |
| White arc | 50- 95 knots (IAS)" |

70mph = 60.828knots

59knots



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* Gotchas and Hiccups *

Scenario:

I am a sport pilot certificate holder and want to fly a qualifying ASEL aircraft.

Question:

Do I need a Vh endorsement?

⦿ **§ 61.327 Are there specific endorsement requirements to operate an aircraft based on V_H ?**

(b) If you hold a sport pilot certificate and you seek to operate an aircraft meeting the performance limits and design requirements of § 61.316 that has a V_H greater than 87 knots CAS you must—



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* Gotchas and Hiccups *

Scenario:

I am a Private pilot (or higher level) certificate holder, but I am exercising the privileges of sport pilot as I don't have a current medical.

Question:

Do I need a Vh endorsement?

Answer:

No, you are not a sport pilot certificate holder. You are assumed to meet this requirement from having the higher level certificate.

⦿ § 61.327 Are there specific endorsement requirements to operate an aircraft based on V_H ?

- (b) If you hold a sport pilot certificate and you seek to operate an aircraft meeting the performance limits and design requirements of § 61.316 that has a V_H greater than 87 knots CAS you must—



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* Gotchas and Hiccups *

Question:

Can a pilot who has had their medical revoked or denied fly as a sport pilot now?

Answer:

Source: MOSAIC Webinar Q&A

If a pilot has lost his/her medical but does have a driver's license, can he/she fly Sport Pilot?

No. See § 61.23(c)(2) is applicable in this scenario.

§ 61.303 If I want to operate an aircraft that satisfies the limitations identified in § 61.316, what operating limits and endorsement requirements in this subpart must I comply with?

(b) A person using a U.S. driver's license to meet the requirements of this paragraph must—

- (1) Comply with each restriction and limitation imposed by that person's U.S. driver's license and any judicial or administrative order applying to the operation of a motor vehicle;
- (2) Have been found eligible for the issuance of at least a third-class airman medical certificate at the time of his or her most recent application (if the person has applied for a medical certificate);
- (3) Not have had his or her most recently issued medical certificate (if the person has held a medical certificate) suspended or revoked or most recent Authorization for a Special Issuance of a Medical Certificate withdrawn; and
- (4) Not know or have reason to know of any medical condition that would make that person unable to operate an aircraft in a safe manner.



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* Gotchas and Hiccups *

Question:

Is a pilot required to have a driver's license to be able fly as a sport pilot if they have a current FAA medical instead?

Answer:

** They would
Need a photo
ID of some sort
that was
government
issued though.*

No, a pilot exercising sport pilot privileges is not required to hold a U.S. driver's license if they have a current FAA-issued medical certificate.

According to FAA regulations (primarily 14 CFR § 61.23 and § 61.303), a person exercising the privileges of a sport pilot certificate (or a higher certificate holder operating under sport pilot rules for light-sport aircraft) must meet medical eligibility requirements in one of these ways:

- Hold a **current and valid FAA medical certificate** (typically at least third-class, but any valid one suffices for these privileges), **or**
- Hold a **current and valid U.S. driver's license** (with additional conditions, such as no prior denial/suspension/revocation of a medical certificate under certain circumstances, compliance with any license restrictions, and no known disqualifying medical condition).

These are **alternative** options—the regulations explicitly allow a pilot to use **either** to satisfy the requirement for operating light-sport aircraft under sport pilot privileges (other than gliders or balloons, which have no medical requirement at all).



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* What exactly is Vh? *

This will apply to most traditional aircraft that now can be flown by sport pilots (or pilots acting under sport pilot privileges).

Vh is a standard V-speed in FAA terminology, defined as the **maximum speed in level flight with maximum continuous power**.

This is the highest calibrated airspeed (CAS) an aircraft can achieve in straight-and-level flight when operating at its maximum continuous power setting (typically at sea level under standard conditions). It's primarily a design and certification parameter used by manufacturers, and it's often referenced in aircraft performance data or for regulatory limits (e.g., ultralight aircraft under 14 CFR Part 103 are limited to a Vh of 55 knots, and light-sport aircraft have a maximum Vh of 120 knots CAS).

Unlike more common V-speeds such as Vno (maximum structural cruising speed) or Vne (never-exceed speed), Vh is not typically marked on the airspeed indicator. It's more of a performance benchmark than an operational limit for everyday flying.



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* Gotchas and Hiccups *

Question:

Can a sport pilot (or sport pilot CFI) be a Safety Pilot?

Source: MOSAIC Webinar Q&A

Answer:

No, not even if they have a medical.

Will a sport pilot now be able to act as a safety pilot for instrument training?

No. Sport pilots may not act as a safety pilot in accordance with 14 CFR 91.109(c) which specifically requiring the person (safety pilot) manipulating the controls hold at least a private pilot certificate with appropriate category and class ratings.

A sport pilot CFI-S who is a private pilot, cannot act as a safety pilot while giving dual instruction

Under FAA regulations, specifically 14 CFR § 91.109 (Flight instruction; Simulated instrument flight), a safety pilot is required when conducting simulated instrument flight in a civil aircraft. This ensures compliance with visual flight rules (VFR) see-and-avoid responsibilities under 14 CFR § 91.113(b), as the pilot under the hood (wearing a view-limiting device) cannot maintain vigilance.

The key requirements for a safety pilot are outlined in § 91.109(c)(1):

- The safety pilot must occupy the other control seat and possess **at least a private pilot certificate** with appropriate category and class ratings for the aircraft being flown.
- An exception exists under § 91.109(c)(1)(ii): A flight instructor with a sport pilot rating may serve as a safety pilot **only** when providing training for a solo cross-country endorsement under § 61.93, and they must meet the requirements of § 61.412 (e.g., holding a valid U.S. driver's license or medical certificate as a sport pilot instructor).



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* Gotchas and Hiccups *

Question:

Is a sport pilot required to have any instrument instruction?

Nothing in that list there about instrument training, right?

Correct, but there is still some that will likely required.

If the aircraft has a Vh greater than 87 knots.

| If you are applying for a sport pilot certificate with . . . | Then you must log at least . . . | Which must include at least . . . |
|-----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (1) Airplane category and single-engine land or sea class privileges, | 20 hours of flight time, including at least 15 hours of flight training from an authorized instructor in a single-engine airplane and at least 5 hours of solo flight training in the areas of operation listed in § 61.311, | (i) 2 hours of cross-country flight training; (ii) 10 takeoffs and landings to a full stop (with each landing involving a flight in the traffic pattern) at an airport; (iii) One solo cross-country flight of at least 75 nautical miles total distance, with a full-stop landing at a minimum of two points and one segment of the flight consisting of a straight-line distance of at least 25 nautical miles between the takeoff and landing locations; and (iv) 2 hours of flight training with an authorized instructor on those areas of operation specified in § 61.311 in preparation for the practical test within the preceding 2 calendar months from the month of the test. |



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* Gotchas and Hiccups *

Question:

Is a sport pilot required to have any instrument instruction?

Now for the why... 61.93(e)(12)

The **pilot is acting as a “student pilot” at that point**, and is **required to had this training to conduct solo XC flights**. No minimum limit is provided, just an item listed that includes what must have been trained.

§ 61.93 Solo cross-country flight requirements.

(e) Maneuvers and procedures for cross-country flight training in a single-engine airplane. A student pilot who is receiving training for cross-country flight in a single-engine airplane must receive and log flight training in the following maneuvers and procedures:

(12) Control and maneuvering solely by reference to flight instruments, including straight and level flight, turns, descents, climbs, use of radio aids, and ATC directives. For student pilots seeking a sport pilot certificate, the provisions of this paragraph only apply when receiving training for cross-country flight in an airplane that has a V^H greater than 87 knots CAS.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question:

Can a sport pilot CFI give this training?

⦿ § 61.415 What are the limits of a flight instructor certificate with a sport pilot rating?

If you hold a flight instructor certificate with a sport pilot rating, you may only provide flight training in a light-sport aircraft and are subject to the following limits:

- (h) You may not provide training on the control and maneuvering of an aircraft solely by reference to the instruments in a light sport airplane with a V_h greater than 87 knots CAS unless you meet the requirements in § 61.412.

In part 91, general operating and flight rules, § 91.109(c) is revised to permit a sport pilot instructor who has obtained the endorsement in § 61.412 to serve as a **safety pilot** only for the purpose of providing flight training on control and maneuvering solely by reference to the instruments to a sport pilot applicant seeking a solo endorsement in an airplane with a V_h greater than 87 knots CAS.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

If I am a Sport Pilot CFI...

§ 61.412 Do I need additional training to provide instruction on control and maneuvering an airplane solely by reference to the instruments in an aircraft based on VH?

To provide flight training under § 61.93(e)(12) on control and maneuvering an airplane solely by reference to the flight instruments for the purpose of issuing a solo cross-country endorsement under § 61.93(c)(1) to a student pilot seeking a sport pilot certificate, a flight instructor with a sport pilot rating must:

(a) Hold an endorsement required by § 61.327(b);

(b) Receive and log a minimum of 1 hour of ground training and 3 hours of flight training from an authorized instructor in an airplane with a V^H greater than 87 knots CAS or in a full flight simulator, flight training device, or aviation training device that replicates an airplane with a V^H greater than 87 knots CAS; and

(c) Receive a one-time endorsement in his or her logbook from an instructor authorized under subpart H of this part who certifies that the person is proficient in providing training on control and maneuvering solely by reference to the flight instruments in an airplane with a V^H greater than 87 knots CAS. This flight training must include straight and level flight, turns, descents, climbs, use of radio navigation aids, and ATC directives.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question:

Can a Sport Pilot CFI Give a Flight Review to a holder of a Private/Commercial/ATP pilot certificate?

Answer:

Maybe. But probably not.

The flight review has to be done by a CFI who can conduct the activity at the level of pilot certificate the pilot holds, not the level of pilot privileges they are currently exercising.

§ 61.56 Flight review.

(a) Except as provided in paragraphs (b) and (f) of this section, a flight review consists of a minimum of 1 hour of flight training and 1 hour of ground training. The review must include:

- (1) A review of the current general operating and flight rules of part 91 of this chapter; and
- (2) A review of those maneuvers and procedures that, at the discretion of the person giving the review, are necessary for the pilot to demonstrate the safe exercise of the privileges of the pilot certificate.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

UPDATE!!

*** Gotchas and Hiccups ***

InFO

Information for Operators

InFO 26006

DATE: 04/10/26

Flight Standards Service
Washington, DC

Question:

Can a Sport Pilot CFI Give a Flight Review to a holder of a Private/Commercial/ATP pilot certificate?

Endorsements received from flight instructors holding a sport pilot rating (subpart K) restrict an individual to exercising only the privileges of a sport pilot certificate, subject to the operational and aircraft limitations outlined in §§ 61.315 and 61.316. For instance, if a private pilot receives a flight review from a flight instructor with a sport pilot rating, that pilot would be limited to exercising sport pilot privileges. To exercise private pilot privileges, they must obtain a flight review from an instructor with the appropriate category and class rating under subpart H. Regulations do not allow a pilot to carry the privileges earned through a flight review from a sport pilot instructor up to their private pilot certificate, even if they hold such a certificate. This restriction also applies to high performance, complex, or tailwheel airplane endorsements from flight instructors with a sport pilot rating (subpart K).

Completion of a flight review: 14 CFR § 61.56(a) and (c).

I certify that [First name, MI, Last name], [grade of pilot certificate], [certificate number], has satisfactorily completed a flight review of 14 CFR § 61.56(a) on [date] and is limited to sport pilot privileges and limitations (Subpart J).

[w/instructor signature, CFI number, and expiration date or recent experience end date, as applicable.]



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MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question:

Does training received from a sport pilot CFI count toward other certificates?

Answer:

Yes. With caveats.

Total time will always count.

Specific experience requirements
Must be met for each
Certificate/rating.

**More on that later*



U.S. Department
of Transportation
Federal Aviation
Administration

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

July 24, 2009

Mr. Tim Kern
Tim Kern INK / 121five.com
P.O. Box 30
Anderson, Indiana 46015-0030

Dear Mr. Kern:

In an e-mail dated March 31, 2009 you asked whether "flight training provided in an airplane by a Sport Pilot instructor, that has resulted in a Sport pilot certificate, [can] be transferred to meet the dual instruction requirements of FAR 61.107 and 61.109 for a Private Pilot certificate with an airplane category rating." You further asked whether instruction provided by a Sport Pilot instructor can satisfy the requirements for a Private Pilot certificate "since the SPI is not 'qualified' to give dual for a Private."

An applicant for a private pilot certificate may therefore use flight training provided in accordance with this interpretation to meet the applicable aeronautical experience requirements specified in § 61.109 for the issuance of a private pilot certificate.



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MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

DOCUMENT HEADINGS

Department of Transportation
Federal Aviation Administration

14 CFR Parts 1, 60, 61, 63, 65, 91, 121, 135, and 141

[Docket No.: FAA-2016-6142; Amdt. Nos. 1-73, 60-6, 61-142, 63-41, 65-58, 91-351, 121-381, 135-140, 141-20]

RIN 2120-AK28

After review of the comments and further analysis, the FAA has decided to allow all training received from a flight instructor with a **sport pilot** rating to be credited by an applicant seeking a recreational or private pilot certificate. The FAA recognizes that an applicant for a **sport pilot** certificate must complete flight training on many of the same areas of operation required for a recreational or private pilot certificate.^[99] Additionally, as explained in the NPRM, many of the tasks and maneuvers outlined in the practical test standards for a **sport pilot** are the same as those outlined in the practical test standards for recreational or private pilot.^[100] In fact, these areas of operation must be performed to identical proficiency standards.^[101] Therefore, the FAA believes that all training received as a **sport pilot** candidate is relative to the aeronautical experience required for a higher certificate. Accordingly, the FAA is not going to limit the **sport pilot** training that may be credited toward a higher certificate to a prescriptive number of hours. The FAA notes, however, that **sport pilots** applying for a higher certificate are still required to complete all the requirements for the specific certificate or rating sought, which includes additional training provided by a subpart H instructor and successful completion of the knowledge test and practical test.^[102]



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MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Subpart K (Sport Pilot) CFI Privileges § 61.415

Sport Pilot CFIs can provide:

- A flight review or operating privilege for a sport pilot, or training to maintain or improve the skills of a sport pilot.

While doing this, they may:

- (d) A person who holds a flight instructor certificate issued under subpart K may receive compensation for providing flight training in accordance with this subpart.


In layman's terms, a Sport Pilot CFI may only provide training for student pilots, sport pilot certificates or privileges, or sport pilots needing (or desiring) additional skills improvement or maintenance.





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A handwritten signature in white ink, appearing to read "Jason Blair", set against a black background.

**Subpart K (Sport Pilot)
CFI Limitations § 61.415**

Limitations of the CFI-S 

|  PERMITTED |  PROHIBITED |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• Train Student Pilots.• Train Sport Pilots.• Conduct skill maintenance for Sport Pilots. | <ul style="list-style-type: none">• Providing training for Private or Commercial certificates (generally).• Conducting Flight Reviews for Private/Commercial/ATP pilots. |



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Subpart K (Sport Pilot) CFI Limitations § 61.415

If you hold a flight instructor certificate with a sport pilot rating, you may only **provide flight training in an aircraft meeting the performance limits and design requirements of § 61.316** and are subject to the following limits:

(k) Cannot carry more than one person.

(l) requires a flight instructor to have received the training and endorsement in an airplane with a manual controllable pitch propeller or an aircraft with a retractable landing gear aircraft prior to providing flight instruction in those aircraft.

Do this by complying with § 61.331 or § 61.31.



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A handwritten signature in black ink, appearing to read "Jason Blair".

MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

TRICK Question:

Can a sport pilot CFI do sign off the cross-country planning and endorse a student who is training to be a private pilot?

Answer:

Yes! [if you don't ask too many questions]

Thy are signing a student pilot certificate holder off to exercise student pilot privileges at that point. It is unclear [yet] if that XC will be used toward a sport or private pilot certificate [if you don't ask too many questions]. And it could technically be utilized toward either.



A.9 Solo cross-country flight: 14 CFR § 61.93(c)(1) and (2).

I certify that [First name, MI, Last name] has received the required solo cross-country training. I find they have met the applicable requirements of 14 CFR § 61.93 and are proficient to make solo cross-country flights in a [M/M] aircraft, [aircraft category].



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects


Why a Sport Pilot CFI may be an attractive route...

- Can begin instructing in limited manner without commercial or instrument rating;
- Faster way start building time

⦿ § 61.405 What tests do I have to take to obtain a flight instructor certificate with a sport pilot rating?

⦿ § 61.411 What aeronautical experience must I have to apply for a flight instructor certificate with a sport pilot rating?

Use the following table to determine the experience you must have for each aircraft category and class:

Expand
Table


| If you are applying for a flight instructor certificate with a sport pilot rating for . . . | Then you must log at least . . . | Which must include at least . . . |
|---------------------------------------------------------------------------------------------|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) Airplane category and single-engine class privileges, | (1) 150 hours of flight time as a pilot, | (i) 100 hours of flight time as pilot in command in powered aircraft, (ii) 50 hours of flight time in a single-engine airplane, (iii) 25 hours of cross-country time, (iv) 10 hours of cross-country time in a single-engine airplane, and (v) 15 hours of flight time as pilot in command in a single-engine airplane that is an aircraft meeting the performance limits and design requirements of § 61.316. |



Why a Sport Pilot CFI may be an attractive route...

The Rise of the Sport Pilot CFI (CFI-S)

Concept

A new instructor tier that does not require Commercial or Instrument ratings (Subpart K privileges § 61.415).

Advantages

- ✓ **For the CFI:** Faster route to building flight time; lower barrier to entry.
- ✓ **For the School:** Potential new staffing source for specific training missions.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question:

Can a sport pilot CFI do the dual XC training flights for night and day for a student working on their commercial certificate?

Answer:

No!

The training is required under 14 CFR 61.129 and is at a higher than student pilot or sport pilot level certificate.

§ 61.129 Aeronautical experience.

- (a) *For an airplane single-engine rating.* Except as provided in paragraph (i) of this section, a person who applies for a commercial pilot certificate with an airplane category and single-engine class rating must log at least 250 hours of flight time as a pilot that consists of at least:
 - (3) 20 hours of training on the areas of operation listed in § 61.127(b)(1) of this part that includes at least—
 - (iii) One 2-hour cross country flight in a single engine airplane in daytime conditions that consists of a total straight-line distance of more than 100 nautical miles from the original point of departure;
 - (iv) One 2-hour cross country flight in a single engine airplane in nighttime conditions that consists of a total straight-line distance of more than 100 nautical miles from the original point of departure; and



Practical Test Required When Adding an Airplane or Helicopter Privilege

A sport pilot “proficiency check” can no longer be used to add an airplane or the (new) helicopter privilege to an existing sport (or higher grade) pilot certificate.

The FAA now requires sport pilots and flight instructors with a sport pilot rating seeking to add an airplane or helicopter privilege to their existing pilot or flight instructor certificate to successfully accomplish a practical test with a designated pilot examiner.

Regulations: § 61.321(b), § 61.419(e)



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Things to think about:

No direct pathway from
Sport Pilot to Private Pilot Certificate
or
Sport Pilot CFI to [regular] CFI Certificate

Adding these is a new “certificate level”,
not an addition of a category or class to the
existing certificate level.

~~§ 61.63 Additional aircraft ratings (other than for ratings at the airline transport pilot certification level).~~

~~(a) General. For an additional aircraft rating on a pilot certificate, other than for an airline transport pilot certificate, a person must meet the requirements of this section appropriate to the additional aircraft rating sought.~~

~~(b) Additional aircraft category rating. A person who applies to add a category rating to a pilot certificate:~~

~~(4) Need not take an additional knowledge test, provided the applicant holds an airplane, rotorcraft, powered-lift, weight-shift-control aircraft, powered parachute, or airship rating at that pilot certificate level.~~



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Things to think about:

No direct pathway from Sport Pilot to Private Pilot.

Going from Sport Pilot ASEL to PP ASEL Requires:

- Private pilot knowledge test
- Complete the dual training required (20 hours in the required areas and the specific items)
- Complete the solo experience requirements (10 hours and the specific items)
- Practical test

§ 61.109 Aeronautical experience.

(a) For an airplane single-engine rating. Except as provided in paragraph (k) of this section, a person who applies for a private pilot certificate with an airplane category and single-engine class rating must log at least 40 hours of flight time that includes at least 20 hours of flight training from an authorized instructor and 10 hours of solo flight training in the areas of operation listed in § 61.107(b)(1) of this part, and the training must include at least—

- (1) 3 hours of cross-country flight training in a single-engine airplane;
- (2) Except as provided in § 61.110 of this part, 3 hours of night flight training in a single-engine airplane that includes—
 - (i) One cross-country flight of over 100 nautical miles total distance; and
 - (ii) 10 takeoffs and 10 landings to a full stop (with each landing involving a flight in the traffic pattern) at an airport.
- (3) 3 hours of flight training in a single-engine airplane on the control and maneuvering of an airplane solely by reference to instruments, including straight and level flight, constant airspeed climbs and descents, turns to a heading, recovery from unusual flight attitudes, radio communications, and the use of navigation systems/facilities and radar services appropriate to instrument flight;
- (4) 3 hours of flight training with an authorized instructor in a single-engine airplane in preparation for the practical test, which must have been performed within the preceding 2 calendar months from the month of the test; and
- (5) 10 hours of solo flight time in a single-engine airplane, consisting of at least—
 - (i) 5 hours of solo cross-country time;
 - (ii) One solo cross country flight of 150 nautical miles total distance, with full-stop landings at three points, and one segment of the flight consisting of a straight-line distance of more than 50 nautical miles between the takeoff and landing locations; and
 - (iii) Three takeoffs and three landings to a full stop (with each landing involving a flight in the traffic pattern) at an airport with an operating control tower.

Addition of an Airplane Single-Engine Land Rating to an Existing Private Pilot Certificate

The table below indicates the required Tasks for each Area of Operation tested in accordance with this ACS.

| Legend | |
|--------|------------------------------|
| ASES | Airplane – Single-Engine Sea |
| AMEL | Airplane – Multiengine Land |
| AMES | Airplane – Multiengine Sea |
| RH | Rotorcraft – Helicopter |
| RG | Rotorcraft – Gyroplane |
| PL | Powered-Lift |

No accommodation for SP CFI given to add on PP certificate in the PP ACS

| Area of Operation | Private Pilot Rating(s) Held | | | | | | | | |
|-------------------|------------------------------|------|------|----|----|--------|---------|---------|----|
| | ASES | AMEL | AMES | RH | RG | Glider | Balloon | Airship | PL |
| | | | | | | | | | |



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Things to think about:

No direct pathway from Sport Pilot CFI to “add on” [regular] CFI Requires:

- Flight Instructor Airplane knowledge test
- Would not require FOI knowledge test
- Full CFI Initial Test (Subpart H)
- No minimum experience requirements for hours

14 CFR Part 61 - Subpart H - Flight Instructors Other than Flight Instructors With a Sport Pilot Rating

- [§ 61.181 Applicability.](#)
- [§ 61.183 Eligibility requirements.](#)
- [§ 61.185 Aeronautical knowledge.](#)
- [§ 61.187 Flight proficiency.](#)
- [§ 61.189 Flight instructor records.](#)
- [§ 61.191 Additional flight instructor ratings.](#)
- [§ 61.193 Flight instructor privileges.](#)
- [§ 61.195 Flight instructor limitations and qualifications.](#)
- [§ 61.197 Recent experience requirements for flight instructor certification.](#)

Addition of an Airplane Single-Engine Rating to an Existing Flight Instructor Certificate

The table below indicates the required Tasks for each Area of Operation tested in accordance with this ACS.

| Legend | |
|--------|----------------------------------|
| AME | Airplane – Multiengine |
| RH | Rotorcraft – Helicopter |
| RG | Rotorcraft – Gyroplane |
| PL | Powered-Lift |
| IA | Instrument Rating – Airplane |
| IH | Instrument Rating – Helicopter |
| IP | Instrument Rating – Powered-Lift |

| Area of Operation | Flight Instructor Certificate and Rating(s) Held | | | | | | | |
|-------------------|--------------------------------------------------|----|----|----|--------|----|----|----|
| | AME | RH | RG | PL | Glider | IA | IH | IP |
| | | | | | | | | |

No accommodation for SP CFI given to add on CFI certificate in the CFI ACS



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Can a Sport Pilot CFI Give a FAA Wings Credit?

Yes, No, Maybe. It Depends.

A CFI-S may:

Act as a WINGS **educational credit provider** (flight credit)
Endorse pilots for **Basic and Advanced WINGS flight credits**
Provide WINGS credit **only for tasks authorized under sport pilot privileges**, typically:

Sport Pilot applicants, Sport Pilots, Pilots exercising sport pilot privileges in qualifying aircraft that can be flown by sport pilots.

A CFI-S may NOT:

Provide WINGS flight credit that requires **Private Pilot or higher privileges**;
Endorse WINGS activities instrument operations;
Act as the WINGS flight credit provider for a Private, Commercial, or ATP pilot when the activity exceeds sport pilot privileges



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MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Can a Sport Pilot CFI Give a FAA Wings Credit?

Look for the details...

Accredited Activity Information

Name: ASEL-Takeoffs, Landings, Go-arounds (Sport & Rec Pilot) [\(print friendly\)](#)

Credits: 1 Credit for Advanced Flight Topic 1

Activity Number: A070405-87

[Request Credit!](#)

Accredited Activity Information

Name: ASEL-Takeoffs, Landings, Go-arounds (ATP, Comm'l, Pvt) Advanced Level [\(print friendly\)](#)

Credits: Basic WINGS
1 Credit for Basic Flight Topic 1
Advanced WINGS
1 Credit for Advanced Flight Topic 1

Activity Number: A070405-89

[Request Credit!](#)




MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

MOSAIC Rule/Guidance References

FAA Order 8900.1 Volume 5, Chapter 2, Sections 12 & 24

[Updated] **AC 61-65K** Certification: Pilots and Flight and Ground Instructors

[New] **AC 61-146** Pilot Certification and Operations for Sport Pilots, Flight Instructors with a Sport Pilot Rating, and Simplified Flight Controls.



Advisory Circular

Subject: Pilot Certification and Operations for Sport Pilots, Flight Instructors with a Sport Pilot Rating, and Simplified Flight Controls


Date: 11/14/25

AC No: 61-146

Initiated by: AFS-800

Change:

This advisory circular (AC) provides guidance on the changes to Title 14 of the Code of Federal Regulations (14 CFR) part 61 concerning sport pilot certification, training, and operations in accordance with the Modernization of Special Airworthiness Certification (MOSAIC) final rule regulatory amendments. MOSAIC also facilitates the new simplified flight controls designation for aircraft and associated pilot training requirements.





Hugh Thomas for
Lawrence Fields
Executive Director, Flight Standards Service



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FAA Updates Guidance Documents after MOSAIC Implementation

 December 10, 2025  jblair

Updating policy guidance after the implementation of the recent MOSAIC regulatory changes, the FAA has updated a series of documents and provided a MOSAIC fact sheet for industry reference.

Flight training providers are encouraged to review the following documents:

Modernization of Special Airworthiness Certification (MOSAIC) Fact Sheet

[Click Here to See the Sheet](#)

AC 61-65K – Certification: Pilots and Flight and Ground Instructors

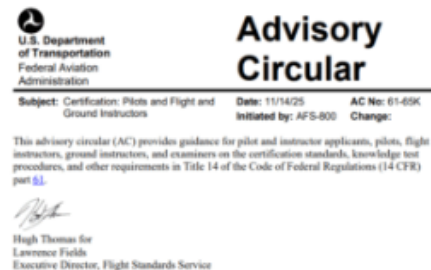
[Click Here to See the AC 61-65K](#)

AC 61-146 – Pilot Certification and Operations for Sport Pilots, Flight Instructors with a Sport Pilot Rating, and Simplified Flight Control

[Click Here to See the AC 61-146](#)

AC 65-32B – Certification of Repairmen (Light-Sport)

[Click Here to See the AC 65-32B](#)



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MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* **Key Takeaways for Flight Training Providers** *

- **Your current fleet of aircraft may now be used for “sport pilot” training activities or pilots flying them.**



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MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

*** Key Takeaways for Flight Training Providers ***

- A CFI-S (sport pilot only CFI) cannot do all the same things a regular CFI can.
- Training from a CFI-S may or may not count toward other certificates. You have to look **CLOSELY** at what has been done and how it has been documented.
- You **WILL** have pilots seeking training as sport pilots in aircraft they weren't previously able to fly.
- A sport pilot CFI-S who is a private pilot, cannot act as a safety pilot while giving dual



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Key Takeaways for Flight Training Providers *

- You WILL have pilots seeking to operate aircraft “acting as sport pilots” who have higher level certificates and no longer have current medical certificates or qualify for BasicMed.
- You MAY have Sport Pilots or Private Pilots who want to get their Sport Pilot CFI next.
- You may encounter students who have had previous training from “sport pilot CFIs”

Logbook Audits

Does CFI-S dual instruction count toward a Private Certificate?
YES, with caveats. Total time counts, but specific experience requirements must be watched closely.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Key Takeaways for Flight Training Providers *

- You really **SHOULD** talk with your insurance provider to determine what / if they have any policy limitations for SP CFIs if you employ them or if you have sport pilots flying at your operation.

The Insurance Gap

Regulatory privileges may outpace insurance policy language. Just because the FAA allows it, does not mean the underwriter does.

- Verify if your policy covers Sport Pilot CFIs.
- Check for limitations on "acting as" Sport Pilots (pilots with dropped medicals).
- Confirm coverage for Sport Pilot operations in standard (non-LSA) aircraft.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Key Takeaways for Flight Training Providers *

- DPEs are not automatically approved to give SP ASEL or SP CFI checkrides; they must get the authorization approved and added in DMS.
- Many DPEs are not as familiar with SP checkrides, they may need a little “coming up to speed”.

Testing Availability

Designated Pilot Examiners (DPEs) are not automatically authorized for Sport Pilot checkrides. They must update their Designee Management System (DMS) profile to conduct these specific tests.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question: Can a sport pilot CFI [Subpart K] who does not meet the 24 months, 200 hours, etc. requirements train an initial sport pilot CFI? Even if they had just been certificated as one themselves?

Answer: Yes. Title 14, Code of Federal Regulations (14 CFR) part 61 subpart K flight instructors are not required to meet the experience requirements identified in subpart H § 61.195(h) *Qualifications to provide ground or flight training to initial flight instructor applicants*. Section 61.181 *Applicability* clarifies that subpart H “prescribes the requirements for the issuance of flight instructor certificates and ratings (except for flight instructor certificates with a sport pilot rating)”. Accordingly, any reference in part 61 subpart H that references “flight instructor” specifically refers to flight instructor certificates issued under that subpart rather than all flight instructors (Subpart H and Subpart K flight instructors). Therefore, the requirements of §61.195(h) do not apply to Subpart K flight instructors.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question: Could that person then be trained for their (subpart H) CFI certificate and not need to have that training be from a CFI who met the 14 CFR 61.195(h) requirements?

To clarify, the FAA believes that your question should be rephrased as follows,

A person who possesses a flight instructor certificate with a sport pilot rating (Subpart K) now seeks to obtain a flight instructor certificate with a category and class rating (Subpart H). Can the instruction provided by a flight instructor with the appropriate category and class rating (Subpart H) provide flight training to the applicant without satisfying the requirements of §61.195(h)?

Answer: Yes. § 61.195(h)(2) that states,

“(2) **Flight training.** A flight instructor who provides flight training to **an initial applicant for a flight instructor certificate** must meet the eligibility requirements prescribed in [§ 61.183](#); hold the appropriate flight instructor certificate and rating; meet the requirements of the part under which the flight training is provided; and meet one of the following requirements—”

Possession of a flight instructor certificate (including one issued under subpart K) clearly supports that the applicant would not be an *initial* applicant for a flight instructor certificate. The language in this regulation subpart does not differentiate between flight instructor certificates issued under Subpart K or H.



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MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question: Would they [an applicant] need to be trained by a subpart H CFI who meets the 61.195 requirements to train an initial CFI, or is that no longer applicable because they are already the holder of a FAA issued CFI certificate?

Answer: No. Possession of a flight instructor certificate issued under Subpart K or H would support the applicant is not seeking an initial flight instructor certificate and the limitation of § 61.195(h) would not apply.

You then provide the following scenario (paraphrased) and follow-on question.

A private pilot is seeking to accomplish a practical test for a commercial pilot certificate and lets their [FAA] medical lapse and has not satisfied the BasicMed [medical qualification]. The private pilot then exercises the privileges of a sport pilot [certificate] using a valid US driver's license and is operating an aircraft that is eligible to be flown by a sport pilot. The pilot continues to receive flight instruction from a Subpart H flight instructor in pursuit of a commercial [pilot] certificate.



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

* Gotchas and Hiccups *

Question: Is my impression correct that they [the pilot applicant] could be the PIC during a practical test for a commercial pilot certificate with no medical or BasicMed as long as it was in an aircraft of the same requirements?

Answer: No. See section **§ 61.23 *Medical certificates: Requirement and duration***. Specifically, § 61.23(a) that states,

“(a) **Operations requiring a medical certificate.** Except as provided in paragraphs (b) and (c) of this section, a person—

(3) Must hold at least a third-class medical certificate—

(iii) When taking a practical test in an aircraft for a recreational pilot, private pilot, commercial pilot, or airline transport pilot certificate, or for a flight instructor certificate, except when operating under the conditions and limitations set forth in § 61.113(i)”



MOSAIC Flight Training / Practical Testing / Pilot Privilege Effects

Any concerns here?

What questions would you be asking of this CFI?

What about if you employed them?



Airplanes and Coffee
Justin Coletti · 14h · 🌐



For all the MOSAIC haters, I was recently hired as a CFI-S at a flight school.

I'll be teaching Sport Pilot, Sport Pilot CFI applicants, tailwheel, high performance, complex, and doing flight reviews.

CFI-S is totally doable at any location. I'll be making a YouTube video soon on my channel (barstool Cub Driver) discussing the pros of being a CFI-S.

See more



www.JasonBlair.net

A handwritten signature in white ink, appearing to read 'Jason Blair'.

Discussion?



Or find more information at:

www.JasonBlair.net



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