

**Case Service Memo: 2005- 03**

Subject: **Flight Training**  
To: All Staff  
From: Stacey Cummings  
Issue Date: 3/18/05  
Effective Date: Immediately

**Purpose:**

The purpose of this Case Service Memo is to clarify the Utah State Office of Rehabilitation current practices with regard to flight training.

**Clarification:**

This Case Service Memo follows instructions sent out several months ago which put all flight training on hold until further notice.

As indicated in the previous memo, USOR does not currently sponsor clients in flight training programs leading to employment as a pilot.\* In order to assist a client who wants to become a pilot in making an informed choice about this employment goal, counselors need to carefully counsel that client about the issues and concerns expressed in this memo. If a client decides to proceed with this employment option, counselors must request administrative approval from the Director of Case Services prior to completing an IPE which contains a vocational goal of pilot. The rationale for treating the goal of “pilot” differently than other vocational goals and requiring administrative approval prior to writing plans containing flight training and/or leading to pilot as the vocational goal includes the following:

Issues re: documentation of a disability for those interested in becoming pilots.

It may be difficult to document that an individual meets the eligibility criteria to receive DRSS services in cases involving an individual wanting to become a pilot because individuals who wish to become employed as civil or commercial pilots must meet strict mental and psychiatric standards indicating they are in excellent health. It is highly unlikely that someone who truly meets the eligibility criteria to receive DRS services would then in turn be able to pass the needed physical exams required for pilot certification.

Information on the requirements to pass the pilot’s exams etc. can be found at: <http://www.faa.gov/>

Additional issues of concern

In addition to the key point above, there have been several other issues related to the VR’s sponsorship of pilot training programs. Even if a client is found eligible for services, counselors must make sure that they carefully counsel clients on each of the issues below before considering asking for approval (from the Director of Case Service)) to support such a vocational goal.

- (1) Limited Placement Opportunities: Counselors must carefully investigate the aviation job market to make sure jobs will be available upon an individual’s completion of flight training. USOR requires this search of the job market because placements for pilots trained by Vocational Rehabilitation have not occurred as expected (we have almost zero placements as pilots).
- (2) Concerns re: Completion Timeframes: Flight training can go through many different levels and continue indefinitely. Since the intent of the VR program is to provide individualized,

time-limited services under an IPE which must describe *a timeline for the achievement of the employment outcome*,<sup>1</sup> long-term service provision, such as may be needed to become a highly certified pilot, is not consistent with the purpose of the program.

IPEs with “pilot” as the employment outcome must include a timeline for completion of the goal, along with clear parameters about the level of pilot certification to be achieved and the criteria that will be used to evaluate the individual’s progress toward achievement of that certification. They must also include the individual’s responsibilities and an estimate of costs for all services needed to complete the plan. As with all training services, counselors must make a thorough search of all available comparable benefits and utilize those benefits prior to using VR funds to pay for training when developing the IPE.<sup>2</sup>

- (3) Limited Availability and High Cost of Training: The amount of training and cost involved with pilot training is often the same as that for an advanced educational degree. All such advanced degrees require administrative approval, and therefore VR’s sponsorship of flight training must be approved by the Director of Case Service prior to inclusion in the IPE.

Counselors need to provide exceptional counseling and guidance and carefully evaluate a client’s potential for succeeding in a demanding and competitive field such as civil or commercial aviation before proceeding with a request to support this vocational goal. It is always a difficult task to balance the desires of clients with the purposes of vocational rehabilitation, and to assist clients to make informed choices. It might be possible in a rare case that a client is found eligible appropriately, and then is able, with the assistance of VR, to restore functioning to the level that it is possible to pass pilot exam. It is also possible that someone who is already a pilot may approach VR because his/her job is in jeopardy due to disability issues and they are requesting VR assistance with those disability issues in order to retain employment. Again these would be exceptional cases, and as always such unique or exceptional cases can be submitted for review and consideration for approval by the Director of Case Service as described above. **Part of an administrative review for consideration of such an exception to general practice would likely include an independent evaluation by a doctor chosen by DRS and certified as an expert in this field by the Federal Aeronautics Administration. Testing by that doctor could include medical and psychological tests and well as flight simulator evaluations where appropriate. Counselors should include a description of how they have addressed the concerns described in this memo as part of any request to support the vocational goal of pilot.**

**\* NOTE:** For this memo flight training refers to training which specifically leads to employment as a pilot. It is different than aviation science training which refers to more general training which could lead to specific employment in a number of jobs in the aviation industry other than as a pilot. The level of approval needed depends primarily on the vocational goal. If the vocational goal is something in the aviation related field but not specifically as a pilot then the approval level would be at the designated level for the institution or training involved. A vocational goal of pilot would require an approval by exception.

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<sup>1</sup> See § 102(b)(3)(B)(ii) of the Rehabilitation Act

<sup>2</sup> See “Mandatory components of an IPE,” listed in § 102(b)(3) of the Rehabilitation Act