

Periods that qualify to be credited to a member's retirement pension account are stated in days, with a cap of 360 days for a full year:

- Days accrued through contributions are reported by employers through their payroll reports (DADS, DSN).
- In addition, members can apply to buy back or to have certain periods credited to their account free of charge.

The member uses their total number of days accrued to claim their CRPNPAC retirement pension, while their days accrued through contributions (employer's contributions or buyback) are used to calculate their pension.

CRPNPAC's board of directors has adopted the following new rules for calculating CRPNPAC days as from January 2018:

This informational guide has been updated to take account of France's decree No. 2020-1491 of December 1st, 2020, on crediting periods of partial employment toward retirement pension entitlements. Under this decree, periods of partial employment with benefits (periods accrued from March 1st, 2020 through December 31, 2020) can be credited free of charge – see appendix. NB: Unlike 2020, periods of partial employment from 2021 are considered to be contributory periods and must therefore be declared in days as employment (Decree no. 2021-570 of 10 May 2021 on the consideration of periods of partial employment for pension entitlements and amending various provisions applicable to the complementary pension scheme of professional civil aviation flight crew).

I. EMPLOYERS: TALLYING CRPNPAC DAYS FOR PAYROLL REPORTS (days accrued through contributions)

Until 2016, the number of days reported by employers was also used to calculate contribution caps. As of 2017, this number is only used when crediting qualifying periods to a member's career account.

The board of directors has revised the rules for tallying these days as follows:

- A **full month** is a month that is covered in its entirety by an air crew employment contract, with no contract suspensions as defined in the appendix, and on which contributions were paid.
 - ➔ It must be reported as **30 CRPNPAC days**¹ (even if the month was 28 or 31 calendar days long).
 - ➔ Unpaid absences for reasons not appearing on the list of unpaid contract suspensions described in the appendix have no impact on the number of days to report.
 - Example: paid work from January 1st through the 13th, followed by unpaid leave or strike from January 14th
 - = 30 days must be reported in January
- A **partial month due to an arrival or departure** is a month during which the member's air crew contract either **began** (on a date other than the 1st of the month) or was **terminated** (on a date other than the last day of the month).
 - ➔ The number of days reported must be equal to the **number of calendar days** in the periods under a contract
 - Examples: arrival on January 15 = 17 days must be reported (January 15 through 31); arrival on February 15 = 14 days must be reported (February 15 through 28); contract terminating on January 15 or February 15 = 15 days must be reported (from the 1st through the 15th); arrival on January 3 and termination on January 29 = 27 days must be reported (January 3 through 29)
 - ➔ If the contract is suspended without pay as defined in the appendix over the course of a given month, the number of calendar days for which the contract was suspended must be subtracted from the number of days being reported.
 - Example: arrival on January 15 and unpaid training leave from January 25 through 30 = 11 days must be reported (17 days under contract – 6 days of suspension).

¹ Comment: The current rules regarding part-time employment cannot be transposed to air crew members in civil aviation due to lack of an application decree. This means that days must not be reduced based on employment percentage.

Comments:

- When a member is determined to be **permanently unfit for work** or is **permanently reassigned to ground work**, the last day of their tally must be the day before the date of the CMAC's determination of permanent unfitness or of the decision to reassign.
 - When a contract is terminated, any days belonging to **periods of notice** not worked must be reported. If full and final settlement of salaries and other sums due ("solde de tout compte") is made before the contract termination date, the number of days reported may be higher as it is the total of days worked + days of notice in the following months that will not generate a further payment.
 - Until 2016, employers were required to report compensation in lieu of paid leave (ICCP) in days. This requirement has ended as of 2017. ICCP remains a pay component that is liable to contributions on the date of payment, but it will no longer allow the member to accrue the leave time for which it compensates.
- A **partial month due to a suspension** is a month during which the **member's contract was suspended without pay** at least one time for part of the month, but was not begun or terminated as previously described.
- ➔ The number of days reported must be equal to the difference between 30 and the number of calendar days during which the contract was suspended without pay as described in the appendix, with at least 1 day reported.
Examples: parental child-rearing leave ("congé parental d'éducation") from January 15 = 13 days must be reported in January (30 – 17 days of suspension), 10-day contract suspensions without pay in January, February, and April as part of an alternating work pattern = 20 days must be reported for these months (30 – 10 days of suspension)
- A **full month with a suspended contract** is a month not worked with **no salary continuation** for that month.
- ➔ It must be reported as **0 CRPNPAC days**.
Example: a month-long contract suspension without pay due to an alternating work pattern. It should be noted that salary components incorporated into the member's pay for their month off work but generated by the previous month's work have no impact on the calculation of their CRPNPAC days.

II. AIR CREW MEMBERS: TALLYING CRPNPAC DAYS WHEN APPLYING FOR CREDITS (days credited free of charge or through buyback)

Suspensions which employers do not declare in days can belong to two categories (see appendix):

1° Suspensions appearing under article R. 426-13 of the French code of civil aviation which do not entitle the member to either a full or a partial salary continuation: these circumstances can qualify the member for a free credit or a buyback if certain requirements are met. Likewise, certain periods outside of an air crew contract can also qualify for crediting to the member's account (examples: quarters in education, unemployment, military service, etc.). Specific guides to free credits and buybacks are available on our website www.crpn.fr.

2° Other contract suspensions explicitly set forth as such by the French labor code and which do not entitle the member to either a full or a partial salary continuation: these are periods not taken into account for a CRPNPAC retirement pension. The rules do not allow for these periods to be credited to the member's account.

See appendix below

APPENDIX:
**List of unpaid contract suspensions with an impact on
the number of days declared by employers**

For CRPN day tallying purposes as shown under point 1, only the following periods are considered as contract suspensions:

- Under article R. 426-13 of the French code of civil aviation, the following types of contract suspension do not occasion any full or partial salary continuation (the member can apply to have these periods credited to their account either through buyback or free of charge):
 - acquisition of an air crew qualification,
 - maternity or adoption leave,
 - parental child-rearing leave (“congé parental d’éducation”),
 - youth leader and facilitator training leave,
 - jury duty,
 - training leave,
 - teaching leave,
 - periods of pregnancy-related temporary unfitness for work,
 - paternity leave,
 - unpaid periods off work while on an alternating work pattern,
 - **periods of partial employment with benefits from 1st March 2020 to 31 December 2020 only.**

- The following additional types of contract suspensions, which are explicitly listed by the French labor code and do not occasion any full or partial salary continuation, cannot be credited to the member’s account:
 - periods of temporary medical leave (unless compensation was paid by a compulsory providence scheme),
 - birth leave in the event of the mother’s death,
 - compassionate leave (“congé de solidarité familiale”),
 - caregiving leave (formerly “congé de soutien familial”, now “congé de proche aidant”),
 - parliamentary-office leave,
 - business creation or takeover leave,
 - leaves of absence.

Important: whenever CRPN contributions have been paid for a given month, any other period of suspension or absence over the course of that month must be reported in days by the member’s employers (please refer to the example set forth under point 1 regarding full months: unpaid leave for personal reasons, strike action, etc.)

Please note that for the suspensions listed in paragraph one which appear in the French code of civil aviation and qualify for free crediting or buyback (see point II), specific guides are available on our website www.crpn.fr.