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Aviation maintenance education calls on Congress to modernize outdated FAA maintenance technical school regulations

[Title 14 Code of Federal Regulations part 147](#)—the regulation dictating what aviation maintenance educational institutions must teach aspiring aviation maintenance mechanics—has not been significantly updated in more than 50 years. In an age where technological advances are constantly driving innovation for safer and more efficient aircraft, schools are required to teach techniques for constructing and maintaining the Wright Flyer. Industry is left with the cost of retraining graduates to complete basic tasks required to maintain a modern, sophisticated aircraft.

In November 2015, six years after industry formally [recommended broad changes](#) to the current part 147, the FAA issued a notice of proposed rulemaking (NPRM) for part 147. In its [comments to the rulemaking](#), industry decried the proposal for its continued reliance on class time at the expense of technical capability and called for a less prescriptive rule that would exempt schools already beholden to Department of Education (ED) quality standards from duplicative oversight.

Three and a half years later, the FAA published a [supplemental notice of proposed rulemaking](#) (SNPRM). Instead of providing additional flexibility, the proposal layers in more prescriptive requirements that would stifle the already inadequate workforce pipeline. In its comments, [ATEC](#) and an [industry coalition](#) decried the supplemental proposal for three key reasons—

- The FAA must defer to ED on all matters concerning quality of education. The proposed rule would require FAA approval of elements already overseen by accreditors such as core competencies, methods of instruction (i.e., one-on-one vs. group), the order in which content is offered, and testing schedules. The proposals duplicate oversight and are reminiscent of those recommended for removal in the NPRM, suggesting industry's calls for agency deference are not being heard.
- In response for industry's call for a regulatory system that supports high school dual enrollment programs that will bolster an already inadequate technician pipeline, the agency proposed a complicated web of approvals that would be required for technical schools to offer content on a high school campus. A recommended simplified approach that would better support technical program expansions, was not acknowledged.
- The education community is in dire need of an outcomes-based regulatory approach, a methodology commonly used to oversee other air agency certificate holders. The agency must provide schools the flexibility to develop individualized programs that meet local employer needs. Given the agency controls and administers the aviation mechanic test, and consequently the knowledge and skill threshold all certificated mechanics must meet, the agency need not micromanage how schools will ensure students are properly prepared to meet the standard.

Given the FAA's failure to timely address part 147 rulemaking (despite a [2018 FAA Reauthorization bill](#) provision specifically calling for promulgation earlier this year, FAA officials have indicated a final rule is not expected until the end of 2020) and to provide the flexibility the community desperately needs, ATEC is calling on Congress to step in. It fully supports legislation directing the FAA to promulgate community-drafted language to ensure education can adequately support America's growing aviation industry.

Additional reading:

Aviation Week's InsideMRO, [Proposed Regulation Raises Questions About FAA's Role In Education](#)
The Hill, [Aviation struggles with 50-year-old maintenance training regulation](#)
ATEC Part 147 Issue Page and Timeline, [Where are We Now?](#)

About ATEC: *ATEC is a partnership of aviation maintenance training schools and employers. The council is dedicated to promoting and supporting technician education through its communications, advocacy programs and networking events.*