



# The New Part 147: An Overview

Jan. 13, 2020



# Welcome, Topic, and Agenda

- New rule coming
  - Part 147 Direct Rule included in [Public Law 116-260](#), effective Dec. 27, 2020
  - Direct rule mandates that the FAA remove and replace current part 147 with community-drafted language
- Section-by-section analysis
- Q&A and discussion
- Recorded version coming, pass it along



# Resources and Downloads

- PDF Version of this presentation (working links)
- Text of the new part 147 as set forth in the new law
- Cross-reference comparison of current 14 CFR Part 147 vs. new rule
- Airman Certification Standards (dated 12.2.20)
- ACS gap analysis self assessment form

Resources also available at [atec-amt.org/the-new-part-147](http://atec-amt.org/the-new-part-147).



# Previous Webinars

- [Part 147: Where Are We Now \(Nov. 18 2020\)](#)
  - Goes through the history of the rulemaking and legislative efforts
  - Gives outline of how the Airman Certification Standards fit in
- [Call to Action: The PARTT 147 Act \(Nov. 19 2019\)](#)
  - Introduces the PARTT 147 Act
  - Makes a call for action
- [Part 147 SNPRM Debrief \(May 30, 2019\)](#)
  - Outlines ATEC's response to the FAA supplemental proposal
  - Sets up the approach for legislative action



# Panelist Introductions

- Jared Britt, Director of Global Aviation Maintenance Training, Southern Utah University
- Justin Madden, Executive Director of Government Affairs, Aircraft Mechanics Fraternal Association
- Gary Hoyle, Director of Campus Operations, Pittsburgh Institute of Aeronautics
- Fred Dyen, Professor, Blue Ridge Community College
- Joel English, Executive Vice President, Aviation Institute of Maintenance
- Ryan Goertzen, Vice President Workforce Development, AAR Corp
- James Hall, Dean of Aviation and Manufacturing National Center for Aviation Training, WSU Tech



# Part 147: The Road to Reform

March 2003: GAO [calls for revision](#) to part 147

Jan 2009: ARAC [recommends broad changes](#) to part 147

Nov 2015: [FAA publishes NPRM](#)

Jan 2016: Congress [sends letter to FAA](#) calling for action on part 147 rulemaking

Aug 2017: Rep. Lamar Smith (TX-21) [requests update](#) on part 147

Aug 2017: Rep. Gus Bilirakis (FL-12) [requests update](#) on part 147

Aug 2017: ATEC pens [editorial](#) in TheHill.com highlighting the issue

Sep 2017: Sen. Hatch (UT) [requests update](#) on part 147

Oct 2018: The [FAA Reauthorization Act of 2018](#) mandates final rule by April 2019

Apr 2019: [FAA publishes SNPRM](#)

Dec 2019: [The PARTT 147 Act \(S. 3043/H.R. 5427\)](#) introduced in House and Senate

Dec 2020: New part 147 included in Public Law 116-260/[Consolidated Appropriations Act of 2021](#) (H.R. 133)



# The Coalition

Accrediting Commission of Career Schools and Colleges

Aeronautical Repair Station Association

Aerospace Industries Association

Aerospace Maintenance Council

Aircraft Electronics Association

Aircraft Mechanics Fraternal Association

Aircraft Owners & Pilots Association

Aircraft Owners and Pilots Association

Airlines for America®

Association for Women in Aviation Maintenance

Aviation Maintenance Technician Association

Aviation Suppliers Association

Aviation Technician Education Council

Cargo Airline Association

Choose Aerospace

International Air Transport Association

International Brotherhood of Teamsters

Modification and Replacement Parts Association

National Air Carrier Association

National Air Transportation Association

National Business Aviation Association

Professional Aviation Maintenance Association

Regional Air Cargo Carriers Association

Regional Airline Association

The Aviation Mechanics Coalition

Women in Aviation



# Coalition Initiatives

Feb 2016: [Industry coalition submits comments](#) decried the NPRM's continued reliance on class time at the expense of technical capability

Feb 2016: The STEM Education Coalition submitted comments to the [part 147 NPRM](#) in support of ATEC's efforts

June 2019: Industry coalition [files comments](#) in support of ATEC SNPRM comments

Dec 2019: Industry coalition [pens letter](#) in support of the PARTT 147 Act

Sept 2020: WA state-based organizations [pen a letter](#) to WA delegation

Dec 2020: Coalition sent letter to [House T&I Committee](#) supporting the PARTT 147 Act's inclusion in aviation safety reform bill



# The New Part 147: Big Picture

- The law directs the FAA to remove and replace the current part 147 with a performance-based rule by March 27
- New rule will require schools to align curriculum with mechanic [Airman Certification Standards \(ACS\)](#), free from FAA micro-management (i.e., no curriculum approvals)
- FAA will assess a program's quality based on student test performance
- For nationally accredited institutions, the FAA will defer to Dept. of Education oversight in all educational elements (e.g., teaching ratios, grading systems, number of instructional hours, competency determinations, etc.)
- FAA will oversee A&P program's facilities, materials, equipment, additional fixed locations, instructor qualifications, student-to-instructor ratio for shop class, and, for non-federally accredited orgs, the quality system.



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

(c) CERTIFICATE AND OPERATIONS SPECIFICATIONS REQUIREMENTS.—

(1) APPLICATION REQUIREMENTS.—

(A) IN GENERAL.—An application for a certificate or rating to operate an aviation maintenance technician school shall include the following:

(i) A description of the facilities, including the physical address of the certificate holder's primary location for operation of the school, any additional fixed locations where training will be provided, and the equipment and materials to be used at each location.

(ii) A description of the manner in which the school's curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated ratings under subpart D of part 65 of title 14, Code of Federal Regulations (or any successor regulation).

(iii) A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of subsection (d)(4).

(B) DOCUMENTED IN THE SCHOOL'S OPERATIONS SPECIFICATIONS.—Upon issuance of the school's certificate or rating, the information required under subparagraph (A) shall be documented in the school's operations specifications.



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

(5) OPERATIONS SPECIFICATIONS.—A certificated aviation maintenance technician school shall operate in accordance with operations specifications that include the following:

- (A) The certificate holder's name.
- (B) The certificate holder's air agency certificate number.
- (C) The name and contact information of the certificate holder's primary point of contact.
- (D) The physical address of the certificate holder's primary location, as provided under paragraph (1)(A).
- (E) The physical address of any additional location of the certificate holder, as provided under subsection (d)(2).
- (F) The ratings held, as provided under paragraph (4).
- (G) Any regulatory exemption granted to the school by the Administrator.



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

## (d) OPERATIONS REQUIREMENTS.—

(1) FACILITIES, EQUIPMENT, AND MATERIAL REQUIREMENTS.—Each certificated aviation maintenance technician school shall provide and maintain the facilities, equipment, and materials that are appropriate to the 1 or more ratings held by the school and the number of students taught.

(2) TRAINING PROVIDED AT ANOTHER LOCATION.—A certificated aviation maintenance technician school may provide training at any additional location that meets the requirements of the interim final regulations required under subsection (a)(1) and is listed in the certificate holder's operations specifications.



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

(3) TRAINING REQUIREMENTS.—Each certificated aviation maintenance technician school shall—

(A) establish, maintain, and utilize a curriculum designed to continually align with mechanic airman certification standards as appropriate for the ratings held;

NOTE: Changes to the ACS will be communicated through the FAA’s “What’s New and Upcoming in Airman Testing.” See previous versions and sign up to receive email notifications when new “What’s New” documents are published: [https://www.faa.gov/training\\_testing/testing/](https://www.faa.gov/training_testing/testing/).



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

(B) provide training of a quality that meets the requirements of subsection (f)(1); and

(C) ensure students have the knowledge and skills necessary to be eligible to test for a mechanic certificate and associated ratings under subpart D of part 65 of title 14, Code of Federal Regulations (or any successor regulation).



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

(4) INSTRUCTOR REQUIREMENTS.—Each certificated aviation maintenance technician school shall—

(A) provide qualified instructors to teach in a manner that ensures positive educational outcomes are achieved;

(B) ensure instructors hold a mechanic certificate with 1 or more appropriate ratings (or, with respect to instructors who are not certified mechanics, ensure instructors are otherwise specifically qualified to teach their assigned content); and

(C) ensure the student-to-instructor ratio does not exceed 25:1 for any shop class.



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

(5) CERTIFICATE OF COMPLETION.—Each certificated aviation maintenance technician school shall provide authenticated documentation to each graduating student, indicating the student's date of graduation and curriculum completed, as described in paragraph (3)(A).



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

(e) QUALITY CONTROL SYSTEM.—

(1) ACCREDITATION.—Each aviation maintenance technician school shall—

(A) be accredited as meeting the definition of an institution of higher education provided for in section 101 of the Higher Education Act of 1965 (20 U.S.C. 1001); or

(B) establish and maintain a quality control system that meets the requirements specified in paragraph (2) and is approved by the Administrator.

(2) FAA-APPROVED SYSTEM REQUIREMENTS.—

In the case of an aviation maintenance technician school that is not accredited as set forth in paragraph (1), the Administrator shall approve a quality control system that provides procedures for recordkeeping, assessment, issuing credit, issuing of final course grades, attendance, ensuring sufficient number of instructors, granting of graduation documentation, and corrective action for addressing deficiencies.



# Department of Education-Recognized Institutional Accrediting Agencies

The goal of accreditation is to ensure that education provided by institutions and/or programs of higher education meets acceptable levels of quality. Accreditors must measure school quality based on:

1. Management and Administration
2. Academic Programs
3. Faculty and Educational Administration
4. Marketing and Advertising
5. Admissions Policies and Practices
6. Student Services
7. Student Learning Assessment & Student Outcomes
8. Facilities Management
9. Distance Education

## National Institutional Accreditors

Accrediting Commission of Career Schools and Colleges  
Accrediting Council for Continuing Education and Training  
Accrediting Council for Independent Colleges and Schools  
Council on Occupational Education  
Distance Education Accrediting Commission

## Regional Institutional Accreditors

Higher Learning Commission  
Middle States Commission on Higher Education  
New England Commission of Higher Education  
Northwest Commission on Colleges and Universities  
Southern Association of Colleges and Schools  
Western Association of Schools and Colleges  
New York State Board of Regents & Commissioner of Education



# SEC. 135. PROMOTING AVIATION REGULATIONS FOR TECHNICAL TRAINING.

## (f) ADDITIONAL REQUIREMENTS.—

(1) MINIMUM PASSAGE RATE.—A certificated aviation maintenance technician school shall maintain a pass rate of at least 70 percent of students who took a written, oral, or practical (or any combination thereof) FAA mechanic tests within 60 days of graduation for the most recent 3-year period.

(2) FAA INSPECTION.—A certificated aviation maintenance technician school shall allow the Administrator such access as the Administrator determines necessary to inspect the 1 or more locations of the school for purposes of determining the school's compliance with the interim final regulations required under subsection (a)(1), the procedures and information outlined in the school's operations specifications according to subsection (c)(5), and the aviation maintenance technician school certificate issued for the school.

(3) DISPLAY OF CERTIFICATE.—A certificated aviation maintenance technician school shall display its aviation maintenance technician school certificate at a location in the school that is visible by and normally accessible to the public.

(4) EARLY TESTING.—A certificated aviation maintenance technician school may issue authenticated documentation demonstrating a student's satisfactory progress, completion of corresponding portions of the curriculum, and preparedness to take the aviation mechanic written general knowledge test, even if the student has not met the experience requirements of section 65.77 of title 14, Code of Federal Regulations (or any successor regulation). Any such documentation shall specify the curriculum the student completed and the completion date.



# What's Not in the New Rule

- Curriculum subject areas mandates
- Curriculum approval requirements
- Seat time or credit hour directives
- Specific space, equipment, and materials requirements
- Passing norms

Q: When does the rule go into effect?

A:

The FAA is required to publish the final, direct rule by March 27 (no guarantee that it will).

The law does not dictate an implementation date, AMTS will by and large be in compliance upon promulgation.



# Q: What will an AMTS be required to submit for FAA approval?

## A:

There are no curriculum approvals, seat time mandates, or operations manual or distance learning approval requirements.

Items that will be included on the operations specifications and will therefore need FAA “blessing” —

1. Name, address, POC
2. Additional fixed locations (meaning the AMTS will have to show that the additional fixed location meets the requirements of part 147)
3. A description of the facilities, equipment, and materials used at each location
4. A description of how the AMTS will ensure students attain the necessary knowledge and skills outlined in the ACS
5. A description of how it will ensure it provides the necessary, qualified instructors.



Q: What should an AMTS do to prepare?

A:

Take the ACS gap analysis spreadsheet (see resources) and conduct a gap analysis. Are all the knowledge, risk mitigation, and skill elements addressed in your program? If not, consider adjusting the content now.

Even under the current rule, adjusting the content does not necessarily mean you'll need to submit changes to the FAA for approval. Depends on what the FAA considers "curriculum" for your school.



# ATEC Project Library

Fill out the project form located at [atec-amt.org/the-new-part-147](https://atec-amt.org/the-new-part-147).

Send a completed version to ATEC and we'll add it to our projects library (subsequent to editorial review), and send you the access password to see other shared projects.

**BONUS:** Contributors will also receive the project grading form.



Q: How does the rule allow for competency-based programs?

A:

There are no seat time or credit hour requirements, meaning the school has freedom to structure the program in whatever manner best conveys the elements outlined in the ACS.

How might you structure a competency-based AMTS?



# Implementation Initiatives

- Community education
  - ATEC representatives available for online PAC meeting presentations
  - Look for an upcoming series of webinars
    - How do I build a competency-based program?
    - A deeper dive into the airman certification standards
    - How to break through the status quo
- Committee objectives
  - Regulatory: Proposing FAA guidance to support new rule
  - Legislative: Ensuring implementation of congressional mandate
  - Membership: Any part 147 certificate holder who is not a member, should be
  - Communications: Communicate the opportunities to the broader community



# Get Looped In

- Confirm you're receiving ATEC newsletters (see [archive](#))
- [Sign up](#) to receive text alerts (click on "mailing list" in the top menu bar)
- [Join](#) a committee
- Sign up for the spring professional development seminar (registration opening later this month)
- Next in-person event: [Annual Conference Fort Worth](#)





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