

ATEC Annual Conference 2022



Federal Aviation
Administration

Breakout Session 2-1: Get the Details on the New Part 147



Date: March 22, 2022

Agenda

- **Background on Part 147 Rulemaking**
- **Rule Status & FAQ**
- **Highlights of Major Changes to part 147**
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 - **Revise the AMTS curriculum to align with the Mechanic ACS.**
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Background on Part 147 Rulemaking

- **Part 147 Interim Final Rule (IFR), Docket: FAA-2021-0237**
 - The basis for this rulemaking is Section 135 of the Aircraft Certification, Safety, and Accountability Act.
 - This Act is also known as Public Law 116-260 - The Consolidated Appropriations Act of 2021.
 - The FAA adopts the statutory language of the Act and implements the language directly into the regulations.
 - The existing part 147 regulations will be repealed and replaced by the new part 147 regulations.
 - Some provisions in new part 147 regulations may look similar to previous requirements, however, the majority of the provisions have been revised.



Rule Status & FAQ

- **The part 147 Interim Final Rule (IFR) is not yet published.**
 - The publish date is the date the final rule is published in the Federal Register.
 - All rulemaking documents will be posted in Docket: FAA-2021-0237
<https://www.regulations.gov/docket/FAA-2021-0237>
- **The FAA posted an “advance copy”, signed by the FAA Administrator on 3/9/2022**
<https://www.faa.gov/newsroom/part-147-aviation-maintenance-technician-schools-amts-interim-final-rule>
 - The published final rule document may contain minor changes due to formatting and editorial requirements.

IMPORTANT: AMTS must continue to comply with the existing part 147 regulations until the effective date of the new regulations issued under the interim final rule.



Rule Status & FAQ

What is an interim final rule?

- An interim final rule is a final rule that skips the NPRM process and seeks public comment post-promulgation.
- Certificated AMTS must operate under the new part 147 regulations beginning on the effective date of the interim final rule.
- There will not be an additional rulemaking (i.e. a final rule) issued after the interim final rule.

Will the public have the opportunity to comment on the interim final rule?

- Yes, the FAA will request public comments in response to the interim final rule.
- The FAA will subsequently consider all public comments submitted in response to the rule and issue a document in the Federal Register responding to the comments.
- The Consolidated Appropriations Act of 2021, did not authorize the FAA to exceed the bounds of the statute when considering and responding to comments.



Highlights of Major Changes to part 147

	Part 147 IFR	Pre-IFR part 147
Training Provided at Another Location (new § 147.15)	<ul style="list-style-type: none"> An AMTS may provide training at a location other than the primary location of the AMTS. 	<ul style="list-style-type: none"> No regulatory provision for AMTS additional training locations.
Training Requirements (§ 147.17)	<ul style="list-style-type: none"> An AMTS must develop and use a curriculum that aligns with the Mechanic Airman Certification Standards (ACS). The Mechanic ACS is incorporated by reference into part 147, as the regulatory standard for AMTS curriculum development. The AMTS curriculum does NOT require FAA approval. 	<ul style="list-style-type: none"> An AMTS is required to develop a curriculum in accordance with the part 147 appendices. The AMTS curriculum require FAA approval.
Quality Control (QC) System (§ 147.23)	<ul style="list-style-type: none"> An AMTS must have a QC system, by either: <ol style="list-style-type: none"> Being accredited Having an FAA-approved QC system <p>Note: Accreditation must be by a Department of Education recognized accrediting agency.</p>	<ul style="list-style-type: none"> Only specified AMTS procedures require FAA approval.
Pass Rate (§ 147.25)	<ul style="list-style-type: none"> The AMTS must maintain a minimum pass rate. 	<ul style="list-style-type: none"> An AMTS quality of instruction is based on a national passing norm.
Early Testing (§ 147.31)	<ul style="list-style-type: none"> AMTS may issue completion documentation that will allow a student who have completed the “general” portion of the school’s curriculum, to take the “general” FAA test under § 65.77, prior to graduation/completion of the full curriculum. 	<ul style="list-style-type: none"> An AMTS must have an exemption to §65.77 to issue a document for early testing.



Rule Implementation

- **Final Rule Effective Date**

- The rule will be effective 120 days after publication
 - An AMTS must be in compliance and have new OpSpecs issued in accordance with the new part 147 regulations.
 - An AMTS that is not in compliance or without new OpSpecs may not conduct part 147 training operations.
- **“Light Switch” effectivity – The statute states (in part) “Upon the effective date of the interim final regulations ... part 147 ... (as in effect on the date of enactment of this title) ... shall have no force or effect on or after the effective date of such interim final regulations.”**

Important: An AMTS must be in compliance with the new regulations on the effective date of the interim final rule.



Rule Implementation

Implementation Tasks for currently certificated AMTS

- Develop the descriptions required by § 147.5 of the new regulations.
- Revise their current AMTS curriculum to align with the Mechanic ACS.
- If the AMTS is not accredited develop an AMTS Quality Control System for FAA approval.

Note: An AMTS that desire to add training locations during the initial transition to the new requirements may have additional implementation tasks.

Curriculum Transition at the AMTS.

- The FAA recognizes that some AMTS may have challenges switching from the old to the new regulations due to changes to the curriculum.
 - The FAA expects each AMTS to determine how to best handle this transition while ensuring the school maintains compliance with the new part 147 regulations.



Rule Implementation

Descriptions required by new § 147.5.

- Each AMTS must develop the following descriptions which will be included in AMTS OpSpecs:
 - A description of the facilities including the physical address of the applicant'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.
 - It is recommended that the AMTS provide the FAA with a detailed drawing showing the layout and dimensions of the facilities that could be referred to in the OpSpecs.
 - 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 part 65 subpart D. This description should include information such as:
 - Curriculum basis (e.g. hours, credit hours, CBT, etc.)
 - Curriculum delivery methods (e.g. classroom, distance learning, virtual practical application, etc.)
 - Curriculum focus (e.g. emphasizing certain curriculum content over others, such as an air carrier career focus)
 - A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19.



Implementation

Revise the AMTS curriculum to align with the Mechanic ACS.

- **Establish, Maintain, and Utilize.** An AMTS must establish, maintain, and utilize a curriculum designed to continually align with Mechanic ACS, as appropriate for the ratings held.
 - The “curriculum” refers to the document(s) a school must develop that must align with the Mechanic ACS, depending on the ratings issued to school.
 - The phrase “mechanic airman certification standards” in § 147.17(a)(1) refers to the standards that have been incorporated by reference in § 147.17(b).
 - AMTS must revise their curriculum whenever there are future revisions of the Mechanic ACS. Revision to the Mechanic ACS will require § 147.17(b) to be updated to reference the revised ACS.
- **Where to Find the ACS.** The Mechanic ACS is available to the public online on the ACS webpage at: https://www.faa.gov/training_testing/testing/acs.
- **Aligning the Curriculum with the ACS.** An AMTS will be in compliance with § 147.17(a)(1) if the school designs its curriculum to include:
 - The high-level subjects that are listed in the Mechanic ACS; and
 - Broader course content items, concepts, and practical projects under each high-level subject which may encompass several of the more detailed knowledge, risk management, and skill elements listed in the ACS.
 - For example, one broad course content item in the curriculum may encompass several knowledge elements listed in the ACS, while still aligning with the ACS. Similarly, a school could develop a curriculum that includes more content than the ACS and still be in alignment with the ACS.

NOTE: The curriculum does not require FAA approval, but it must meet the requirements of § 147.17(a)(1), and the FAA may request a copy, at any time, to verify compliance.



Implementation

Quality Control System Requirements

- § 147.23(a), QC System
 - Each certificated AMTS must have a QC system by either:
 - Being accredited within the meaning of Title 20 of the United States Code (20 U.S.C.) § [1001\(a\)\(5\)](#), or
 - Establishing and maintaining a QC system approved by the FAA.
- **Accreditation**
 - To be accredited within the meaning of 20 U.S.C. § 1001(a)(5) requires a school to be accredited by a Department of Education nationally recognized accrediting agency or association.
 - Pre-accreditation does not meet the requirements of § 147.23(a), since the regulation specifically requires “accreditation.”
 - The FAA will request evidence of accreditation prior to issuing new OpSpecs and may request evidence of accreditation at any time, to verify compliance with part 147.



Implementation

Develop a QC System for FAA Approval

- **FAA Approved QC System.** The QC System for FAA approval must include procedures for the following:
 - 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.
- **AC 147-3C.** The AC expands on the information expected in each of these areas in order to receive FAA approval.
- **FAA Approval.** The QC System must be submitted to the FAA for approval. The approved document(s) will be listed in AMTS OpSpecs.
- **QC System Revision.** Revisions to the QC System must be submitted to the FAA and receive FAA-approval prior to being implemented by the AMTS.



Additional Information

- **FAA form 8310-6**

- A new FAA form 8310-6, *Aviation Maintenance Technician School Certificate and Ratings Application*, has been developed to reflect the changes in part 147 based on the IFR.
 - The form must be approved by OMB (per the Paperwork Reduction Act) and will be available upon the effective date of the IFR.

- **Safety Procedures**

- The aviation maintenance environment may contain hazards especially to those who are not knowledgeable of the risks associated.
- Although not required by part 147 regulation, to prevent serious injury or death to students and AMTS personnel, the FAA encourages every AMTS to develop clear policy and procedures to ensure the safety of its training operations and conform to local, state, and Federal regulations for workplace safety.
- Procedures should be included for:
 - any training equipment used by the AMTS to include tools or other devices with the capability to operate, actuate, or store energy, or that otherwise has the potential to expose a person to injury
 - chemicals such as cleaners, lubricants, and flammable liquids used during training operations.
- These items should be evaluated by the AMTS for hazards and safety risks with policy and procedures to reduce the risk to an acceptable level.



Resources

Note: Some resources may not be available until the publish date or shortly after the publish date of the interim final rule in the Federal Register.

- New part 147 rule and preamble <https://www.regulations.gov/docket/FAA-2021-0237>
 - Advance Copy: <https://www.faa.gov/newsroom/part-147-aviation-maintenance-technician-schools-amts-interim-final-rule>.
- Mechanic ACS (also available in the rulemaking docket upon rule publication in the Federal Register)
www.faa.gov/training_testing/testing
- AC-147-3C (also available in the rulemaking docket upon rule publication in the Federal Register)
 - Draft - https://www.faa.gov/aircraft/draft_docs/afs_ac/
 - Final (once published) - https://www.faa.gov/regulations_policies/advisory_circulars/
- Notice 8900.616, Part 147, Aviation Maintenance Technician School, New Regulations and OpSpecs
 - https://www.faa.gov/regulations_policies/orders_notices/
- 8900.1 Guidance <https://drs.faa.gov/browse>
(New guidance will be available shortly after rule publication in the Federal Register.)
 - Volume 2, Chapter 12 (AMTS Certification)
 - Volume 6, Chapter 10 (AMTS Inspection)
 - Volume 3, Chapter 18, Section 11 (AMTS OpSpecs)



Questions/Feedback



- **The policy office for part 147 rulemaking, policy, and guidance is:**
 - **Office of Safety Standards, Aircraft Maintenance Division (AFS-300).** Division Manager: Jackie Black
 - **Airman and Special Projects Group (AFS-320).** Acting Manager: John Endicott
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