

Advisory Circular

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This advisory circular (AC) provides guidance to assist persons in obtaining and maintaining Federal Aviation Administration (FAA) certification of an Aviation Maintenance Technician School (AMTS). This guidance is not legally binding in its own right and will not be relied upon by the FAA as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with the guidance is voluntary only and nonconformity will not affect rights and obligations under existing statutes and regulations.

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CHAPTER 1. INTRODUCTION

- **1.1 Purpose of This Advisory Circular (AC).** This AC provides guidance to assist persons in obtaining and maintaining Federal Aviation Administration (FAA) certification of an Aviation Maintenance Technician School (AMTS). This guidance is not legally binding in its own right and will not be relied upon by the FAA as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with the guidance is voluntary only and nonconformity will not affect rights and obligations under existing statutes and regulations.
- **1.2** Audience. The primary audience for this AC is currently certificated Title 14 of the Code of Federal Regulations (14 CFR) part <u>147</u> AMTSs and persons desiring to obtain certification of an AMTS. The secondary audience includes Flight Standards (FS) personnel who have certification and surveillance responsibilities for part 147 certificated AMTSs.
- **1.3 Where You Can Find This AC.** You can find this AC on the FAA's website at <u>https://www.faa.gov/regulations_policies/advisory_circulars</u> and the Dynamic Regulatory System (DRS) at <u>https://drs.faa.gov</u>.
- **1.4 What This AC Cancels.** AC 147-3B, Certification and Operation of Aviation Maintenance Technician Schools, dated June 5, 2015, is canceled.
- 1.5 Principal Changes. This AC incorporates new and revised content to reflect the changes to part 147 that were made in accordance with Section 135, Promoting Aviation Regulations for Technical Training, of the Aircraft Certification, Safety, and Accountability Act in Public Law (P.L.) <u>116-260</u>, Consolidated Appropriations Act, 2021.
- **1.6 Applicability.** This AC applies to currently certificated AMTSs and to applicants seeking FAA certification of an aviation maintenance school.
- **1.6.1** <u>Guidance Information</u>. Guidance information is information considered advisory in nature and will contain terms such as "should" or "may."

1.7 Background.

1.7.1 <u>History of Part 147</u>. Part 147 prescribes the requirements for the certification and operation of FAA-certificated AMTSs, including the curriculum requirements. Part 147 originated as Civil Air Regulations (CAR) part 53 in 1940.¹ In 1962, the CARs were recodifed; CAR 53 became 14 CFR part 147.² In 1970, the FAA issued a final rule that changed the name of "mechanic schools" to "aviation maintenance technician schools," provided more specific guidelines for the certification and operation of schools, increased the required core curriculum hours from 1,500 to 1,900, and further defined teaching

¹ Final Rule, "Providing for the Rating and Certification of Civilian Schools giving Instruction in Aircraft and Aircraft Engine Mechanics," 5 FR 673 (Feb. 15, 1940).(amending the Civil Air Regulations by adding new part 53, effective May 1, 1940).

² Final Rule, "Schools and Other Certificated Agencies," 27 FR 6655 (Jul. 13, 1962).

guidelines and subject content to reflect technological advancements in the aviation industry.³ In 1992, the FAA revised part 147 by adding a definition in appendix <u>A</u> for "teaching materials and equipment" to include the use of computers in the training environment. The FAA also revised the headings of several subjects in part 147 appendices <u>B</u>, <u>C</u>, and <u>D</u> to better reflect course content, added course content items within several subject areas, and added two new subject headings with related course content items for "Unducted Fans" and "Auxiliary Power Units".⁴ Subsequently, in 1992, the FAA made a minor amendment to § <u>147.21</u> as part of another rulemaking.⁵ Specifically, the FAA added a provision to § 147.21 that allowed AMTS to apply for and receive approval of special courses in the performance of inspection and maintenance on primary category aircraft, and authorized the school to issue certificates of competency to persons successfully completing such courses.⁶

1.7.2 Notice of Proposed Rulemaking (NPRM).

- 1.7.2.1 On October 2, 2015, the FAA published an NPRM titled, "Aviation Maintenance Technician Schools."⁷ In the NPRM, the FAA proposed to amend the regulations governing the curriculum and operation of FAA-certificated AMTSs. The FAA proposed to modernize and reorganize the required curriculum subjects found in the appendices of the current regulations, remove the course content items from the appendices and relocate them to each school's operations specifications (OpSpecs), and revise the curriculum requirements to include an option for schools to use a credit hour curriculum as an alternative to an instructional hour curriculum.
- 1.7.2.2 After considering the comments to the NPRM, and the potential benefits to industry, the FAA decided to expand the scope of the rulemaking by issuing a Supplemental Notice of Proposed Rulemaking (SNPRM), published on April 16, 2019.⁸ The SNPRM proposed: (1) to allow curriculums using competency-based training (CBT) programs as a curriculum delivery; (2) to allow the establishment of satellite training locations; and (3) to remove the national passing norm requirements in § <u>147.37</u> and replace them with a standard pass rate.
- 1.7.3 <u>Interim Final Rule (IFR)</u>. While the FAA was in the process of completing the final rule, which would have responded to all significant comments received on the NPRM and SNPRM, Congress passed legislation requiring the FAA to replace part 147, as in effect on the date of enactment of Section 135, with new regulations that conform to the statutory requirements. Specifically, on December 27, 2020, Congress passed the Consolidated Appropriations Act, 2021 (P.L. 116-260), which includes the Aircraft Certification, Safety, and Accountability Act (the "Act"). In Section 135 of the Act, titled

⁷ 80 FR 59674.

³ Final Rule, "Name, Operations, and Curriculum," 35 FR 5531 (Apr. 3, 1970).

⁴ Final Rule, "Revision of Aviation Maintenance Technician Schools Regulations," 57 FR 28952 (Jun. 29, 1992).

⁵ Final Rule, "Primary Category," 57 FR 41360 (Sept. 9, 1992).

⁶ 57 FR 41366 and 41370.

⁸ 83 FR 15533.

"Promoting Aviation Regulations for Technical Training," Congress directed the FAA to issue interim final regulations, no later than 90 days after the date of enactment of the Act, to establish requirements for issuing AMTS certificates and associated ratings and the general operating rules for the holders of those certificates and ratings.

- **1.7.3.1** Additionally, the statute states that the current part 147 regulations and any regulations issued under Section 624 of the FAA Reauthorization Act of 2018 shall have no force or effect on or after the effective date of the IFR. As a result, the IFR repealed and replaced former part 147 upon the effective date of the IFR.
- **1.7.3.2** Upon review of Section 135, the FAA determined that the proposed requirements in the NPRM and SNPRM would have significantly exceeded the scope of the statutory mandate. Therefore, to comply with Section 135, the FAA published a Federal Register (FR) Notice withdrawing the NPRM (Notice No. 15-10) and SNPRM (Notice No. 19-02). Instead of finalizing these proposals, the FAA issued the IFR to establish requirements for certificated AMTSs in accordance with Section 135 of the Act.
- **1.7.4** <u>Statutory Mandate</u>. Pursuant to Section 135(a)(1) of the Act, the FAA issued the interim final regulations in accordance with the requirements set forth in Section 135. The provisions of Section 135, which are discussed further below, include requirements pertaining to:
 - When an AMTS certificate is required;
 - Applications for AMTS certificates and associated ratings, additional ratings, and changes to certificates;
 - OpSpecs and the contents thereof;
 - The duration of a certificate or rating issued under part 147;
 - The ratings that an AMTS may obtain under part 147;
 - AMTS facilities, equipment, and material;
 - Training provided at another location;
 - AMTS training and curricula;
 - Instructors;
 - Certificates of completion;
 - Quality control (QC) systems;
 - The minimum passage rate each school must maintain;
 - FAA inspections;

- The display of part 147 certificates; and
- A student's ability to take the FAA's mechanic general written test prior to satisfying the experience requirements of 14 CFR part <u>65</u>, § <u>65.77</u>, provided certain conditions are met.
- **1.8 Discussion.** An AMTS is an educational facility certificated by the FAA under part 147 to train students in the knowledge and skills required for careers in the aviation maintenance industry. When all other eligibility requirements are met, a certificate of completion issued by a part 147 AMTS can be used by a mechanic applicant to show eligibility to test for a mechanic certificate airframe and/or powerplant rating, as applicable to the curriculum from which the applicant graduated/completed. The goal of any AMTS should be to prepare students with the basic knowledge, skills, and attitude to be successful in an aviation maintenance career.
- **1.8.1** From the initiation of the AMTS certification process to the issuance of the certificate, the amount of time and capital for required facilities, equipment, and curriculum development can be significant.
- **1.8.2** Frequently, the AMTS program is only part of a school's overall instruction program (for example, programs that include AMTS curriculum in addition to other curriculum content to achieve a bachelor's or other degree). The requirements of part 147 should not be interpreted as applicable for any courses other than those required by the part 147 curriculum.
 - **1.9** AC Feedback Form. For your convenience, the AC Feedback Form is the last page of this AC. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this AC on the Feedback Form.

CHAPTER 2. CERTIFICATION REQUIREMENTS FOR A PART 147 AMTS

- 2.1 AMTS Ratings. An AMTS may be FAA-certificated with the following ratings:
 - Airframe,
 - Powerplant, and/or
 - Airframe and Powerplant.
- **2.1.1** <u>Certificate of Completion</u>. The ratings issued to an AMTS indicate what curriculum(s) the school is authorized to deliver, and subsequently issue a certificate of completion for. An AMTS may only issue a certificate of completion upon a student's graduation from a specific curriculum, consistent with the school's ratings (refer to § <u>147.21</u>). The general portion of a curriculum is not a rating, but must be completed as a required part of any rating, pursuant to regulation.

Note: See paragraph <u>2.7.2</u>, Curriculum, and Table <u>2-1</u>, Curriculum Design Examples, for additional discussion on the relationship between AMTS ratings, curriculum structure/delivery, and when the AMTS can issue a completion document for a completed curriculum or portion of a curriculum.

2.1.2 <u>Early Testing</u>. The AMTS may choose to issue a document that indicates the student has completed the general portion of the school's curriculum. This document can be used to demonstrate the student's preparedness to take the mechanic general written test in accordance with 14 CFR part <u>65</u>, § <u>65.75(c)</u>. Early testing under § <u>147.31</u> is discussed in paragraph <u>3.7</u>.

2.2 AMTS Operations Specifications (OpSpecs).

- 2.2.1 <u>Part 147 OpSpec Paragraphs</u>. OpSpecs are authorizing documents issued to an AMTS by which an AMTS must comply, pursuant to § <u>147.3</u>. Part 147 OpSpec templates and policy are developed by the Office of Safety Standards, Aircraft Maintenance Division. The responsible Flight Standards office works with the AMTS to populate the OpSpecs with information and authorizations specific to the AMTS.
 - The FAA issues "Required" OpSpecs to all AMTS.
 - The FAA issues an "Optional" OpSpec to an AMTS depending on specific operations of the school.
- **2.2.2** <u>Issuing Part 147 OpSpecs</u>. OpSpecs for part 147 AMTSs will be issued utilizing the following paragraphs, as appropriate and applicable to the AMTS ratings and operations.

Note: Asterisk (*) items are OpSpecs that include information specifically required by Section 135 of the Aircraft Certification, Safety, and Accountability Act in Public Law (P.L.) <u>116-260</u>, Consolidated Appropriations Act, 2021.

- 1. A001, Issuance and Applicability (Required).* Lists the AMTS's name, physical address and mailing address of the primary location for operation, primary point of contact (POC), and the school's Air Agency Certificate number.
- A002, Definitions and Abbreviations (Required). Lists definitions of words or phrases used in the part 147 OpSpecs. These definitions are intended to enhance understanding between the FAA and the aviation industry in regards to part 147 AMTSs.
- 3. A003, Ratings (Required).* Lists the ratings held by the AMTS.
- 4. A004, Summary of Special Authorizations and Limitations (Required). Identifies all optional/nonrequired OpSpec paragraphs applicable to the AMTS.
- 5. A005, Exemptions (Optional).* Lists any exemptions used by the AMTS.
- 6. A007, Designated Persons (Required). Lists persons the AMTS has designated to officially apply for and receive OpSpecs on behalf of the AMTS.
- 7. A008, Additional Training Locations (Optional).* Lists the additional training locations of the AMTS.
- 8. A013, Instructors (Required).* Includes a description of the manner (or a reference to the description) in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19.
- 9. A015, Facilities, Equipment, and Materials (Required).* Includes a description of the facilities, equipment, and materials used at the primary school location, and at each additional training location, or a reference to that description.
- A025, Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals/Documents (Optional). Identifies AMTS's use of, and quality control (QC) system procedures for the use of, electronic signatures, electronic recordkeeping, or electronic manuals.
- 11. A027, Quality Control System (Required). Authorizes how the AMTS meets the QC system requirements of § 147.23(a). If the AMTS uses accreditation to meet § 147.23(a), then Table 1 will list the accrediting agency of the school. The AMTS should notify the FAA of changes to its accreditation to ensure the school's OpSpecs show the school is meeting the QC system requirements. If the AMTS obtains an FAA-approved QC system, then Table 2 will list the AMTS's FAA-approved manuals, documents, or sections containing procedures that make up the FAA-approved QC system.
- 12. B001, Curriculum (Required).* Includes a description of the manner (or reference to the description) 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 <u>D</u>.

- 2.2.3 <u>Web-Based Operations Safety System (WebOPSS)</u>. Part 147 OpSpecs are processed and issued electronically through WebOPSS by the Flight Standards office responsible for the AMTS. AMTS personnel responsible for part 147 OpSpecs can request access to their OpSpecs in WebOPSS through the responsible Flight Standards office. AMTS personnel approved for access to WebOPSS and authorized to accept OpSpecs on behalf of the AMTS (see paragraph 2.2.4 below) can purchase a digital certificate to sign their OpSpecs electronically through the Digital Certificate Service (DCS) at <u>https://dcs.faa.gov/</u>.
- **2.2.4** <u>Receiving and Maintaining OpSpecs</u>. The AMTS should designate at least one person as authorized to sign and receive OpSpecs and who will be identified in OpSpec A007. Only individuals listed on A007 are authorized to receive/sign OpSpecs. This applies to the use of electronic signatures or pen-and-ink signatures applied to an OpSpec.
- **2.2.5** <u>AMTS Manually Signing OpSpecs</u>. If the certificated entity does not have a person authorized to sign/receive OpSpecs (A007) with access and a digital certificate to sign OpSpecs electronically in WebOPSS, the responsible Flight Standards office will prepare the OpSpecs for manual signature by the AMTS. The signature block will include the name and title of the authorized AMTS representative (A007) who will sign the OpSpecs.
 - **2.2.5.1** AMTSs should retain copies of all current, signed OpSpecs, being diligent in ensuring they always use and maintain the most recently approved amendment to each issued OpSpec.
- **2.2.6** <u>AMTS Responsibility for OpSpecs</u>. Pursuant to § 147.3, an AMTS may not operate without, or in violation of, its OpSpecs. The AMTS has the responsibility to review and maintain each OpSpec paragraph for correctness and should conduct regular reviews to ensure all information is correct.
- **2.2.7** <u>Transition to Part 147 Interim Final Rule (IFR)</u>. The promulgation of the part 147 IFR has resulted in revised, added, and removed OpSpecs for part 147 certificate holders. Upon the effective date of the IFR, an AMTS may not operate under the former part 147 regulations and OpSpecs issued under those former regulations. In order to ensure continuous training operations at the AMTS, the school must demonstrate compliance with the new part 147 requirements prior to the effective date of the IFR.
 - **2.2.7.1** To demonstrate compliance with the IFR, the AMTS must provide the following information to the AMTS's responsible Flight Standards office (see Chapter <u>4</u>, paragraph <u>4.2.3.4</u>):
 - **2.2.7.1.1** The descriptions required by <u>147.5</u>:
 - 1. A description of the AMTS facilities at the primary location, and each additional training location.
 - 2. A description of the AMTS equipment used at the primary location, and each additional training location.

- 3. A description of the AMTS materials used at the primary location, and each additional training location.
- 4. 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.
- 5. A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19 (refer to § 147.5(b)(3)).
- **2.2.7.1.2** The school's curriculum, that aligns with the Mechanic Airman Certification Standards (ACS) as required by $\frac{147.17}{2}$.
- **2.2.7.1.3** Evidence of accreditation, if the AMTS intends to meet the QC system requirements using accreditation as provided in § 147.23(a)(1).
- **2.2.7.1.4** A QC system, if the AMTS intends to meet the QC system requirements using a QC system as provided in § 147.23(a)(2).

Note: The AMTS must allow a reasonable amount of time for the FAA to review and approve requests for approval of a QC system.

2.2.7.1.5 Any other information applicable to the school's training operations such as additional training locations or regulatory exemptions.

Note: AMTSs that are certificated prior to the effective date of the new part 147 (see paragraph <u>1.7.4</u>) are not required to submit a new application for certification; however, the FAA must ensure that the new and changed requirements of part 147 can be met by the AMTS prior to conducting training. Therefore, the certificated AMTS must work with their assigned Flight Standards office to provide all requisite information.

- **2.2.7.2** If compliance is demonstrated prior to the effective date of the IFR, the FAA will review the AMTS submission to ensure compliance with the new regulations and issue OpSpecs that are effective upon the effective date of the IFR. The AMTS may continue to conduct training operations.
- 2.2.7.3 If compliance is demonstrated after the effective date of the IFR, the FAA will issue OpSpecs once it has verified the part 147 requirements have been met. In this instance, the AMTS will not be permitted to operate as a certificated AMTS during the period of time between the effective date of the IFR and the date upon which the FAA determines the new part 147 requirements have been met and issues new OpSpecs.

2.3 AMTS Certificate Requirements.

2.3.1 <u>Duration of Certificate</u>. Pursuant to § <u>147.7</u>, an AMTS's FAA certificate remains in effect until it is surrendered, suspended, or revoked.

2.3.2 <u>Display of Certificate</u>. Pursuant to § <u>147.29</u>, an AMTS is required to display its FAA Air Agency Certificate in a location that is visible by and normally accessible to the public. The certificate must be displayed in this manner at the primary location of the AMTS and at any additional fixed location.

Note: It is acceptable to display a copy of the Air Agency Certificate.

- **2.3.3** <u>Advertising</u>. Part 147 no longer addresses advertising requirements of an AMTS. The AMTS should ensure it complies with all Federal and state laws, as well as accreditation requirements, as applicable, that are in place to protect the public from false and misleading advertising.
- **2.3.4** <u>FAA Inspection</u>. Pursuant to § <u>147.27</u>, an AMTS must allow the FAA access to its facilities for inspection for the purposes of determining the school's compliance with the requirements of part 147. This includes access to the primary AMTS location and each additional training location. When a formal application is made to the FAA for certification, the applicant will be required to allow the FAA to inspect its facilities and equipment as part of the certification process. After certification, FAA inspections are conducted as determined by FAA surveillance program requirements. Typically, inspections are conducted at least annually, with additional inspections to be conducted as determined by the FAA. An FAA inspection may also be conducted when a school requests to add an additional training location.
 - **2.4 Descriptions Required by § 147.5.** An AMTS must develop and submit to the FAA the following descriptions relative to its training operations:
 - A description of the facilities, including the physical address of the applicant's primary location for operation of the school, and any additional fixed locations where training will be provided, and the equipment and materials to be used at each location. See paragraph <u>2.8</u>.
 - 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. See paragraph <u>2.7.1</u>.
 - A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19. See paragraph <u>2.9</u>.
- 2.4.1 <u>Inclusion in AMTS OpSpecs</u>. The descriptions provided to the FAA, pursuant to § 147.5, will be documented in the AMTS OpSpecs. Additionally, if descriptions are changed, the AMTS must provide the changes to the FAA in order for the documented changes to be updated in the OpSpecs to maintain compliance with their OpSpecs, pursuant to § 147.3. The descriptions may be included in the OpSpecs by reference to a document provided by the AMTS, rather than including the description directly into the body of the OpSpec. In these instances, the document's title, revision level, and revision date will be listed in the OpSpec, and the FAA will retain a copy of the document.

- **2.5 AMTS Quality Control System.** As stated in § 147.23(a), 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.) § <u>1001(a)(5)</u> (see paragraph 2.5.1), or
 - Establishing and maintaining a QC system approved by the FAA (see paragraph <u>2.5.2</u>).
- 2.5.1 <u>Accreditation</u>. 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. Pursuant to 20 U.S.C. § 1001(c), the Secretary of Education publishes a list of all nationally recognized accrediting agencies or associations determined to be a reliable authority as to the quality of the education or training offered. The list can be found on the Department of Education website. A school can become accredited by seeking recognition from one of the accrediting agencies recognized by the Department of Education. The accreditation may be for the entire institution (institutional accreditation) or limited to a part of an institution or the AMTS program itself (specialized or programmatic accreditation).
 - **2.5.1.1** The Department of Education's recognition of accrediting agencies is limited by statute to accreditation activities within the United States. As such, in order to be accredited within the meaning of 20 U.S.C. § 1001(a)(5), an AMTS must have its primary location within the United States.
 - For an AMTS with the primary location located within the United States, the AMTS's accreditation extends to any additional training locations, whether located within or outside the United States.
 - For an AMTS whose primary location is outside of the United States, accreditation is not recognized by the Department of Education and therefore does not satisfy § 147.23(a)(1). The AMTS must establish and maintain a QC system pursuant to § 147.23(b), for the primary location and any additional training locations whether located within or outside the United States.
 - **2.5.1.2** In order to demonstrate accreditation under § 147.23(a), a school should have documentation that shows the school's accrediting agency and the school's current accreditation status. The AMTS should notify the FAA when there are changes to its accreditation, such as changes to the accrediting agency or a lapse in accreditation.

Note: If the AMTS is not accredited, it must have and use a QC system that is FAA approved.

2.5.1.3 Pre-accreditation does not meet the requirements of § 147.23(a), since the regulation specifically requires "accreditation."

- 2.5.2 <u>FAA-Approved QC System</u>. Schools that are not accredited within the meaning of 20 U.S.C. § 1001(a)(5) must obtain FAA approval of a QC system; however, the regulation does not preclude an accredited school from obtaining an FAA-approved QC system should they choose that manner of compliance with § 147.23. An AMTS with an FAA-approved QC system must continually maintain that system under § 147.23(a)(2). For new applicants for AMTS certification, the QC system must be submitted to the FAA for approval during the certification process, and any subsequent revisions to the system must be submitted for approval. Pursuant to § 147.23(b), the QC system must include procedures for the following, which are discussed in detail in paragraphs 2.5.3 through 2.5.10:
 - 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.
- **2.5.3** <u>Recordkeeping</u>. The AMTS recordkeeping procedures should describe the types of records the school will produce and retain, and for how long. Recordkeeping procedures should encompass all records produced within the QC system to include:
 - 1. Records of assessment of a student's knowledge and skill, as applicable to the curriculum for which the student is enrolled. Records should clearly distinguish between successful performance and unsuccessful performance.
 - 2. Records showing credit granted for previous experience and/or previous instruction, including supporting transcripts, when applicable. Records should clearly show what subject areas were credited to the student based on the school's evaluation of previous experience or training using the school's crediting procedures.
 - 3. Records of the student's grades, to include final course grades, as applicable. Records should clearly distinguish between successful performance and unsuccessful performance.
 - 4. Records of student attendance relative to the school's attendance policy.
 - 5. Records of curriculum completion and records showing issuance of graduation documentation, and/or records showing general curriculum course content completion and issuance of general curriculum course content completion documentation.
 - 6. Records showing identified deficiencies of the QC system and records showing the school's corrections of those deficiencies. If follow-up audits are performed to validate corrective actions, those records should also be retained.

- 7. Examples of the forms the school will use for records described above.
- 8. Record retention procedures should state how long the school will retain its records. It is recommended the school retain records for at least 2 years after the end of the student's enrollment. Any record archival policy should also be described in the school's recordkeeping procedures.
- 2.5.3.1 Electronic/Digital Recordkeeping. If the AMTS chooses to use electronic/digital recordkeeping for any of the records described in the school's QC system, it is recommended that the school incorporate the guidelines put forth in AC <u>120-78</u>, Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals, in developing its electronic/digital recordkeeping procedures. The FAA will issue OpSpec A025 to authorize digital/electronic recordkeeping.
- **2.5.4** <u>Assessment</u>. AMTS course testing/assessment (not FAA-administered tests), including preparation and post-test reviews, is an important part of the learning process and is considered part of the teaching validation process. Testing should be directly related to the subject matter and consistent with the expected learning outcome. Assessment procedures should include:
 - When and how the school will assess its students;
 - How the school ensures testing integrity in all testing environments (e.g., classroom, shop, computer-based testing, distance learning testing, etc.);
 - How the school ensures test security; and
 - How the school handles instances of cheating on tests.
 - 2.5.4.1 It is recommended that upon completion of each curriculum subject area, a test should be scheduled. In addition, quizzes may be scheduled at the school's discretion at any time. When testing for subjects that have many hours of instruction, an AMTS should consider planning more than one test or quiz during the instructional unit.
 - **2.5.4.2** Test security procedures should include provisions for regular test revisions and the secure storage of tests and quizzes.
- **2.5.5** <u>Issuing Credit</u>. The school must have procedures that describe how and when the AMTS will issue credit for a subject or course. These procedures should include:
 - How the AMTS issues credit for its courses delivered as a part of its part 147 curriculum.

- If, and under what circumstances, the school credits a student's prior instruction or experience.
- How the school will determine the amount of credit to be given that ensures the student's prior experience or training is equivalent to the curriculum for which the student is receiving credit.
- **2.5.5.1 Crediting Prior Instruction.** The AMTS should only grant credit for previous instruction that has been satisfactorily completed at:
 - An accredited university, college, community college, or junior college;
 - An accredited vocational, technical, trade, or high school;
 - A military technical school; or
 - Another certificated AMTS.
- **2.5.5.2** Crediting Prior Experience. The AMTS should only credit previous maintenance experience after examining documents that verify that experience.
- **2.5.5.3 Determining Issuance of Credit.** The AMTS should determine the amount of credit to be given as it relates to the training requirements provided in § 147.17. An AMTS should utilize the following methods:
 - An evaluation of an authenticated transcript from the student's former AMTS (applicable for prior instruction),
 - A qualifying entrance test equal to one given to students who complete the corresponding curriculum content at the crediting AMTS (applicable to either prior instruction or prior experience), or
 - Another method that verifies the student's previous training or experience meets the crediting school's curriculum requirements.
- **2.5.5.3.1** When basing credit on an evaluation of an authenticated transcript, the crediting AMTS should ensure the individual has completed training comparable (i.e., meets or exceeds the curriculum content) of that offered by the crediting school. The AMTS should be able to show documented evidence of the evaluation. Evaluation of a transcript could be based on a combination of the following:
 - Detailed transcripts.
 - The course catalog description of the course that was completed by the student.

- Audits of the class for which the credit is to be based when crediting a specific course on a routine basis. In this circumstance, the AMTS should define its audit schedule within the QC procedures.
- Other documents showing the course content on which the credit is being based.
- **2.5.5.3.2** When using an entrance test to determine the credit to be granted, the test should be equal to one given to students who complete the corresponding curriculum content at the school. This is applicable to either prior instruction or prior experience. The entrance test should include both knowledge and skill components of the curriculum to which credit is being granted.
- **2.5.5.3.3** Generally, creditable previous mechanic experience should be aviation maintenance experience comparable to the required AMTS curriculum subject areas.
 - Example 1: An individual with substantial powerplant experience (no airframe experience) gained while working in the military or at an airline should be considered as having previous experience only within powerplant subject areas.
 - Example 2: An uncertificated mechanic working for an airline for 5 years only in the tire shop should not be considered to have experience relating to all airframe subjects.
- 2.5.4 Credit for the General Curriculum. A school may credit a student seeking an additional mechanic certificate rating with previous satisfactory completion of the general curriculum content. If an individual has obtained a mechanic certificate with either an airframe rating or a powerplant rating, that rating indicates the individual has met the knowledge requirements for issuance of a mechanic certificate, which includes knowledge and skills that would be required within the general portion of an AMTS curriculum. Therefore, a student who is seeking an added rating to their mechanic certificate may be issued graduation documentation by the AMTS upon completion of the applicable curriculum, even though the student did not complete the general portion of the AMTS curriculum.

2.5.5.5 Exceptions to Crediting Procedures.

- If an AMTS Air Agency Certificate has been suspended by the FAA, courses taught during the suspension period cannot be credited retroactively, even if the school becomes re-certificated later, because the AMTS would be operated in violation of § 147.7.
- An AMTS applicant may not teach students as an AMTS before receiving an FAA certificate and then give credit for that training after the school becomes certificated, because the AMTS would be operating in violation of § 147.3.

- **2.5.6** <u>Issuing of Final Course Grades</u>. The AMTS QC system must include procedures that describe how the AMTS will issue final course grades. The procedures should describe the AMTS's standards for passing grades to include:
 - The minimum passing grade sufficient to achieve the required knowledge and skills of the school's curriculum;
 - How grade weighting (percentage) and/or grade averaging will be used to determine the final course grade, as applicable;
 - Forms or samples of electronic records the AMTS will use for recording grades;
 - Any other procedures the school uses to determine final course grades; and
 - A description of any audit or verification procedures the AMTS will use to ensure accuracy of the final grade.
 - **2.5.6.1** A common academic standard for passing is a minimum score of 70 percent, and the FAA written, oral, and practical tests have a 70 percent minimum passing standard in accordance with § 65.17. The AMTS should define its standard for a passing final course grade in its QC system procedures (refer to § 147.23(b)). However, it is recommended that the school does not implement a passing standard lower than 70 percent, to support the school in meeting the quality of instruction requirements of § <u>147.25</u>.
 - **2.5.6.2** Theoretical portions of the curriculum may have different grading standards from those required in laboratory and shop classes.
- **2.5.7** <u>Attendance</u>. The QC system must include attendance procedures. Procedures should include the following:
 - The AMTS attendance policy for courses that are required for curriculum completion.
 - How the AMTS will track student attendance when required by its attendance policy.
 - Any limitations on student attendance or enrollment, such as limiting class hours in a day/week, or limiting enrollment in additional courses.

Note: Depending on the basis of the curriculum, attendance policies can vary greatly. For example, schools basing their curriculum on hours may have more strict or detailed attendance requirements than schools basing their curriculum on credit-hours or competency.

2.5.8 <u>Ensuring Sufficient Number of Instructors</u>. The school must have QC system procedures describing how the school will ensure it maintains a sufficient number of instructors to achieve the school's training requirements. Procedures should include the following:

- A description of how the AMTS will ensure the 25:1 student-to-instructor ratio required by § 147.19(c) is maintained.
- A description of any other requirements the AMTS is placing on student-to-instructor ratios for the purpose of achieving the school's training requirements.
- **2.5.9** <u>Granting of Graduation Documentation</u>. The school must have QC system procedures describing how it grants graduation documentation under § 147.21 and completion documentation required for early testing under § 147.31.
 - **2.5.9.1** Section 147.21, Certificate of Completion. Under § 147.21, when a student satisfactorily completes the required curriculum content for graduation, the school must issue an authenticated document to the graduating student. A graduation document may only be issued consistent with the school's ratings. The procedures for issuing the authenticated document should include the following:
 - **2.5.9.1.1** A description of the document to be issued and what information will be included on the document. At a minimum, the following information should be included on the document in order to meet the requirements of § 147.21(a):
 - Student name, indicating who the document was issued to.
 - School name and Air Agency Certificate number, to indicate who issued the document and that the document was issued by an FAA-certificated AMTS.
 - Authentication, using the method of authentication determined by the school to show the document was issued legitimately.
 - The student's date of graduation.
 - The name of the curriculum completed by the student (i.e., either "Airframe", "Powerplant", or "Airframe and Powerplant").
 - **2.5.9.1.2** A description of the authentication process used by the school to ensure the document was legitimately issued by the school, and a description of designated school personnel authorized to authenticate the document. For example, schools may use a signature, an embossed seal, or some other method to indicate authentication, and may limit the performance of authentication to certain school officials.
 - **2.5.9.1.3** The process used to verify the student has passed the curriculum based on the school's standards for issuing final course grades, any attendance requirements, and/or crediting of the AMTS curriculum that was based on prior instruction or experience.
 - **2.5.9.1.4** How the school ensures the student is eligible to receive the graduation certificate.

- 2.5.9.2 Section 147.31. Under § 147.31, when a student satisfactorily completes the general portion of a school's curriculum, the school may issue an authenticated document that demonstrates the student's preparedness to take the FAA mechanic general written test in accordance with § 65.75(c). When a school intends to support the option of the early testing provision, the QC system procedures should include procedures describing how the school issues the required document that will allow early testing under § 65.75(c). At a minimum, the following information should be included on the document in order to meet the requirements of § 147.31:
 - Student name, indicating who the document was issued to.
 - School name and Air Agency Certificate number, to indicate who issued the document and that the document was issued by an FAA-certificated AMTS.
 - Authentication, using the method of authentication determined by the school to show the document was issued legitimately.
 - The student's date of graduation.
 - Indicate the document demonstrates completion of the general curriculum content of the school's curriculum.

Note: Some schools incorporate the general curriculum content as a part of the Airframe and/or Powerplant curriculum content. Students may be issued a completion document as long as the school can identify and verify that the student has completed the general curriculum content requirements of the school.

- 2.5.9.3 Electronic Signatures. If the AMTS chooses to use electronic signatures on the authenticated document issued under § 147.21 or § 147.31, the school should describe its electronic signature procedures within its QC system. It is recommended that the school incorporate the guidelines put forth in AC 120-78 in developing its electronic signature procedures. The FAA will issue OpSpec A025, to authorize the AMTS use of electronic signatures.
- **2.5.10** <u>Corrective Action for Addressing Deficiencies</u>. The school must have QC system procedures which describe how the school will take corrective action for addressing deficiencies. The term "deficiencies" refers to deficiencies or defects within the school's QC system. The procedures should include a description of the following:
 - How the school will receive and record reports of deficiencies.
 - How the school will determine the cause of the deficiency.
 - How the school will develop, implement, and track correction of deficiencies.
 - How the school will perform follow-up to ensure deficiencies have been adequately corrected.

- **2.5.11** <u>QC System Format</u>. The AMTS should consolidate its QC system policy and procedures into a single manual/document because the entire QC system receives FAA approval through OpSpec A027. However, the OpSpec does allow the listing of multiple approved documents that make up the QC system, if applicable. The AMTS should not include procedures that are not specified by § 147.23(b) within the QC system documents being approved by the FAA, unless the additional procedures are clearly noted as being not a part of the FAA-approved QC system.
 - **2.5.11.1** FAA approval of the QC system described under paragraphs <u>2.5.2</u> through 2.5.11 is provided by issuance of OpSpec A027, which indicates the revision level and date of the QC procedures currently approved by the FAA.
 - **2.5.11.2** Because § 147.23 requires that a QC system be FAA approved, if a school revises the procedures of its QC system, the school must receive FAA approval of the revised system prior to implementing those changes. It is important that the AMTS have a means of maintaining revision control of its QC document(s). This provides a way for both the AMTS and the FAA to verify if the school is maintaining its compliance with the requirements of part 147. The following controls should be included in any manual or document system for revision control, as appropriate:
 - Revision Procedures. Define in writing the revision procedures for its manuals/documents to ensure consistent and correct application.
 - List of Effective Pages (LEP). The LEP shows the current active pages of the document, to include their date of revision and revision level.
 - Record of Revisions. This page is a running list of the revisions that have been applied to the document historically, and includes the revision level and date of the revision.
 - Highlights of Revision. This page is based on the current revision and briefly describes the changes that were implemented within the document. The details should be described on a page-by-page level.
 - Form Control. Forms should include a form-specific revision level identified on the form. Forms may be included within the document, within an appendix, or within a separate forms manual.
 - Identify Revised Text. Revised text within the document should be identified. Vertical change bars adjacent to the revised text, highlighting text, or another method of identifying revised text could be used.
 - **2.6 Other AMTS Procedures.** All AMTS are encouraged to develop additional procedures regarding their training operations. The procedures should be directed at AMTS personnel and students to provide transparency in expectations. While additional procedures are encouraged, they should not be included in the FAA-approved portion of a school's QC system. Doing so can create confusion when determining regulatory compliance with part 147. Certain additional AMTS procedures may be required by

regulation (e.g., some exemptions include a requirement for procedures), or may affect how the AMTS or students comply with a related regulation (e.g., testing under § 65.80). Some examples of other policy and procedures that an AMTS is encouraged to develop are included below.

- 2.6.1 <u>Safety Procedures</u>. The aviation maintenance environment can be dangerous, especially to those who are not knowledgeable of its hazards and risk. To prevent serious injury or death to students and AMTS personnel, the FAA encourages the 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. The FAA highly recommends that AMTSs contemplate the mitigation of hazards associated with performing high risk training operations, using the following guidelines:
 - 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, should be evaluated by the AMTS for hazards and safety risk.
 - The use of chemicals such as cleaners, lubricants, and flammable liquids (refer to material safety data sheets (MSDS)) during training operations should be evaluated by the AMTS for hazards and safety risk.
 - The AMTS should develop safety policy and procedures that ensure the equipment or chemical's safe use in all training scenarios, by mitigating risk to acceptable levels.
 - Safety procedures should include checklists wherever applicable. Training should be provided, to AMTS personnel and students, on the checklists prior to their use.
 - The school's curriculum should include or reference briefings on all safety procedures appropriate to laboratory or shop practical projects. The briefings should be readily available to instructors and students and be used to increase safety awareness prior to high risk training operations.
- **2.6.2** <u>AMTS Safety Programs</u>. As FAA certificate holders, AMTSs may voluntarily disclose apparent violations of part 147 to the FAA under the Voluntary Disclosure Reporting Program (VDRP). Written procedures could provide expectations and guidance to AMTS personnel. The procedures should define who is responsible for making disclosures, describe internal AMTS procedures related to disclosures, and include or refer to the applicable procedures of AC <u>00-58</u>, Voluntary Disclosure Reporting Program. The VDRP web page can be found at <u>https://vdrp.faa.gov/</u>.
- 2.6.3 <u>Student Testing Under § 65.80</u>. AMTS students may take their FAA oral and practical tests prior to taking their FAA written tests, when done in accordance with § 65.80. Because § 65.80 contains certain requirements that must be met, AMTSs are encouraged to develop written procedures to ensure those requirements are met before the school authorizes the student to test under § 65.80 (i.e., by signing the appropriate blocks on FAA Form <u>8610-2</u>, Airman Certificate and/or Rating Application). Having written procedures may streamline the FAA approval process for these test authorizations. The procedures should address the following:

- **2.6.3.1** Determine the Student Has Met the § 65.80 Requirements. When an AMTS has determined that a student has met the requirements of § 65.80, the AMTS must sign the appropriate block of FAA Form 8610-2 to show the student is prepared to take the oral and practical tests prescribed by § <u>65.79</u>. The requirements are as follows:
 - The AMTS must show to the FAA that the student has made satisfactory progress,
 - The student is prepared to take the oral and practical tests prescribed by § 65.79, and
 - The student is in the final subjects of training in the curriculum (i.e., the AMTS must be prepared to show the FAA that the student is in the final subjects of training in the curriculum).
- **2.6.3.2 AMTS Signature.** The AMTS procedures should describe how it will ensure that each student applying to take the FAA oral and practical tests prior to taking the FAA written knowledge tests has met the § 65.80 requirements. The procedures should include who (by title) is authorized to sign FAA Form 8610-2 on behalf of the AMTS and the timeframe for submitting the form to the FAA.
- **2.6.4** <u>Exemptions</u>. Many exemptions granted by the FAA have associated conditions or limitations which the exemption holder must meet to be in compliance with the exemption. The AMTSs are encouraged to develop written procedures to ensure compliance with the conditions and limitations of the exemption it intends to use, and thereby ensure continued regulatory compliance and safety.
- **2.6.5** <u>Technical Data</u>. The use of appropriate technical data is a cornerstone of aviation maintenance. Accordingly, the FAA recommends that AMTSs describe procedures for ensuring access to appropriate technical data applicable to the school's rating(s), training equipment, and training materials, to include chemicals used during training.
- **2.6.6** Special Tools and Hand Tools. The AMTS should describe procedures for how it will ensure the maintenance of precision/special tools and hand tools. If the school has a student hand tool policy, such as a requirement that the student supply certain hand tools, this should also be described.
- 2.6.7 <u>Procedures for FAA Certification of Students (e.g., Taking the FAA Written, Oral, and</u> <u>Practical Tests After Graduation</u>). Since the main goal of most AMTS graduates is to obtain an FAA mechanic certificate, it is recommended the AMTS provides students with procedures describing how the student will move forward to the FAA testing process following graduation. The procedures should also describe how the AMTS graduation certificate, or other appropriate documentation, will provide eligibility towards FAA testing.

- **2.6.8** <u>Additional Administrative Procedures</u>. The FAA recommends the AMTS provides whatever additional procedures it deems necessary to ensure its personnel are conducting operations in accordance with the expectations of the AMTS, and the requirements of part 147.
 - **2.7** Curriculum/Training Requirements. Part 147 contains the following curriculum requirements:
 - Curriculum description (application requirements), as required by § 147.5(b)(2). See paragraph 2.7.1 for additional discussion.
 - Curriculum document and training requirements, as required by § 147.17(a)(1). See paragraph 2.7.2 for additional discussion.
- 2.7.1 <u>Curriculum Description</u>. The AMTS OpSpecs include 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, and, therefore, the description must be included in the AMTS's application for a certificate and rating, as required by § 147.5(b)(2). The FAA recognizes that there are many methods of instruction available in the education industry, and part 147 allows the school to decide the best method for the structure and delivery of its curriculum. The FAA will include the curriculum description in the AMTS OpSpec B001. The description should include discussion in the following areas, as applicable:
 - Curriculum Basis,
 - Curriculum Delivery Methods, and/or
 - Curriculum Focus.
 - **2.7.1.1 FAA Oversight**. Pursuant to the FAA's authority to conduct inspection (§ 147.27), the FAA's oversight includes:
 - Ensuring the AMTS is delivering its curriculum in the manner stated in the description. If the school were not following the described manner, it would be in violation of its OpSpecs (refer to § 147.3).
 - Ensuring the curriculum basis, delivery methods, and any curriculum focus are achieving the standards of § 147.17(a)(2) and (3).
 - 2.7.1.2 OpSpec Paragraph B001. The curriculum that an AMTS must provide in accordance with § 147.5(b)(2) will be included in the AMTS OpSpecs. Additionally, because an AMTS may not operate in violation of its OpSpecs, pursuant to § 147.3, whenever the AMTS changes the description of its curriculum basis or delivery, it must provide those changes to the FAA for amendment of OpSpec B001. The description may be included in the OpSpecs by reference to a document provided by the AMTS, rather than by including the description directly into the body of the OpSpec. In these instances, the

document's title, revision level, and revision date will be listed in the OpSpec, and the FAA will retain a copy of the document.

- 2.7.1.3 Curriculum Basis. The following are examples of a curriculum basis that may be used for AMTS curriculum. There may be other examples of a curriculum basis that are not discussed here. Appendix <u>B</u>, Related References (Current Editions), lists several references that may assist schools in determining and developing the curriculum basis.
- 2.7.1.3.1 <u>Hours-Based Curriculum</u>. An AMTS may choose to base its curriculum on requiring student completion of a defined number of curriculum hours. For example, the school could base its curriculum on curriculum hours defined by the school, for each of the school ratings:
 - Airframe 1,150 hours (400 hours of general content plus 750 hours of Airframe content).
 - Powerplant 1,150 hours (400 hours of general content plus 750 hours of Powerplant content).
 - Combined Airframe and Powerplant 1,900 hours (400 hours of general content plus 750 hours of Airframe and 750 hours of Powerplant content).

Note: Part 147 does not prescribe minimum curriculum hours.

2.7.1.3.2 <u>Credit Hours-Based Curriculum</u>. An AMTS may choose to base its curriculum on requiring student completion of a defined number of credit hours. Credit hours should be based on higher education criteria, such as the credit hour criteria of the school's accrediting agency.

Note: Part 147 does not prescribe an amount of credit hours.

- **2.7.1.3.3** <u>Competency-Based Training (CBT) Curriculum</u>. An AMTS could choose to develop its curriculum using educational practices based on competency and assessment. A standard for CBT has been developed by the International Civil Aviation Organization (ICAO).
 - ICAO Doc <u>9868</u>, Procedures for Air Navigation Services—Training, defines CBT and assessment as: "Training and assessment that are characterized by a performance orientation, emphasis on standards of performance and their measurement, and the development of training to the specified performance standards." The ICAO document describes and the training takes into account the competencies and behaviors that are considered fundamental for aircraft maintenance personnel.
 - ICAO Doc <u>10098</u>, Manual on Competency-Based Training and Assessment for Aircraft Maintenance Personnel, provides guidance on a new approach of applying competency-based training and assessment to

aircraft maintenance personnel in accordance with Part III of the PANS-TRG (Doc 9868).

Note: Part 147 does not prescribe CBT standards.

2.7.1.4 Curriculum Delivery Methods. The school must ensure that the curriculum delivery method used to teach the various knowledge and skills required to perform aircraft maintenance under 14 CFR will achieve the training requirements put forth in § 147.17. Additionally, the delivery method must ensure that each instructor is able to comply with the instructor requirement to teach in a manner that ensures positive educational outcomes are achieved (refer to § 147.19(a)).

Note: The FAA does not approve a school's curriculum delivery method.

- **2.7.1.4.1** <u>In-Person Delivery</u>. Much of the knowledge and skill training relative to aircraft maintenance is suited to in-person delivery, where students can learn and experience aircraft maintenance in an environment that is similar to what individuals will experience as certificated mechanics.
- 2.7.1.4.2 <u>Distance Learning Delivery</u>. There are various methods a school could use to deliver curriculum content that enables access to learning when the source of information and the learners are separated physically by time or distance, or both. Schools should carefully consider what curriculum content is appropriate for distance delivery to ensure expected learning outcomes will be met.
- 2.7.1.4.3 <u>Virtual Simulation</u>. Many AMTS are incorporating virtual simulation for conducting practical application of certain skills. For example, virtual welding and virtual paint booths use simulation equipment and technology to provide near-real environments while minimizing the hazards associated with those activities. When virtual simulation is used, the school must ensure that the learning objectives for knowledge and skill are met, just as they would in real-world practical application. Additionally, while the simulated environment may reduce the hazards associated with the task, it is important that students are highly aware of hazards when conducting the real-world task, as well as how to mitigate those hazards, such as with personal protective equipment (PPE).
- 2.7.1.5 Curriculum Focus. An AMTS may enrich portions of its curriculum to develop graduates who are directed toward particular areas of the aviation industry. For example, schools may train graduates specifically for employment at commercial airlines, helicopter operations, repair stations, or agricultural aircraft operations. Schools must ensure that the curriculum does not omit content that is in the Mechanic ACS, as, pursuant to § 147.17(a),

curriculum must continually align with the Mechanic ACS (refer to paragraph 2.7.2). Examples of curriculum focus include:

- 2.7.1.5.1 Example 1. An AMTS in a rural area may wish to focus on preparing students for General Aviation (GA) and aircraft operations such as agricultural operations. In this case, airframe subjects such as wood, dope, fabric, welding, rigging, and corrosion control would be emphasized for these subjects. Powerplant courses such as propellers and reciprocating powerplants, including radial and opposed, would also be emphasized in the same ways. On the other hand, turbine engines, electronics, and air conditioning may be deemphasized, while still ensuring all knowledge and skills required by the Mechanic ACS are taught in these areas.
- 2.7.1.5.2 <u>Example 2</u>. An AMTS in a metropolitan area may concentrate on preparing students for employment at major airlines. This AMTS would tend to emphasize areas such as turbine engines, nondestructive inspection (NDI), air conditioning systems, auto flight, electronics, and airline maintenance systems. This AMTS may want to de-emphasize its teaching of wood, dope, fabric, welding, and reciprocating engine subjects, while still ensuring all knowledge and skills required by the Mechanic ACS are taught in these areas.
- 2.7.2 <u>Curriculum</u>. An AMTS must establish, maintain, and utilize a curriculum designed to continually align with Mechanic ACS, as appropriate for the ratings held, pursuant to § 147.17. The "curriculum" refers to the curriculum document(s) that a school must develop, which must align with the Mechanic ACS, depending on the ratings issued to school under § 147.11. The school's curriculum must be used at all training locations of the school (i.e., different locations may not use different curriculum). However, all or a portion of the curriculum may be taught at any of the school's locations.
 - 2.7.2.1 Mechanic ACS. 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). The Mechanic ACS contains several high-level subjects. For each subject, the ACS specifies the aeronautical knowledge, risk management, and skill standards that an applicant for a mechanic certificate must know. An AMTS curriculum is required to align with the subject areas and with each of the aeronautical knowledge, risk management, and skill standards included in the Mechanic ACS.
 - 2.7.2.1.1 Because part 147 requires use of the Mechanic ACS, which was not already published in the CFR or another location that carries the full force and effect of the law, the FAA incorporated the Mechanic ACS by reference. Incorporation by reference is a mechanism that allows Federal agencies to comply with the requirements of the Administrative Procedure Act (APA) to publish rules in the Federal Register (FR) and the CFR by referring to material published elsewhere. Material that is incorporated by reference has the same legal status as if it were published in full in the CFR.

- 2.7.2.1.2 In accordance with 5 U.S.C. § 552(a) and 1 CFR part 51, the FAA makes the Mechanic ACS reasonably available to interested parties. The FAA provides free online public access to view read-only copies of the Mechanic ACS that is incorporated by reference. The Mechanic ACS is available to the public for free viewing online on the ACS web page at https://www.faa.gov/training_testing/acs. In addition to the free online availability of this material for viewing on the FAA's website, hard copies and printable versions are available from the FAA.
- 2.7.2.2 Aligning the Curriculum with the ACS. As previously discussed, the Mechanic ACS includes high-level subjects (e.g., Fundamentals of Electricity and Electronics, Aircraft Drawings, etc.), and then breaks the high-level subjects into components that include knowledge, risk management, and skill elements relevant to that subject. The knowledge, risk management, and skill elements set forth the standards for certification. Because § 147.17(a)(1) requires a curriculum to align with the Mechanic ACS, the curriculum must align with the standards set forth under the high-level subjects.
- **2.7.2.2.1** 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: While a curriculum must align with the high-level subjects and the standards set forth under those subjects, this does not mean that an AMTS must copy and paste the entirety of the Mechanic ACS into its curriculum. The intent of the regulation is to remove the prescriptive curriculum requirements from part 147 and provide a more flexible, performance-based standard that enables an AMTS to develop a curriculum that coincides with the Mechanic ACS.

- 2.7.2.2.2 If the curriculum does not align with the knowledge and skill elements contained in the Mechanic ACS, the school would also be in violation of the § 147.17(a)(3) training requirement because the Mechanic ACS contains the knowledge and skill standards that will be evaluated on the FAA written, oral, and practical tests for a mechanic certificate under part 65.
- **2.7.2.3** The curriculum must provide the opportunity for the student to obtain and demonstrate skill, as will be required during mechanic certification testing and expected following certificate issuance. Skill components of the ACS which

specify the applicant demonstrate the ability to perform an action related to a subject area element should be included into the AMTS curriculum as practical projects with defined performance criteria and outcomes.

- 2.7.2.3 Curriculum Document Design. The regulation does not require a specific design/format for a curriculum. Based on the ratings issued to the AMTS, the AMTS has the flexibility to design its curriculum document structure as desired. The school can only issue a certificate of completion for a completed curriculum, which correspond to the AMTS ratings. The AMTS ratings, curriculum design, and the graduation/completion document issued by the AMTS will affect at what point a student may be eligible to take the FAA written, oral, and practical exams.
- 2.7.2.4 Examples of Curriculum Document Design. Examples of possible curriculum document design have been included in Table 2-1 below. There may be additional possibilities that have not been included in the table. The left column reflects the ratings referenced in § 147.11. The middle columns show the possible curriculum designs, standalone or combined. The three columns preceding the "General Early Testing" column show the graduation document (or completion document) a school can issue after the appropriate curriculum is completed. For the last column, please refer to the footnote.

If the AMTS holds this rating	And curriculum document design is in this format					Then the AMTS may issue completion documentation referencing the following curriculum				
	Airframe (A)	Powerplant (P)	General (G)	Airframe + General (A+G)	Powerplant + General (P+G)	Combined (A+P+G)	Airframe (A)	Powerplant (P)	A & P (single certificate)	General (early testing)
Airframe &	X	X	X						X	
Powerplant						X				
Airframe				X			x			X ^[1]
All frame	X		X				Λ			\mathbf{A}^{CT}
Doworplant					X			X		
Powerplant		X	X					Λ		

Table 2-1. Curriculum Design Examples

^[1] A "general" curriculum completion document should only be issued if the AMTS can clearly document completion of the general content of its curriculum.

- **2.7.2.5** Additional Curriculum Content. The requirement that curriculum content align with the Mechanic ACS is a minimum standard. AMTSs may include additional content in their curriculum that is above and beyond what is included in the Mechanic ACS.
- 2.7.2.5.1 Safety Information. The aviation maintenance environment can be dangerous, especially to those who are not knowledgeable of its hazards and risk. The FAA recommends that AMTS integrate additional safety policy and procedures referenced in paragraph 2.6.1 into its curriculum document(s). Results of AMTS risk mitigations, such as safety briefings or references to appropriate safety procedures, should be included in the AMTS curriculum or otherwise be readily available to instructors and students to increase safety awareness prior to high risk training operations.

- **2.7.2.5.2** <u>Tests/Evaluations</u>. AMTS may choose to include information in the curriculum on the tests and/or other evaluations that are related to the subjects in the curriculum.
- **2.7.2.5.3** <u>Practical Project Information</u>. AMTS may choose to include additional information in their curriculum related to practical projects, such as performance criteria, tools and equipment required for the project, and safety information.

2.7.3 <u>Revisions to the Curriculum</u>.

- **2.7.3.1** Section 147.17(a)(1) requires AMTS curriculum to align with the ACS. Therefore, when the Mechanic ACS is revised, a corresponding revision to the AMTS curriculum must also be made, no later than the effective date of the change to those standards.
- **2.7.3.2** The curriculum document(s) should use a method to identify revisions to the curriculum, such as a revision level and date, change bars, and/or LEP.
- **2.7.3.3** There is no requirement for the school to submit a revised curriculum to the FAA for review; however, the requirement to maintain the curriculum aligned with the Mechanic ACS is ongoing. Therefore, AMTSs are encouraged to communicate curriculum changes with the FAA certificate management team, and the FAA will conduct routine surveillance on AMTS curriculum to ensure continued alignment with the Mechanic ACS.
- 2.8 Facilities, Equipment, and Materials. Under § <u>147.13</u>, each AMTS must provide and maintain the facilities, equipment, and materials that are appropriate to the rating or ratings held by the school and the number of students taught. The term "appropriate" means that the facilities, equipment, and materials provide a safe and suitable learning environment that results in the ability to meet the training requirements of § 147.17 (see paragraph <u>2.6</u>). If certain facilities, equipment, and materials are essential to support the school's curriculum, then the school must have those facilities, equipment, and materials. To illustrate, if the curriculum includes a skill requirement that an applicant must perform on a specific piece of equipment, the school must have that piece of equipment (e.g., where a school's curriculum requires a student to be able to perform a skill requirement to service a battery, the school must have an aircraft battery in a condition that will allow a student to demonstrate the appropriate servicing requirements in order to be considered to have equipment appropriate to the rating).

Note: The safety of students is of utmost importance. Aircraft maintenance tasks can be dangerous and schools must ensure their facilities, equipment, and materials prevent injury or death in the learning environment.

2.8.1 <u>AMTS Facilities</u>. The AMTS must provide an environment suitable for learning to ensure that learning objectives set forth in § 147.17 are met. Considerations should include:

- Distractions from learning, such as excessive noise, dust and fumes (poor ventilation), heat and cold (temperature control), and clutter should be considered. For example, classrooms should be separated from the noise and activity of shop and/or hangar environments.
- Facilities should be of adequate size for the number of students in a classroom, or accomplishing any of the laboratory or shop projects as appropriate to the school's instructional design (e.g., a certain area or piece of equipment cannot accommodate a large number of students, but the school's instructional design ensures it is used by small groups of students at different times).
- Facilities should be located and classes scheduled so that students can travel between classes without cutting into instructional time.
- The school should ensure the laboratory and shop floors are free from clutter, such as extension cords and air hoses.

Note: All school facilities must conform to any local, state, and Federal standards including those imposed by local fire departments, health agencies, and other regulatory agencies. Discussion of those requirements is beyond the scope of this AC.

2.8.1.1 Facility Description. AMTS OpSpecs will include a description of the facilities that will be used for instruction, as required by § 147.5(b)(1). The description must be detailed enough to demonstrate that the AMTS can provide and maintain facilities that are appropriate to the rating or ratings requested, and the number of students taught.

Note 1: The facility description discussed above may be included in the OpSpecs by reference to a document provided by the AMTS, rather than including the description directly into the body of the OpSpec. In these instances, the document's title, revision level, and revision date will be listed in the OpSpec, and the FAA will retain a copy of the document.

Note 2: It is recommended that the AMTS provide the FAA with a detailed drawing showing the layout and dimensions of the facilities. See Appendix \underline{C} , Sample Layout Facility.

2.8.1.2 Additional Training Locations. Facility descriptions must be included for each additional training location. The facilities of each additional training location must meet the requirements of part 147 and be listed in the AMTS OpSpecs, pursuant to § <u>147.15</u>.

Note: Sometimes a course of study may be offered at a separate facility due to standards from local, state, and Federal codes that the primary AMTS facility cannot meet (e.g., requirements relating to operation of aircraft and associated noise, fire, and safety hazards). If

the AMTS will instruct curriculum content at a separate facility, then the AMTS must consider this an additional training location.

- **2.8.2** <u>AMTSs Equipment</u>. AMTS equipment includes, but is not limited to, shop equipment, tools (including hand tools), and instructional aids such as aircraft, aircraft components, and mock-ups used for learning. The AMTS must provide equipment suitable for learning to ensure that learning objectives set forth in § 147.17 are met.
 - **2.8.2.1 Shop Equipment.** AMTS should consider the following guidelines for shop equipment:
 - Have enough shop equipment in place and in satisfactory operating condition to adequately serve the student enrollment and support intended curriculum learning outcomes.
 - Maintain an adequate ratio of instructional aids-to-students in each shop class to ensure safety and facilitates learning.
 - Shop equipment should be maintained in good working order and be in a condition for safe operation. A system should be in place for routine preventive maintenance and/or replacement.
 - Large standing equipment should be securely installed and located to provide sufficient aisle space so students can move about freely.
 - **2.8.2.2 Tools.** The AMTS should provide any necessary tools required to provide appropriate instruction. The tools should be in satisfactory working condition and of the proper kind for the purpose for which they are intended. The AMTS should either provide common hand tools or require students to furnish their own.
 - **2.8.2.3** Instructional Aids. The instructional aids should be appropriate for the scope and depth of the school's curriculum. The AMTS should ensure the complexity of instructional aids is appropriate to the level of knowledge and skill outcome of the subject element. The AMTS should maintain a ratio of instructional aids-to-students, which ensures safety and facilitates learning. Broken or deteriorated instructional aids should be repaired or replaced. Examples of instructional aids include:
 - Diagrams;
 - Visual aids;
 - Computers;
 - Interactive software;
 - Aircraft and mock-ups of aircraft;
 - Engines and engine accessories; and
 - Components, such as hydraulic servos, accumulators, etc.

Note: Part 147 does not require that each school have at least one aircraft currently certificated by FAA for private or commercial operations with powerplant, propeller, instruments, navigation and communications equipment, landing lights, and other equipment and accessories on which a maintenance technician might be required to work and with which the technician should be familiar. However, an aircraft can often provide an all-in-one instructional aid opportunity and can assist in familiarizing students with the real-world aircraft maintenance environment.

- **2.8.2.4** Sharing Training Equipment. Sharing of training equipment is acceptable among locations of an AMTS as long as equipment is available when needed to deliver the school's curriculum.
- **2.8.2.5** Equipment Description. The AMTS OpSpecs will include a description of the equipment that will be used for instruction as required by § 147.5(b)(1). The description must be detailed enough to demonstrate that the AMTS will provide and maintain equipment that is appropriate to the rating or ratings requested/issued, and the number of students taught. Descriptions must be provided to the FAA relative to equipment located at each training location of the AMTS.

Note: The equipment description discussed above may be included in the OpSpecs by reference to a document provided by the AMTS, rather than including the description directly into the body of the OpSpec. In these instances, the document's title, revision level, and revision date will be listed in the OpSpec, and the FAA will retain a copy of the document.

- **2.8.3** <u>AMTS Materials</u>. The AMTS must describe the materials to be used for instruction. The school must have sufficient materials in stock and properly stored to provide for the student enrollment.
 - **2.8.3.1 Materials Description.** The AMTS OpSpecs will include a description of the materials that will be used for instruction as required by § 147.5(b)(1). The description must be detailed enough to demonstrate that the AMTS can provide and maintain materials that are appropriate to the rating or ratings requested and the number of students taught. Descriptions must be provided to the FAA for materials located at each training location of the AMTS.

Note: The materials description discussed above may be included in the OpSpecs by reference to a document provided by the AMTS, rather than including the description directly into the body of the OpSpec. In these instances, the document's title, revision level, and revision date will be listed in the OpSpec, and the FAA will retain a copy of the document.

- **2.8.3.2 Technical Data.** An AMTS should provide suitable technical data reference access. The technical data should be appropriate to the AMTS ratings and to the instructional equipment used by the school. At a minimum, the technical data should include the following:
 - Title 14 CFR parts <u>1</u> through 199.
 - Aircraft, engine, propeller, and Type Certificate Data Sheets (TCDS) and specifications.
 - Airworthiness Directives (AD).
 - Aircraft maintenance manuals, relative to the equipment used by the school.
 - Supplemental Type Certificates (STC), relative to the equipment used by the school.
 - ACs.
 - Other instructional materials, such as textbooks on basic physics, math, hydraulics, powerplants, etc.
- **2.8.4** <u>Additional Training Locations</u>. Section 147.15 allows the AMTS to provide training at additional training locations. Additional training locations are any fixed location other than the school's primary location. The additional location must meet all part 147 requirements and be listed in the AMTS OpSpecs, pursuant to § 147.15.

Note: If an AMTS is, or will be, conducting training at a location different from the address listed on the AMTS Air Agency Certificate and OpSpec A001, the school must consider these locations as additional training locations and notify the FAA to add these locations to the AMTS OpSpecs. Buildings co-located on a campus do not need to be considered separate training locations.

- **2.8.4.1** Notify the FAA. Prior to conducting any training at an additional training location, the AMTS must notify the FAA so that the location can be added to the AMTS OpSpecs. Additionally, the facilities, equipment, and materials for each location are included in the AMTS OpSpecs. See paragraph <u>2.7.1</u> for additional information.
- **2.8.4.2** Curriculum Taught at Additional Location. All or a portion of the AMTS curriculum may be taught at an additional training location.

Note: Part 147 states each certificated AMTS must establish, maintain, and utilize a curriculum; both "AMTS" and "curriculum" are stated in the singular. While an AMTS may only have one curriculum, it may have separate curriculum components (i.e., general, Airframe, Powerplant) for the ratings that the AMTS holds.

- **2.8.4.3 Procedures.** As previously stated, should an AMTS make changes to their FAA-approved QC system, such changes would need to be submitted to the FAA for updated approval.
- **2.8.4.4** FAA Surveillance. Pursuant to § 147.27, the FAA may inspect each additional training location requested by the AMTS, prior to adding the location to the AMTS OpSpecs.
- **2.8.5** <u>AMTS Located Outside of the United States</u>. Part 147 does not prohibit AMTS having a primary AMTS location, or additional training locations, from being located outside of the United States.
 - **2.8.5.1** Certification and subsequent surveillance of AMTS primary or additional training locations outside of the United States are subject to fees in accordance with 14 CFR part <u>187</u>. Refer to AC <u>187-1</u>, Flight Standards Service Schedule of Charges Outside of the United States, for information on fees.
 - **2.8.5.2** FAA certification and surveillance activities may be a coordinated effort between FAA offices depending on the location of the primary facility and any additional training locations.
 - **2.8.5.3** The Department of Education recognition of accrediting agencies is limited by statute to accreditation activities within the United States as discussed in paragraph 2.5.1.1:
 - **2.8.5.3.1** AMTS having a primary location within the United States and that are accredited within the meaning of 20 U.S.C. § 1001(a)(5) are recognized as having institutional accreditation which carries over to all additional training locations, whether located within or outside the United States
 - **2.8.5.3.2** As previously discussed in paragraph 2.5.1, the Department of Education's recognition of accrediting agencies is limited by statute to accreditation activities within the United States. As such, AMTS having a primary location outside of the United States must obtain FAA approval of a QC system meeting the requirements of § 147.23. Although the school may hold accreditation, the FAA will not recognize accreditation that is not within the scope of 20 U.S.C. § 1001(a)(5).
 - **2.9 AMTS Instructor Requirements.** Pursuant to § 147.5(b)(3), the AMTS must have a description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19. This description will be included in the AMTS OpSpecs. The requirements of § 147.19 include the following areas discussed in paragraphs 2.9.1 through 2.9.3:

Note: The instructor description discussed above may be included in the OpSpecs by reference to a document provided by the AMTS, rather than including the description directly into the body of the OpSpec. In these instances, the

document's title, revision level, and revision date will be listed in the OpSpec, and the FAA will retain a copy of the document.

- **2.9.1** <u>Positive Educational Outcomes</u>. Each school must provide qualified instructors to teach in a manner that ensures positive educational outcomes are achieved, as required by § 147.19(a). Positive educational outcomes to refer to the training standards set forth in § 147.17, which are geared toward ensuring the AMTS provides training of a quality that satisfies the pass rate requirement specified in § 147.25 and equips students with the knowledge and skills needed to be prepared to test for a mechanic certificate and associated ratings under part 65.
 - **2.9.1.1** The AMTS is responsible for ensuring the effectiveness of its instructors. The AMTS may decide to do this by a periodic internal evaluation of the instructor, or by some other method(s).
 - **2.9.1.2** The FAA will assess instructor competency periodically during inspections by observing instructors in their teaching environment. Should the FAA have concerns with an instructor's abilities to achieve positive educational outcomes, the concerns and observations will be provided to the AMTS to address the concern.
- 2.9.2 Instructor Qualifications. Section 147.19(b) requires that AMTS instructors either:
 - Hold an FAA mechanic certificate, with one or more appropriate ratings; or
 - Be otherwise specifically qualified to teach their assigned content.
 - **2.9.2.1** Instructors Holding an FAA Mechanic Certificate. When using instructors that hold an FAA mechanic certificate, the AMTS must ensure that the instructor has the appropriate mechanic certificate rating relative to the specific subject(s) or course content they teach. Additionally, during certification or other FAA inspection, the AMTS must be able to show the FAA that the instructor holds an FAA mechanic certificate, with appropriate ratings.
 - 2.9.2.2 Specifically Qualified Instructors (Instructors Not Holding an FAA Mechanic Certificate). The AMTS must ensure that any instructor who has not been issued an FAA mechanic certificate is specifically qualified to teach their assigned subject(s) or course content. The specifically qualified instructor should have specific qualifications relative to their intended area of instruction. Some examples for showing qualifications include:
 - Documentation of practical experience in the procedures, practices, inspection methods, materials, tools, machine tools, and equipment. In most cases, this should reflect aviation maintenance experience.

- Documented evidence of formal training designed to qualify the applicant for the specific area of instruction (e.g., a specialized course, webinar, or symposium).
- **2.9.2.3** Qualifying and Authorizing Instructors. The AMTS should make a determination that all of its instructors are competent to instruct students in the areas where they will be assigned teaching responsibilities. The AMTS should ensure it is maintaining and following its description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19. Failure to follow this description could be a violation of AMTS OpSpecs.

Note: During certification and surveillance, the FAA will verify the requirements of § 147.19 for each of the AMTS instructors. It may be beneficial to the AMTS to maintain a list of all instructors, their qualifications, and their assigned teaching content. This documentation may save an AMTS time during FAA inspection; however, a list is not required by regulation.

2.9.3 <u>Student/Teacher Ratios</u>. Section § 147.19(c) requires at least one instructor for every 25 students in any shop class. The AMTS may choose to provide a lower student-to-teacher ratio (i.e., additional instructors, according to the needs of the class or subject).

CHAPTER 3. OPERATING REQUIREMENTS

- **3.1 Operation After Certification.** Title 14 CFR part <u>147</u> specifies the requirements for the certification and operation of FAA-certificated AMTSs. An AMTS must continue to meet all of the requirements of part 147 following initial certification and after the AMTS has added or removed a rating. Initial certification requirements are continuing and ongoing; therefore, the certification requirements discussed in Chapter <u>2</u> are not repeated in this chapter. The following additional topics are discussed below related to operation following certification:
 - Amending the FAA Air Agency Certificate (§ <u>147.5</u>).
 - Other Changes Requiring Application.
 - Changes Requiring Notification to the FAA.
 - Minimum Passage Rate (§ 147.25).
 - FAA-Approved Quality Control (QC) System (§ <u>147.23(b)</u>).
 - Early Testing (§ <u>147.31</u>).
- **3.2** Amending the Air Agency Certificate. An AMTS is required to operate in accordance with its AMTS certificate and its OpSpecs, which are issued by the FAA, pursuant to § 147.3. Therefore, should any of the elements that formed the basis for original certification change, the AMTS must apply for an amended certificate. Therefore, the AMTS must submit an FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application, in the following situations:
 - When there is a requested change in the AMTS rating(s) (i.e., adding or removing a rating);
 - Change of location of the primary school location;
 - Change of name of the AMTS;
 - Changes of ownership, if the AMTS is requesting a new certificate number.

Note: The AMTS is responsible for submitting proposed amendments to the FAA, while allowing the FAA a reasonable amount of time to evaluate and respond to the changes, based on the scope of the proposed amendment(s). The FAA recommends that the AMTS contact its responsible FAA office to coordinate a reasonable timeframe for evaluation of the proposed amendment.

3.2.1 Adding/Removing Ratings.

3.2.1.1 The ratings issued to an AMTS are displayed on the FAA-issued Air Agency Certificate. Therefore, either adding or removing a rating results in an amendment to the certificate. When adding a rating, § 147.5(c) states the application must only include the information necessary to substantiate the

change; therefore, the school does not have to submit information substantiating a rating already held.

3.2.1.2 The school's operations specifications (OpSpecs) will list the AMTS ratings. Therefore, changes to AMTS ratings will also require revision to OpSpec A003 by the FAA.

3.2.2 Change of AMTS Primary Location.

- **3.2.2.1** The address of the primary location of the AMTS is displayed on the FAA-issued Air Agency Certificate. Therefore, changing the location of the AMTS primary location requires an amendment to the certificate. When changing the primary location, § 147.5(c) states the application must only include the information necessary to substantiate the change; the school does not have to submit information regarding other training locations not relevant to the change.
- **3.2.2.2** The school's OpSpecs will list the physical address of the school's primary location. Therefore, changes to the AMTS primary location address will also require revision to OpSpec A001, Issuance and Applicability, by the FAA.
- **3.2.3** <u>Change of AMTS Name</u>. The name of the AMTS is displayed on the FAA-issued Air Agency Certificate. Therefore, changing the AMTS name results in an amendment to the certificate. When changing the name, § 147.5(c) states the application must only include the information necessary to substantiate the name change.
 - **3.2.3.1** Each of the school's issued OpSpec paragraphs include the name of the school. Therefore, the FAA will reissue all OpSpecs paragraphs upon change of an AMTS name.
 - **3.2.3.2** Additional business names (doing business as (DBA)) are also displayed on the FAA-issued Air Agency Certificate. Therefore, requests for addition or removal of a DBA results in an amendment to the certificate, and the AMTS must make the request by submitting FAA Form 8310-6.
- **3.2.4** <u>Change in Ownership/Sale or Transfer of Assets</u>. There is no express provision in part 147 that addresses a change of ownership of an AMTS. A change of ownership does not require application for a new certificate if there has been no change to location, facilities, or personnel. If the new owner amends the Air Agency Certificate rather than obtaining a new certificate, that owner could be held responsible for regulatory noncompliance that occurred by the air agency under the original owner.
 - **3.2.4.1** Change of AMTS Certificate Number. When there are changes in AMTS ownership that include a change of location, facilities, equipment, materials, personnel, or curriculum, the FAA recommends that the new owner request a new certificate number by undergoing the certification process. Doing so would ensure the new owner is not subject to a Freedom of Information Act (FOIA) request and liability issues.

- **3.2.4.1.1** If a new owner requests to retain the existing certificate number, that owner could be held responsible for any actions that were taken by the air agency under the original owner. New owners will be asked to stipulate in writing that they clearly understand the potential of release of information under the FOIA.
- **3.2.4.1.2** A request for a new Air Agency Certificate number requires amendment of the AMTS certificate and the owner will be directed to make the request on FAA Form 8310-6. The request will be reviewed by the FAA to ensure the air agency continues to meet all part 147 requirements.
- **3.2.4.1.3** If the new owner elects to retain the original certificate number, and is permitted to do so, the revised FAA Form 8000-4, Air Agency Certificate, will show the original certification date in the "Date issued" field.
- **3.2.4.1.4** If a new certificate number is issued, the Air Agency Certificate will show the issuance date of the new certificate number.

Note 1: The "Date issued" should always reflect the original certification date of the certificate number on the Air Agency Certificate.

Note 2: The FAA will reissue all OpSpecs following an approved change of the certificate number.

3.3 Changes Requiring Notification to the FAA.

- **3.3.1** <u>Adding Training Locations</u>. When adding training locations, a certificated AMTS is not required to submit FAA Form 8310-6, because adding locations is neither an initial certification nor an amendment to a certificate. However, § <u>147.15</u> requires each additional training location to be listed in the AMTS OpSpecs. Therefore, the AMTS must notify the FAA of its additional location being requested. The school may not use an additional training location unless the FAA has listed the location on OpSpec A008, Additional Training Locations.
 - **3.3.1.1** The AMTS should expect the FAA to conduct inspections to determine the additional location meets all part 147 requirements prior to adding the location to OpSpec A008.
 - **3.3.1.2** Additionally, the AMTS must provide a description of the facilities, equipment, and materials for each location as required by § 147.5(b)(1); this description will be included in the AMTS OpSpecs. Therefore, the AMTS must provide descriptions (or reference to those descriptions) of the facilities, equipment, and materials, for each location, to the FAA for inclusion in OpSpec A015, Facilities, Equipment, and Materials (see Chapter <u>2</u>, paragraph <u>2.4</u>).

- **3.3.2** <u>Changes to the AMTS Description of Facilities, Equipment, or Materials</u>. Since a description of AMTS facilities, equipment, and materials are included in the AMTS OpSpec, and because an AMTS may not operate contrary to its OpSpecs pursuant to § 147.3, any changes to the AMTS facilities, equipment, or materials must be submitted to the FAA so that the OpSpecs can be revised.
- **3.3.3** <u>Changes to the AMTS Description of Curriculum</u>. Since a description of the AMTSs' curriculum is included in the AMTS OpSpec, and because an AMTS may not operate contrary to its OpSpecs pursuant to § 147.3, any changes to the AMTS curriculum description must be submitted to the FAA so that the OpSpecs can be revised.
- **3.3.4** <u>Changes to the AMTS Description on Instructors</u>. Since a description of how the AMTS ensures it provides the necessary qualified instructors is included in the AMTS OpSpec, and because an AMTS may not operate contrary to its OpSpecs pursuant to § 147.3, any changes to the AMTS instructor description must be submitted to the FAA so that the OpSpecs can be revised.
- **3.3.5** <u>Transfer of a Part 147 Certificate Oversight</u>. Transfers of certificates can occur as a result of an AMTS request, or could be FAA initiated. Transfers between FAA offices typically occur if the AMTS changes its location; however, other instances could also result in a transfer of FAA office of responsibility.
 - **3.3.5.1** Whenever there is a change to the AMTS location that results in a change to the responsible Flight Standards office, the AMTS should coordinate with its current responsible office to outline a plan for the transfer that ensures school operations and the impact on students is minimal.
 - **3.3.5.2** If the transfer is the result of an AMTS location change, the responsible Flight Standards office will coordinate with and forward a copy of the application (FAA Form 8310-6) and the plan to the receiving responsible Flight Standards office.
 - **3.3.5.2.1** The receiving responsible Flight Standards office will review the application for a change in location and is responsible for the reissuance of the Air Agency Certificate and OpSpecs, if required.
 - **3.3.5.3** When transfers occur for reasons other than a change to AMTS location, the AMTS should coordinate with both its current and new office to ensure a smooth transition of information between offices.
- **3.3.6** <u>AMTS Exemptions.</u> Exemptions that are granted to and/or used by an AMTS will be listed in the AMTS OpSpecs.
 - **3.3.6.1** Exemptions to 14 CFR requirements cannot be granted by the responsible Flight Standards office. The AMTS must make a request for exemptions using the procedures outlined in 14 CFR part <u>11</u>. The AMTS should notify its responsible Flight Standards office of any exemption issued to the AMTS so that it can be added to the AMTS OpSpec A005, Exemptions.

- **3.3.6.2** Prior to listing an exemption in OpSpec A005, the FAA will ensure the school has appropriate procedures developed to ensure compliance with any specified conditions and limitations of the exemption, as necessary.
- **3.3.6.3** The FAA will add the exemption number to the AMTS assigned exemptions and issue OpSpec A005, prior to the school using the exemption.
- **3.3.6.4** Exemptions typically expire every 2 years. The AMTS must make a request for an extension (as specified in part 11), and be granted an extension to the exemption. This will result in a revised exemption number; therefore, the AMTS must again notify the FAA of the exemption grant, and request the update to OpSpec A005 prior to using the exemption extension.
- **3.4 Minimum Passage Rate.** AMTS must meet the minimum passage rate requirements of § 147.25. The minimum passage rate is an important indicator of whether the school's curriculum content is sufficient, if curriculum design and delivery methods are appropriate, and if instructors are providing quality instruction.
- **3.4.1** <u>Pass Rate Metric</u>. A certificated AMTS 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 test within 60 days of graduation for the most recent 3-year period.
- 3.4.2 Pass Rate Reports.
 - **3.4.2.1** The passage rate is based on the results of FAA tests; therefore, the FAA will provide quarterly reports based on 3 years of test data, for each AMTS. The reports will be publicly available on <u>https://www.faa.gov</u>.
 - **3.4.2.2** Students that fail a test within the 60-day window after graduation, and then retest and pass that same test within the same 60-day window, are counted as passing students towards the AMTS pass rate.
- 3.4.3 Noncompliance With Pass Rate.
 - **3.4.3.1** Because § 147.25 requires a data collection period of 3 years, compliance with the pass-rate requirement will be evaluated after there is 3 years of data collected on the school's students who are testing within 60 days of graduation.

Note: While an AMTS is required to meet the pass rate in § 147.25, an AMTS is also generally required to ensure students have the knowledge and skills necessary to be prepared to test for a mechanic certificate and associated ratings, pursuant to § 147.17(a)(3). As part of the FAA's general inspection authority in § 147.27, the FAA may review an AMTS's pass rate data as a whole, not only as it pertains to those students who test 60 days after graduation, to ensure that students are prepared with the knowledge and skill to test for the applicable certificate and/or rating.

- **3.4.3.2** As with any regulatory noncompliance, the FAA may take compliance, administrative, or legal enforcement action as appropriate to the specific details of the noncompliance. Investigative personnel follow the FAA compliance and enforcement policy located in FAA Order <u>2150.3</u>, FAA Compliance and Enforcement Program.
- **3.5 Records.** An AMTS with an FAA-approved QC system must maintain the records described within that system, as required by § 147.23(a)(2). Additionally, the AMTS must allow the FAA access to the records that are a part of the school's FAA-approved QC system, as required by § 147.27.
- **3.5.1** <u>Student Records</u>. The AMTS must maintain student records in accordance with the procedures and retention timeframes described in their FAA-approved QC system. The records should:
 - Show attendance, tests, quizzes, and practical projects grades received on subjects required.
 - Clearly distinguish between successful performance and unsuccessful performance.
 - Show how credit was granted for previous experience and/or previous instruction.
 - Show the practical projects and shop/lab work completed and/or to be completed.
- **3.5.2** <u>School Records</u>. The AMTS must maintain records for all areas of the QC system, to include records of the school taking corrective action on deficiencies. The AMTS must maintain these records in accordance with the procedures and retention timeframes described in their FAA-approved QC system.
 - **3.6 Graduation Documentation.** Section <u>147.21</u>, Certificate of Completion, requires each AMTS to provide an authenticated document to each graduating student. Graduation can only be attained by completing the curriculum requirements, either Airframe, Powerplant, or Airframe and Powerplant curriculum, as related to the AMTS ratings.
- **3.6.1** <u>Authentication</u>. Pursuant to § 147.21, an AMTS must provide authenticated documentation to each graduating student; therefore, an official of the AMTS should authenticate all student certificates issued. This should be accomplished by verifying the student has passed the specified courses or has received prior credit based on the AMTS-approved curriculum requirements. The certificate cannot be issued unless all curriculum requirements have been completed. The AMTS must use some method to authenticate the document that is visible on the document itself. For example, an official's signature or a raised or unique seal are some methods used to demonstrate authentication.
- **3.6.2** <u>Document Content</u>. The graduation document should include the following information:
 - Student name, indicating who the document was issued to.

- School name and Air Agency Certificate number, to indicate who issued the document and that the issuer is an FAA-certificated AMTS.
- Authentication, using the method of authentication determined by the school to show the document was issued legitimately.
- The student's date of graduation.
- The name of the curriculum completed by the student (i.e., either "Airframe," "Powerplant," or "Airframe and Powerplant").

Note: The FAA strongly recommends the inclusion of the AMTS Air Agency Certificate number on the authenticated document. A school's name may not provide the same verification, because some schools, both certificated and noncertificated, may share the same or a similar name. Failure to include this information on the document may prevent or delay FAA testing facilities from verifying the student's eligibility to test.

3.7 Early Testing.

- **3.7.1** <u>Title 14 CFR part 65, § 65.75(c)</u>. This provision of part 65 authorizes mechanic applicants to take the mechanic general written test prior to meeting the applicable experience requirements of § 65.77, when the applicant can present an authenticated document from a certificated AMTS that demonstrates satisfactory completion of the general portion of the school's curriculum and specifies the completion date.
 - **3.7.1.1** Part 147 has § 147.31, Early Testing, as a corresponding requirement, which states an AMTS may issue an authenticated document that demonstrates the student's preparedness to take the mechanic general written test in accordance with § 65.75(c). See paragraph 3.7.1 regarding discussion on authentication.

Note: A student will not be eligible to take the FAA general written test prior to graduation if the school does not issue the document required in § 65.75(c). Schools should ensure that the issuance of an authenticated document that facilitates a student to test early is applied equally and consistently to all qualifying students.

- **3.7.1.2** An authenticated document used for the purposes of §§ 65.75 and 147.31 should include the following information:
 - Student name, indicating who the document was issued to.
 - School name and Air Agency Certificate number, to indicate who issued the document and that the issuer is an FAA-certificated AMTS.
 - Authentication, using the method of authentication determined by the school to show the document was issued legitimately.
 - The student's date of graduation/curriculum completion.

• Indicate the document demonstrates completion of the general curriculum content of the AMTS curriculum.

Note: The FAA strongly recommends the inclusion of the AMTS Air Agency Certificate number on the authenticated document. A school's name may not provide the same verification, because some schools, both certificated and noncertificated, may share the same or a similar name. Failure to include this information on the document will prevent or delay FAA testing facilities from verifying the student's eligibility to test.

- **3.7.2** <u>Section 65.80 Testing</u>. This provision of part 65 allows certain AMTS students, who have not yet graduated from the AMTS, to take the FAA oral and practical tests when the AMTS can show to an FAA inspector that the student:
 - Has made satisfactory progress at the school,
 - Is prepared to take the oral and practical tests prescribed by § 65.79, and
 - Is in the final subjects of training in the AMTS curriculum.

Note: The school should be prepared to show the FAA how the student meets the requirements above to facilitate FAA approval on FAA Form <u>8610-2</u>, Airman Certificate and/or Rating Application. It is recommended that the school develop written procedures that define how the school makes § 65.80 determinations, which would assist the FAA in issuing § 65.80 approvals.

- **3.7.2.1** An applicant must submit an appropriately completed FAA Form 8610-2 to the FAA for approval to test under § 65.80. This form has specified blocks requiring completion by an official from the AMTS to certify that the above listed requirements are met. If approved, the FAA will sign and return the form to the applicant to proceed with oral and practical testing prior to graduation from the AMTS.
- **3.7.2.2** Once the student graduates from the AMTS and receives a graduation document, the student is eligible to complete any applicable remaining FAA tests.

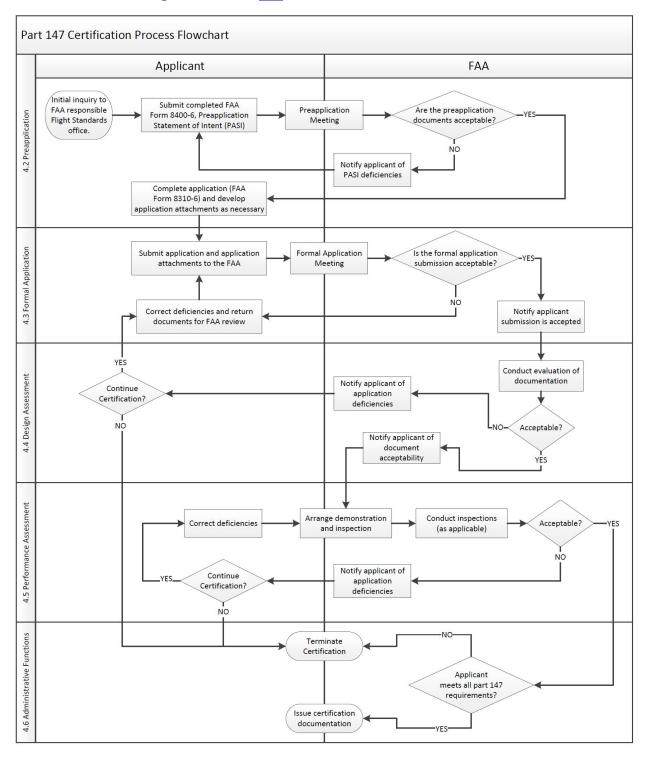
Note: The provisions of §§ 65.75(c) and 65.80 are mutually exclusive. Taking the general written test early under § 65.75(c) does not prevent subsequent testing under § 65.80, and vice versa.

CHAPTER 4. CERTIFICATION PROCEDURES

- **4.1 General Information on Certification Procedures.** The AMTS certification process is an interaction between the AMTS applicant and the FAA. The certification process extends from the initial inquiry by the school applicant to the final issuance of the Air Agency Certificate and operations specifications (OpSpecs). This process ensures the school's method of compliance with curriculum, policies and procedures, facilities, equipment, materials, and personnel regulatory requirements are thoroughly reviewed, evaluated, and validated.
- **4.1.1** <u>Five Phases</u>. The FAA certification process consists of the five separate phases listed below:
 - Preapplication phase.
 - Formal application phase.
 - Design Assessment (DA) phase (document compliance).
 - Performance Assessment (PA) phase (demonstration and inspection).
 - Administrative functions phase (certification).

Note: These phases may often overlap and can proceed concurrently. As an example, the DA phase may begin as soon as documents are received, either before or during the formal application phase.

4.1.1.1 The applicant must maintain an active project. Inactivity of greater than 90 calendar-days may be cause to terminate the certification process. Additionally, the responsible Flight Standards office may terminate the process when it is clear that continuing the process will not result in approval or acceptance (i.e., multiple failures of the applicant's submissions).





4.2 Preapplication Phase.

- 4.2.1 <u>Initial Inquiry</u>. An applicant seeking certification of an AMTS under part 147 should contact the FAA responsible Flight Standards office and advise the office of the intent to pursue part 147 school certification. The FAA will advise the applicant that submission of FAA Form <u>8400-6</u>, Preapplication Statement of Intent, (PASI) (see Figure <u>4-2</u>, Preapplication Statement of Intent) will place the applicant in the FAA's certification queue, which ensures that applicant certification requests are processed in the order application is made. Additionally, submission of the PASI notifies the FAA of the applicant's intent, which allows the FAA to contact the applicant and conduct a preapplication meeting (see paragraph 4.2.3). The form is available at <u>https://www.faa.gov/forms</u>.
 - **4.2.1.1** It is the applicant's responsibility to be knowledgeable on the regulatory requirements applicable to the FAA certificate requested. The applicant could complete a Letter of Compliance (see Appendix <u>D</u>, Sample Letter of Compliance (i.e., Statement of Compliance, Compliance Statement)) to help facilitate understanding of part 147.
- **4.2.2** <u>PASI</u>. An applicant should submit a completed PASI only after reviewing the appropriate regulations and advisory materials. Before PASI submission, the applicant should consider the personnel, facility, equipment, and other regulatory requirements for certification and operation.
 - **4.2.2.1** The FAA uses Safety Assurance System (SAS) automation to manage certification activities under part 147. Although not required, applicants may use the SAS External Portal to submit information. The SAS External Portal can be found at <u>https://sas.faa.gov/sas.external.portal/ext/accounts.</u>
- **4.2.3** <u>Preapplication Meeting</u>. Following receipt of the completed PASI, the FAA will contact the AMTS applicant and arrange a preapplication meeting. During this meeting, the applicant should ask any questions concerning FAA certification. The following events take place during the preapplication meeting:
 - **4.2.3.1** FAA personnel will brief the applicant on the regulatory requirements and policies regarding certification and operation of an AMTS.
 - **4.2.3.2** The applicant informs the FAA as to which of the three types of ratings are sought: airframe, powerplant, or combined airframe and powerplant.

Note: Because of the complexity and costs involved in certification, many AMTS applicants initially choose to seek certification for only one rating to reduce certification time and to get training classes under way.

Figure 4-2. Preapplication Statement of Intent

Form Approved OMB No. 2120-0593
Expiration Date: 04/30/2024

PREAPPLICATION STATEMENT OF INTENT							
US Department of Transportation Federal Aviation Administration							
Pederal Aviation Actinities automatication Paperwork Reduction Act Statement: A federal agency may not a collection of information subject to the requirements of the Paperwork information collection is 2120-0593. Public reporting for this collect data sources, gathering and maintaining the data needed, completi comments regarding this burden estimate or any other aspect of thi SW, Washington, DC 20591. Attr: Information Collection Clearam Section 1A. To Be Completed By Ali Applicant	ork Reduction Act unless that colle ion of information is estimated to b ng and reviewing the collection of is collection of information, includir ce Officer, ASP-110.	ction of information displays a be approximately 96 hours per information. All responses to	response, including the this collection of inform	ontrol Number. The OMB Control Number for this e time for reviewing instructions, searching existing ation are mandatory per 14 CFR Part 119. Send			
Section 1A. To be completed by All Applical	15						
1. Name and mailing address of company		2. Address of principal base where operations will be conducted (do not use post office box)					
3. Proposed Start-up date	4. Requested three-let	ter company identifie 2.		ference 3.			
Company Email Address	Doing Business As (D			3.			
5. Management Personnel	T						
Name (Last, first, middle)		Title		Telephone (including area code) and Email Address			
Section 1B. To Be Completed By Air Operator	s						
6. Proposed type of operation (check as many							
Air Carrier Certificate Part 121 Operating Certificate Part 125 Part 133 Part 135	Cargo On Scheduled	ers and Cargo Single Pilot Operator nly Single Pilot-in-Command Operator ed Operations Basic Part 135 Operator eduled Operations					
Section 1C. To Be Completed By Air Agencies	;						
7. Proposed type of agency and rating(s)							
Part 145 Repair Station Part 147 Maintenance Technical School Domestic Airframe Foreign New Renew Satellite Powerplant Airframe Instrument Powerplant Accessory Propeller Specialized Service Radio Any other purpose for which the FAA finds the applicant's request if appropriate							
Section 1D. To Be Completed By Air Operators	s						
8. Aircraft Data			ographic area of	Intended operations			
Numbers and types of aircraft (Include Registration if ava (by make, model, and series)	illable) Number of passen cargo payload cap						
FAA Form 8400-6 (05-17) Supersedes Previous Edition		Page 1		Electronic Version			

Section 1E. To Be Completed By All Applicants						
10. Additional information that provides a better understanding of the proposed operation or business (attach additional sheets, if necessary)						
11. The statements and information contained on this fo	rm denote an intent to apply f	or FAA ce	ertification.			
Signature	Date	Name an				
Section 2. To Be Completed By FAA District Office						
Received by (district office):			Precertification Number			
Date:			Date Coordinated with AFS-620			
Remarks						
Remarks						

Page 2

Electronic Version

- **4.2.3.3** The applicant is given a thorough briefing on required attachments to the formal application. The FAA will discuss the certification process and events, and the applicant's expectations for the certification completion schedule (see Figure <u>4-3</u>, Sample Part 147 Schedule of Events (SOE)).
- **4.2.3.4** These attachments can be presented to the FAA either before or during formal application. The format (e.g., paper, electronic) is the choice of the applicant. The attachment documents need to be prepared and brought to the formal application meeting, if not previously submitted, and include the following:
 - A completed FAA Form <u>8310-6</u>, Aviation Maintenance Technician School Certificate and Ratings Application. This form is available at <u>https://www.faa.gov/forms</u>. See Figure <u>4-4</u>, FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application.
 - 2. A description of the AMTS facilities (refer to § <u>147.5(b)(1)</u>). The descriptions will be included in the AMTS OpSpecs once issued. The description must be detailed enough to demonstrate that the AMTS can provide and maintain facilities that are appropriate to the rating or ratings requested, and the number of students taught. The applicant may provide facility diagrams in addition to the written description, which could be referenced in the OpSpec. The applicant must provide the facility description for the primary location and each additional training location. See paragraph <u>2.8.1</u> for discussion on AMTS facilities.
 - 3. A description of the equipment (refer to § 147.5(b)(1)). The description will be included in the AMTS OpSpecs once issued. The description must be detailed enough to demonstrate how the AMTS can provide and maintain equipment appropriate to the rating or ratings requested, and the number of students taught. The applicant must provide an equipment description for the primary location and each additional training location. See paragraph 2.8.2 for discussion on AMTS equipment.
 - 4. A description of the materials (refer to § 147.5(b)(1)). The description will be included in the AMTS OpSpecs once issued. The description must be detailed enough to demonstrate how the AMTS can provide and maintain materials appropriate to the rating or ratings requested, and the number of students taught. The applicant must provide a material description for the primary location and each additional training location. See paragraph <u>2.8.3</u> for discussion on AMTS materials.

Note: For certificated AMTSs that provide training at more than one location in accordance with § <u>147.15</u>, the facilities, equipment, and materials used at each location must be appropriate to the curriculum or portion of the curriculum, and the number of students being taught, at that location.

5. 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 <u>65</u> subpart <u>D</u> (refer

to § 147.5(b)(2)). This description should describe the basis of the curriculum, such as hours, credit hours, competency-based training (CBT), or some other basis of the curriculum. The description may also describe course delivery methods to be used by the school, such as in-person or distance learning.

- 6. A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § <u>147.19</u> (refer to § 147.5(b)(3)). The description should include how the school provides the appropriate number of instructors, how it ensures instructors are appropriately qualified, and how the school ensures the student-to-instructor ratios are maintained in shop classes.
- 7. Curriculum. The school must submit its curriculum to the FAA. The FAA will review the curriculum to ensure it meets the requirements of $\frac{147.17(a)(1)}{10}$ prior to certification of the AMTS.

Note: The FAA does not formally approve the AMTS curriculum. However, the FAA ensures the curriculum aligns with the Mechanic ACS, pursuant to \S 147.17(a)(1).

- 8. Evidence of accreditation, if applicable. If the AMTS meets the requirements of § <u>147.23(a)</u> through accreditation within the meaning of 20 U.S.C. § <u>1001(a)(5)</u>, then it must be able to demonstrate to the FAA how its meets the accreditation requirement, to include evidence of the school's accrediting organization and the school's accreditation status.
- 9. AMTS quality control (QC) system, if applicable. If the AMTS intends to meet the requirements of § 147.23(a) through a QC system that meets the requirements specified in § 147.23(b), then the school must submit its QC system to the FAA for review and approval.
- 10. Exemption approvals, if applicable. Exemptions held by an AMTS are listed in the AMTS OpSpecs. If an AMTS holds an exemption to a 14 CFR requirement, it should include a copy of the exemption grant in the formal application package. If the AMTS is in the process of requesting an exemption, it should include a copy of the exemption request that was sent to the FAA.
- 11. Any other application attachments the AMTS would like to submit to demonstrate compliance with part 147.
- 12. A letter requesting that the application be processed and indicating when the facilities and equipment will be ready for a formal inspection by the FAA.
- 13. If the applicant elects to perform the applicable Element Design Data Collection Tools (ED DCT), these completed DCTs should be submitted to the FAA as a part of formal application to allow for evaluation during the DA phase.

Phase	Event	Proposed Date MM/DD/YYYY
1. Preapplication	Initial Contact	
1. Preapplication	Submit PASI, FAA Form 8400-6	
1. Preapplication	Preapplication Meeting	
2. Formal Application	Conduct Formal Application Meeting	
2. Formal Application	Submit Formal Application and Attachments	
2a. Documents	Application, FAA Form 8310-6	
2a. Documents	Descriptions Required by § 147.5	
2a. Documents	Curriculum	
2a. Documents	Evidence of Accreditation, if applicable	
2a. Documents	Quality Control (QC) System, if applicable	
2a. Documents	Evidence of Exemption Grant/Request, if any	
2a. Documents	Applicant-Completed DCTs, if applicable	
2. Formal Application	Review Formal Application Documents	
2. Formal Application	Accept or Deny Formal Application	
3. Design Assessment (DA)	Review Documents	
3. Design Assessment (DA)	Document Deficiencies, if any. Notify Applicant.	
3. Design Assessment (DA)	Approve QC System, if applicable	
4. Performance Assessment (PA)	Evaluate Facilities and Proposed Training Operations	
4a. Inspection Items	Facilities	
4a. Inspection Items	Equipment	
4a. Inspection Items	Materials	
4a. Inspection Items	Instructor Qualifications	
4a. Inspection Items	Evidence of Accreditation, if applicable	
4. Performance Assessment (PA)	Observe use of FAA-Approved QC System, if applicable	
4. Performance Assessment (PA)	Observe Exemption Conditions and Limitations, if applicable	
4. Performance Assessment (PA)	Document Deficiencies, if any. Notify Applicant.	
5. Certification	Issue Part 147 Air Agency Certificate	
5. Certification	Issue Part 147 OpSpecs, as appropriate	
5. Certification	Prepare FAA Certification File	

Fi	gure 4-3.	Sample P	art 147 S	Schedule o	of Events (SOE)	

Figure 4-4. FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application

TYPE OR PRINT ALL ENTRIES IN DARK I	NK				0	MB No. 2120-0040	Exp//
	Maintenance te and Ratings	Technician Sc Application	hool				
A. APPLICANT							
1. Name of School			2. A	dditional Business I	Names (Doing	Business As (DBA)) (If applicable)
3. Name of Contact/Training Direct	or	4. Contact Telephone N	0.		5. Contact E	mail Address	
B. PURPOSE OF APPLICATION	P						
1. ORIGINAL CERTIFICATE a. RATINGS REQUESTED (Specify): b. ADDITIONAL TRAINING LOCATIONS REC 1. ORIGINAL CERTIFICATE AIRFRAME DOWERPLANT NO AIRFRAME AND POWERPLANT YES (Enter address information in solution)				-	tial certification):		
	a. 🗆 ADDED RATING (S	pecify): 🗌 AIRFRAME		VERPLANT 🗆 A	IRFRAME ANI	D POWERPLANT	
2. 🗆 AMENDED CERTIFICATE	b. 🗆 REMOVED RATING	i (Specify): 🗌 AIRFRAM	1 E [POWERPLANT		E AND POWERPLA	NT
(Indicate only those items that are additions/changes to what is currently approved.)		TION (Primary Location) (ailing address	in section C below,	
3. 🗆 OTHER	a. IDENTIFY REASON FO	R SUBMISSION:					
C. FACILITIES	,						
1. PHYSICAL ADDRESS OF PRIMARY S Address	SCHOOL LOCATION.	City			State	Zip Code	Country
2. MAILING ADDRESS OF SCHOOL	Same as Physical A	ddress.					
Address		City			State	Zip Code	Country
3. PHYSICAL ADDRESS OF ADDITION	AL TRAINING LOCATION	S. (List additional location	ns on sep	arate sheet if neede	ed) 🗆	Additional Location	s Attached
Address		City			State	Zip Code	Country
Address		City			State	Zip Code	Country
D. APPLICATION ATTACHMEN	NTS						
Description of Facilities (each	location) 🗌 De	scription of ensuring in	nstructo	r requirements	Qua	lity Control Syste	m (as applicable)
Description of equipment (ea	ach location) 🛛 🗆 Cu	rriculum			Oth	er (list other applic	ation attachments):
Description of materials (eac	h location) 🛛 🗌 Ev	idence of instructor qu	alificati	ons			<u></u>
Description of curriculum	🗆 Ev	idence of accreditation	a (as app	licable)			
E. APPLICANT'S CERTIFICATIO	N						
APPLICANT'S CERTIFICATION NAME OF AUTHORIZED REPRESENTATIVE OF THE APPLICANT (Print Name) TITLE OF AUTHORIZED REPRESENTATIVE OF THE APPLICANT (Print Title)							
I hereby certify that I have been authorized by the school identified in section A to make this application and that statements and attachments hereto are true and correct to the best of my knowledge.							
DATE (MM/DD/YYYY) AUTH	IORIZED REPRESENTATI	/E SIGNATURE					
F. FAA CERTIFICATION ACTION (FOR FAA USE ONLY)							
ACTION TAKEN	Number			CERTIFICATE		tings Issued:	
DISAPPROVED (Certificate NOT Iss	sued) Date:				POWERPLAN		AND POWERPLANT
Date FAA Signature (Print Name and Sign)				FAA Office/Desig	nation No.		

FAA Form 8310-6 (01-22) SUPERSEDES PREVIOUS EDITION

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- **4.2.3.5** The FAA uses SAS automation to assist in documenting the applicant's compliance with regulatory requirements. SAS automation utilizes design DCTs which can be provided to the applicant to assist them in developing their policies and procedures to ensure compliance. If provided during the certification process, applicants may use these DCTs to conduct a self-audit to determine if the organization is in compliance with regulatory requirements prior to submitting the application attachments to the FAA for review. The applicant can submit their self-audit DCTs along with the required formal application attachments.
- **4.3 Formal Application Phase.** The formal application phase begins upon submission of the completed FAA Form 8310-6 and the required application attachments discussed in paragraph <u>4.2.3.4</u>.
- **4.3.1** <u>The Formal Application Meeting</u>. The formal application meeting could occur before, after, or in conjunction with submission of the formal application and attachments. In the formal application meeting, the AMTS applicant's key decision-making personnel should be available to meet with the FAA and discuss the entire application package. The purpose of this meeting is to resolve any questions on the part of either party and to establish a common resolve for future proceedings of the application process.
- **4.3.2** <u>Submission Package Review</u>. When the responsible Flight Standards office has determined that the application package submission is complete, the Flight Standards office will notify the applicant that the submission is acceptable and will proceed to review all documents within the submission. In the case of a rejected application, the FAA will return the application and attachments to the applicant with the reasons stated for rejection.
 - **4.4 Design Assessment (DA) (Document Compliance) Phase.** The DA or document compliance phase is the part of the certification process when the applicant's curriculum and other documents are reviewed in depth to ensure compliance with applicable regulations and conformity to safe operating practices. These documents may include paper representation or electronic format. It is recommended that this phase be initiated as early as possible in the certification process.
- **4.4.1** Evaluation of Documentation. The FAA will carefully review all documents submitted during the formal application phase. The FAA will maintain contact with the applicant during this phase. If deficiencies are found in the submission items, the FAA will return the entire submission to the applicant with a letter outlining the deficient areas. The FAA generally offers suggestions on modifying the product, but will not write the applicant's documents. A future meeting between the FAA and the applicant can be scheduled to discuss each deficiency in detail, if necessary. If the submission as a whole is not of sufficient quality to complete the certification, the FAA may terminate the entire certification process.
- **4.4.2** <u>Termination</u>. In the case of termination of the certification process, the applicant must begin the certification process again. See paragraph <u>4.2</u>.

- **4.5 Performance Assessment (PA) (Demonstration and Inspection) Phase.** In the PA phase, the FAA determines whether the applicant's proposed procedures and programs for training and directing personnel in the performance of their duties are effective. In this phase, the emphasis is on compliance with regulations and safe performance practices.
- **4.5.1** <u>Inspection Schedule</u>. When appropriate, the FAA will arrange with the applicant to inspect the facility. At this point, the FAA expects the AMTS facility to be complete with all facilities, equipment, and materials available for inspection. Before scheduling an inspection, the applicant should be certain the facility is ready to meet part 147 requirements.
- **4.5.2** <u>Demonstration Criteria</u>. In particular, the AMTS must demonstrate compliance with $\frac{147.13}{147.13}$ and 147.23, to include:
 - 1. The descriptions of facilities, equipment, and materials provided pursuant to § 147.5 represent those actually used by the AMTS.
 - 2. The AMTS as a whole is providing the facilities, equipment, and materials that are appropriate to the rating or ratings held by the school and the number of students taught.
 - 3. At each training location, the AMTS facilities, equipment, and materials are appropriate to the curriculum or portion of the curriculum, and the number of students being taught, at that location.
 - 4. Evidence of instructor qualifications. The school must be able to demonstrate to the FAA how its instructors meet the requirements of § 147.19.
 - 5. Evidence of accreditation, if applicable. If the AMTS meets the requirements of § 147.23(a) through accreditation within the meaning of 20 U.S.C. § 1001(a)(5), then it must be able to demonstrate to the FAA how its meets the accreditation requirement, to include evidence of the school's accrediting organization and the school's accreditation status.
 - 6. If the AMTS meets the requirements of § 147.23(a) through a QC system that meets the requirements specified in § 147.23(b), then the FAA will verify that the school is using its QC system procedures and that the procedures are producing the desired outcomes.
 - 7. Observation of the AMTS compliance with conditions and limitations associated with any FAA exemption issued to the school and listed in the AMTS OpSpecs.
- **4.5.3** <u>Demonstration Deficiencies</u>. When deficiencies in the demonstration arise, the FAA will provide a written list of the discrepancies to the applicant. Depending on the magnitude of the deficiencies, the FAA may schedule a meeting to discuss in detail the appropriate corrective actions that are needed. Should the AMTS want to continue in the application and certification process, the AMTS must demonstrate how they have corrected the deficiencies to comply with part 147.

4.5.4 <u>Termination</u>. If the FAA terminates the application, and the applicant would like to continue to pursue certification, the applicant should correct the identified discrepancies and submit a new PASI to reinitiate the certification process.

4.6 Administrative Functions (i.e., Certification) Phase.

- **4.6.1** <u>Successful Application</u>. When the FAA has determined that the regulatory requirements have been met, the school will be issued an AMTS Air Agency Certificate and appropriate OpSpecs. The original FAA Form 8000-4, Air Agency Certificate, signed by the responsible FAA office manager, will contain the school's certificate number; the name of the school, including any additional business names used by the school (i.e., doing business as (DBA)); and the ratings issued to the school. At this time, the FAA will return any documents to the applicant. Copies of AMTS curriculum, the AMTSs' FAA-approved QC system (if applicable), and copies of documents that include the descriptions required by § 147.5 (when those descriptions are not included directly in the AMTS OpSpecs) will be kept on file at the responsible Flight Standards office.
 - **4.6.1.1** The school must display FAA Form 8000-4 pursuant to $\frac{147.29}{147.29}$ at a location that is visible by and normally accessible to the public, at:
 - The primary school location, and
 - Each additional fixed location.

Note: The FAA only provides the air agency with a single FAA Form 8000-4. The AMTS may display a copy of its Air Agency Certificate at each additional fixed location.

4.6.2 <u>FAA Inspection</u>. A newly certificated school should expect that the FAA will inspect and observe the school frequently during the first 90 days of operation to determine compliance with the applicable regulations. The FAA may also identify needed changes in the methods or techniques of the school's operation and communicate these with the AMTS.

APPENDIX A. GLOSSARY OF TERMS

This listing contains clarification of select terms used in this advisory circular (AC) and relevant to 14 CFR part <u>147</u>. When used within the context of part 147, these terms apply to Aviation Maintenance Technician School (AMTS) requirements.

- **A.1.** Accreditation. Relative to part 147, accreditation refers to institutional accreditation by an accrediting agency or association recognized by the Department of Education pursuant to 20 U.S.C. § <u>1001(a)(5)</u>.
- **A.2 Responsible Flight Standards Office.** The FAA office with oversight responsibility of a particular part 147 AMTS. This is typically based on the service area of the office and the location of the AMTS, and could be a Flight Standards District Office (FSDO) or an International Field Office (IFO).
- **A.3 Letter of Compliance or Statement of Compliance (SOC).** A document which lists each applicable part 147 section and provides either a brief narrative or a specific reference within the document(s) describing the applicant's manner of compliance with the regulation.
- A.4 Public Law (P.L.) <u>116-260</u>. References to P.L. 116-260, Consolidated Appropriations Act, 2021, are intended to refer specifically to Section 135 of the Aircraft Certification, Safety, and Accountability Act in P.L. 116-260. Section 135, Promoting Aviation Regulations for Technical Training, contains specific requirements for promulgating part 147 regulation.

APPENDIX B. RELATED REFERENCES

- **B.1** Advisory Circulars (AC) (current editions). Current ACs are available at https://www.faa.gov/regulations policies/advisory circulars/ and https://drs.faa.gov.
 - 1. AC <u>00-58</u>, Voluntary Disclosure Reporting Program.
 - 2. AC <u>20-37</u>, Aircraft Propeller Maintenance.
 - 3. AC <u>20-77</u>, Use of Manufacturers' Maintenance Manuals.
 - 4. AC <u>20-107</u>, Composite Aircraft Structure.
 - 5. AC <u>43-4</u>, Corrosion Control for Aircraft.
 - 6. AC <u>43-9</u>, Maintenance Records.
 - 7. AC <u>43.9-1</u>, Instructions for Completion of FAA Form 337.
 - 8. AC <u>43.13-1</u>, Acceptable Methods, Techniques and Practices—Aircraft Inspection and Repair.
 - 9. AC <u>43.13-2</u>, Acceptable Methods, Techniques, and Practices—Aircraft Alterations.
 - 10. AC <u>65-30</u>, Overview of the Aviation Maintenance Profession.
 - 11. AC <u>65-31</u>, Training, Qualification, and Certification of Nondestructive Inspection Personnel.
 - 12. AC <u>65-33</u>, Development of Training/Qualification and Certification Programs for Composite Maintenance Technicians.
 - 13. AC <u>91-82</u>, Fatigue Management Programs for In-Service Issues.
 - 14. AC <u>120-72</u>, Maintenance Human Factors Training.

B.2 FAA Orders and Handbooks (current editions).

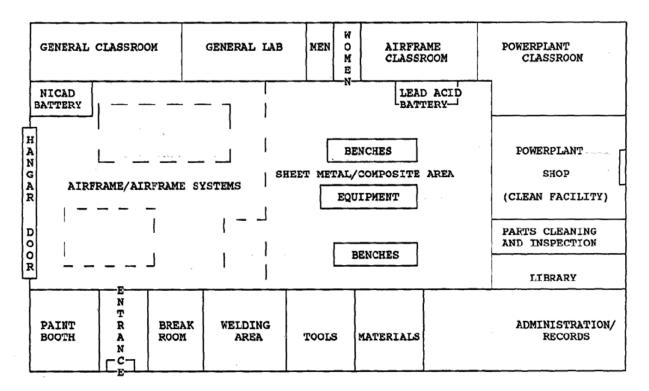
- 1. FAA Order 8900.1, available at <u>https://fsims.faa.gov</u> and <u>https://drs.faa.gov</u>.
- 2. FAA Order <u>8900.2</u>, General Aviation Airman Designee Handbook.
- 3. FAA-H-8083-1, Weight and Balance Handbook.
- 4. FAA-H-8083-9, Aviation Instructor's Handbook.
- 5. FAA-H-8083-21B, Helicopter Flying Handbook.
- 6. <u>FAA-H-8083-30</u>, Aviation Maintenance Technician Handbook—General.
- 7. <u>FAA-H-8083-31</u>, Aviation Maintenance Technician Handbook—Airframe, Volumes 1 and 2.
- 8. <u>FAA-H-8083-32</u>, Aviation Maintenance Technician Handbook—Powerplant, Volumes 1 and 2.

B.3 Related 14 CFR Parts.

- 1. Part <u>1</u>, Definitions and Abbreviations.
- 2. Part <u>43</u>, Maintenance, Preventative Maintenance, Rebuilding, and Alteration.
- 3. Part <u>65</u>, Certification: Airmen Other Than Flight Crewmembers, Subpart <u>D</u>, Mechanics.
- 4. Part <u>91</u>, General Operating and Flight Rules.
- 5. Part <u>145</u>, Repair Stations.
- 6. Part <u>147</u>, Aviation Maintenance Technician Schools.
- 7. Part <u>183</u>, Representatives of the Administrator.
- 8. Part <u>187</u>, Fees.

B.4 Other.

- 1. Public Law (P.L.) 116-260, Consolidated Appropriations Act, 2021, available at https://www.congress.gov/bill/116th-congress/house-bill/133.
- 2. Human Factors in Aviation Maintenance and Inspection, documents are maintained at <u>https://www.faa.gov/about/initiatives/maintenance_hf/</u>.
- 3. Optimization of Aviation Maintenance Personnel Training and Certification, Goldsby, Soulis, and Advisors, January 2002.
- 4. Part 147 Aviation Maintenance Technician Schools Curriculum and Operating Requirements Working Group—<u>Final Report to the Aviation Rulemaking Advisory</u> Committee (ARAC), December 2008.
- 5. <u>A National Study of the Aviation Mechanics Occupation, Final Report,</u> <u>September 1970</u> (commonly referred to as the Allen Study).
- 6. <u>University of California, Los Angeles National Study of the Aviation Mechanics</u> <u>Occupation (1974)</u>.
- General Accounting Office Report Number <u>GAO-03-317</u>, Aviation Safety: FAA Needs to Update Curriculum and Certification Requirements for Aviation Mechanics (2003).
- 8. ICAO Document <u>9868</u>, Procedures for Air Navigation Services—Training.
- 9. ICAO Document <u>10098</u>, Manual on Competency-Based Training and Assessment for Aircraft Maintenance Personnel.
- 10. Type Certificate Data Sheets (TCDS), available at <u>https://drs.faa.gov</u>.



APPENDIX C. SAMPLE FACILITY LAYOUT

APPENDIX D. SAMPLE LETTER OF COMPLIANCE (I.E., STATEMENT OF COMPLIANCE, COMPLIANCE STATEMENT)

Purpose of the Letter of Compliance. The Letter of Compliance describes how the applicant complies with each individual section of 14 CFR part <u>147</u>. To benefit the applicant's understanding of all part 147 requirements, the Statement of Compliance (SOC) ensures that all applicable regulatory requirements are addressed during the certification process. The SOC provides a method to ensure the applicant understands each regulatory requirement put forth in the regulation and how the applicant will comply with each requirement.

When developing the Letter of Compliance, the applicant must ensure that the responses reflect how the applicant will comply with any regulatory requirement. The SOC must list each part 147 section and should provide either:

- A brief narrative of the method of compliance, or
- A specific reference to a manual or other document describing the planned method of compliance with the regulation.

The sequence should be the same as the regulations. The SOC should be submitted along with all other formal application attachments.

The FAA will review the SOC during the document compliance phase of certification, and discuss any deficiencies with the applicant.

Sample Letter of Compliance. The below information may be used as a template for applicants to base a properly formatted and comprehensive part 147 SOC.

- Each applicable part 147 section is listed in the template.
- Following each section, the template provides sample responses (in italics) which may assist the applicant in crafting a complete response. In some instances, the example invites an operating manual reference; in other instances, the example invites a narrative. However, the example is not meant to require one type of response over the other.
- References to specific documents, facilities, equipment, or personnel are for illustrative purposes, and should not be construed as the only approved methodology for school compliance.

Note: The SOC included in this AC is a generic example and must be modified to describe each individual applicant's method of compliance with part 147.

Statement of Compliance for [Applicant Name] [Date]

This document provides the manner in which [Applicant] intends to comply with the provisions of part 147.

Subpart A—General

§147.1, Applicability.

This part prescribes the requirements for issuing aviation maintenance technician school certificates and associated ratings and the general operating rules for the holders of those certificates and ratings.

[Applicant] is prepared to comply with all part 147 requirements and general operating rules, as defined in this document, the [Applicant's] manuals, curriculum documents, and/or other [Applicant] publications.

§ 147.3, Certificate Required.

No person may operate an aviation maintenance technician school without, or in violation of, an aviation maintenance technician school certificate and the operations specifications issued under this part.

[Applicant] attests that it will not operate or represent itself as a certificated school without, or in violation of an FAA Air Agency Certificate and operations specifications (OpSpecs) issued under part 147.

§ 147.5, Application Requirements.

(a) To be issued a certificate or rating under this part, an applicant must demonstrate compliance with the requirements of this part.

[Applicant] understands that to be issued a certificate or rating under this part, [Applicant] must demonstrate compliance with the requirements of this part.

(b) An application for a certificate and rating to operate an aviation maintenance technician school must include the following:

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

[Applicant] has submitted as part of its application attachments, a description of the facilities, including the physical address of the applicant's primary location for operation of the school, and any additional fixed locations where training will be provided.

Additionally, [Applicant] has submitted as part of its application attachments a description of the equipment and materials to be used at each location.

(2) 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;

[Applicant] has submitted as part of its application attachments, 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.

(3) A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19; and

[Applicant] has submitted as part of its application attachments a description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19.

(4) Any additional information necessary to demonstrate compliance with the requirements of this part.

[Applicant] has submitted the following additional information necessary to demonstrate the requirements of this part:

- The curriculum required by \S 147.17(a)(1).
- Evidence of instructor qualifications meeting § 147.23.
- Evidence of accreditation required by § 147.23 (if applicable).
- The school's quality control (QC) system meeting §147.23(b) (if applicable).
- The following additional attachments to show compliance with part 147: (list additional attachments as applicable).

(c) An application for an additional rating or amended certificate must include only the information required by paragraph (b) that is necessary to substantiate the reason for the additional rating or change sought.

[Applicant] understands that when applying for an additional rating or an amended certificate, only information that is necessary to substantiate the reason for the additional rating or change sought must be submitted as attachments to the application.

§ 147.7, Duration of Certificates.

An aviation maintenance technician school certificate or rating issued under this part is effective from the date of issue until the certificate or rating is surrendered, suspended, or revoked.

[Applicant] recognizes that the aviation maintenance technician school (AMTS) certificate is effective until it is surrendered, suspended, or revoked.

§ 147.11, Ratings.

The following ratings may be issued under this part:

- (a) Airframe.
- (b) Powerplant.
- (c) Airframe and powerplant.

[Applicant] seeks the [enter rating or ratings being sought] rating.

Subpart B—Certification and Operating Requirements

§ 147.13, Facilities, Equipment, and Material Requirements.

(a) Each certificated aviation maintenance technician school must provide and maintain the facilities, equipment, and materials that are appropriate to the rating or ratings held by the school and the number of students taught.

[Applicant's] school provides and maintains the facilities, equipment, and materials that are appropriate to the rating or ratings held by the school and the number of students taught. Descriptions of the school's facilities, equipment, and materials are located in [Applicant's] operating manual [insert reference], and have been provided to the FAA for inclusion in the [Applicant's] OpSpecs.

(b) For certificated aviation maintenance technician schools that provide training at more than one location in accordance with § 147.15, the facilities, equipment, and materials used at each location must be appropriate to the curriculum or portion of the curriculum, and the number of students being taught, at that location.

At each location of [Applicant's] school, the facilities, equipment, and materials used at each location must be appropriate to the curriculum or portion of the curriculum, and the number of students being taught at that location. Descriptions of the school's facilities, equipment, and materials used at each additional training location are located in [Applicant's] operating manual [insert reference], and have been provided to the FAA for inclusion in the [Applicant's] OpSpecs.

§ 147.15, Training Provided at Another Location.

A certificated aviation maintenance technician school may provide training at any fixed location other than its primary location, provided the additional training location meets the requirements of this part and is listed in the certificate holder's operations specifications.

[Applicant] will ensure that each additional training location will meet the requirements of part 147 and [Applicant's] OpSpecs. [Applicants] will notify the FAA of the location of any additional fixed location it intends to provide training at as described in [Applicant's] operating manual [insert procedure reference]. [Applicant] will not train at any additional location not listed in [Applicant's] OpSpecs.

§ 147.17, Training Requirements.

(a) Each certificated aviation maintenance technician school must:

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

[Applicant] has designed a curriculum that aligns with the Mechanic Airman Certification Standards (ACS) and will ensure the curriculum continually aligns with the Mechanic ACS by revising its curriculum any time the Mechanic ACS is revised.

(2) Provides training of a quality that meets the requirements of § 147.25; and

[Applicant] has designed a curriculum that will provide training of a quality that meets the minimum passage rate requirements of § 147.25. [Applicant] will ensure a pass rate of 70 percent of its students who test within 60 days after graduation, based on 3 years of test data as reported by the FAA, as described in [Applicant's] operating manual [insert manual reference].

(3) Ensures students have the knowledge and skills necessary to be prepared to test for a mechanic certificate and associated ratings under subpart D of part 65 of this chapter.

[Applicant] ensures that students will have the knowledge and skill necessary to be prepared to test for a mechanic certificate because the curriculum aligns with the knowledge and skill requirements outlined in the FAA's mechanic certificate testing standards.

(b) The standards required in paragraph (a)(1) of this section are contained in the Aviation Mechanic General, Airframe, and Powerplant Airman Certification Standards; FAA-S-ACS-1, November 1, 2021, which are incorporated by reference into this section with the approval of the Director of the Federal Register under 5 U.S.C. § 552(a) and 1 CFR part 51. All approved material is available for inspection at the Federal Aviation Administration, Airman Testing Standards Branch/Regulatory Support Division, 405-954-4151, AFS630Comments@faa.gov. It is also available for inspection at the National Archives and Records Administration (NARA). For information on the availability of this material at NARA, email: fedreg.legal@nara.gov, or go to www.archives.gov/federal-register/cfr/ibr-locations.html.

[Applicant] understands that the standards referenced in paragraph (a)(1) of this section are specifically provided in paragraph (b) of this section.

§ 147.19, Instructor Requirements.

Each certificated aviation maintenance technician school must:

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

[Applicant] ensures its instructors are qualified and that each instructor teaches in a manner that ensures positive educational outcomes are achieved by [insert description of how the AMTS ensures this requirement is met for each instructor].

(b) Ensure instructors either—

(1) Hold a mechanic certificate with 1 or more appropriate ratings; or

[Applicant] ensures that instructors who hold an FAA-issued mechanic certificate also hold the appropriate rating relative to the courses/course content the instructor teaches by requiring the instructor to provide [Applicant] with a copy of their FAA-issued mechanic certificate. A copy of the instructor's FAA-issued mechanic certificate is kept on file by [Applicant].

(2) If they do not hold a mechanic certificate, are otherwise specifically qualified to teach their assigned content; and

[Applicant] ensures that instructors who do not hold an FAA-issued mechanic certificate are specifically qualified to teach their assigned content. To ensure appropriate qualifications, [Applicant] will request and review the instructor evidence of past training and experience and assign teaching content as appropriate to that training/experience. A copy of the specifically qualified instructors resume and training is kept on file by [Applicant].

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

[Applicant] ensures that shop classes maintain a 25:1 student-to-instructor ratio by [insert a description of how the school ensures this ratio].

§ 147.21, Certificate of Completion.

Each certificated aviation maintenance technician school must provide an authenticated document to each graduating student, indicating the student's date of graduation and curriculum completed.

[Applicant] will provide a document to each graduating student that includes the following:

- Student's name.
- *Title of the curriculum from which the student graduated.*
- The graduation date.
- The school's FAA-issued Air Agency Certificate number and school name.
- A raised seal evidencing authentication of the document [describe as appropriate to your school].

§ 147.23, Quality Control System.

(a) Each certificated aviation maintenance technician school must:

(1) Be accredited within the meaning of 20 U.S.C. § 1001(a)(5); or

[Applicant] has submitted as part of its application attachments evidence of its accreditation within the meaning of 20 U.S.C. § 1001(a)(5).

(If the school does not meets the accreditation requirements of § 147.23(a)(1), it must submit a QC system for approval. Enter "*not applicable*" as a response.)

(2) Establish and maintain a quality control system that meets the requirements specified in paragraph (b) of this section, and is approved by the Administrator.

[Applicant] has submitted as part of its application attachments its QC system procedures for FAA approval.

(If the school meets the accreditation requirements of § 147.23(a)(1), there is no requirement to submit a QC system for approval. Enter "*not applicable*" as a response.)

(b) The quality control system specified in paragraph (a)(2) of this section must provide 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.

[Applicant] has developed a QC system which includes the procedures required by § 147.23(b).

[Applicant] has submitted as part of its application attachments its QC system procedures for FAA approval.

(If the school meets the accreditation requirements of § 147.23(a)(1), there is no requirement to submit a QC system for approval. Enter "*not applicable*" as a response.)

§ 147.25, Minimum Passage Rate.

(a) Each certificated aviation maintenance technician school must maintain the pass rate specified in paragraph (b) for the most recent 3-year period.

(b) For students who take an FAA mechanic test under part 65 of this chapter within 60 days after graduation, at least 70% of students must pass one of the following tests or any combination thereof:

- (1) Written test;
- (2) Oral test; or
- (3) Practical test.

(c) For students who take a combination of tests within the 60-day window specified in paragraph (b), an AMTS must count a failure on any one test as a student failure for purposes of determining the pass rate, unless that failed test is subsequently passed within the 60-day window.

[Applicant] understands that the school must maintain the pass rate described in § 147.25.

§ 147.27, Inspection.

A certificated aviation maintenance technician school must allow the Administrator such access as the Administrator determines necessary to inspect the one or more locations of the school for purposes of determining the school's compliance with the requirements of this part.

[Applicant] acknowledges that the AMTS may be inspected at any time by the Administrator for purposes of determining the school's compliance with the requirements of part 147. [Applicant] will allow the FAA access at any time to inspect the school's primary location or any additional

training location for the purpose of determining the school's compliance with the requirements of part 147.

§ 147.29, Display of Certificate.

A certificated aviation maintenance technician school must display its aviation maintenance technician school certificate at a place in each location of the school, including the primary location and any additional fixed locations, that is visible by and normally accessible to the public.

[Applicant] will display its FAA Air Agency Certificate, or a copy of the certificate, [insert where the certificate(s) will be located] at the primary location, and [insert where the certificate is located] at each additional fixed location of the school, ensuring the certificate is visible by and normally accessible to the public.

§ 147.31, Early Testing.

When a student satisfactorily completes the general portion of a certificated aviation maintenance technician school's curriculum, the school may issue an authenticated document that demonstrates the student's preparedness to take the mechanic general written test in accordance with § 65.75(c) of this chapter.

[Applicant] will issue an authenticated document to students who have successfully completed the general portion of the school's curriculum, showing the student's preparedness to take the mechanic general written test in accordance with § 65.75(c).

In accordance with § 65.75(c), the school will ensure that it issues an authenticated document that demonstrates satisfactory completion of the general portion of the school's curriculum, and specifies the completion date. The documentation will also include the student's name, the school's name, and the school's FAA-issued Air Agency Certificate number.

Advisory Circular Feedback Form

If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by contacting the Flight Standards Directives Management Officer at 9-AWA-AFB-120-Directives@faa.gov.

Subject: AC 147-3C, Certification and Operation of Aviation Maintenance Technician Schools

Date: _____

Please check all appropriate line items:

An error (procedural or typographical) has been noted in paragraph ______ on page _____.

Recommend paragraph ______ on page ______ be changed as follows:

In a future change to this AC, please cover the following subject: (*Briefly describe what you want added.*)

Other comments:

I would like to discuss the above. Please contact me.

Submitted by: _____

Date: _____