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Part 141 Reform Has Support, But Not a Free Pass

It seems most generally agree the rulebook is old. The harder question is what replaces it.

By Matt Ryan | Published Monday, May 18, 2026 at 04:23 PM ET | Edited by Zach Vasile



The FAA may have found the one thing **almost** everyone in flight training seems to agree on. Part 141 is showing its age.

That is the easy bit. The agency says current Part 141 pilot school rules have roots in the early years of pilot training and the old Civil Air Regulations, and that updating them

should help training meet “21st century challenges” in technology, safety and teaching methods.

In an effort to address that perceived need for change, the National Flight Training Alliance developed a [comprehensive modernization report](#) detailing a broad proposed restructuring of Part 141 pilot-school rules, including changes to school oversight, curriculum approval, examining authority, safety and quality systems, simulation credit, data use and how FAA manages approved training programs. The report was posted to the docket April 1, with an original April 10 comment deadline that the FAA [later extended to May 11](#) after multiple requests from industry groups for more time to review.

The formal comment period around the Part 141 modernization report was only the latest phase of a [longer FAA effort that began last year](#). The agency opened the modernization initiative through a series of public meetings that ran from March 2025 through March 2026, giving schools, instructors, associations and other stakeholders a forum to discuss Part 141 certification, certificate management, examining authority, new training technology and evolving learning methods. In February, the FAA scheduled closing public meetings for March 10 and 11, setting the stage for the industry report that followed.

It’s worth noting that the FAA said the report and related Part 141 public meetings were “not part of a rulemaking action” and that any future rulemaking would include another required comment period.

Even so, with more than 8,000 [comments](#) received between the report and broader Part 141 modernization meetings, the response has been anything but mundane. Naturally, viewpoints run the gamut.

The destination looks fairly popular

The [National Flight Training Alliance’s industry recommendations report](#) is a 471-page document that lays out a broad rewrite of the Part 141 training framework. Although there is certainly a lot to it, the report is organized around eight principal recommendations.

Those include establishing a central FAA management office for Part 141 oversight; implementing safety and quality management systems; and modernizing school management, oversight and documentation through a single Pilot Training Management

Manual. The report also calls for developing industry consensus standards as an alternate path to compliance and reforming examining authority.

The rest focus on expanding credit for the use of flight simulation training devices and extended-reality technology; modernizing the training course appendices, including ATP-CTP and Enhanced Qualification Program structures; and replacing the provisional pilot school category with a new Registered Pilot School pathway.

That general direction of Part 141 modernization isn't necessarily where the record looks divided. Indeed, many commenters argued for modernization.

University Aviation Association, National Air Transportation Association and Aviation-Impacted Communities Alliance filed a joint comment prior to the release of the report saying modernization should "enhance training efficiency, safety, and industry alignment." Their early filing urged the FAA to optimize training efficiency, integrate scenario- and competency-based training, expand use of flight simulation and virtual or augmented reality, and bring more data into flight training oversight.

Charleston Southern University's aeronautics department filed a similar comment last year as initial Part 141 modernization meetings kicked-off, asking FAA to adopt objectives including scenario- and competency-based training, expanded use of flight simulation devices and virtual or augmented reality training, and evidence-based practices such as SMS, FOQA, ASAP, LOFT, CRM and UPRT.

There are surely exceptions, but by-and-large, the visible record does not look like an industry trying to resist change. It looks more like an industry saying yes, but not without more guardrails.

That's important, because Part 141 reform is more than an administrative clean-up. The recommendations so far touch nearly every part of the approved training-school model, from FAA oversight and recordkeeping to examining authority, simulation credit, safety systems and course approval.

So the question is not just whether the old rule needs updating, but more than that; who gets to define the new system, how much flexibility will it allow and how will the FAA make sure resulting certificates still mean the same thing everywhere.

Data, delegation and the small-school question

The proposal's most attractive ideas are also the ones that raise perhaps the most practical questions.

Better use of data in training sounds hard to oppose. So does more scenario-based instruction, modernized course approval, electronic records, simulation, safety management and quality systems. Ideally, the report represents a move toward a system in which schools track student performance more effectively, identify weak areas more accurately, and improve curriculum continuously for every student.

Those are worthwhile goals, but much of the concern around the proposal has to do with what it takes to operate in that system on a practical level.

A large university program or national academy can build compliance staff, data systems, quality processes and audit trails. A small Part 141 school may have the same safety intent but a very different administrative capacity. The docket mood, taken as a whole, is not anti-data. It is wary, however, of a data-heavy structure that could be relatively easy for large organizations to satisfy, while potentially threatening the very survival of some of the smaller operators.

NBAA, for instance, argued that formal Quality Management Systems will help “align flight schools with the safety cultures of professional flight departments,” and that such systems will ensure “that a pilot’s first introduction to aviation includes the risk management and standardization principles required in business aviation.”

Even so, later in its comments, the NBAA cautioned that smaller schools — in particular, boutique Part 141 schools that provide specialized training, like Upset Prevention and Recovery Training, for instance — could face scalability problems.

“The FAA must ensure that the Tier 2 QMS requirements are scalable,” the NBAA said in its comments. “We must not allow the administrative cost of a QMS to inadvertently shutter specialized schools that provide critical, high-level safety training to our members.”

Others, including AOPA, warned that QMS and SMS programs have the potential to “be treated as substitutes for independent FAA oversight or external evaluation.”

“Poorly defined criteria could allow low-quality providers to ‘check the box’ while advancing marginal students,” AOPA wrote in its comments. “Quality assurance systems must be evaluated based on outcomes, including demonstrated willingness to fail or remediate students who do not meet established standards.”

Examining authority is another version of the same question. Everyone wants less friction in training and testing. Nobody wants a certificate that looks easier to get or is less credible when earned. The Flight School Association of North America (FSANA) wrote in an early comment, for instance, that if a pilot school is granted ODA-style authority, oversight “MUST be strictly adhered to” so there is no chance to “rubber-stamp” the process.

That is probably where the FAA will have to do its most careful work. Modernization can speed up training administration, but if examining authority looks too internal, there will almost certainly be a credibility issue, whether perceived or real. The industry wants bottlenecks reduced, but on the whole, it seemed to indicate that it nonetheless does not want any risk of the practical test being reduced to a formality or a paperwork event.

There is also a broader competitive question hiding in the comments. If Part 141 gets more flexible, data-driven and technology-friendly, that could make it more attractive relative to Part 61. But at the same time, if the new framework requires heavy systems, manuals and audits, it could also make Part 141 less accessible than it already is for smaller schools.

In such a scenario, some commenters pointed out, we could see a reduction in the competitive landscape and in overall capacity as smaller outfits fall to the wayside, either by simply going out of business, shifting to Part 61 training, or through the forces of industry consolidation.

The neighbors are in the room

One of the more interesting parts of the docket is that the comments are not only from schools, aviation associations and pilots.

AICA, Save Our Skies Alliance and Groton Ayer Buzz filed an early comment saying pilot school training “influences the quality of life” in communities across the country. Their recommendations included noise-abatement training, transparency on graduation rates and safety records, accident-data-informed curricula and more community engagement.

That line of argument showed up in a surprisingly large number of comments, including a joint UAA-NATA-AICA filing, which asked the FAA to incorporate responsible operations in noise-sensitive areas and stakeholder inclusion into Part 141 modernization. The groups also endorsed the City of Phoenix Aviation Department’s call

for better responsibility to, communication with and recognition of impacted communities.

This is not the traditional center of a pilot-training debate, of course, but it is increasingly hard to keep outside the fence. Repetitive training operations have a way of impacting local communities, for better or for worse. Especially in a time when many airports are faced with the [threat of closure](#) or [increased usage fees](#), it's important that we make a point of being good neighbors. That, of course, starts during training.

By no means should Part 141 become an explicit tool for airport-noise regulation, but it is a good example of the FAA being asked to think about training outcomes more broadly than certificates issued and hours flown.

And perhaps that may be the best way to understand the comments so far. The industry does not seem to be rejecting modernization. Nonetheless, it is asking the FAA to prove that modernization means better training, not just faster throughput; better oversight, not just more delegation; better use of technology, not just another compliance burden.

For now, the destination appears to be broadly accepted. The route is where all the weather is.