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# A Deeper Look at Part 141 Pilot School Examining Authority: The Effect of Changes to FAA Order 8900.1

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Prior research suggests that flight training providers experience delays scheduling check rides when using Designated Pilot Examiners. One potential solution to alleviate these delays is for Part 141 pilot schools to obtain examining authority. According to Rosser and Mosey (2024) many Part 141 flight schools experience challenges in attaining examining authority. This project specifically addresses recent changes to Document 8900.1 which is guidance used by Flight Standards District Offices in the examining authority application process. Part 141 Chief Flight Instructors were surveyed to provide their perceptions of the new guidance and any effect the guidance has on their intent to pursue examining authority for their pilot school. If a pilot school had already applied for examining authority, they were asked to share their experiences during the application process.

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## Introduction

As the airline industry continues to demonstrate a need for large numbers of qualified pilots to fill open pilot positions, there is a corresponding need to train and certificate those pilots. The Federal Aviation Administration (FAA) Part 141 pilot schools remain a main source for training large numbers of pilots. While most of these schools train the pilots to proficiency and utilize FAA Designated Pilot Examiners (DPEs) to conduct the practical test, some have been awarded examining authority. Prior research suggests that flight training providers experience delays scheduling check rides when using DPEs (Beckman et al., 2023). One potential solution to alleviate these delays is for Part 141 pilot schools to obtain examination authority. A pilot school with examining authority has the authority to recommend its graduates for pilot certificates or ratings without further testing by the FAA (2021). Beckman et al. (2023) reported that there were 851 DPEs approved to conduct practical tests in 2021, which accounted for 87% of total practical tests administered with the remaining 13% of practical tests conducted by flight schools with examining authority. At the time of the Beckman study, only 6.5% of the responding school 14 CFR Part 141 pilot schools had received examining authority for at least one course.

Until September 26, 2023, when FAA Notice 8900.675 was released, FAA Order 8900.1, Volume 5, Chapter 12, Section 4, Examining Authority, Paragraph 5-1850 advised the Flight Standards District Offices (FSDOs) that after receiving an application for examining authority from a Part 141 pilot school, the local FSDO *should* conduct the FAA practical test for at least 50 percent of the graduates of the course for which the school applied for examining authority (FAA, 2022). According to the FAA's Terms of Reference, "should" means a procedure is recommended (FAA, 2003). The verbiage of the statement suggests that FSDO participation in practical tests was not a regulatory requirement as much as an advisement of practice, although some FSDOs may have viewed the statement as a directive from the FAA that they "must" follow. Respondents in Rosser and Mosey (2024) indicated that their FSDO of oversight was treating this guidance as regulatory which led these Part 141 pilot schools to discontinue their pursuit of examining authority. Respondents indicated that feedback from their FSDO indicated the FSDO did not have adequate manpower to complete the suggested observations.

On September 26, 2023, Notice 8900.675 was issued by the Federal Aviation Administration with a subject line of: Role of the FSDO in Conducting Practical Tests for a Pilot School Seeking Examining Authority. The Notice indicates that due to resource constraints, FSDOs are unable to conduct practical tests at the level specified in FAA guidance, and therefore have not been considering applications for examining authority. This wording in the Notice supports the findings of Rosser and Mosey (2024). According to the Notice, this has precluded Part 141 pilot schools from obtaining examining authority (FAA, 2018). The Notice further explains that 141.63(a)(5) requires the practical tests to be conducted by either an Aviation Safety Inspector (ASI) or a DPE who is not an employee of the school, but it does not indicate a percentage of practical tests that must be administered by an ASI in order to achieve examining authority. The FAA has determined that the guidance as provided is confusing, and not supported by regulations. As a result, the FAA is removing the provision that *advises* FSDOs to conduct practical tests for at least 50 percent of the graduates of the course for which the school applied for examining authority. According to the Notice, the FAA has stated that by removing this

provision, FSDOs should now be more readily able to process applications for examining authority.

This project continues the work of Rosser and Mosey (2024) and examines the effect of recent changes to Federal Aviation Administration guidance for applicants seeking examining authority. The previous study examined perceptions of the overall process of application and approval, and identified several issues associated with obtaining examining authority. This study specifically looks at the application guidance changes as presented in Notice 8900.675 and the possible effect of those changes on a pilot school's ability to achieve examining authority. Part 141 chief flight instructors were surveyed to provide their thoughts on the new guidance, specifically, any effect the guidance has on their intent to pursue examining authority for their pilot school.

### **Methodology**

This study continues the work of Rosser and Mosey (2024) by examining the perceptions of pilot school chief flight instructors regarding obtaining examining authority in their FSDO region. The study specifically addresses Notice 8900.675 updates as they pertain to outlining the requirements for application for examining authority. The target population of this study was all Part 141 pilot school chief flight instructors in the United States. The primary research questions that directed this study were:

1. Do chief flight instructors think that having examining authority would help alleviate the backlog of practical tests under the current system using DPEs?
2. Are pilot schools more inclined to pursue examining authority now that the changes have been made?

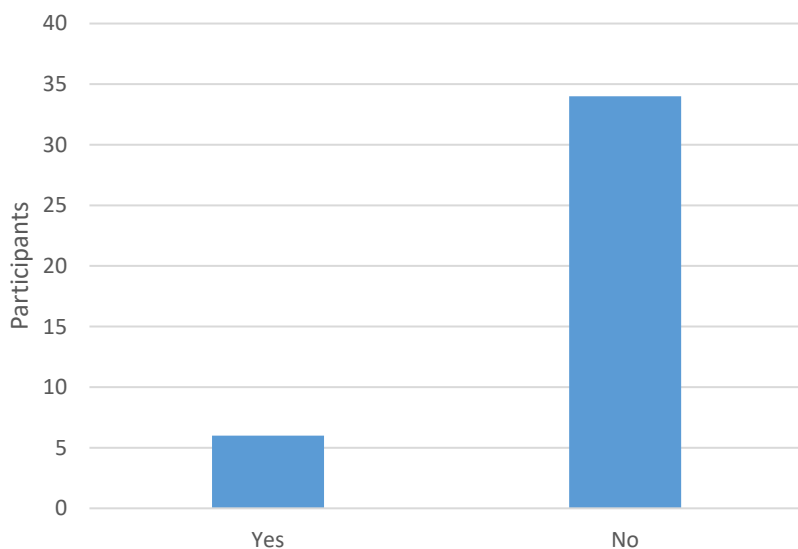
Part 141 pilot school chief flight instructors were asked to share their thoughts on their experiences with the examining authority application process through a survey. The survey contained 24 questions. The first five questions were to address informed consent. The remaining questions consisted of fifteen yes/no type questions and three questions that were open-ended. These questions addressed whether schools had examining authority, if they planned to add examining authority, either for an initial application or application for an additional rating or certificate, and if they would apply, or re-apply, for examining authority now that the FAA has published the guidance contained in 8900.675. Other questions asked whether their school had ever been denied for examining authority, and the reason(s) given for denial. Schools were also asked how many DPEs they had access to in order to conduct practical tests for their schools, whether they experienced delays in the practical test process under the current DPE system, and if they believed having examining authority would alleviate those delays. Additionally, chief flight instructors were asked if they thought the 90% first time pass rate for two years was a hindrance to obtaining examining authority, and whether specific DPEs were utilized, or avoided, to strengthen first time pass rate. Respondents were also asked if they provided flight training for a collegiate flight program and whether their school was a member of the University Aviation Association.

To provide face validity, the survey was reviewed by two chief flight instructors and an individual with extensive experience in developing research survey questionnaires. The individuals all had knowledge of the topic and their feedback was incorporated into the survey. This study involved human participants; therefore, the researchers applied for and were awarded an exemption from the Institutional Review Board (IRB). The Aircraft Owners and Pilots Association (AOPA) Flight School Finder (2023) provided contact information for participants. The site lists flight schools that provide flight training under FAR Part 61 and Part 141, and lists fixed wing (airplane), rotorcraft (ex. helicopter) and lighter than air (ex. balloon) flight schools. The researchers were able to utilize the site filter to obtain email contact information for 457 Part 141 pilot schools and included any Part 141 flight training providers who conduct airplane, rotorcraft, or balloon flight training that were listed in the Finder. The University Aviation Association (UAA) was asked to distribute the survey to its membership since the majority of collegiate aviation program flight training is conducted under Part 141.

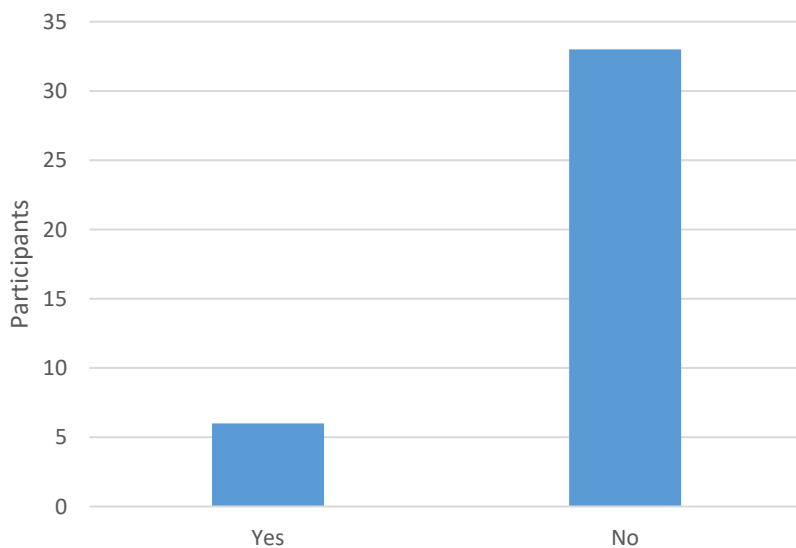
## **Results**

The survey instrument was developed in Qualtrics XM survey software, and a link was sent to 457 Part 141 pilot schools identified in the Aircraft Owners and Pilots Association Flight School Finder. An email was sent two weeks after the initial invitation email to remind Part 141 pilot school chief flight instructors to complete the survey if they had not already. The survey was closed in Qualtrics after another two weeks, and the data was compiled. Of the 457 emails sent, 31 were returned as undeliverable, making the total of potential recipients 426. Valid responses to the survey were received from 40 participants, making the response rate 9.4%.

To address research question one, we asked the following four questions. When asked if their school currently had examining authority 6 (15%) indicated they had examining authority for at least one training course outline (TCO) offered, with 34 (85%) respondents indicating they did not have examining authority for any course offered (Figure 1). 27 (69%) respondents stated that they provide flight training for a collegiate flight program, and 12 (32%) noted that they were University Aviation Association member schools.

**Figure 1***Part 141 Pilot Schools with Examining Authority*

Pilot schools were asked how many DPEs are regularly available to provide practical tests for their students. When asked if they felt that the number of DPEs in their area was sufficient, 6 (15%) of respondents said yes, while 33 (85%) answered no (Figure 2). These two questions were meant to gauge what the general thoughts were on DPE staffing levels.

**Figure 2***Are the numbers of available DPEs available in your area sufficient?*

**Table 1**

*Number of DPEs Regularly Available to Provide Practical Tests for Your Students*

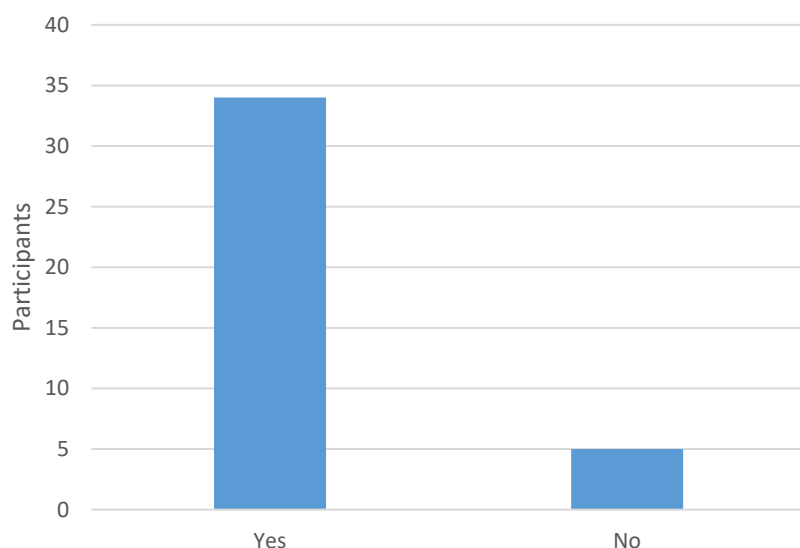
Number	Number of Schools
None	3
One	6
Two	13
Three	8
Four	2
Five	2
Six	1
Eight	1
Twelve	2

Note: One respondent indicated that two DPEs completed training as of 12/2023 but had not been activated by the FSDO yet.

Participants were asked if it was their experience to encounter delays scheduling a DPE for a practical test for their students; 34 (87%) answered yes, while 5 (13%) answered no (Figure 3). This was expanded into the next question which asked if they believe that having examining authority would alleviate delays they experience in scheduling of practical tests where 34 (87%) answered yes, 4 (10%) answered no, while 1 (3%) answered N/A (Figure 4).

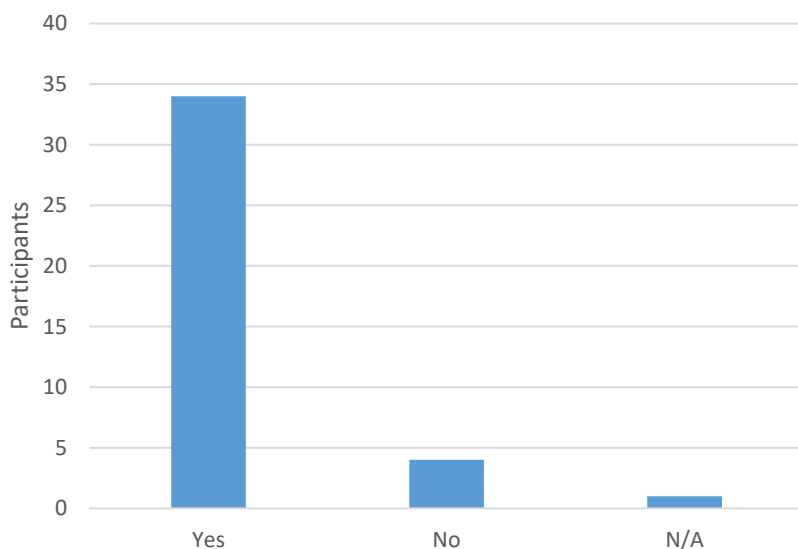
**Figure 3**

*Do you experience delays scheduling DPEs for practical tests?*



**Figure 4**

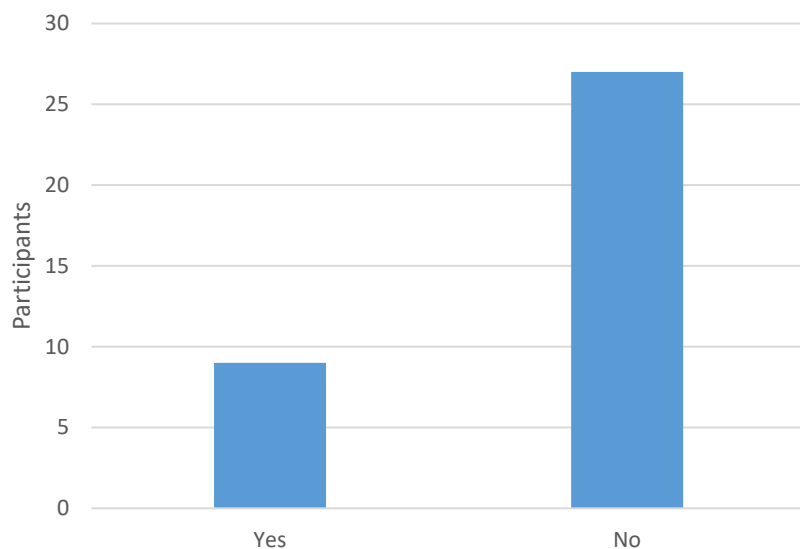
*Do you believe that having EA would alleviate delays scheduling practical tests?*



To address research question number two, we asked the following two questions: The survey then addressed where in the application process pilot schools were prior to the publication of 8900.675, and whether the changes would alter the school's intent to apply for examining authority. When asked if their pilot school was in the process of applying for examining authority before Notice 8900.675 was published, 9 (24%) answered yes, and 27 (76%) answered no (Figure 5). Participants were then asked; if they originally did not intend to pursue examining authority for either an initial application, or to add examining authority to another TCO before the publication of Notice 8900.675, would their school now pursue examining authority after the Notice came out, 23 (68%) answered yes, while 11 (32%) answered no (Figure 6). If the question was answered yes, the follow up asked if their school would be pursuing an initial application or adding to an existing TCO, 18 (55%) answered initial, 6 (18%) answered add-on, while 9 (27%) answered N/A.

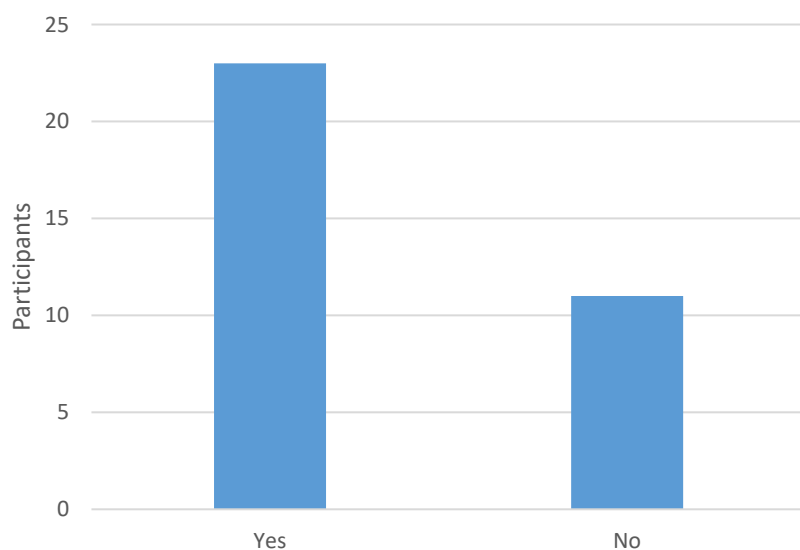
**Figure 5**

*Was your school applying for EA prior to Notice 8900.675 publication?*



**Figure 6**

*Do you intend to apply for EA now that Notice 8900.675 has been published?*



### **Limitations of the Study**

Several factors could be considered limitations to this study. As the study was presented by email, there is the distinct possibility that messages sent by an unrecognized source may have been ignored, deleted or even undetected if sent to a junk or spam email folder. Flight programs



that already have examining authority may have been disinterested in participating if they perceived the contents not pertinent to their operations. The same may be said for schools who were not planning to apply for examining authority at all, no matter what FAA changes were made. Another factor to consider is that some of those who completed the survey may not have completely understood the questions as the researchers may have expected. If the survey was conducted in person, it would have allowed the researchers to clarify the intent of what each question was asking.

Steps to help reduce the effects of the limitations listed included providing potential respondents an estimated timeline with the survey instruction overview. It was with hope that those reading the survey would not view the time investment as excessive and encourage participation. Additionally, in an effort to provide straightforward, understandable questions, two former Part 141 chief flight instructors familiar with pilot school operations reviewed the survey and provided feedback to help with the wording of the questions. The researchers recognize that the number of responses may be considered somewhat low and understand the limitations and possible biases associated. The surveys were only sent to Part 141 flight training schools, as the population accurately represents the study being conducted. As all the recipients fall under the same FAA regulations and requirements of application for examining authority, we feel this helped limit sampling bias, and the answers represent a true depiction of what pilot school views are towards the EA process.

### **Discussion and Conclusions**

Most respondents do not currently hold examining authority status, so they rely on DPEs to conduct the majority of their practical tests (Figure 1). Prior research has indicated that pilot schools have shared that there are challenges to completing student practical tests due to a perceived shortage of DPEs. In this study, when asked if the numbers of DPEs in their area were sufficient (Figure 2), most respondents answered no. Answers to the follow-on question asking if their pilot school experiences delays scheduling DPEs (Figure 3), answers were also one sided, as most of the respondents answered yes (87%). These answers seem to indicate that the general perception is that there are not enough DPEs to meet the demands that pilot schools have for practical test completion.

If current numbers of DPEs cannot keep pace with the numbers of practical tests needed, then it stands to reason that an alternative means to complete practical tests needs to at least be considered. When asked if they believed that having EA would alleviate delays scheduling practical tests (Figure 4), again, respondents overwhelmingly answered yes. This directly answers research question number one; Do chief flight instructors think that having examining authority would help alleviate the backlog of practical tests under the current system using DPEs? Part 141 pilot schools have indicated that they do believe that having examining authority would accelerate the practical test process.

Participants were then asked questions on their pilot school's intent to apply for EA prior to, and after changes to Notice 8900.675 were announced (Figures 5 and 6). Results indicate that the majority of respondents were not applying for EA prior to the change. The results further indicate that most of those pilot schools now intend to apply after the change has gone into

effect. The reversal of those before and after numbers seem to indicate that pilot schools are more inclined to pursue examining authority now that changes have been made to the examining authority application process under 8900.1 than they were prior to those changes.

The purpose of this paper was to further examine the state of examining authority among Part 141 pilot schools. Specifically, the possible effects of publication of FAA Notice 8900.675, and if its contents could ease the path towards examining authority for those schools. As the results appear to show, Part 141 flight training providers may believe that examining authority would help alleviate the backlog of practical tests currently being experienced at their schools. The results also may show a new attitude towards application, or re-application, for examining authority due to the application requirement changes as outlined in the publication of FAA Notice 8900.675.

### **Future Research**

The results of this study offer insight into perceptions of the examining authority approval process from Part 141 pilot schools' viewpoint. Specifically, any viewpoints that may have emerged after publication of FAA Notice 8900.675. It should be noted that this study examined challenges associated with the examining authority process only from the perspective of pilot schools. In an effort to establish parity, the researchers feel it important to gain insight from the FSDO's perspective also. FSDO personnel almost certainly experience different challenges to the process, and in fairness, we feel it necessary to examine the process from their perspective in order to provide balance to the research.

The recent availability of FAA Draft Order 8100.15 regarding Organization Designation Authorization (ODA) procedures has possibly opened a new path of research that appears to coincide with current study of examining authority. The ODA Program Overview (FAA, 2024) provides an explanation:

Reducing Designees. The designee system leverages the FAA's resources by authorizing individuals and organizations to perform functions for the agency...the FAA expects that an ODA applicant employing individual designees would, after being issued the organizational delegation, significantly reduce the number of individual designees performing the functions for which the applicant sought ODA. (p. 2-1)

As this appears to offer a possible alternative to examining authority for Part 141 pilot airman certification, it would stand to reason that a study into the comparisons between the two would be warranted.

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