



Foreign Part 147 approvals User guide for Applicants	Doc #	UG.CAO.00015-001
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Foreign Part 147 approvals – User guide for Applicants

UG.CAO.00015-001

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**DOCUMENT CONTROL SHEET**

Process Area	Organisation approval
Main Process	Continuing Airworthiness Organisation Approval
Scenario	Foreign Part 147 approval
Process	All
Main Process Owner	Karl SPECHT

Reference documents**a) Contextual documents**

Commission Regulation (EC) 2042/2003 - Regulation of 20 November 2003 laying down implementing rules for the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L315, 28.11.2003)

Commission Regulation (EU) No 127/2010 of 5 February 2010 amending **Commission Regulation (EC) No 2042/2003** on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 40, 13.02.2010)

Commission Regulation (EC) 216/2008 - Regulation of European Parliament and of Council of 20 Feb. 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency and repealing Council Directive 91/670/EEC, Regulation (EC) 1592/2002 and Directive 2004/36/EC

Commission Regulation (EC) 593/2007 - Regulation of 31 May 2007 on the fees and charges levied by the European Aviation Safety Agency Regulation (OJ L140, 01.06.2007)

ED Decision 2003/19/RM - On AMC and GM to Commission Regulation (EC) 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

ED Decision 2007/019/R - On the "general Acceptable Means of Compliance for Airworthiness Product, Parts and Appliances (AMC20)".

MB decision 10-2007 - MB decisions No 10/2007 on outsourcing of tasks to NAAs or Qualified entities.

EASA Decision 2010/011/R on aircraft type ratings for Part 66 aircraft maintenance licence

b) Internal documents**Log of issues**

Issue	Issue date	Change description
001	28/07/2011	First issue prepared by Frédéric MUR



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0. Introduction



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0.2. Definitions and Abbreviations

Abbreviations	
A&P	APPLICATIONS AND PROCUREMENTS SERVICES
AMC	ACCEPTABLE MEANS OF COMPLIANCE
AMO	APPROVED MAINTENANCE ORGANISATION
ATO	APPROVED TRAINING ORGANISATION
CAA	CONTINUING AIRWORTHINESS AUTHORITY
CAOM	CONTINUING AIRWORTHINESS ORGANISATIONS MANAGER
CAO	CONTINUING AIRWORTHINESS ORGANISATION
C/S	CERTIFYING STAFF
EASA	EUROPEAN AVIATION SAFETY AGENCY
EASATL	EASA TEAM LEADER
EU	EUROPEAN UNION
F145	FOREIGN PART 145
F147	FOREIGN PART 147
GM	EASA GUIDANCE MATERIAL
MOA	MAINTENANCE ORGANISATION APPROVAL
MTOA	MAINTENANCE TRAINING ORGANISATION APPROVAL
MTOAP	MAINTENANCE TRAINING ORGANISATION APPROVAL PROCEDURES
MTOC	MAINTENANCE TRAINING OVERSIGHT COORDINATOR
MTOE	MAINTENANCE TRAINING ORGANISATION EXPOSITION
NAA	NATIONAL AIRWORTHINESS AUTHORITY
NAATL	NAA TEAM LEADER
WG	WORKING GROUP
WH	WORKING HOURS
WHOC	WORKING HOURS EASA OVERSIGHT COORDINATOR



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0.3. Scope & Purpose

This user guide is dedicated to EASA Part 147 organisations based outside the EU Member States (hereinafter referred to as “Foreign Part 147 organisations”).

This User Guide is complementary to the requirements of Implementing Rule - Regulation EU 2042/2003 Annex IV, Part-147 -as amended- and does not supersede or replace the information defined within this document.

The purpose of this user guide is to describe how the applicant should proceed when applying for an EASA Part 147 approval and how EASA will handle the initial investigation, continuation, change, limitation, suspension or revocation of the approval of the aforementioned organisation according to Annex IV Part-147 of Regulation 2042/2003.

This user guide provides also explanations about technical matters.

All documents and correspondences between the Applicant, the overseeing authority and EASA shall be in the English language unless otherwise agreed by EASA.



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1. Initial approval



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1.1. Application to an initial EASA Part 147 approval

A new application for an EASA Part 147 Maintenance Training Organisation Approval shall be made in accordance with Section B of Part 147 by using an EASA Form 12. This Application form shall be sent directly to EASA by mail, fax, E-mail (foreign147@easa.europa.eu).

Details about on the EASA's Regulation including fees and charges can be found on the EASA website (www.easa.europa.eu).

In the following is proposed an overview of the application management process:

Step 1: reception and review of the application

EASA Applications & Procurement Department will acknowledge receipt of the application.

EASA Applications & Procurement Department in cooperation with the CAO Department will check the application for eligibility. The purpose of the eligibility check is to ensure that the application is complete & acceptable (see notes 1 and 2), but also that the certification process can be carried out in a reasonably timely manner, taking into account -in particular- the availability of qualified surveyors or the existence of travel restrictions. When incorrect or incomplete information is supplied, EASA Applications & Procurement Department shall notify the applicant as soon as possible by letter or email detailing the omissions and errors.

Initial application package must include:

- The EASA Form 12
- The official document proving the legal status of the applicant, with an official English translation when necessary (see note1).
- No technical document (MTOE, Form 4, Course material etc...) is to be submitted at this stage.

Step 2: invoicing & payment of the certification fees

Once an application has been accepted, an estimate of the fees & charges to be paid by the applicant in order to cover the certification tasks is established iaw the Fees & Charges Regulation (see notes 3 & 4), and is sent to the applicant for acceptance. When formally accepted the corresponding invoice covering the initial certification tasks & the instructions for payment are produced by EASA and the applicant is required to complete the payment before the technical investigation is started.

In case of payment not received within 6 months from the date of application, the applicant will be notified that EASA terminated the application. Should the applicant wish to re-apply for an EASA Part 147 approval in the future, he will have to send a new application as detailed above.



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Step 3: task allocation & technical investigation

-Once the payment has been confirmed EASA will provide the applicant with:

- The Preliminary approval number (a suffix "P" indicates the pending status of the approval (for example EASA.147.XXXXP)),
- The Confirmation of receipt of payment of any fees associated with the initial application.

-EASA will concurrently allocate the file to a surveyor from EASA or from an EASA Accredited Authority (EU NAA).

-The applicant will be notified by EASA and provided with the relevant contacts. The applicant is then requested to take contact with this surveyor in order to organise with him the review of documents (MTOE, Form 4s, course material, exam questions, etc...) as well as the schedule for the initial certification audit.

-a review of the status of "pending applications" is performed periodically by the Agency. Pending applications of more than 6 months and for which the allocated surveyor observes that no action was taken by the applicant ("Dormant" applications) will be notified to EASA by the surveyor, and termination of the application will be considered. The applicant will be contacted prior to take this decision. When the application is terminated by the Agency, the applicant is informed about the decision. Should the applicant wish to re-apply for an EASA Part 147 approval, he will have to send a new application as detailed above.

Step 4: granting of the Approval

Once the initial audit and the review of all documents are completed, and after all findings are closed, the surveyor sends to EASA a recommendation form 22 in order to allow the granting of a Part 147 approval. The approval certificate is produced and shipped out. The invoice for the coming annual surveillance fee is shipped with the certificate or shortly after.

Notes:

Note 1: In accordance with 147.A.10, a Training Organisation shall be an organisation or part of an organisation registered as a legal entity. For commercial organisations a copy of the current Certificate of Incorporation (certificate of trade registration) shall be provided.

Note 2:

-The intended scope of approval should be detailed as much as possible. It shall mention the class (Basic or Type/Task Training), the ratings & the limitations. When the training is limited to theory, or excludes the training to engines/ avionic systems, this should be indicated. Examples are provided at the end of this note.



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-“Limitations” for type training should be in accordance with the Aircraft type’s denomination as provided by the Annex to ED Decision 2010/011/R “APPENDIX I AIRCRAFT TYPE RATINGS FOR PART-66 AIRCRAFT MAINTENANCE LICENCE”.

The decision and its annex can be found by following the link: <http://easa.europa.eu/agency-measures/agency-decisions.php>

-The above EASA Decision is periodically reviewed by EASA and superseded by a new decision; attention is therefore required to use the latest decision.

-“difference course” should be indicated in a similar manner (airframe1 (eng1) to airframe 2 (eng2)).

-For each A/C type applied for, only the variants for which the training organisations has the capability to train should be indicated (ie only A319 (CFM 56) if the organisation does not have a course covering the whole A319/A320/A321 family).

-Basic Training: it is not possible to apply for a few modules only. Only applications for a full Basic Training Course will be considered, even when the organisation intends to then subcontract part of the training iaw 147.A.145 (d).

-The timely processing of an application cannot be guaranteed for applications requiring a significant number of courses to be approved; in such a case it is recommended that the applicant prioritises the courses to be approved and submit a new application once the first batch has been approved.

Exemples:

- Basic Training, cat B1.1 and cat B2
- Type Training, cat B1, Airbus A340 (CFM 56), theoretical & practical elements
- Type Training, cat B1, Airbus A319/A320/321 (IAE V2500), theoretical elements only
- type training, cat B1, Difference course, Airbus A380 (RR RB 211 Trent 900) to Airbus A380 (EA GP7200)
- type training, cat B1 & B2, CFM 56 (as fitted on A340)*
- type training, cat B2, A340 (CFM56) –limited to avionics*

* refers to AMC 147.A.300



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Note 3:

-the fees and charges are calculated iaw the Fees and Charge regulation 593/2007 and are based on the number of staff declared in the application form 12.

-the fees and charges do NOT include the costs related to the performance of on-site audits (travel, accommodation, allowances etc...) which are calculated and invoices separately.

-In the following, guidance is proposed for calculating the number of staff working within the Part 147 organisation and to be declared in the box 6 of EASA Form 12.

-Personnel requirements are described in Part 147.A.105 and further detailed in AMC 147.A.105.

-The total number of staff as required by EASA Part-147 in order to obtain and maintain the EASA Part-147 approval should include, but not be limited to:

- The Persons nominated in accordance with Part 147.A.105 a & b to hold the function of Accountable Manager, Training Manager, Examination Manager, Quality Manager.
- Knowledge & practical Instructors, knowledge examiners and practical assessors required by 147.a.105 (c) to perform trainings and conduct associated examinations/practical assessments.
- Personnel necessary to administrate training/ exam activities such as the planning of training/ exams, the management of the library and of the training materials, the update and maintenance of the training devices, the administration of trainees' applications and the issuance/ retention of Certificates of Recognitions, the management of sub-contractors and the Quality Monitoring of the approval holder's training/ exam activities. The declared staff shall cover all sites present on the Approval Certificate and the MTOE related section.

-Staff not belonging to the approved Maintenance Training Organisation but involved into the Part 147 training & exam/ assessment activities must be declared (ie instructors of a sub-contracted Part 145 organisation)

-Personnel belonging to the Training Organisation but not involved into EASA Part 147 activities shall not be declared.

- Surveyors are requested to assess the pertinence of the number of staff declared on the EASA Form 12 as part of the initial and subsequent in-situ audits. Incorrect information may lead to delays in the granting of the approval.

1.2. Allocation of the investigation team

After eligibility of the application has been fully assessed and the invoice has been paid, the CAOM decides if the application is to be further processed internally by an EASATL or if the technical investigation is to be allocated to an external party (accredited NAATL).

In case the technical investigation is to be performed internally, the CAOM will establish an appropriate EASA certification team using EASA staff. The CAOM will inform EASA Applications & Procurement Department of his selection.



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When not internally allocated the technical investigation can be allocated only to an EU NAA duly accredited and having appropriate contractual arrangements with EASA.

The Applicant is informed in writing about the allocated investigation team by the EASA Applications & Procurement Department.



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1.3. Initial technical investigation

Documents to be submitted by the applicant:

Upon receipt of the EASA allocation decision, the applicant shall provide the appointed NAATL or EASATL with the following documents:

- EASA Forms 4,
- a draft of the MTOE established using the "EASA Part 147 Maintenance Training Organisation Exposition" user guide,
- the Course Approval Forms
- The training course material*
- A set of exam questions for each course to be approved

* Training course material includes the trainee's notes and the instructor's material (slides etc...); in effect it is important for EASA to assess the information delivered by instructors and to ensure an acceptable ratio with student self study notes.

Note: documents received by EASA or accredited surveyors, such as instructor notes, are not to be distributed to third parties and precautions related to confidential/ commercial information are required from the surveyors.

Preparation of the investigation.

Pending the NAATL or EASATL is reviewing the draft of the MTOE and the applicable EASA Forms 4, the Applicant's Quality department shall audit the Organisation in full for compliance with Regulation 2042/2003 and subsequent amendments.

For an initial approval application, a statement signed by the Organisation's Quality Assurance Manager shall always be provided before the audit takes place, confirming that documents, procedures, training/exam material, facilities and personnel subject to the application have been reviewed and audited showing compliance with all applicable requirements.

The relevant audit report shall be provided by the Applicant upon request of the NAATL or EASATL.

As soon as:

- the draft of the MTOE,
- the EASA Forms 4
- the associated documents
- the course approval forms



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- the training material (instructor & trainees course notes)
- a set of examination questions for each course applied for
- the Quality Assurance Manager statement
- the audit report (if requested)

are deemed acceptable, the accredited NAATL or EASATL initiates the investigation in accordance with Section B of Part 147, its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM) and Internal CAO procedures and work instructions.

The NAATL or EASATL will:

- Liaise with organisation for scheduling the audit
- Prepare and notify the Organisation with the audit plan



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On site investigation.

The EASATL or the NAATL should start the investigation audit* with an opening meeting with the auditee's management and where possible with the Accountable Manager. The following points should be considered when carrying out the meeting:

- Confirmation of the audit schedule (including the scope of the audit).
- Explanation on the method used for reporting non conformities.

*Note: depending on the scope of approval applied for and the number of sites, the Investigation Team may include several auditors under the leadership of the EASATL or NAATL.

The EASATL or the NAATL shall meet the Accountable Manager during the visit and ensure that he has a reasonable understanding of applicable regulations and of his role within the approved organisation, but also that he has all necessary means, in particular financial, to fulfil the Accountable Manager's duties as exposed in the MTOE. The EASATL or the NAATL shall immediately notify the CAOM if he intends to reject a prospective accountable manager.

The EASATL or the NAATL shall notify EASA MTOC of any inconsistencies with the number of staff required to meet the manpower requirements of the scope of approval as detailed in EASA Part 147.A.105 and in the approved MTOE.

A closing meeting chaired by the audit Team Leader will be held to present the audit findings and conclusions to the auditees in order to ensure that they are understood. The auditee will be given the opportunity to discuss any non compliance identified and suggest corrective actions and a timeframe for implementation.

Findings made during the investigation process will be handled by the EASATL or the NAATL according to Section B of Part-147 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

For an initial Audit the findings should not be classified as Level 1 or 2 as no action can be taken against the certificate. Unless otherwise agreed by the Agency, a maximum of three months shall be allowed to take corrective action for each finding raised during the initial audit. Failure to close these findings during this three months period could lead the Agency to terminate the application.

The formal notification of the findings must be sent to the Organisation by the EASATL or NAATL within a maximum of 15 calendar days from the end of the audit.

The EASATL or the NAATL will follow up the closure of all findings identified during the audit. When he/she is satisfied with the actions that have been taken by the Organisation in respect of the finding raised during the audit, he/she notifies the Organisation in writing that the non compliances are considered to be closed.



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Depending on the extent and nature of findings and the related corrective actions, an additional audit to assess the effective implementation of the corrective actions may be necessary.

Recommendation:

Once compliance of the applicant with Part-147 has been established, the EASATL or the NAATL will recommend to EASA the Part 147 approval of the organisation. This includes the recommendation for the MTOE approval and the acceptance of management personnel.

For that purpose he/she will prepare a recommendation package to be reviewed for quality check by the NAA MTOC. The recommendation package is then forwarded to EASA MTOC.

Issuance of an approval Certificate

The recommendation package is reviewed by the EASA for compliance and accuracy. Once satisfied EASA will prepare for signature by EASA authorised persons:

- the certificate EASA Form 11
- the approval letter of the MTOE together with its associated document and lists
- the nominated personnel EASA Form 4s acceptance letters
- The Accountable Manager acceptance letter.

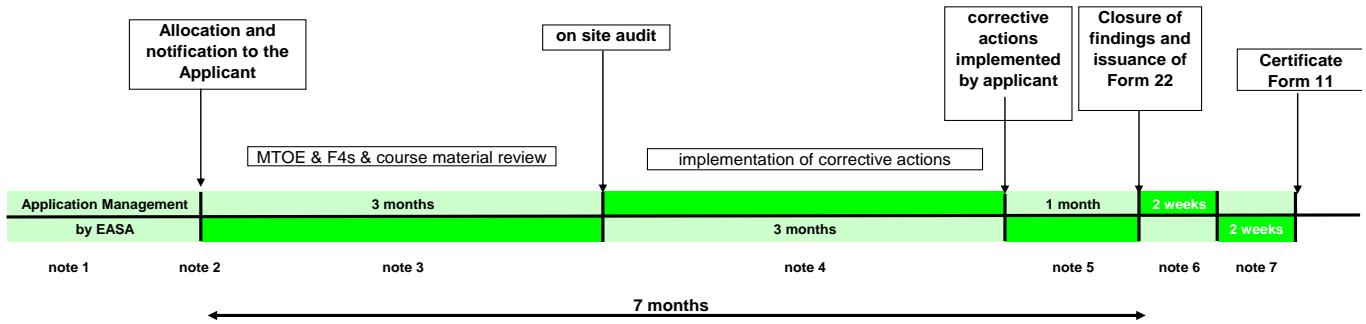
The EASA MTOC will forward the original signed EASA Form 11 together with the relevant approval and acceptance letters to EASA Applications & Procurement Department. This department will establish the first annual surveillance fee invoice and send it attached to the above document to the applicant. The first annual invoice is due immediately after the issuance of the certificate.

1.4. Time frame

The normal time frame to process a PART 147 approval is about 8 months from the allocation to an EASATL or NAATL; however the amount of time taken is largely dependant on the ability of the applicant to produce the documentation required and to rectify any non conformity that may be identified during the certification process. Unless duly justified failure to meet this time frame might lead the Agency to terminate the application



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- note 1: the MTOE guidance is made available to the applicant
- note 2: The allocation is confirmed by the Purchase Order (NAAs) or the Involvement notification (EASATL).
The applicant is informed by EASA regarding the allocated NAA to which MTOE, Form 4 and course/ exam material must be sent.
- note 3: MTOE draft review by the team leader and correction by the applicant up to an acceptable level
- note 4: Implementation of corrective actions and notification to the Team Leader by the applicant.
- note 5: The Team Leader to close the findings and issue the Recommendation package
- note 6: Form 22 and TV quality check: 2 weeks NAA to review recommendation package and forward to EASA
- note 7: 2 weeks EASA to process the recommendation package and issue the certificate F11.



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2. Change to Part 147 approval



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2.1. Application for change

An application for change of an EASA Part 147 Maintenance Training Organisation Approval shall be made in accordance with Section B of Part-147 by using the EASA Form 12. This Application form shall be sent directly to EASA by surface mail, fax, e-mail, via the 'foreign 147' email box.

Details about on the EASA's Regulation including fees and charges regulation can be found on the EASA website (www.easa.europa.eu).

EASA Applications & Procurement Department will acknowledge receipt of the application by fax/email for applications not received via the 'Foreign 147' mailbox from which an acknowledgement of receipt is automatically sent.

EASA Applications & Procurement Department will check the application. When incorrect or incomplete information is supplied, EASA Applications & Procurement Department shall notify the applicant as soon as possible by letter or email detailing the omissions and errors.

Application for a change of name (organisation's legal registration) must include the corresponding Certificate of Incorporation as detailed on the EASA Form 12.

For the definition of "number of staff" to be declared on the EASA Form 12, the paragraph related to "Initial investigation" applies.

Note : the staff previously declared should be reviewed and adjusted when a new application is sent to EASA or when the MTOE is amended to reflect a change in the organisation's staffing (i.e. due to the addition of training courses or the addition of a site).

In case of refusal of an application, EASA Applications & Procurement Department will notify this decision in writing to the applicant together with the reasons thereto.

Once the application package is complete, the EASA CAO section checks the eligibility of the application according to Part-14 regulation.

When eligibility has been fully assessed, EASA Applications & Procurement Department will Inform the NAA MTOC or the EASA MTOC that the application shall be processed.

In the mean time, the applicant shall forward to the Team Leader all documents related to the change.

2.2. Allocation of the investigation team

By default the investigation is performed by the assigned initial team. However, should it become necessary or more appropriate to allocate a different auditor, the CAOM makes the decision to allocate another NAA or EASATL, he/she will inform the EASA Applications & Procurement Department who will inform the selected NAA or EASATL together with the applicant in writing.

2.3. Technical Investigation for Change

To process a change the EASATL or the NAATL will proceed as detailed within paragraphs related to "Initial technical investigation" (§1.3).



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Note: Depending on the nature of the requested change(s) and his past experience of the Training Organisation, the EASATL or NAATL will decide to perform the investigation either through an in-situ audit or by using a “desktop” audit process.



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3. Continued surveillance



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The continued surveillance is carried out in accordance with a surveillance plan proposed by the EASATL or NAATL. The surveillance plan covers a two year cycle, and a new surveillance plan is submitted at the completion of each cycle. When relevant, it is updated to reflect changes such as the addition of approved sites or a major amendment of the scope of approval (ie addition of Basic Training capability to an existing approval certificate that was limited to Aircraft Type Training) .

Frequency of visits:

The surveillance period starts from the date when the certificate was granted or from the last continuation date. This may be varied when agreed by the EASA MTOC.

The frequency of on-site visits for the normal continued surveillance shall consist of a minimum of:

- one (1) visit per year for organisations approved for Type Training
- two (2) visits per year for organisations approved for Basic Training

Note 1: it is not required to audit all approved sites every year, however the surveillance plan should be managed in a way that all approved sites are audited during a 2 years cycle.

Note 2: These figures constitute a baseline and may be increased:

- In case changes are applied for, and require a specific in-situ audit,
- In case the EASATL or NAATL considers that additional audits are justified, ie to check the effective implementation of corrective actions (only after the CAOM has accepted the additional audits),
- When the organisation intends to conduct trainings or exams away from the maintenance training organisation address(es) iaw 147.A.145 (c). Iaw GM.147.B.110 §4, these training/ exams are subject to sampling. The size of the sampling will be proposed by the EASATL or NAATL and agreed by the EASA MTOC.
- Etc...

Note3: deviations to the above figures must be approved on a case by case basis by the EASA MTOC, and supported by acceptable justifications & compensating measures.

The criteria to be reviewed by the EASA MTOC for changing audit visit frequency are as follows:

- a) Follow up of audits / findings
- b) Change to the approval
- c) Incident response
- d) Request by the Agency
- e) Large complex organisation



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Every 24 months the EASATL or the NAATL will have to summarize the surveillance performed and if satisfied, to recommend EASA to continue the approval. For that purpose he/she will prepare a recommendation EASA form 22 (parts 1-5), a continued surveillance plan and the associated Technical Visa.

At the time of the continuation, recent findings having not reached yet the deadline may be still open. However it should be clearly stated that the accredited NAA EASATL or the NAATL in charge of the recommendation is satisfied with the corrective action plan (CAP) of any open finding made at the time of the recommendation.

The formal corrective action plan submitted by the Accountable Manager or the Quality Manager must be formally accepted by EASATL or NAATL.

After satisfactory quality check by the NAA MTOC he/she shall forward the recommendation package to the EASA MTOC.

When continued validity of the certificate is accepted the EASA MTOC shall formally notify the approved maintenance organisation and copy in NAA MTOC.

Findings made during the continued surveillance will be handled by the EASATL or the NAATL according to Section B of Part-147 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

By default the continued surveillance is performed by the assigned initial team. However, should it become necessary or more appropriate to allocate a different auditor, the CAOM makes the decision to allocate another NAA or EASATL, he/she will inform the EASA Applications & Procurement Department who will inform the selected NAA or EASATL together with the applicant in writing.



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4. Corrective actions and level 1 finding



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In case of non compliance with Part 147, the Organisation is formally notified by the surveyor.

For any finding, the quality system of the organisation should propose a corrective action or a corrective action plan designed in a way which allows identifying and recording:

- the finding,
- the root cause,
- the relevant immediate action,
- the long term preventive action,
- the appropriate timescales.

When the surveyor identifies a significant non compliance with Part 147, he/she must get a formal confirmation from EASA that the finding is a level 1.

In that case the organisation will not receive the audit report from the Surveyor but will be formally notified of the finding(s) by EASA together with the decision against the approval.

For any level 1 finding, the organisation should, as part of the immediate actions:

- 1) Identify the Part-147 certificates of Recognition issued that are concerned by the finding,
- 2) inform the relevant customer/ trainee and the competent authority,
- 3) Take the appropriate immediate corrective/ preventive action



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5. Determination of the audit team



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The MTOC will nominate an audit team made up of a team leader / members to carry out the investigation process. Normally, the number of auditors is limited to one. Cases for which more than one auditor is to be used must be justified by the EASATL or NAA MTOC and agreed by EASA MTOC prior to the investigation taking place.

The criteria applied by EASA to determine the investigation team are as follows:

- Complexity of the organisation approval
- Number of sites to be audited
- Type of audit (initial, changes, follow up audits, findings etc.)
- Size of the organisation
- Nature of the services to be covered by the ATO and its direct impact to aviation safety
- Appropriate technical experts (may include language needs)
- Any additional reason deemed necessary by EASA and justified by a specific situation

If the accredited NAA elects to use additional staff or trainees for an audit, EASA must be informed in advance. In such cases any associated costs will be borne directly by the NAA and not by the applicant or EASA.

Trainee staff from EASA may participate in investigation teams at no direct cost to the applicant.

When the investigation is allocated to an external party the NAA MTOC shall be the single point of contact for liaison with the Agency. The external party shall follow all applicable provisions detailed in this procedure and section B to Part-147. The team leader of the external party will be responsible for complying with these procedures.



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6. Correspondence and focal points



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The “contact point notification” letter sent by EASA specifies the contact details of the overseeing authority. For any technical issue related to the approval the ATO shall contact the designated team leader.

For any administrative issue such as those related to fees and charges, invoices, the ATO shall directly contact EASA Application and Procurement department.

Any application for change will also have to be sent to EASA. The EASATL or NAATL could be copied in of the application Form 12 by the ATO.

EASA will directly send the formal approval of all documents related to the approval such as EASA Certificate form 11, accepted FORM 4s, MTOE, associated procedures, lists and continuation letter to the applicant.

An audit report could be produced at the time of completion of the audit. But in any case the formal notification of the findings must be sent by the EASATL or NAATL to the Organisation within a maximum of 15 calendar days from the end of the audit.

In case of suspected Level one finding the EASATL or NAATL will have to liaise with EASA for confirmation of finding level.

When the level 1 finding is confirmed, the EASATL or NAATL will NOT transmit the audit report to the Organisation. However he/she will transmit a recommendation Form 22 to the EASA MTOC /DA.

EASA will notify the finding(s) to the Organisation together with the decision against the approval.



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7. Maintenance Training Organization Exposition



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EASA has developed a user guide for Maintenance Training Organisation Exposition (MTOE) (UG.CAO.00014) for Foreign EASA Part 147 Approval which is complementary to the requirements of Implementing Rule - Regulation EU 2042/2003 Annex II, Part-147 "as amended" and does not supersede or replace the information defined within this document.

This user guide is designed to be used by:

- Part 147 Maintenance training Organisations - To assist them in the production of their own MTOE.
- Competent Authority - As a comparison document for MTOEs submitted to them for approval.

The user guide is provided for guidance only and should be customised by each organisation to demonstrate how they comply with Part 147. The organisation may choose to use another format as long as all the applicable sections of the regulation are addressed and cross-referenced.

- For each detailed procedure described within the MTOE, the Part 147 organisation should address the following questions:
What must be done? Who should do it? When must be done? Where must it be done? How must it be done? Which procedure(s)/form(s) should be used?
- The MTOE should be available in the English language however, it may also be written in a second language (English and the language of the country where the organisation is located) provided that the overseeing competent authority has agreed and EASA has finally accepted. In the case the MTOE is written in English and in a second language, the English version shall prevail.



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8. Qualifications and experience of Instructors, Knowledge examiners and practical assessors



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8.1 Table of Content:

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8.3/ Qualifications and experience requirements of Instructors, Knowledge examiners and practical assessors

8.4/ assessment by the Competent Authority

8.5/ Grandfathering

8.6/ Continued qualification

8.7/ Extension of the scope of instruction, examination & assessment

8.8/ Entry into force



8.2/ introduction

147.A.105 Personnel requirements quotes: “ (f) The experience and qualifications of instructors, knowledge examiners and practical assessors shall be established in accordance with criteria published or in accordance with a procedure and to a standard agreed by the Competent Authority. The purpose of this document is to establish the criteria applicable to instructors, examiners and assessors exercising their activity in Foreign Part 147 Maintenance Training Organizations approved by EASA.

These apply to concerned staff of the Maintenance Training Organization approved under Part 147, as well as to any instructors, examiners and assessors sub-contracted by the approved organization.

8.3 Qualifications and experience requirements of Instructors, Knowledge examiners and practical assessors

8.3.1: preamble

The competency of the instructors, examiners and assessors is an essential factor contributing to the quality of a training course and only adequately qualified staffs should be assigned by the Training Organization to carry out the training and examination tasks.

It is therefore important to assess the competency of the proposed staffs, and the following criteria are meant to establish the parameters that EASA intend to use to measure the level of competency of training/ examination staffs.

Rather than strict educational background or pre-determined professional experience –such requirements would be difficult to establish in a fair and harmonized manner for the large variety of ‘foreign 147’ schools- , the criteria address qualities –or skills- that are expected to be owned by the staffs, and which must be demonstrated to the surveyor.

Note: The means to demonstrate that a proposed instructor, examiner or assessor owns these qualities is addressed in § 8.4.

8.3.2 Definitions

To better understand the criteria and which categories of staff are subject to compliance, the following definitions are proposed for:

- Instructor: a nominated person who will deliver a part 66 module (iaw appendix I), a part 66 element (iaw appendix III), or part thereof. The instructor is not necessarily the person involved into the drafting of the course material (content, duration etc...), however he must be involved at some point into the organization of the lessons themselves (creation of the instructor notes, slides, sequencing etc...).
- Examiner: a nominated person who will determine the level of theoretical knowledge of the trainees on a particular module, element, or part thereof. The function may include the drafting and/ or the selection of questions (MCQs and Essays), the performance of the examination exercise itself for essay questions, the evaluation of the correctness of answers (except when correct answers are pre-determined) and the final judgment regarding the level of knowledge demonstrated by the trainee. Persons solely supervising an exam session consisting of pre-selected MCQ questions are not considered as examiners but are considered as support staffs (invigilators), and are therefore not subject to the knowledge and experience requirements, but need to be trained to the examination procedure described in the MTOE.
- Practical Assessor: a nominated person who will determine the level of practical knowledge/ practical skills of the trainees on a particular module, element, or part thereof. The function may include the drafting and/ or the selection of practical tasks, the performance of the practical assessment itself, and the evaluation of the practical abilities on the tasks covered by the assessment.
- Scope of privileges: the part of a course that an individual is authorized by the training organization to instruct, examine or assess; this scope can cover a full course or be reduced to a particular module or element, or even be limited to a part thereof (ie sub-module, a specific area within a sub-module, etc ...).



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8.3.3: standard

8.3.3.1 Instructors

To be deemed as competent, the instructors should be:

1. fully knowledgeable about the Part 66 elements that are assigned to their scope of instruction, but also about the rules and specific procedures (MTOE etc...) governing the teaching in a controlled environment (Part 147 organizations),
2. pedagogic, and should know how to organize a lesson and how to efficiently deliver a course that clearly highlights the fundamental points; they should also be able to adapt his communication to a particular audience, what may require efforts to bypass, for instance, the language barrier or the very variable profiles of trainees in a same class (in terms of pre existing knowledge/ experience...);
3. convincing, and therefore should have the required experience proving that he has a good command of the subjects taught, at least sufficient to convince trainees that for instance may themselves have a pre-existing experience of the aircraft types to be taught. He should be in a position to understand -and possibly answer- a number of questions asked by trainees, and should be able to expose the links between the academic training delivered to the trainees and the actual maintenance tasks that these will have to accomplish all along his career. The instructor should also keep and promote the "appropriate attitude" towards regulations and procedures, and in particular the strict adherence to approved maintenance practices and quality standards that can only be acquired through his own experience in a regulated (or governed) aviation environment,
4. Proficient, and in particular should be familiar with the tools or the training techniques used by the training organization to support the lessons (STDs etc.); they should also have a good command of the languages used in aviation literature such as A/C maintenance instructions and that will be used by trainees in an international Part 145 environment.



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8.3.3.2 Knowledge examiners

To be deemed as competent, the knowledge examiners should be:

1. fully knowledgeable about the Part 66 elements that are assigned to their scope of examination, but also about the rules and specific procedures (MTOE etc...) governing the organizations & performance of exams in a controlled environment (Part 147 organizations),
2. Trained to examination techniques. The examiner should be fully aware of the aim of the examination and conduct an examination in such a way that the true abilities of the candidate are demonstrated. These involve technical knowledge, but through the essay questions the examiner should also determine the ability for the candidate to satisfactorily cope with the necessary “documentary phase” of a maintenance action (ability to fully understand maintenance entries such as task requests or maintenance reports, and to report in an understandable and complete manner the tasks performed or decision taken (ie troubleshooting). The examiner should remain neutral at all times, and behave in a manner that will not influence or prejudice the final result of the examination, for example by providing undue assistance or clarification to a candidate.
3. Proficient, and in particular should be familiar with the tools or the examination techniques used by the training organization to perform the exams (paper system, computerized systems..);



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8.3.3.3 Practical assessors

To be deemed as competent, the practical assessors should be:

1. Fully knowledgeable in order to build a solid judgment regarding the abilities of the assessed trainees, the assessor should have the required knowledge and experience of the tasks to be assessed. He should also be able to determine if the trainee accomplishes the tasks iaw current regulations, utilizing approved procedures, maintenance practices etc... He should additionally be knowledgeable about the rules and specific procedures (MTOE etc...) governing performance of assessments in a controlled environment (Part 147 organizations).
2. Trained to assessment techniques. The assessor should be fully aware of the aim of the assessment and conduct a practical assessment in such a way that the true abilities of the candidate are demonstrated. These involve technical abilities but also the ability for the candidate to satisfactorily perform the tasks in an actual maintenance environment where basic principles of human factors apply (such as work performed under stressful conditions i.e. time or management' pressure etc...). Therefore the assessor should remain neutral at all times, and behave in a manner that will not influence or prejudice the final result of the assessment, for example by providing assistance to a stressed candidate.
3. Proficient, and in particular the assessor should be familiar with the tools or the techniques used by the training organization to assess the practical abilities of trainees (maintenance simulators, mock up etc.);.



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8.4: Assessment & acceptance of staffs

8.4.1 Pre-assessment by the Training organization

Before being proposed to EASA, the proposed candidate to a position of instructor, examiner or assessor shall be physically interviewed by the appropriate staff of the training organization (QA Manager, Training/ exam Manager etc...) in order to ensure its competency. The pre-assessment shall be performed in accordance with an approved procedure, and must be documented.

Once satisfactorily completed, the detailed result of this pre-assessment must be provided with the list of concerned staff and supporting (diplomas etc...). The intended scope of instruction, examination or assessment must be detailed.

Note: The surveyor will have to assess that the training organization has an acceptable system in place to ensure that each proposed instructor, examiner and assessor is competent, but also that the organization can demonstrate that it has enough qualified instructors, examiners and assessors to cover, without any gap, the integrality of the approved courses. The procedure shall be described in the MTOE.

8.4.2 Assessment by the surveyor

The above standard exposes the expectations of EASA for an individual to qualify as an instructor, examiner or assessor.

Several possibilities exist to assess whether a proposed staff owns the skills or qualities as exposed in § 7.3 and that qualify him as an instructor, examiner or assessor.

Whenever possible, a review of the candidate's individual file, followed by an interview of the candidate and the partial attendance to an event lead by the candidate (lesson, exam, assessment) should be prioritized by the surveyor.

Whenever the direct interview of the candidate is not possible or not appropriate, the background of the candidate (education/ experience etc..) should be carefully reviewed in order to determine if this background can demonstrate that the qualities of §7.3 are owned by the candidate.

Note 1: In order to assist with the completion of this task, a number of generic acceptable means of demonstration (ie school diplomas, experience requirements etc...) have been summarized included into the MTOE User Guide. These generic cases were drafted with consideration to the vast variety of educational systems, national requirements (ie for pedagogical skills evidence) etc... applicable in the different countries where 'foreign 147' organizations are located. Other ways to demonstrate the compliance can be proposed by an applicant and accepted by the surveyor, however after having checked that these guarantee the same level of safety and confidence than those proposed in the guidance material.

Note 2: in any case, samplings –including interviews and event witnessing- must be performed by the surveyor when approving a new organization, or when significantly extending the scope of an existing approval, and repeated as part of the continued surveillance carried out within the organization.

8.4.3 Acceptance of candidates

Assessment and acceptance of Instructors, examiners and assessors shall be performed by the approved training organization in accordance with the dedicated procedure described in the MTOE (as approved by the Agency). The list of those staffs shall be included into the MTOE or cross referred document. no Form 4 is to be submitted to the Agency for approval of these staffs.



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8.5/ "Grandfathering"

- Instructors, examiners and assessors accepted (via the approved MTOE) prior to the entry into force of this document, and exercising their privileges, or part thereof, at the entry into force of this standard, are considered as fulfilling the knowledge and experience requirements. However an assessment of the gap between actual qualifications and this standard should be performed and provided to the surveyor within a reasonable timeframe.
- The requirements resulting from the above standard shall not apply to Instructors, examiners and assessors employed by an organization having already applied for an EASA approval at the time when this document enters into force. However an assessment of the gap between actual qualifications and this standard should be performed and provided to the surveyor before the approval is granted.

8.6 continued qualification

The qualification criteria and experience requirements only address the initial acceptance of instructors, examiners and assessors. The training organization must develop and document a program to ensure the continued qualification and competence of these staff, and expose it in the MTOE. The recurrent training program shall as a minimum comply with Part 147.A.105 Personnel requirements:

"(h) Instructors and knowledge examiners shall undergo updating training at least every 24 months relevant to current technology, practical skills, human factors and the latest training techniques appropriate to the knowledge being trained or examined."

The continued qualification shall be assessed and confirmed at cycles not exceeding two years. The updating training (syllabus, participants) and the QA assessment shall be documented and made available to authority surveyors.

8.7 Extension of the scope of instruction, examination & assessment

- Would the scope of privileges of an instructor, examiner or assessor be extended, an assessment must be performed by the organization and documented in order to demonstrate that the additional qualification and experience requirements induced by the extended scope of privileges are fulfilled (ie specific knowledge received).

8.8 Entry into force

The requirements contained in this chapter shall enter into force three (3) months after the initial Approval Date of the present User Guide.