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|  Foreign Part 147 approvals – User Guide for applicants and approval holders |
| **UG.CAO.00015-005** |
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| **DOCUMENT CONTROL SHEET** |
| **Reference documents** |
| **a) Contextual documents** |
| Commission Regulation (EU) 1321/2014 - Commission Regulation (EU) of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasksCommission Implementing Regulation (EU) 2019/2153 of 16 December 2019 on the fees and charges levied by the European Union Aviation Safety Agency, and repealing Regulation (EU) No 319/2014ED Decision 2015/029/R - ED Decision 2015/029/R of 17 December 2015 issuing acceptable means of compliance and guidance material to Part-M, Part-145, Part-66 and Part-147 of Regulation (EU) N°1321/2014 and repealing Decision 2003/19/RM of the ED of the Agency of 28 November 2003.MB Decision 01-2017 - Decision of the Management Board of 13 June 2017 repealing MB Decision 01-2011 on guidelines for the allocation of certification tasks to National Aviation Authorities and Qualified EntitiesRegulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91. |
| **b) Internal documents** |
| WI.IMS.00105 - Filing plan Maintenance and Production DepartmentFO.CAO.00012 - EASA Form 12 - Application for PART 147 Approval  |

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| **Log of issues** |
| Issue | Issue date | Change description |
| 001 | 28/07/2011 | * First issue
 |
| 002 | 01/09/2014 | * Update of Quality documents to implement the new corporate image of the Agency and the changes to the organization structure.
 |
| 003 | 27/05/2019 | * Updated the whole document to reflect current technical & administrative. processes.
* Qualifications of instructors” section removed.
 |
| 004 | 05/03/2020 | * Updated fees and charges regulation reference (EU) 2019/2015
* Deletion of fee level information to the applicant
 |
| 005 | 15/11/2023 | * Introduction of the use of an Oversight Management Software (IFP - Inspection & Finding Platform) for the management of Part 147 approvals
* Addition of dedicated chapter detailing the technical interpretations of Part 66 / Part 147 requirements
* Addition of a dedicated chapter detailing the procedure for continued surveillance of Part 147 approvals
* Use of Résumé instead of an EASA form 4for the Management personnel
 |

# Introduction

##

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## Definitions and abbreviations.

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| **Abbreviations/Definitions** |
| AMC: Acceptable Means of ComplianceCAO: Continuing Airworthiness OrganisationCAOM: Continuing Airworthiness Organisations ManagerDSL: Distance LearningEASA: European Aviation Safety AgencyEASATL: EASA Team LeaderEU: European UnionF145: Foreign Part 145F147: Foreign Part 147GM: Guidance MaterialMTO: Maintenance Training organisationMTOA: Maintenance Training Organisation ApprovalMTOAP: Maintenance Training Organisation Approval ProceduresMTOC: Maintenance Training Oversight CoordinatorMTOE: Maintenance Training Organisation expositionNAA: National Airworthiness AuthorityNAATL: NAA Team LeaderOMS: Oversight Management SoftwarePPB: Principal Place of BusinessQE: Qualified EntityWH: Working HoursWHOC: Working Hours Oversight Coordinator |

## Scope and applicability

EASA is the Competent Authority for maintenance training organisations having their principal place of business located outside the EU, as established by EASA Part 147.1 “General” and is therefore responsible for the final approval of these maintenance training organisations and for establishing procedures detailing how these EASA Part-147 applications and approvals are managed.

This User Guide applies to EASA Part 147 organisations based outside the EU Member States (hereinafter referred to as “Foreign Part 147 organisations”), and for which EASA is the Competent Authority.

The provisions of this user guide are complementary to the requirements of Part-147 regulation “as amended” and does not supersede or replace the associated regulatory requirements.

## Purpose

The purpose of this User Guide is to describe the processes to be applied:

- for the initial granting of an EASA Part 147 Approval

- for the changes applied to an existing and valid EASA Part 147 Approval

- for the continued oversight of Part 147 approvals according to Part-147 regulation

For each part of the process, it details the documents to be submitted, the investigations that are carried out by the Authority, and provides information regarding the general timeframes and the costs.

## Entry into force

This document is applicable on 01 July 2023, after its publication on the EASA website.

## Communication

All documents and correspondences between the training organisation, the accredited NAA/QE and EASA shall be in the English language.

## Management of approvals by EASA

The Oversight Management Software is an IT tool which is being used for the management of approvals, including issuance of audit reports and findings management. This OMS tool currently in use is IFP – Intelex Finding Platform.

All Foreign EASA Part 147 approvals are currently managed with this OMS tool.

## Audit types

The following type of audits are identified:

* • **Desktop audit**: is a paperwork exercise performed from the desk without any real-time interaction with the auditee;
* • **On-site audit:** is an audit where the inspection team directly accesses the premises of the training organization
* • **Remote audit:** is an audit performed with the use of any real-time video and audio communication tools in replacement of the physical presence of the inspector on-site.

# Initial Approval

## Process overview

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| process | step | action | Applicant | EASA | Estimated times | **Average time** |
| Application submission & processing | Prepare application | - Eligibility check- Scope of approval- Language considerations- Management personnel and instructional staff- Costs estimation | C:\Users\murfred\Desktop\information.jpg |  |  |  |
| Submit application | - Secure communications- Documents to be provided- Scope applied for- Number of staff to be declared- Pre-application meeting as necessary- Application Form 12 | C:\Users\murfred\Desktop\information.jpg |  |  | Approx.2 months |
| Application review& eligibility checks | - Administrative eligibility- Technical eligibility- Restrictions |  | C:\Users\murfred\Desktop\information.jpg | 2-3 weeks |
| Pending approval number allocation & identification of the designated inspector | - Pending Approval number allocation- Identification of designated inspector |  | C:\Users\murfred\Desktop\information.jpg |
| Fee Level information and invoice  | - Applicant informed about fee level- Invoice produced and shipped out |  | C:\Users\murfred\Desktop\information.jpg | Max. 90 days |
| Application amendement as necessary | - Amended application submitted, as necessary | C:\Users\murfred\Desktop\information.jpg |  |
| Assignement of the designated inspector | - Designated inspector assigned  |  | C:\Users\murfred\Desktop\information.jpg | Approx. 30 days |  |
| Application rejection | - Applicant & inspector notification- Compute financial balance |  | C:\Users\murfred\Desktop\information.jpg |  | Approx.6 months |
| Technical investigation & recommendation | Submission of documents | - Documents provided by the applicant | C:\Users\murfred\Desktop\information.jpg |  | 3-4 months |
| Review of documents | - Findings /comments notified to the applicant in OMS |  | C:\Users\murfred\Desktop\information.jpg |
| Quality Assurance internal audit & statement | - Internal audit completed- Part 147 compliance confirmed | C:\Users\murfred\Desktop\information.jpg |  |
| On-site audit | - Audit plan- Audit completed |  | C:\Users\murfred\Desktop\information.jpg |
| Audit report & findings notification | - OMS accesss granted to the organization- Audit report provided to applicant in OMS |  | C:\Users\murfred\Desktop\information.jpg |
| Corrective actions | - Corrective Action Plan defined in OMS-Ccorrective actions implemented  | C:\Users\murfred\Desktop\information.jpg |  | 3 months |
| Closure of findings | -Follow-up on-site audit, as necessary-Notification of closure in OMS |  | C:\Users\murfred\Desktop\information.jpg |
| Recommendation for the granting of the approval | -Rrecommendation (OMS)-Technical Visa (OMS)- - Quality check (OMS) |  | C:\Users\murfred\Desktop\information.jpg |  |
| Application termination | - Notification to applicant and application termination- Financial balance determination |  | C:\Users\murfred\Desktop\information.jpg |  |
| Approval granting | Issuance of the approval documents | - Form 11 (OMS)- MOE and associated documents approval (OMS)- Management personnel approval |  | C:\Users\murfred\Desktop\information.jpg | 1 month |
|  |
| Invoice for continued surveillance | - Invoice produced |  | C:\Users\murfred\Desktop\information.jpg |  |

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Approx.

1month

## Process details

#### Application submission & processing

#### Prepare application

An application should be submitted only when the organisation is ready to be audited for the purpose of the approval.

The documents must be ready and the training or examination means in place, the staff recruited and operational.

Before submitting the application, a few points should be verified***:***

##### Eligibility check.

###### Location of the applicant

EASA is the Competent Authority for all organizations having their Principle Place of Business (PPB) located outside of the EU Member States territories. Article 2 of Commission Regulation (EU) No 1321/2014 defines the PPB as following:

‘**principal place of business’** means the head office or the registered office of the undertaking within which the principal financial functions and operational control of the activities referred to in this Regulation are exercised.

Organizations having their PPB in an EU Member State should therefore apply to the Civil Aviation Authority of the concerned Member state, and not to EASA.

Note: when an organisation for which EASA is the Competent Authority applies for a “second training site” located in an EASA country (EU & associated states), EASA remains the Authority in charge, however the local Authority (NAA) will be informed and invited to participate to the audit(s).

###### Nature of the applicant

The applicant must be a registered legal entity, and can be a private training school or a training institution under the local government‘s responsibility (i.e. universities, etc.…).

Military colleges or training institutions can apply on a case-by-case decision by the Agency.

Blocking points are generally:

* the lack or the restrictions of access to part of the facilities and resources involved into the training & assessments (including aircraft used for practical training, technical documentation used for the establishment of the training material, etc.…). If not compatible with the normal oversight of an approved organisation, such restrictions could prevent EASA investigating & granting an approval
* the raining organization is not registered as a legal entity



##### Scope of approval.

* The courses that can be approved are those defined by the Part 66. It includes the Basic Training courses, A/C Type Training courses and Type Training “differences” courses.
* Under certain conditions, EASA also approves derived courses such as “combined” courses (i.e. combined Category B1 and category B2 course) or courses bridging from a Category/ sub-category to another category/ sub-category (i.e. from Cat B1.1 to cat B1.2)
* Organizations cannot be approved to deliver examinations only. Exceptions are those A/C types for which type training is not required by Part 66, only an type examination (refer to Part 66 A/C Groups definitions and their license type endorsement requirements)
* A/C type trainings are limited to those level 1, 2 and 3 courses as defined by Part 66, appendix 3. Other courses meant for specialists (i.e. structure specialist, engine testing, etc.…) are not approvable under Part 147 and their acceptability is under the responsibility of the training organisation and its overseeing Authority.
* A/C types are those defined by the Part 66 and used for the Licensed endorsements. They may differ from the types certificate designations. For instance A320 (CFM 56) and A320 (V2500) are considered as two different types from a license perspective and are both subject to a specific Part 147 course (full or “differences”).
* When an aircraft type includes several variants (i.e. A320 A318/319/320/321 (CFM 56)), it is not required to apply and develop the course for all these variants. An application may be limited to a particular model/ variant i.e. A319 (CFM 56). The certificates of recognition issued at the completion of the course will however have to reflect with precision the exact content/limitation of the approved course.
* A/C Type Training courses can be applied for and approved when an A/C type that is not yet EASA Type-Certified. Specific conditions however apply in such a case, which must be discussed with EASA before submitting an application. It is however important to realize that the A/C type will only be endorsed onto the Part 66 Licenses by Licensing Authorities once the A/C type is granted by EASA.
* Trainings such as EWIS, Fuel Tank Safety, etc.… and required by Part 145 are not approvable within the framework of Part 147.
* Courses limited to a few Basic Training modules (i.e. Module 9 and module 10) cannot be approved. The organisation must be approved for the entire Basic Training curriculum as defined by Part 66, appendix 1.
* As definedin 147.A.147(e), a training organization cannot apply to conduct only examination without applying to conduct corresponding training.



##### Language consideration.

English is used as the principal communication language,however it might be acceptable to provide associated training materials in a language other than English if this is the most convenient language to ensure an efficient and reliable transfer of training information from the trainer to all the trainees, such acceptance will be documented through an approved procedure in the MTOE

Restrictions apply:

* Training material should be translated in English (dual language). In case of conflict, the English version always prevails.
* The second language document should refer to the English version and have the same revision level. A procedure to manage both documents and ensure their consistency must be in place, and should be audited regularly.
* Examples of original TCH documentations (AMM, Wiring Diagrams, SRM etc..) written in English shall be used as examples during the lessons or assessments.
* Examination questions must be written in English language only. No written translation or translator are allowed. Answers by the trainees shall be written in English.

This aims at verifying that trainees receiving a training certificate and applying to an aeronautical license hold the minimum English proficiency to exercise their future privileges in an international aviation environment.

* During the on-site audit(s), the delivery of trainings or examination/ assessment shall be conducted in English. To this effect, the instructor shall demonstrate an acceptable English language proficiency (please refer to EASA User Guide related to instructor qualifications for more details).

Proficiency in English language for instructors, knowledge examiners and practical assessors are exposed in the User Guide UG.CAO.00154 setting the standard for Qualification & experience of instructors, knowledge examiners and practical assessors. No specific requirement applies to the other staff but a minimum English proficiency is mandatory to allow a good communication between the inspector and the staff.



##### Management personnel and instructional staff.

###### Choose the Accountable Manager

The Accountable Manager needs to demonstrate that he has the Corporate Authority and the direct or delegated financial means available to guarantee that the training & examination activities are continuously carried out with respect to regulations and quality standards. He should therefore hold an adequate position in the company that enables his decisions and actions.

However, it must be kept in mind that the Accountable Manager will have to be reasonably knowledgeable about the training & examination activities, actively involved into the training organisation’s management, identified non compliance or safety concern. He will have to be easily accessible to inspectors in particular during audits. It is therefore advised, specifically for large and very large organisations, to select an Accountable Manager with a position that is compatible with these requirements.

A balance between Corporate Authority and operational availability should therefore be targeted.

###### Choose the Management personnel

Management personnel that need to be formally accepted by EASA via a résumé are described in the Part 147 regulation. These include for example the Quality Assurance Manager, the Training Manager and the Examination Manager. These staff will in particular have to demonstrate:

* their competencies and their knowledge of the applicable regulations and of the derived Training Organisation’s procedures (MTOE, Associated Procedures etc…)
* their knowledge of the practices and standards related to training & examination activities,
* their technical knowledge and experience in the assigned domain, for example “auditing methods” for the Quality Assurance Manager, “training techniques” etc… for the training manager.

They will also have to demonstate their abilities to manage the assigned activities within the organisation. This could include a previous experience in an equivalent manager’s position, specific trainings received by the candidate, or a solid experience in the maintenance training domain that justifies the competence of the candidate as a Manager, or a combination of these.

The staff should hold a position in the company that allows a direct reporting to the Accountable Manager and to the Quality Assurance Manager.

The Quality Assurance Manager will have to demonstrate a position that allows him to implement an efficient and independent Quality Assurance Monitoring System, including a direct access to the Accountable Manager and to Authorities.

###### IInstructional staff

The Training Organisation is responsible to define acceptable criteria for the assessment and acceptance of instructors, knowledge examiners & practical assessors, and to describe them into the organisation’s exposition. In order to assist, EASA has published User Guide UG.CAO.00154 proposing several means deemed to be acceptable, and which will be used by the inspector as a reference. Deviations to these criteria are possible as long as an equivalent level of qualifications can be demonstrated. The new applicant can therefore refer to this document in order to assess acceptability of proposed staff, and what will be required to provide to demonstrate the qualifications of instructional staff.



##### Costs estimations.

Before submitting an application, the applicant may want to estimate the costs related to the granting of an approval, and for maintaining it.

Costs that should be considered include:

* the applicable fees and charges for the granting of an approval
* The fees and charges for the continued oversight of the approved organisation, and for changes applied for.
* audit costs (initial granting & continued oversight)

###### Fees and charges

Commission Regulation (EU) No 2019/2153, as amended, defines the applicable fees and charges for the initial granting of an approval and for the annual continued oversight of the approved organisation and the changes to the approval.

The applicable fees and charges are primarily based on the number of staffs involved into the Part 147 activity. To these, it must be added the fees determined by the number of Training & Examination facilities and the number of courses applied for. These are detailed in table 12 of the fees and charges regulation.

Notes:

* The initial application includes 1 course and 1 facility (PPB). Additional courses or facilities are subject to the fees and charges stated in table 12 of Commission Regulation (EU) No 2019/2153, as amended.
* The fee applicable to courses is only levied 1 time, when the course is first applied for. No annual fee applies to courses already approved.
* The fees and charges applicable to facilities are levied at the time of their approval, and then annually.
* When an organisation delivers training and/ or examinations at locations not listed in the MTOE (temporary facilities) and i.a.w. a procedure described in the MTOE, a flat fee corresponding to 1 additional site will be considered. The fee is levied when the organisation applies for such procedure, and then annually.
* Not all courses and facilities applied for are subject to the fees and charges. The fees reflect the workload generated by the application. In order to get information regarding how EASA will determine what will be charged or not, please refer to the EASA Website in the FAQ section of the Fees and Charges regulation:

<https://www.easa.europa.eu/the-agency/faqs/fees-charges-faq#category-c4---maintenance-organisation-approval-moa-and-maintenance-training-organisation-approval-mtoa>

* The fees and charges for the continued oversight are determined and invoiced at the time of the approval of the organisation, and cover the annual surveillance starting from that point onward.

###### Audit costs

* The fees and charges above described do NOT include costs associated to on-site visits (audits), such as flight or train tickets, car rental, visa costs, hotel accommodation and daily subsistence etc.… These are charged separately.
* Additionally, an hourly rate is levied for travel hours necessary to reach an organisation, and to come back to the inspector’s place of employment. The hourly rate is defined in the Fees and Charges regulation (refer to article 5).
* For an initial approval, it is foreseen that a minimum of 1 on-site audit will be performed by 1 auditor. However for a large organisation or for an important scope of approval applied for (i.e. Basic Training, or a significant number of Type Trainings) 2 auditors may be appointed by EASA. In case of major finding requiring an on-site verification of the corrective action(s) by the inspector(s), a second on-site audit may be necessary.
* Once approved, the organisation is subject to a continued monitoring that includes on-site visits.
* In principle, only one inspector is assigned, however a second auditor may also participate to audits either permanently or occasionally. When the oversight is assigned to a inspector belonging to a EASA-partner NAA, then it has to be expected that an EASA inspector will participate to at least 1 audit together with the assigned inspector.
* A first audit will be organized between 6 months and 1 year after approval.
* Except otherwise agreed by the Agency, subsequent audits shall be performed as following:
* Type Training organizations: 1 audit per year
* Basic Training organizations: 2 audits per year, this could be changed to 1 audit per year when the performance of the training organization is satisfactory and no significant finding where identified during the cycle
* Additional audits to sample Distance learning Trainings (DSL) trainings and training/examination organized at non-approved locations (off-site trainings)
* the above frequencies constitute a baseline; more audits may take place in case of significant changes occurring in between 2 “routine” scheduled audits, or in case of established concerns with the training organisation (major findings, observed low quality of trainings or examinations, specific investigation needs, etc.…).
* Except otherwise agreed by the Agency, all training & examination facilities listed in the MTOE shall be audited over each two-years period.
* The regulation also requires the Authority to audit by sampling the trainings & examinations that are carried out at locations not listed in the MTOE i.e. at customer premises etc.… The relevance and extent of the samplings will be determined by the inspector based on his experience and the profile of the Training Organisation. When applicable, associated costs have to be borned by the applicant.

Notes:

* It is advised to read the Fees and Charges FAQs at:

<https://www.easa.europa.eu/the-agency/faqs/fees-charges-faq#category-c4---maintenance-organisation-approval-moa-and-maintenance-training-organisation-approval-mtoa>

* Under certain conditions and in particular for long travel times, inspector(s) are allowed to travel in Business Class. Most organizations applying to an approval being located outside the EU territories, this cost has to be anticipated.

* It is in not permitted to use a travel ticket provided by the applicant / approved organisation. Tickets have to be purchased by EASA via the travel agency designated by the Agency and i.a.w. the EASA travel policy.
* Efforts are made by EASA to reduce these costs in particular by combining several audits in a same region. In such a case, a pro-rata is determined for each organisation included into the inspector’s Mission Order.
* It is however not always possible to do such combinations, and this should not be considered by the applicant when estimating the costs.
* For an estimation of travel costs, please contact EASA at: foreign147@easa.europa.eu
* In case the organisation or EASA decides to terminate an application before the approval is granted, or if the Agency suspends or revokes an existing approval, EASA will manage the applicant/ Approval Holder’s payment’s balance i.a.w. the provisions of articles 9 to 11of the Commission Regulation (EU) No 2019/2153, as amended.



#### Submit application

##### Secure communications

Most communications between EASA and the applicant, in particular accounting or approval-related notifications, are done via electronic mail (E-mail) or EASA Filebox (<https://filebox.easa.europa.eu/> ).

In order to avoid problems when an individual is leaving the company or is out-of-office and that could possibly impact the validity of the approval, the applicant is required to create a generic E-mail address dedicated to the EASA Part 147 activity.



##### Documents to be provided

This application form shall be sent directly by e-mail to EASA via the ‘foreign 147’ email box (foreign147@easa.europa.eu). The documents to be provided with the initial application are:

* The application form (EASA form 12) is available for download on the EASA Foreign Part 147 webpage:

<https://www.easa.europa.eu/document-library/application-forms/easa-form->4

Once filled, it has to be signed by the person proposed as Accountable Manager.

* A copy of the official document establishing the Training Organisation as a legal entity in the country where the Principle Place of Business is located. This document is either a Certificate of Incorporation, or extracts of government official documents such as the Official Journal, decrees establishing the training institution etc.…

Note: when such document is written in the local language, an official translation in English must be provided together with the copy of the original document.

**NO** other document is to be provided at this stage (Résumé, MTOE, Course Material, etc.…)



##### Scope applied for

The scope applied for must be detailed in the form 12, by using the appropriate blocks (Basic Training, Type training) taking into consideration the following:

- For Type Training, it is necessary to indicate the airframe and the associated engine(s) subject of the course as detailed in the list of type rating endorsement in the Appendix I to AMC to Part 66. It is possible to apply for an airframe & several engine types.

- For Type Training, “Difference”s Courses should read: From Aircraft A (engine A) to. Aircraft B (engine B).

In the MTOE however, it will be necessary to identify which aircraft/engine combination constitutes the source aircraft and which one is the target aircraft i.e. aircraft A (engine A) to aircraft B (engine B).

- As a policy, EASA will only approve “differences” courses when the applicant is already approved or concurrently applying for the full course of either the source aircraft combination i.e. airframe A (engine A) or the target aircraft combination i.e. Airframe B (engine B).

##### Number of staff to be declared

The organisation should declare in the form 12 a number of staff that is representative of the size and the volume of the training & examination activities applied for.

These include the company employees (permanent staff) and the contracted staff, involved in the EASA Part 147 training organisation.

The staff to be considered include, as applicable:

* Company employees:
* Accountable Manager
* Senior managers (Management personnel), including:
	+ Training Manager
	+ Examination Manager
	+ Quality Assurance Manager
* Other managers, as appropriate:
	+ Site management, when several permanent sites are approved
	+ Practical training Workshops management, for Basic Training schools
	+ Administration management:
		- Planning & scheduling of courses
		- Administration of trainees
		- Issuance of Certificates of Recognition
		- Records management
* Instructors (theoretical elements / practical elements)
* Theoretical knowledge Examiners
* Practical assessors
* Other staff:
	+ Quality Assurance auditors
	+ Subject Matter Experts or Course Designers
	+ Training Courseware management and reproduction staff
	+ Records & archives staff
* Contracted staff:
* Instructors (theoretical elements / practical elements)
* Theoretical knowledge Examiners
* Practical assessors

Notes:

* Permanent as well as part-time and occasional staff must be declared.
* As indicated in GM to 147.A.105(c), the Maintenance Training Organisation should have a nucleus of permanently employed staff to undertake the minimum amount of maintenance training proposed.
* A person can hold several functions. It will however be verified that the workload of individuals remains acceptable and does not compromise the overall quality of trainings and examinations. For Accountable Manager & Management personnel, functions’ combinations are restricted to those permitted by AMC 147.A.105 “Personnel requirements”.
* During on-site audits, the consistency of the declared staff will be assessed against the scope of approval applied for during the eligibility check and verified during on-site audits. Non-conformities will delay or block the granting of the approval.



##### Pre-application meetings as necessary

The applicant may request a meeting in order to expose and discuss his project, clarify the certification process steps and ensure that the intended training activities are approvable and relevant.

The meeting shall be held at EASA premises (Cologne, Germany) at the travel & accommodation costs of the potential applicant. No fee applies for such meeting.

###### Use of Consultants

The potential applicant may use the services of private consultants to assist them in getting approved. They need to be endorsed in written by applicant to EASA. These can also attend the meetings organized between the applicant and EASA, however the responsibility and the active involvement of the applicant will be required at all times. Applicants are responsible for any official notification, including applications, application termination, etc... Consultants cannot be authorized to notify “on behalf” of the applicant/approval holder.

##### Application form 12

The Application form 12 and supporting documents shall be sent to EASA by E-mail at: **foreign147@easa.europa.eu**.

Form 12 is available on the Forgeign Part 147 webpage: https://www.easa.europa.eu/en/domains/aircraft-products/continuing-airworthiness-organisations/foreign-part-147-organisations



#### Application review & eligibility check

##### Administrative eligibility

The application is verified by the Application Management Team to ensure:

-that the form 12 is completely and correctly filled,

-that the application is dated and signed,

- that all documents are enclosed and acceptable (i.e. Certificate of Incorporation and official copy in English if required).

The application is then forwarded to the “Foreign 147” Organisations Approvals section for the technical assessment.

##### Technical eligibility

* At this stage, it is confirmed that EASA is effectively the Competent Authority for the applicant and that the scope is approvable. Please refer to the previous steps for details.
* Using the data provided by the applicant, it is also verified that the staffing (number of staff, distribution) of the organisation is compatible with the scope of approval and the number of training sites applied for. It is, at this stage, only a rough evaluation based on experience of similar applications. The exact figures are verified later in the process (review of documents, on site audit).
* The ratio permanent employees Vs. contracted staff is assessed i.a.w. GM to 147.A.105(c).
* Where necessary, clarifications and adjustments are requested to the applicant with regards to the scope of approval and the number of staff declared.



##### Restrictions

As part of the technical assessment, EASA ensures that the certification process can be carried out in a timely manner taking into account the availability of qualified inspectors, but also the existence of possible travel restrictions which may occasionally apply to EASA inspectors. These are for example due to:

- war zones

- political instability

- High risk level (crime, violence, terrorism, etc...)

- natural disasters or diseases

- Etc.…

When such travel restrictions apply, the on-site audits won’t be authorized consequently not allowing the granting of an approval. The applicant is informed of such restrictions as soon as known, either at the beginning of the process or when they occur.

Depending on how long it is estimated by EASA that the restrictions will apply, it is proposed to the applicant:

* to terminate its application,
* to put the application on hold (only for short-term restrictions)

Notes:

- The assessment of the potential risks for the inspector is conducted in accordance with advisories and/ or travel restrictions provided by the specialized services of the European Institutions.

- Travel restrictions may apply to the whole country or be limited to specific areas.

- The decision to not authorize travels is applicable to EASA-employed inspectors as well as to inspectors contracted from a partner NAA / Qualified Entity.



#### Pending approval number allocation & identification of the designated inspector

##### Pending approval number allocation

Once the administrative & technical eligibility checks are completed, the new-applicant’s profile is updated in EASA databases and a pending Approval number EASA.147.XXXX is allocated. This approval number will then be used as a reference for future correspondences.

Note:

* the individual reference “XXXX” is automatically and assigned in sequence by the IT tools. It is not possible for the applicant to choose a specific number. Each reference is used only 1 time, and cannot be re-allocated to a new applicant except in very specific cases (merge of two approved organizations for instance).

##### Identification of the designated inspector

The EASA “Foreign147” approvals Coordinator identifies potential inspector(s) for the initial granting of the new applicant, and estimate a budget (working hours, number of audits & audit team composition). The inspector(s) may be an EASA qualified auditor or a qualified inspector employed by an EASA partner Authority NAATL or Qualified Entity QE.

Notes:

* otherwise decided by the Agency, the continued-oversight inspector will remain the same as the initial-granting Inspector. An inspector is assigned for a period not exceeding 5 years.
* the decision to outsource the initial approval task to an NAA/QE or to allocate it to an EASA employed inspector is taken by the Agency.

#### Fee Level information and invoice

##### - Applicant informed about fee level

EASA determines the applicable fees for the initial granting of the approval. The amount that will be charged is then communicated to the applicant..

##### Invoice produced and shipped out

Corresponding invoice will be transmitted to the applicant. The invoice has to be paid before the deadline stipulated on the invoice (30 days).

Any difficulty or delay in paying the fees should be discussed with the EASA Accounting department. The contacts are available on EASA website.In any case, the initial Approval Certificate will not be provided to the applicant before full payment of the fees.

#### Application amendement as necessary

Would there be a mistake or would the applicant decide to revise its application, for instance to reduce the number of courses or facilities applied for, EASA must be informed at the earliest and when applicable an amended application Form 12 be provided. The applicant should clarify in writing what has changed in the application. The financial data will be, if necessary, updated and communicated to the applicant, which will have to confirm his final acceptance.



#### Assignement of the designated inspector

The applicant is informed via the Acceptance Letter/Official Notification Letter about the allocation process and the designated inspector. All necessary contacts are provided to the applicant in this letter.

The applicant is requested to contact the inspector at the earliest in order to initiate the technical part of the process (documents review, audits etc.…) and to agree on a schedule for the submission of documents and a target period for the on-site audit.

Note: Work carried out by EASA and by the disgnated inspector and any other cost may be charged to the applicant would this one decide to terminate the certification process before having paid the initial fees.

Additionnal inspector(s) may be added to the audit team depending on:

* Number of training site
* Size of organization
* Complexity of the scope of approval

#### Application rejection

##### Applicant and inspector notification

The application process may be terminated at any time upon decision of the applicant, or by EASA when the applicant fails to comply with his obligations and previously described deadlines.

The applicant and the assigned Inspector are in any case informed about any decision and action taken against his application.

##### Compute financial balance

In such case, EASA will compute the account balance of the applicant, taking into consideration the working times and costs generated at the time when the termination becomes effective, and will liaise with the applicant in order to clear any due amount to EASA, or any sums to be reimbursed to the applicant (please refer to the EASA General Conditions & Terms of Payment).



#### Technical investigation & recommendation

#### Submission of documents

The applicant shall agree with the inspector regarding the documents to be provided for review and acceptance, in electronic format.

These should at least include the electronic copies of:

* The Résumés for the Senior Management personnel
* The draft MTOE
* The draft associated procedures
* The list of proposed instructors, knowledge examiners and practical assessors, if not included into the MTOE
* The Course Approval Forms (for Basic or Type Training courses, as applicable). The forms are available for download on the “Foreign147” page of EASA website.

For Type Trainings, the inspector may also request to receive an Executive Summary of the Training Needs Analysis (TNA)’ outcomes including the content (detailed syllabus & key points) & the training durations.

A guidance to help drafting the TNA is available at the website address below:

<https://www.easa.europa.eu/sites/default/files/dfu/approvals-and-standardisation-organisation-approvals-docs-part-147-TNA-User-Guide.pdf>

Following the review of the above documents, the inspector will perform samplings on the course(s) syllabi, the training materials and the examination question.

The samplings should cover, as appropriate, the Theoretical Elements, the Practical Elements for Type Trainings or the list of tasks for Basic Training curriculums (workshops tasks + tasks performed in an actual maintenance environment, as required by the regulation).

Aside of the training material usually developed for the trainees, the inspector may ask to review by sampling the instructor’s notes and presentations (slides, etc.…) during the on-site audit in order to better assess the nature and the level of the information delivered during instructor-led sessions. Information delivered as part of Computer Based Training (CBT) may also require samplings, also preferably done during the on-site audit.

Examination questions: due to confidentiality and examination’s integrity concerns, it is preferred that the inspector sample-checks the examination questions during the on-site audit, and to avoid transferring such questions via mail or E-mail or providing unlimited non-restricted access passwords to question banks.



#### Review of documents

The inspector reviews the documents for full compliance with EASA requirements: - The MTOE review and any other document reviewed is managed with a Desktop audit in the OMS

- Findings are created in OMS to report the non-compliances identified by the inspector

- Findings are notified to the training organization through OMS using an electronic workflow.

- The applicant shall respond to the comments directly in OMS and submit the amended pages or paragraphs, as required.

- To minimize delays, it is important that the applicant clearly identify what has been modified in the text in response to the comment/finding.

- Submitting an highlight of changes comparing on one document the text before amendment and after being amended also helps the inspector to quickly review and accept the new text, and to move to the next step of the process (audit).

Notes:

* The review of the documents should be done in an efficient manner, and should not become an exaggerated time-consuming exercise for the inspector, whose task is to assess the compliance and not to excessively guide the applicant how to be compliant.
* If the document, i.e. the MTOE, quickly appears to be obviously not acceptable and will generate a large number of comments, it will be returned to the applicant with a request to amend the document in-depth and to re-submit it after a verification that it now complies with regulations and standards. This situation often occurs when the MTOE does not provide sufficient information, thus not allowing the inspector to verify the compliance of the organisation’ structure and processes in place.
* When the MTOE is generaly considered acceptable (some issues may still be opened for review), it may be more useful to discuss the changes to the documents during the on-site audit. This should however be avoided if the inspector considers that the process(es) of the organisation are not compliant to an extent that these have to be fixed before the audit, so to minimize the risk of having to perform a second follow-up on-site audit.
* The MTOE should reflect the actual structure and processes in place within the Training Organisation. Care should therefore be exercised when using materials developed by other organizations or consultancy providers and then used as a basis for the development of the organization’s own exposition (in general, the procedure should detail who does what, when, where and how).
* When documents, i.e. the MTOE, must be amended several times as part of the review process care must be exercised when referencing the consecutives “drafts”. The final documents should be referenced as the initial issue and not as “amendment X” corresponding to the latest draft. Care must also be exercised to ensure that the official date of the document’s initial issue remains reasonably close to its formal acceptance by EASA (date of initial approval as a Part 147 Training Organisation).
* once the document is finalized and considered as acceptable by the inspector, a full consolidated copy (electronic) should be sent to the inspector for his records.



#### Quality Assurance internal audit & statement

Once the draft of the MTOE with associated documents and the proposed nominated personnel are confirmed as acceptable by the allocated inspector, a tentative period for the on-site audit should be discussed and agreed with the inspector at the earliest.

The on-site audit actual dates should however only be confirmed after the applicant has confirmed compliance of the training organisation with all applicabe regulatory requirements or standards.

Such assessment, based on the organization’s compliance to the MTOE structure and processes as reviewed and accepted by the inspector, should be conducted by the Quality Assurance department and documented in an internal audit report.

The report, together with a statement of compliance by the Quality Assurance Manager, shall then be sent to the inspector.

This requirement aims at confirming the readiness of the applicant and at minimizing the risk of major non-compliance(s), possibly resulting in the need to perform a follow-up on-site audit and delaying further the whole certification process.

Note:

* due to scheduling reasons and the (un)availability of the inspector, it can be accepted that an audit is organized despite some elements are not yet fully in place. For instance if part of the training equipment is still not received or an already hired instructor is still to arrive. This is left to the discretion of the inspector, and compensating measures should be proposed by the applicant (i.e. evidence of orders placed for the equipment, later confirmation of the instructor’s arrival, etc.…). The audit report and statement of compliance above described should clearly indicate any missing or on-going element.



#### On-site audit

* Ahead of the audit, the Inspector will provide the applicant with an audit plan, indicating the areas and activities to be audited, and a tentative scheduling. Audit plan is an electronic document sent by email.

Notes:

* For an initial approval granting, all the areas and representative training / examination activities will be assessed.
* However, when the organisation has submitted an application that includes several sites having a similar scope of activities, the inspector may decide either to visit all of them before the approval is granted, or alternatively may propose a selection of sites that can be audited after the approval and during the continued oversight. The decision will be based on the nature and the extent of the activities conducted at the various sites.
* The requested scope of approval shall not be extended during the course of the audit.
* Contracted activities may be audited as part of the initial audit. This includes for example the practical elements delivered at a contracted maintenance organisation. The applicant shall inform the contracted party and secure access to the premises for the inspector(s).
* The applicant shall secure all accesses and required security clearances to the training premises before the arrival of the inspector. The organisation shall assist the inspector for visa granting when necessary (letter of invitation etc…).
* The applicant shall ensure the availability of the Accountable Manager, all Senior Managers and instructional & examination staff.
* An in-briefing shall be organized, in particular for the Inspector to present himself & the team members to the Accountable & Senior Managers, to review the audit plan and recall the objectives of the audit, and to finalize its scheduling.
* As part of the audit, the delivery of trainings, examinations & assessments shall be audited. It is however difficult to audit an activity not yet running while waiting for the approval. The inspector may decide to organize a “simulated” theoretical/practical trainings or examinations/ assessments. This allows to verify at least the knowledge of the instructor, his respect of the company procedures related to trainings & examinations, his English language proficiency, his pedagogic skills etc.…
* This exercise shall however be completed by the attendance to a real training and examination/assessment event at the earliest opportunity, in order to verify other aspects such as, and not limited to, the instructor’s pedagogical and communication abilities, the time and interruption management by the instructor, the consideration for examination’s integrity and neutrality by the examiner/ assessor, which can only be assessed in real conditions. To this effect, a first “intermediate” continued-oversight audit is organized between 6 months and 1 year after the granting of a new approval,
* At the end of the audit, time shall be booked for the auditing team to compile the audit findings and draft a report to be presented during the out-briefing.
* An out-briefing shall be organized with the senior Management for the audit team in order to present the outcomes of the audit, clarify the findings and the next steps. Intermediate de-briefings with the Quality Assurance Manager can be organized at the request of the applicant.



#### Audit report and finding notification

* The audit report, findings and observations as applicable, are notified through the OMS using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).
* The audit report shall be finalized in OMS within 2 weeks after the audit out-briefing. A draft report can be left, however the applicant is informed that such draft may be modified. This usually occurs for a better clarity of findings or for grouping them when appropriate. In such case the Inspector will inform the applicant about the modifications.
* The audit report only list non-compliances (negative statements). For an initial investigation, no level (1 or 2) is associated to the finding as any non-compliance has to be corrected before the approval is granted. The report shall not propose or suggest the corrective actions to be enforced, which have to be determined by the applicant.
* Any other observation or recommendation shall only be discussed during the out-briefing and left to the discretion of the applicant. They won’t be recorded into the report.

#### Corrective actions

* A Corrective Action Plan (CAP) has to be submitted in OMS by the training organization within 2 weeks, detailing for each finding:
* the root cause analysis
* the corrective action(s) (corrects the detected non-conformity)
* the preventive action(s) (prevents the re-occurrence of the non-conformity)
* As part of the CAP, the applicant should verify and confirm that no other areas, i.e. other training sites, or other activities could be affected by the same finding(s). When applicable, corrective and preventive actions have to be extended to these areas & activities.
* The applicant shall ensure with the surveyor that the CAP is acceptable.
* Once the CAP is accepted by the inspector, the applicant Quality Assurance verify the actual implementation and efficiency and shall provide in OMS the evidences that the implemented corrective and preventive actions are in place.
* During initial investigation; findings shall not be classified as Level 1 or 2 as the training organisation is not yet approved. A maximum of 3 months is granted for the finding closure. All findings must be closed before the initial granting of the approval is recommended to EASA by the Inspector. EASA expects that the applicant regularly provides progress updates. Failure to do so may result in the Agency terminating the application after some time.

#### Closure of findings

* When major findings are identified during the audit, the inspector may request to verify by himself the effectiveness and the efficiency of the corrective actions before closing the findings, and therefore initiate a follow-up on-site audit.
* When satisfied with the corrective & preventive actions, the inspector closes the finding(s) in OMS.



#### Recommendation for the ganting of the approval

Once the previous steps are complied with and all findings are closed, the maintenance training organisation’s compliance with EASA Part-147 has been established. The inspector can proceed with the recommendation to grant the Part 147 approval.

The recommendation is prepared by the allocated inspector in OMS for review by EASA for compliance and accuracy. this is consits in the following electronic documents in OMS:

* Recommendation for the approval of the training courses and the training sites
* Technical visa for the approval of the MTOE with associated documents and lists

A Quality check is performed by EASA in OMs to ensure completeness of the recommendation package and its accuracy.

#### Application termination

##### Notification to the applicant and application termination

* As an application results in EASA and its partner NAA/ QEs allocating resources, a “dormant” application cannot be accepted more than a few months. A review of the progress will be done periodically with the inspector. Would this one confirm the lack of progress and/ or lack of communication with the applicant, EASA will notify the organization’s Management of its intention to terminate the application would the applicant’s intentions not being confirmed and a road-map with reasonable deadlines not being submitted to EASA.

The applicant and the assigned inspector are in any case informed about any decision and action taken against the application. The technical investigation shall stop immediately.

##### Financial balance determination

* In such case, EASA will compute the financial balance of the applicant, taking into consideration the working times and costs generated at the time when the termination becomes effective, and will liaise with the applicant in order to clear any due amount to EASA or any sums to be reimbursed to the applicant (please refer to the EASA General Conditions & Terms of Payment).

#### Approval granting

#### Issuance of the approval documents

Once satisfied, EASA will generate in OMS:

* the approval certificate EASA Form 11 with an electronic copy sent by email to the training organisation
* the approval of the MTOE, together with its associated document(s) and list(s) and any concession
* the OMS also identifies the approved management personnel as specified in the approved MTOE

In order to improve the readability of the form 11, the following information will be listed in the approval schedule:

- all basic training courses listed at MTOE 1.9

- only full type training courses listed at MTOE 1.9

- all training sites identified at MTOE 1.6 including the Principla Place of Business of the training organisation

Therefore, the following courses will only listed in the MTOE 1.9

- type difference courses

- type engine only courses, for this courses MTOE 1.9 will specifify whether the aircrame interface is included or not

#### Invoice for continued surveillance

The invoice covering the annual surveillance starting from that point onward is produced in adccordance with applicable fees and charge and sent to the training organization



# Change

##  Process overview

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| process | step | action | Applicant | EASA | Estimated times | **Average time** |
| Application submission & processing | Prepare application | - - Scope of approval applied for- Costs estimation | C:\Users\murfred\Desktop\information.jpg |  |  |  |
| Submit application | - Application Form 12 | C:\Users\murfred\Desktop\information.jpg |  |  |
| Application review& eligibility checks | -Administrative eligibility- Technical eligibility |  | C:\Users\murfred\Desktop\information.jpg | Approx. 2 weeks | Approx.2 weeks |
| Assign task | - Initiate technical investigation |  | C:\Users\murfred\Desktop\information.jpg |  |
| Invoice for change of approval | -Invoice produced and sent to the applicant |  | C:\Users\murfred\Desktop\information.jpg | Approx. 1 week | Approx.4 months(2 months w/out audit) |
| Application rejection | - Applicant & inspector notification- Financial balance determination |  | C:\Users\murfred\Desktop\information.jpg |  |
| Technical investigation& recommendation | Submission of documents | - Documents provided by the applicant | C:\Users\murfred\Desktop\information.jpg |  | Approx. 3 months |
| Review of documents | - Findings /comments notified to the applicant in OMS |  | C:\Users\murfred\Desktop\information.jpg |
| Quality Assurance internal audit & statement | - Internal audit completed- Part 147 compliance confirmed | C:\Users\murfred\Desktop\information.jpg |  |
| On-site audit, if necessary | - Audit planned- Audit completed |  | C:\Users\murfred\Desktop\information.jpg |
| Audit report& findings notification | - Audit report provided to applicant in OMS |  | C:\Users\murfred\Desktop\information.jpg |
| Corrective actions | - Corrective Action Plan defined in OMS- Corrective actions implemented | C:\Users\murfred\Desktop\information.jpg |  | Approx. 1 month |
| Closure of findings | -Follow up audit as necessary-Notification of closure in OMS |  | C:\Users\murfred\Desktop\information.jpg |
| Recommendation for the granting of the change approval | - Recommendation (OMS) as necessary-Technical Visa (OMS)- Quality Check (OMS) |  | C:\Users\murfred\Desktop\information.jpg |
| Approval of change | Issuance of the approval documents | - Form 11 (OMS) if necessary- MOE and associated documents approval (OMS)- Management personnel approval (OMS) |  | C:\Users\murfred\Desktop\information.jpg | Approx. 2 weeks | Approx. 2 weeks |

## Process details

#### Application submission & processing

#### Prepare application

Applicants must be aware that, depending on its nature and importance, a change may require time to be assessed before it results into an approval. This is in particular true for new additional courses applied for.

Such courses should therefore not be organised nor advertised to customers until the Training Organisation has received a confirmation by EASA that the course is approved, or will shortly be.

Easa may not be able to ensure an expediate processing and the on-time approval when the application and recommendation were received too close to the course’s expected delivery date. Requests for a fast-handling may be rejected when only justified by the applicant having scheduled a course while still waiting for its approval.

Changes such as the extension of the scope of the training activities, or of the number of training facilities, should be applied only when the organisation is performing in a satisfactory manner with the current scope & facilities.

Major open findings with the Quality Assurance oversight or with the examinations/ assessments process that were raised during the routine oversight could for instance be blocking points for the recommendation of an extension by the inspector, and could be required to be fixed before any addition is processed by EASA.

The applicant may request a meeting in order to expose and discuss his project, clarify the certification process steps and ensure that the intended training activities are approvable and relevant. The meeting shall be held at EASA premises at the travel & accommodation costs of the potential applicant. No fee applies for such meeting.



##### Scope of approval applied for

The general policy is described in this User guide at initial application process. Frequent questions more specifically related to changes mainly concern the possibility to apply for:

“derived” courses: some of these courses, commonly delivered by Training Organisations, are not clearly stated in the regulations. They may however be approved. These include, for instance:

* + “combined” courses can be approved on the basis of existing standalone courses (i.e. combined Category B1 + category B2 course) and a specific procedure in the MTOE. The curriculum has to be submitted for acceptance by the inspector. Such courses can be applied via an MTOE amendment.
	+ courses “bridging” from a Category/ sub-Category to another Category/ sub-Category of license. This applies to Basic Trainings (i.e. from Cat B1.1 to cat B1.2) and to Type Trainings (i.e. from A320 (CFM56) Cat B2 to A320 (CFM56) cat B1).
	+ “differences courses”, as defined in Part 66, Appendix 3. As a policy, EASA will only approve “differences” courses when the applicant is already approved or concurrently applying for the full course of either the base aircraft combination (airframe A + engine A) or the target aircraft combination (airframe B + engine B).
* New aircraft Type Training courses: these can be applied for and approved when the A/C is not yet EASA Type-Certified (pending). Specific conditions however apply in such a case, which must be discussed with EASA before submitting an application. The process will require a gap analysis between the approved course and the final configuration of the aircraft at the moment of its EASA type-certification, and compensation measures adapted to the severity of the gap.

It is important to realize that where as the course can be delivered and the corresponding Certificates of Recognition can be issued before the entry into service of the A/C, the type will only be endorsed onto the Part 66 Licenses by the competent Licensing Authorities once the A/C type is officialy granted by EASA.

All the above courses require a specific “Training Needs Analysis” process to be submitted to the inspector for review and acceptance.



##### Costs estimation

Evaluating the costs is an important step for the applicant, as an application is binding and no quote will be provided for acceptance before the actual invoicing.

Costs that should be considered include:

* The applicable fees for the addition of a training facility or of a training course, if any
* The amended annual fees and charges for the continued oversight of the approval. These may be impacted by the new number of facilities & training courses, but also by the number of staff now required to handle the amended scope of approval.
* audit(s) costs, if necessary

### Fees and charges

* Commission Regulation (EU) No 2019/2153 , as amended, defines the applicable fees and charges for the continued oversight, including changes, of the approved organisation.
* The Commission Regulation (EU) No 2019/2153 and its subsequent amendments are available in the “regulations” section of EASA website.
* Additional courses or facilities applied for are subject to the fees and charges stated in the table 12 of Commission Regulation (EU) No 2019/2153 , as amended.
* the fee applicable to courses is only levied 1 time, when the additional course approval is applied for through an application for change. No annual fee will then apply to courses already approved.
* The fees applicable to additional facilities are levied at the time of their approval, and then annually.
* When an organisation delivers training and/ or examinations at locations not listed in the MTOE (temporary facilities) and i.a.w. a procedure described in the MTOE, a flat fee corresponding to 1 additional site shall be considered. The fee is levied when the organisation applies for such procedure, and then annually.
* When the change (i.e the addition or removal of a facility) introduces a revised number of staff (increase or decrease) the EASA financial data is updated once the change is approved, and will be reflected in the next regular annual invoice.
* The application for such change shall be done via an application form 12.
* Not all courses and facilities applied for are subject to the fees and charges. The fees levied shall reflect the workload generated by the application. In order to get information regarding how EASA will determine what will be charged or not, please refer to the EASA Website in the FAQ section of the Fees and Charges regulation:

<https://www.easa.europa.eu/the-agency/faqs/fees-charges-faq#category-c4---maintenance-organisation-approval-moa-and-maintenance-training-organisation-approval-mtoa>

### Audit costs

* Some changes will require an on-site audit. When this audit cannot be combined with an already scheduled audit (continued oversight) then the additional costs should be anticipated.
* The decision to perform an on-site audit or to approve the change via a “desktop” investigation will be taken by the inspector, with consideration to:
* The nature and the importance of the change. For example it would be expected that the addition of a new training facility or the addition of a Basic Training curriculum to an organisation previously approved for Type Training justifies an on-site audit. Addition of type trainings to an organisation already approved to deliver trainings for aircraft of a similar technology may however not systematically require an on-site visit.
* The knowledge and experience that the inspector has from the training organisation, and his confidence in the efficiency of the Quality Assurance system,
* The maturity of the organisation and its experience with EASA Part 147 trainings & exams,
* The absence of significant open findings that would not be compatible with the extension of training scope or facilities,
* Etc…
* The fees stated in table 12 do NOT include costs associated to on-site visits (audits), such as flight or train tickets, car rental, visa costs, hotel accommodation and daily subsistence etc.… These are charged separately.
* Additionally, an hourly rate is levied for travel hours necessary to reach an organisation, and to come back to the inspector’s place of employment. The hourly rate is defined in the Fees and Charges regulation (refer to article 5)

Notes:

* It is not permitted to use a travel ticket provided by the applicant / approved organisation. Tickets have to be purchased by EASA via the travel agency designated by the Agency and i.a.w. the EASA travel policy.
* Efforts are made by EASA to reduce these costs in particular by combining several audits in a same region. In such a case, a pro-rata is determined for each organisation included into the inspector’s Mission Order.
* It is however not always possible to do such combinations, and this should not be considered by the applicant when estimating the costs.
* An on-site audit is an “instant picture”of the Training Organisation which remains valid only for a certain period of time (a few months) after which it is no longer relevant to be used to recommend a change. A second on-site audit may therefore be necessary when the corrective actions called by the certification audit take an extensive amount of time and the situation has to be completely re-assessed on-site. Applicants should in such case anticipate increased costs as compared to their intial estimates.
* In case the organisation or EASA decides to terminate an application for change before the approval is granted, EASA will manage the applicant/ Approval Holder’s payment’s balance i.a.w. the provisions of articles 9 to 11of the Commission Regulation (EU) No 2019/20159, as amended.



#### Submit application

* The approved Training Organisation can apply by using an application Form 12, for a change related to:
* The scope of approval (courses), extended or reduced
* The facilities (addition, removal, change of address etc…)
* The Accountable Manager
* The number of staff
* Change name of the Training Organisation,
* etc…
* Other changes such as simple amendments of the MTOE (without impact on the certificate of approval), Management personnnel, list of instructors & examiners etc… do not require a form 12 and the documents (MTOE, Management personnel, list etc…) are simply addressed to the inspector for his review and acceptance.
* If the change affects the legal registration of the company (i.e. change of name etc…), an updated copy of the official document establishing the Training Organisation as a legal entity in the country where the Principle Place of Business is located, should be provided. This document is either a Certificate of Incorporation, or extracts of government official documents such as the Official Journal, decrees establishing the Training Institution etc… When such document is written in the local language, an official translation in English must be provided together with the copy of the original document.
* In the form 12, it is important to care that the number of staff declared must be amended as necessary to reflect the staffing after the changes (a significant addition of scope should be supported by more instructional staff unless justified). The new figures will be captured by the next scheduled annual invoice.
* Other documents such as the amended MTOE, the course approval forms, Résumés etc…are to be provided directly to the inspector.
* The scope applied for must be detailed in the form 12, by using the appropriate blocks (Basic Training, Type training) taking into consideration the following:

- For Type Training, it is necessary to indicate the airframe and the associated engine(s) subject of the course as detailed in the list of type rating endorsement in the Appendix I to AMC to Part 66. It is possible to apply for an airframe & several engine types.

- For Type Training, “Difference”s Courses should read: From Aircraft A (engine A) to. Aircraft B (engine B).

In the MTOE however, it will be necessary to identify which aircraft/engine combination constitutes the source aircraft and which one is the target aircraft i.e. aircraft A (engine A) to aircraft B (engine B).

- As a policy, EASA will only approve “differences” courses when the applicant is already approved or concurrently applying for the full course of either the source aircraft combination i.e. airframe A (engine A) or the target aircraft combination i.e. Airframe B (engine B).

##### Application Form 12

Form 12 is available on the Foreign Part 147 webpage:

<https://www.easa.europa.eu/en/domains/aircraft-products/continuing-airworthiness-organisations/foreign-part-147-organisations>

Once filled, it has to be signed by the Accountable Manager.The form 12 should be sent concurrently to EASA and to the assigned inspector (vie email). Failure to do so may result in delays when processing the inspector’s recommendation for approval.

The Application form 12 and supporting documents shall be sent to EASA by E-mail at:

**foreign147@easa.europa.eu**.



#### Application review& eligibility check

##### Administrative eligibility

The application is verified by the Application Management Team to ensure:

* that the form 12 is completely and correctly filled,
* that the application is dated and signed,
* that all supporting documents are enclosed and acceptable (i.e. Certificate of Incorporation and its official copy in English, if required).

The application is then forwarded to the “Foreign 147” Organisation Approvals section for the technical assessment.

##### Technical eligibility

At this stage, it is confirmed that the scope is approvable. Please refer to the previous steps for details.

Using the data provided by the applicant, it is also verified that the staffing of the organisation is compatible with the amended scope of approval and the number of training sites applied for.

The ratio permanent employees Vs. contracted staff is assessed i.a.w. GM to 147.A.105(c).

Where necessary, clarifications and adjustments are requested to the applicant.



#### Assign task

The acceptance of the application is communicated to the applicant via a letter, which indicates the amount of fees that will be invoiced.

The task is assigned to the inspector who intiate the technical investigation from this point in time. The payment’s confirmation of associated fees is not a pre-requisite.



#### Invoice for the change of approval

The invoice is generated and sent to the applicant reflecting the cost estimation detailed above.

In case of overdue payement, late payement interest are added to the invoice after 30 days

#### Application rejection

##### Applicant and inspector notification

* The application process may be terminated at any time upon decision of the applicant, or by EASA when the applicant fails to comply with his obligations and previously described deadlines.

The applicant and the assigned Inspector are in any case informed about any decision and action taken against his application.

##### Financial balance determination

* In such case, EASA will compute the account balance of the applicant, taking into consideration the working times and costs generated at the time when the termination becomes effective, and will liaise with the applicant in order to clear any due amount to EASA, or any sums to be reimbursed to the applicant (please refer to the EASA General Conditions & Terms of Payment).

#### Technical investigation & recommendation

#### Submission of documents

The applicant shall agree with the inspector regarding the documents to be provided for his review and acceptance, in electronic format.

Depending on the nature of the change, these can include, as necessary, electronic copies of the amended:

* Résumés for the Senior Management Staff
* MTOE and/or the associated procedures
* list of proposed instructors, knowledge examiners and practical assessors, if not included into the MTOE

for the addition of courses:

* The Course Approval Forms (for Basic or Type Training courses, as applicable). The forms are available for download on the “Foreign147” page of EASA website.

For Type Trainings, the inspector may also request to receive an Executive Summary of the Training Needs Analysis (TNA)’ outcomes including the content (detailed syllabus & key points) & the training durations.

A guidance to help drafting the TNA is available at the website address below:

<https://www.easa.europa.eu/sites/default/files/dfu/approvals-and-standardisation-organisation-approvals-docs-part-147-TNA-User-Guide.pdf>

Following the review of the above documents, the inspector will perform samplings on the training material, and may ask for more detailed information regarding the TNA and the justifications of content or duration in specific areas .

The samplings should cover, as appropriate, the Theoretical Elements courseware, the Practical Elements syllabus for Type Trainings or the list of tasks for Basic Training curriculums (workshops tasks + tasks performed in an actual maintenance environment, as required by the regulation).

Aside of the training material usually developed for the trainees, the inspector may ask to review by sampling the instructor’s notes and presentations (slides, etc.…) in order to better assess the nature and the level of the information delivered during instructor-led sessions. Information delivered as part of Computer Based Training (CBT) may also require samplings. When the change is not assessed via an on-site audit, the inspector may request to receive screen prints etc… or may agree on a review of these materials at the opportunity of the next routine audit.

Examination questions: due to confidentiality and examination’s integrity concerns, it is preferred that the inspector sample-checks the examination questions during an on-site audit, and to avoid as much as possible transferring such questions via mail or E-mail or providing unlimited non-restricted access passwords to question banks. When the change is processed through a desktop exercise, the decision to review the questions at the next opportunity (routine audit) will be taken against the inspector’s confidence in the training organisation procedures and its adherence to examination standards. When not possible, then the organisation and the inspector have to agree on a way for the inspector to assess the questions’ content and level.



#### Review of documents

The inspector reviews the documents for full compliance with EASA requirements:

* The MTOE review and any other document reviewed is managed with a Desktop audit in the OMS
* Findings are created in OMS to report the non-compliances identified by the inspector
* Findings are notified to the training organization through OMS using an electronic workflow.
* The applicant shall respond to the comments directly in OMS and submit the amended pages or paragraphs, as required.
* To minimize delays, it is important that the applicant clearly identify what has been modified in the text in response to the comment/finding.
* Submitting a highlight of changes comparing on one document the text before amendment and after being amended also helps the inspector to quickly review and accept the new text, and to move to the next step of the process (audit).

Once the document is finalized and considered as acceptable by the inspector, a full consolidated copy (electronic) should be sent to the inspector for his records.



#### Quality Assurance internal audit & statement

When the change requires an on-site audit, this one should only be confirmed after the applicant has verified that everything is in place and ready to be audited against compliance to Part 147.

Such assessment should be conducted by the Quality Assurance department and documented in an internal audit report.

The report, together with a statement of compliance by the Quality Assurance Manager, shall then be sent to the inspector.

Due to scheduling reasons and the (un)availability of the inspector, it can be accepted that an audit is organized despite some elements are not yet fully in place. For instance if part of the training equipment is still not received or an already hired instructor is still to arrive. This is left to the discretion of the inspector, and compensating measures should be proposed by the applicant (i.e. evidence of orders placed for the equipment, later confirmation of the instructor’s arrival, etc.…).

The audit report and statement of compliance above described should clearly indicate any missing or on-going element.



#### On-site audit if necessary

When an on-site audit is required:

* Ahead of the audit, the inspector shall provide the applicant with an audit plan, indicating the areas and activities to be audited, and a tentative scheduling. All the areas and representative training or examination activities subject of the change shall be assessed.
* Contracted activities may be audited as part of the audit. This includes for example the practical elements delivered at a contracted maintenance organisation. The applicant shall inform the contracted party and secure access to the premises for the inspector(s).
* The applicant shall secure all accesses and required security clearances to the training premises before the arrival of the inspector.
* The applicant shall ensure the availability of all Senior Managers and instructional & examination staff concerned by the change. An interview of the Accountable Manager and Management personnel will be performed to ensure that they can demonstrate:

- an acceptable working knowledge/understanding of the maintenance training organisation procedures and the EASA Part-166 / Part 147 requirements as applicable

- An acceptable level of English

* An in-briefing shall be organized with the participation of the EASA team and the senior management staff to recall the objectives of the audit and to finalize its scheduling.
* As part of the audit, the delivery of trainings, examinations & assessments may be audited. It is however difficult to audit an activity not yet running while waiting for the approval. The inspector may decide to ask for a “simulated” training or examination/ assessment to be organized. This allows to verify at least the knowledge of the instructor, his respect of the company procedures related to trainings & examinations, his English language proficiency etc.…
* An out-briefing shall be organized with the senior Management for the audit team in order to present the outcomes of the audit, clarify the findings and the next steps. Intermediate de-briefings with the Quality Assurance Manager can be organized at the request of the applicant.



#### Audit report and finding notification

The audit report findings are notified through the OMS using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

The audit report shall be finalized in OMS within 2 weeks after the audit out-briefing. A draft report can be left, however the applicant is informed that such draft may be modified. This usually occurs for a better clarity of findings or for grouping them when appropriate. In such case the inspector will inform the applicant about the modifications.

The audit report only lists non-compliances (negative statements). Any non-compliance has to be corrected before the approval of the change is granted. The report shall not propose or suggest the corrective actions to be enforced, which have to be determined by the applicant.

Any other observation or recommendation shall only be discussed during the out-briefing and left to the discretion of the applicant. They won’t be recorded into the report.

For a change audit, findings related to the change shall not be classified as Level 1 or 2. A maximum of three months is allowed to implement the corrective action for each finding raised during the change audit.



#### Corrective actions

##### Corrective action plan defined in OMS

A Corrective Action Plan (CAP) has to be submitted in OMS by the training organization within 2 weeks, detailing for each finding:

* the root cause analysis
* the corrective action(s) (corrects the detected non-conformity)
* the preventive action(s) (prevents the re-occurrence of the non-conformity)

Non-compliances have to be corrected before the change is approved, unless the finding is clearly marked by the inspector as not being directly related to the change. Such findings raised at the opportunity of a change investigation while not directly related to the change should however not conflict with the proposed change.

As part of the Corrective Action Plan, the applicant shall verify and confirm that no other areas, i.e. other training sites, or other activities could be affected by the same finding(s). When applicable, corrective and preventive actions have to be extended to these areas & activities.

The applicant shall ensure with the inspector that the CAP is acceptable.

##### Corrective action implementation

Once the CAP is accepted by the inspector, the applicant Quality Assurance verify the actual implementation and efficiency and shall provide in OMS the evidences that the implemented corrective and preventive actions are in place before the due date defined by the inspector in OMS.



#### Closure of findings

When satisfied with the corrective & preventive actions, the inspector closes the finding(s) in OMS.

For major findings, the inspector may request to verify by himself the effectiveness and the sustainability of the corrective actions before closing the findings, and therefore initiate a follow-up audit.

In case the organisation is unable to complete the corrective actions within the established three months, an extention request shall be submitted to the allocated inspector, which may be granted up to a maximum of another three months.

#### Recommendation for the change approval

Once the previous steps are complied with and all findings are closed, compliance with EASA Part-147 the maintenance training organisation’s change has been established. The inspector can proceed with the recommendation to grant the change approval.

The recommendation is prepared by the allocated inspector in OMS for review by EASA for compliance and accuracy. this is consits in the following electronic documents in OMS:

* Recommendation for the approval of the training courses and the training sites if applicable
* Technical visa for the approval of the MTOE with associated documents and lists

A Quality check is performed by EASA in OMS to ensure completeness of the recommendation package and its accuracy.



#### Approval of the change

#### Issuance of the approval documents

Depending on the nature of the change, EASA will generate the following documents in OMS:

* the approval certificate EASA Form 11 with an electronic copy sent by email to the training organisation
* the approval of the MTOE, together with its associated document(s) and list(s) and any concession
* the OMS also identifies the approved management personnel as specified in the approved MTOE

In order to improve the readability of the form 11, the following information will be listed in the approval schedule:

- all basic training courses listed at MTOE 1.9

- only full type training courses listed at MTOE 1.9

- all training sites identified at MTOE 1.6 including the Principla Place of Business of the training organisation

Therefore, the following courses will only listed in the MTOE 1.9

- type difference courses

- type engine only courses, for this courses MTOE 1.9 will specifify whether the airframe interface is included or not



# Continued Surveillance

## Continued surveillance principles.

The oversight of the approved Training organizations is organized in cycles of a 2-years duration each, starting at the date of the initial approval or from the last continuation date. During these cycles, the assigned inspector(s) shall perform a number of on-site / remote audits to ensure that all the approved Part 147 areas and activities are reviewed for their continued compliance with regulatory requirements and standards in the various training sites.

The allocated inspector notifies the maintenance training organsiation the plan of the routine audits in order to agree on specific dates. Support shall be provided to the allocated inspector in order to accommodate the proposed audit dates, with particular reference to on-site audit. This will allow the allocated inspector to plan the audits with an efficient cost and time management.

EASA will take actions to suspend or limit the organisation approval if unforeseeable circumstances outside the control of the EASA prevent its inspectors from the oversight over the oversight planning cycle.

Part 147 approvals granted by the Agency remain valid until they are suspended, terminated or revoked. Such decisions are notified to the Approval Holder before they are enforced.

Valid approvals are listed in the dedicated “Foreign 147 approvals” page of EASA’s website, with the details of the scope of approval. There is therefore no expiration date attached to the certificate, and no application is required from the approval holder in order to maintain the validity of an approval.

#### Audit types

The following type of audits are identified:

* Desktop audit: is a paperwork exercise performed from the desk without any real-time interaction with the auditee;
* On-site audit: is an audit where the inspection team directly accesses the premises of the training organization
* Remote audit:is an audit performed with the use of any real-time video and audio communication tools in replacement of the physical presence of the inspector on-site.

#### Frequency of visits and number of auditors.

The number of surveillance audits as well as the number of auditors may be adapted by the EASA CAOA Section depending from the outcome of an assessment, which particularly consideres the following factors:

* Size/Complexity/locations of the training organisation approval and use of EASA privileges, overall defining the intrinsic risks of the organisation’s activity,
* Performance of the organsiation and related risks, which depends on the results of the past oversight and the level of maturity of the Quality system,
* Stability of the organization in terms of number and frequency of change applications, in particular related to management changes, etc.;
* • Country risk factor, which consider the particular environment in which the organization is located.

A first audit will be organized between 6 months and 1 year after the initial approval.

Typical oversight program baselines would include the following audits:

* 1 audit per year for Type Training organisations
* 2 audits per year for Basic Training organizations, this could be changed to 1 audit per year when the performance of the training organization is satisfactory and no significant finding where identified during the cycle
* Additional remote audits to sample Distance learning Trainings (DSL) trainings
* Additional on-site audits to sample training/examination organized at non-approved locations (off-site trainings/examinations)
* Additional desktop or remote or on-site audits, as necessary, to audit changes to the approval.
* Unannounced audits. These unannounced audits may be performed by the allocated inspector or by any other inspector designated by EASA CAOA section
* All training & examination facilities listed in the MTOE shall be audited over each two-years period.

In principle, only one inspector is assigned, however a second auditor may also participate to audits either permanently or occasionally, on the following cases:

- When the oversight is assigned to an inspector belonging to an EASA-partner NAA, then it has to be expected that an EASA inspector will participate to at least the first audit with the newly assigned NAA inspector

- for the Handover of large organisation or a package of organisations located at same location from one inspector to another one

- for large organisation with several training site, additional auditors can be used for different training sites

- Re-instatement audits

Change application requiring on-site audit may preferably be combined with the oversight on-site audits to limit the travel costs for the training organisation.

EASA may require additional audit(s) when major and / or numerous findings were identified during the oversight.

#### Allocation of the investigation team.

By default the continued surveillance of an approval is performed by the inspector(s) allocated during the initial investigation or the previous surveillance cycle.

The CAOA Section Manager may decide to allocate another inspector. In case of permanent change of the allocated inspector ,the EASA Applicant Services Department will formaly inform the maintenance training organisation regarding the change of allocation.

A rotation policy is in place to change the allocated inspector at specified interval, which is typically 5 years.

## Technical investigation.

#### Audit report

The technical investigation process for a continued surveillance is identical to the initial process described in the chapter “technical investigation for initial approval” of this user guide. However the followings peculiar points shall be considered:

* all findings shall be classified with a level in accordance with EASA Part-147.A.160
* After each audit, the allocated inspector will provide the training organisation with a draft audit report
* Final audit report is generated in OMS and the findings are notified with an electronic workflow to the training organisation within a maximum of 15 calendar days from the end of the audit. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

#### Level 1 finding.

In the particular case of level 1 finding, the allocated inspector shall liaise with EASA to confirm the level 1 finding.

When the level 1 finding is confirmed, EASA will send a formal notification to the training organisation in the form of a pre-consultation letter, anticipating possible action against the approval in line with 147.B.130, with the audit report generated in OMS.

The notification of a level 1 finding immediately suspend the privileges of the Training Organisation. It means that on-going training & exam activities, and the production and release of Certificates of Recognitions related to the area of the level 1 findig have to be stopped until the level 1 finding closure is confirmed.

In the meantime, a Corrective Action Plan shall be submitted in OMS for each finding and detailing:

* the root cause analysis
* the corrective action(s) (corrects the detected non-conformity)
* the preventive action(s) (prevents the re-occurrence of the non-conformity)

If applicable, the corrective action shall require to recall and cancel any identified certificate of recognition related to the level 1 finding in coordination with the assigned inspector.

The CAP is reviewed and accepted by the inspector and within 3 days, the organisation must implement the submbited CAP and notify EASA in the OMS.

Where the training organisation fails to comply with any of the above mentioned requirements, EASA could revoke the EASA training organisation approval as detailed at 3.5

When the corrective and preventive actions are found not satisfactory by the inspector and EASA, this could lead to a suspension or limitation of the approval as detailed in 3.5

#### Level 2 finding.

Level 2 findings are notified to the training organisation directly by the allocated inspector thought the OMS.

The corrective action period granted by the allocated inspector depends on the nature of the finding. In any case the initial due date cannot be more than three months.

In the meantime, a Corrective Action Plan shall be submitted in OMS withing 2 weeks for each finding and detailing:

* the root cause analysis
* the corrective action(s) (corrects the detected non-conformity)
* the preventive action(s) (prevents the re-occurrence of the non-conformity)

As part of the CAP, the applicant should verify and confirm that no other areas, i.e. other training sites, or other activities could be affected by the same finding(s). When applicable, corrective and preventive actions have to be extended to these areas & activities. The applicant shall ensure with the surveyor that the CAP is acceptable.

Should the maintenance training organisation need an extension of the initial due date agreed for a finding, such an extension cannot exceed three additional months and shall be justified and requested in writing to the allocated inspector. Findings extensions is not systematically granted by the inspector depending from the nature of the finding.

When the training organisation fails to submit an acceptable corrective action plan or to meet the timescales specified for Level 2 findings, EASA will escalate the finding to level 1 and take actions on the approval as detailed at 3.5.

All the actions related to findings management (including root cause analysis and corrective action report) are submited directly in the OMS by the training organisation

#### Corrective action

Once the CAP is accepted by the inspector, the applicant Quality Assurance verify the actual implementation and efficiency and shall provide in OMS the evidences that the implemented corrective and preventive actions are in place.

#### Closure of findings

When satisfied with the implemented corrective & preventive actions, the inspector closes the finding(s) in OMS.The implementation of the whole corrective action shall not exceed the time frame imposed by EASA to close the finding. This implies that the allocated inspector has received the agreed corrective actions and the relevant evidences with enough anticipation to review them as necessary and to formally close the related findings before the due date.

When major findings are identified during the audit, the inspector may request to verify by himself the effectiveness and the efficiency of the corrective actions before closing the findings, and therefore initiate a follow-up on-site audit.

The closure of an audit report requires the closure of each finding included in that report.

The closure of an audit report which includes at least one level 1 finding shall be done according to the chapter re-instatement of this user guide.

#### Continuation of approval

At the end of the oversight cycle, the allocated inspector will have to summarize the surveillance performed and if satisfied, will recommend EASA to continue the approval (continuation of the approval). For that purpose he/she will prepare in OMS a recommendation for continuation which will be reviewed and accepted or rejected by EASA MTOC

The recommendation for continuation can be submittoed with open level 2 finding not having reached the due date as long as corresponding CAP was submitted in OMS by the training organisation and accepted by the inspector.

The continuation of an approval is a process not requiring any application from the approval holder and it is entirely managed by EASA with the support of the allocated inspector.

#### Shared audits

Taking into consideration that the oversight of the Foreign AMOs is carried out by different entities being EASA/NAAs/QE inspectors, the need exist for EASA as the competent authority to have a system in place which enables verification of areas which cannot be observed on a desktop basis during the review of the recommendation reports. This system is identified with the shared audit exercise.

The Shared Audit is defined as an audit carried out by an EASA designated inspector together with the EASA/NAAs/QE allocated inspector who is in charge for the oversight of the AMO.

## Voluntary surrender of an approval

The approval holder may decide at any time to voluntarily surrender its approval. This shall be initiated by a formal written communication by the Accountable Manager to EASA and an application Form 12 asking for the surrender in the application details.

This notification shall be sent by electronic mail and indicate the date the approval shall be considered as surrendered.

EASA will confirm the reception and initiate the termination of the approval, with the new status being “surrendered”. At the same time, EASA Financial department will process any outstanding payment /recovery according the current fees and charges Regulation. In addition, any fee not consumed will be reimbursed.

According to 147.A.125, the organisation shall keep all student training, examination and assessment records for an unlimited period. Therefore, in case of termination of approval the training organization shall contact the inspector to present possible measures which could be implemented to allow access to such records.

In addition, according to 147.A.155(b), the approval shall be returned to EASA.

## Limitation, Suspension and Revocation of an approval.

EASA is the competent authority for Foreign EASA Part-147 approvals and as such shall suspend , revoke or limit an approval in case of:

* failure of the training organisation to satisfactorily implement the corrective actions of any level 1 finding;
* failure of the training organisation to submit an acceptable corrective action plan or to implement the corrective action within the time period accepted or extended by EASA;
* unforeseeable circumstances outside the control of the competent authority preventing its inspectors from ensuring their oversight responsibilities over the oversight planning cycle;

A limitation of an approval means that the competent authority imposes restrictions to the privileges held by the training organisation with or without impact on the certificate eg. Removal of DSL training method or off-site training privilege.

A suspension of an approval means that the competent authority removes partially or in whole the ratings endorsed on the certificate and the MTOE.

Revocation means that the approval granted to the training organisation is removed in whole and definitively, e.g. EASA fees are not paid by the training organisation.

Based upon a recommendation to limit, suspend or revoke the approval of an organisation, the EASA Head of Maintenance and Production Department in coordination with the EASA CAOA Section Manager and the EASA MTOC will make a decision in relation to the approval and formally notify the maintenance training approval holder about EASA decision to the limit, suspend or revoke the EASA training organisation approval;

The training organisation is required to:

* acknowledge receipt of the letter by return of mail, confirming that the training organisation has put in place the restrictions required by EASA;

During the suspension phase the assigned inspector remains the contact point for the training organisation and all exchanges must be addressed to him/her. The EASA MTOC shall be copied with any messages related to the points addressed above.

In case of revocation of an approval, the trainingorganisation shall immediately send the original certificate back to EASA.

## Approval Re-instatement

When an approval is revoked or surrendered, the organisation has the option to start an application for a new Part-147 approval.

When an approval is suspended or limited, the training organisation must take action as detailed above at chapter 3.3.

When the corrective action plan is acceptable to EASA the organisation must start the implementation of the proposed immediate and long term corrective actions to the findings.

* Once the implementation process (including those related to the level 1 finding) is fully completed, the training organisation Quality Assurance department shall audit the organisation in full for compliance with Part-147 regulation “as amended”
* Before the re-instatement audit takes place, a statement confirming the effective implementation of the proposed corrective actions signed by the Training organisation Quality Assurance Manager shall be provided with the relevant audit report to the allocated inspector.

Once the inspector is satisfied with the actions that have been taken by the training organisation, he/she liaises with the training organisation and the EASA MTOC for scheduling the re-instatement audit.

In addition to the allocated inspector , the CAOA Section Manager may select an EASA representative who will take part in the re-instatement audit (shared audit).

During the reinstatement audit, the audit team will review all applicable requirements and MTOE chapters similarly to an initial audit. Once compliance of the training organisation with EASA Part-147 requirements has been established during the audit, the allocated inspector will recommend in OMS the training organisation EASA Part 147 approval re-instatement. This might include the recommendation for the approval of a MTOE revision.

Based upon this recommendation for re-instatement, the EASA will formally notify the re-instatement of the approval of the training organisation.

Note: During the suspension phase and at the time of the re-instatement audit, EASA will not accept any application for change related to the extension of the scope of approval. However, other changes including reduction of the scope could be considered.

Following a satisfactory reinstatement recommendation the status of the approval returns to “valid” in OMS and the organization can start at this point to exercise the Part-147 privileges.

## Publication of the EASA Part-147 approvals list

The following lists of all the EASA approvals with related status are published on the EASA website:

* List detailing the status of Continuing Airworthiness Organisation approvals available under the following link <https://www.easa.europa.eu/en/domains/aircraft-products/continuing-airworthiness-organisations/valid-and-invalid-foreign-part-145-part-147-part-camocao-dataset>
* List detailing the scope of approval of EASA Part-147 organisations available under the following link <https://www.easa.europa.eu/en/domains/aircraft-products/continuing-airworthiness-organisations/foreign-part-147-organisations/part-147-scope-of-approval-dataset>

The lists published in the EASA website are generated directly from a source file created in the OMS, which ensure the information published on the website is relieable, and updated on recurrent basis reflecting changes of the approvals status. This is particularly the case, when issuing a new approval, or when an approval is surrendered, limited, suspended or revoked.

# Technical interpretations of Part 66 / Part 147 requirements

## Purpose

In the frame of the oversight of foreign Part 147 approval by EASA, several decisions for interpretation were taken in order to assist the training organization and the inspectors in implementing Part 147 / Part 66 requirements applicable to training organizations.

These intepretations :

* do not supersede or replace any associated regulatory requirements
* are only intended to standardize the implementation of Part 147 / Part 66 requirements among EASA Part 147 training organizations
* to support assigned inspector and training organization to interpret Part 66 / Part 147 ‘’grey areas’’ which could potentially be interpreted in various ways
* will be regularly updated to reflect current Part 66 / Part 147 amendments, however in case of amended rules affecting these interpretations, the amended rules shall be implemented instead of these UG intepretations
* are applicable to Foreign EASA Part 147 traning organisations
* are aligned whenever possible with the most common current interpretation implementated within EU NAAs

These interpretations shall be implemented by the training organization in its MTOE procedures and associated documents as applicable. Their implementation will be ensured by the assigned inspector during the oversight.

## List of interpretations

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Training sites | 147A.140(a)147.A.145(b) | 147A.140(a)6:A general description of the training and examination facilities located at each address specified in the maintenance training organisation's approval certificate, and if appropriate any other location, as required by point 147.A.145(b).147.A.140(a)11:list of the locations pursuant to point 147.A.145(b)147A.145(b):Training, knowledge examinations and practical assessments may only be carried out at the locations identified in the approval certificate and/or at any location specified in the maintenance training organisation exposition. | Non-approved training sites which are frequentily used (off-site trainings) shoud be listed at MTOE 1.6 as permanent site. This should be assessed by the training organisation and confirmed by inspector on case by case. |
| Number of students | AMC 147.A.105 | AMC 147.A.105:1. The larger maintenance training organisation (an organisation with the capacity to provide training for 50 students or more) …
2. The smaller maintenance training organisation (an organisation with the capacity to provide training for less than 50 students) ….
 | A small training organisation is an organisation with the capacity to train less than 50 students present at the same time |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Type Training - Practical elements | 147.A.100(e) | 147.A.100(e):In the case of an aircraft type/task training course, access shall be provided to appropriate facilities containing examples of aircraft type as specified in point 147.A.115(d)147.A.115(d):The aircraft type training organisation as specified in point 147.A.100(e) must have access to the appropriate aircraft type. Synthetic training devices may be used when such synthetic training devices ensure adequate training standards | Training organisations may be approved to deliver Practical elements of the type training without having permanent type practical training sites listed at MTOE 1.6 and shall use off-site training privilege to access customer aircrafts to perform the practical training.In case of CBT practical training at main site, this training site shall identified as a type practical training site in MTOE 1.6 |
| Basic Training Examination | GM 66.B.200 | GM 66.B.200 is currently implemented by basic training organisations. It clearly refers to a written report with up to 40% of mark allocated to its clarity and presentation. Written report is understood here as a ‘’hand written’’. | The essay question examination can only be done in hand written form and not on computer |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Type Training – Theoretical elements | 147.A.145(a) | 147.A.145(a)(iv) The maintenance training organisation may carry out the following as permitted by and in accordance with the maintenance training organisation exposition: the examination of students who did not attend the aircraft type training course at the maintenance training organisation147.A.145(a)(vi) The issue of certificates in accordance with Appendix III following successful completion of the approved basic or aircraft type training courses and examinations specified in points (a)(i), (a)(ii), (a)(iii), (a)(iv) and (a)(v), as applicableForm 149 Issue 4 does not allow to issue a COR for the type training examination only or for the attendance of the theoretical part only | COR for the theoretical element of the type training can be issued only after attending the theoretical training and passing corresponding examination at the same training organisation. No COR can be issued for the attendance of the theoretical element of the type training only without successfully passing the examinationBoth theoretical element type training and theoretical examinations have to done at the same training organisation |
| Basic training - Examination | Appendix I to Part 66 – 2.Modularisation | B1 basic training requires performance of Module 15 and B2 basic training requires Module 14 | In case of a combined B1+B2 Basic training, it is sufficient to pass only Module 15 examination (Module 14 not required) |
| Basic Training - Examination | Appendix II to Part 66– Basic examination standard | Basic examinations shall comply with standard detailed in Appendix II to Part 66 | Basic examination questions purchased by training organisations at third parties have to be reviewed and validated by the training organisation for compliance with Part 66 requirements. In addition, training organisations should demonstrate to the inspector that the integrity of the purchased questions is ensured. |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Basic Training - Examination | Appendix II to Part 66– Basic examination standard | Basic examinations shall comply with standard detailed in Appendix II to Part 66Module 7 Essay Question | - Module 7 essay question examinations can be organized separately in 20 mn examination each- COR following Module 7 essay examination shall only be issued when both Module 7 essay questions are passed- When one of the 2 Module 7 essay question examination is failed, the resit of both essay questions examinations is required |
| Type Training - Examination | Appendix III to Part 66 – Aircraft type training and examination standard | 4.1 - Theoretical element examination standard:(d) The level of examination for each chapter1 shall be the one defined in point 2 ‘Aircraft type training levels’. However, the use of a limited number of questions at a lower level is acceptable | For type training examination:The number of MCQs at lower level cannot not exceed 25% of the total number of questionsANDMCQs at a lower level should be equality distributed over all ATAs (i.e. similar proportion of 25%) |
| Basic / Type training | 147.A.200 / 147.A.300 | 147.A.200 – The Approved basic training gourse147.A.300 – Aircraft type/task trainingThere are no limitations related to the possibility for students to have additional activity to the daily training time. | It is not acceptable for students to have additional activities to the daily training except if human factors and pedagogical principles are continuously ensured. This should be assessed by the training organisation and confirmed by inspector on case by case. |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Basic / Type training | 147.A.105(f)147.A.105(g) | 147.A.105(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 authority147.A.105(g)- -The knowledge examiners and practical assessors shall be specified in the organisation exposition for the acceptance of such staff. | Examination Manager acting as Examiner has to be appropriately qualified/authorised as per MTOE 3.7 and listed in MTOE 1.5 as an examiner |
| Type training – Training Material | 147.A.120(a) | 147.A.120(a)There are no requirement related to the training material source in Part 147 | Training material identified/labelled under the name of another organisation shall be rejected by the inspector, unless the training organisation is contractually allowed to use such training material |
| Type training - COR | Appendix III to Part 147 | Appendix III to Part 147 – 2. Type Training/Examination– Form 149 Issue 4The certificate shall indicate the airframe/engine combination for which the training was imparted | - In case of a type training limited to certain models of the Part 66 type rating as listed in MTOE 1.9, COR has to display corresponding Part 66 type rating endorsement fully as listed in Appendix I to AMC to Part 66- In case of type training covering several engine options, COR has to display each corresponding Part 66 type rating endorsement separetly |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Basic / Type training - COR | Appendix III to Part 147 | Appendix III to Part 147No requirement are detailed for the correction of issued CORs | When an error is identified on a COR and a correction is required, a new COR have to be re-issued by the training organisation with a new tracking number and issue date |
| Basic Training – Practical training | AMC 147.A.200(d) | AMC 147.A.200(d)2:At least 30% of the practical training element should be carried out in an actual maintenance working environment. | A maximum of 50% of the practical training carried out in an actual environment may be performed in a simulated maintenance environment within the training organisation facilities, i.e. in an evironnement replicating a Maintenance Organisation |
| Basic Training -Examination | Appendix II to Part 66 – Basic examination standard | GM 66.B.200- Examination by the competent authority:All requirements from (a) to (i) | GM 66.B.200 requirements are an acceptable standard for marking essay questions by the basic training organisation |
| Basic Training -Examination | Appendix II to Part 66– Basic examination standard | 1.9 - If either the multi-choice part only or the essay part only is failed, then it is only necessary to retake the multi-choice or essay part, as appropriate | For basic training modules requiring both MCQ and essay question(s), COR can be issued after successfully passing either essay or MCQ examination |
| Basic Training -Examination | Appendix II to Part 66– Basic examination standard | Basic examinations shall comply with standard detailed in Appendix II to Part 66 | For basic examination papers randomly generated, it is necessary to ensure that distribution of MCQ questions is proportionate to the times spent on the sub-module as detailed on the course approval form |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Type Training - Examination | Appendix III to Part 66 – Aircraft type training and examination standard | 4.1 - Theoretical element examination standard:There is no requirement related to number of similar question between consecutive examination papers, e.g in case of resit examination | The number of common MCQs between consecutive examination papers cannot exceed 25% of the total number of question, e.g. in case of resit examination |
| Type training – Difference course approval | Appendix III to Part 66 – Aircraft type training and examination standard | Appendix III to Part 66 – Aircraft type training and examination standard – 1. General (c):(iii) A type rating shall only be endorsed on a licence after differences training when the applicant also complies with one of the following conditions:- having already endorsed on the licence the aircraft type rating from which the differences are being identified, or - having completed the type training requirements for the aircraft from which the differences are being identified. | - The approval of a type difference course does not require prior approval of both target aircraft and source aircraft. Only either the source or the target aircraft type training shall be previously approved or approved at the same time as the difference course.- The approval of difference courses in series is not acceptable and at least 1 approved full course is required prior to the approval of any difference course (either the source aircraft or target aircraft). |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Basic / Type - COR | AMC 147.A.200(f)2AMC to point 3.1(d) of Appendix III to Part-66 ‘Aircraft Type Training and Examination Standard. On-the-Job Training’ – 5(j) | AMC 147.A.200(f)2:The minimum participation time for the trainee to meet the objectives of the course should not be less than 90 % of the tuition hours. Additional training may be provided by the training organisation in order to meet the minimum participation time. If the minimum participation defined for the course is not met, a certificate of recognition should not be issued.AMC to point 3.1(d) of Appendix III to Part-66 ‘Aircraft Type Training and Examination Standard. On-the-Job Training’ – 5(j)The minimum participation time for the trainee in order to meet the objectives of the course should not be less than 90 % of the tuition hours of the theoretical training course. Additional training may be provided by the training organisation in order to meet the minimum participation time. If the minimum participation defined for the course is not met, a certificate of recognition should not be issued. | COR can be issued at the end of the training only if the attendance of the training is above 90 %.For a basic training course, this means the attendance of both theoretical and Practical training.For a Type training course, this is means the attendance of the elements related to the COR, either Theoretical elements or Practical element or both. |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Basic Training -Examination | Appendix II to Part 66– Basic examination standard | Basic examinations shall comply with standard detailed in Appendix II to Part 66 – 2. Number of questions per Module:2.13. MODULE 13 — AIRCRAFT AERODYNAMICS, STRUCTURES AND SYSTEMS Category B2: 180 multiple-choice and 0 essay questions. Time allowed: 225 minutes. Questions and time allowed may be split into two examinations, as appropriate. | In case Module 13 examination is split, each examination has to be successfully passed to consider Module 13 passed.COR following Module 13 examination shall be issued only when all split examinations are passed. |
| Basic Training -Examination | Appendix II to Part 66– Basic examination standard | 1.13. The maximum number of consecutive attempts for each module is three. Further sets of three attempts are allowed with a 1 year waiting period between sets. | When there is more than 12 months between 2 consecutives attempt of basic training examination, the last attempt is considered as the first attempt of a new set of 3 attempts |
| Basic/Type Training -Examination | Appendix I to Part 147– Maintenance training organisation exposition (MTOE) | MTOE 3.3 - Analysis of examination results | All examination questions with a pass rate below 50 % or above 90 % shall be analysed |
| Basic Training -Students records | 147.A.125 | The organisation shall keep all student training, examination and assessment records for *an unlimited period.* | - The training organisation shall contact the inspector and EASA prior to cease activity and review possible solutions for the students records retention.EASA will not retrieve and store any student records from training organisations ceasing operation |

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| **Topic** | **Part 66 / Part 147** | **Part 66 / Part 147 Requirement** | **Foreign Part 147 interpretations** |
| Basic Training -Students records | 147.A.125 | The organisation shall keep all student training, examination and assessment records for *an unlimited period.* | Students records in electronic format are acceptable, training organisation procedure should aligned with criteria detailed AMC M.A.305(e) § (e) and § (f)  |
| Type training – Duration/number of questions | Appendix I to Part 147– Maintenance training organisation exposition (MTOE) | 4.2 - Syllabus of each training course | On the Course Approval Form, grouping small duration ATAs is an acceptable practice forATAs 05/06/07/08/09/10/11/12 (i.e. 1 duration and 1 number of question for the group). However, engine ATAs should not be grouped. |
| Basic / Type training | 147.A.130(b)1 | The organisation shall establish a quality system including an independent audit function to monitor training standards, the integrity of knowledge examinations and practical assessments, compliance with and adequacy of the procedures,  | QA internal program shall include sampling of basic and/or type training courses and examinations as applicable, including DSL trainings and off-site trainings/examination |
| Type Training - Examination | Appendix III to Part 66 – Aircraft type training and examination standard | 4.1(d) - Theoretical element examination standard:The level of examination for each chapter1 shall be the one defined in point 2 ‘Aircraft type training levels’. However, the use of a limited number of questions at a lower level is acceptable. | Level 3 questions shall only be replaced by level 2 questions |

# Contacts

## To contact EASA

For any query (technical, financial), or to download forms, please contact the appropriate EASA section using the “contact us” page at:

[***http://www.easa.europa.eu/contact-us***](http://www.easa.europa.eu/contact-us)



## To download the application form 12 or for queries regarding an application:



Then:



## To get information regarding the Foreign 147 activity:



Then:



## For queries related to invoices or payment issues:

