European Union Aviation Safety Agency

Part-147

Basic training

Is it possible to grant a Part-147 approval to a training organisation which intend to conduct only training on one or only several modules?

Answer

No, a Part-147 approval can only be granted to an organisation which plans to conduct training on all the modules related to a (sub)category of an aircraft maintenance licence, so that a full understanding of the training needs, interfaces and examination relative to that (sub)category of licence is achieved.

However, some modules may be sub-contracted as mentioned in 147.A.145(d).

It does not mean that the Part-147 organisation is not allowed to conduct courses on just one module. In particular, in the case of limitations resulting from the conversion process, limitations can be lifted through the teaching and/or examination of one module or a part of a module.

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Link:
https://www.easa.europa.eu/en/faq/19071

I have completed a part of my basic training course (including some module examinations) in an approved Part-147 organisation. I'm moving to another country and would like to continue my basic training in a Part-147 organisation located in the country where I move in. Is this possible? What will happen with my certificates? Can I get the maximum reduction of the experience required for the Part-66 licence?

Answer

There are several scenarios possible depending on the particular case. Here are some most

probable cases for category A, B1, B2, B2L, B3 or L:

Case No 1 (baseline – standard case): The applicant completes the whole basic knowledge course (including the training, practical assessments and basic modules examinations) in an approved Part-147 maintenance training organisation.

Result: The Certificate of Recognition (CoR) of the basic course completion is issued by the organisation. The applicant can apply for the Part-66 licence with 1 or 2 years of maintenance experience (66.A.30).

Case No 2: The applicant completes the basic training in two different Part-147 AMTO (including the examinations).

Result: The CoRs for the successful examination of each individual module are issued (by different AMTO), but not the CoR for the basic course completion. The applicant does not benefit from the experience reduction and have to fulfil the requirement of 2 or 3 years of experience (if recognised as skilled worker) or 1, 2, 3 or 5 years (66.A.30).

- It may happen that some of the competent authorities would give the complete credit on experience in case the applicant can prove that: the training completed in different organisation covers in total the Appendix I or Appendix VII syllabus; and
- all the practical assessments are performed and passed successfully; and
- all interactions between the modules have been correctly addressed; and
- there was a right proportion of theoretical and practical training for each subject.

As this demonstration requires a significant investment, the applicant is invited to directly contact the competent responsible for performing such an investigation.

Case No 3: The applicant has completed a full basic training course in one approved Part-147 organisation. Unfortunately, the candidate was not in a position to successfully pass the full examination process (all modules) in that organisation and had to pass the missing portion of the examination in another approved Part-147 organisation.

Result: In this case the applicant would receive a CoR for basic training only as well as the CoRs related to the modules successfully passed in that approved Part-147 organisation. The examination for the missing modules may be successfully passed in another approved Part-147 organisation(s) with issuance of the related CoRs thereof. The combination of all these CoRs may be sufficient for the competent authority to recognise the training course as successfully “completed” and to grant the maximum credit for the experience (only 1 or 2 years needed, see case No 1) for the issue of the license.

Case No 4: The applicant did not attend a Part-147 basic training course but only took examinations in one or more approved Part-147 organisation(s).

Result: The applicant would receive several CoRs for the successful examination of individual

modules from one or more approved Part-147 organisations. No credit of experience as per 66.A.30 will be granted (except for skill workers – 2 or 3 years). Standard 1, 2, 3 or 5 years of experience will be required.

Further information is given in AMC to Appendix III to Part-147 “Certificates of Recognition referred to in Annex IV (Part-147) – EASA Forms 148 and 149.

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https://www.easa.europa.eu/en/faq/19079

Is it possible to grant a Part-147 approval to a training organisation which intend to conduct only basic knowledge examinations?

Answer

No, a Part-147 approval can only be granted to an organisation which can prove its capability to conduct training and examinations on a complete syllabus of at least one (sub)category of the Part-66 licence. Only in the case the organisation holds the approval for the complete basic training course, it may conduct basic examinations not being an integral part of the approved basic training course.

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https://www.easa.europa.eu/en/faq/19070

Is it possible to grant a Part-147 approval to an organisation applying only for basic knowledge training?

Answer

Yes, in such case Form 148 shall be used as template for the Certificate of Recognition, which specifies “Basic training course” or “Basic examination”. In the particular case where all modules are not conducted, the certificate shall state only “Basic training course” and the modules conducted be mentioned on the certificate including the date(s) of the training module(s).

Reference: 147.A.145

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https://www.easa.europa.eu/en/faq/19068

Part-147 approved organisations have the privilege to carry out basic examinations on behalf of the competent authority. Does this imply that the said authority has to supply or approve examination questions?

Answer

No, the competent authority does not have to supply examination questions. However, as part of the oversight, the authority must sample check and review the organisations' question data bank and the examination process.

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Type training

Is it possible to perform aircraft type training in two different organisations? Can I do my practical portion of the type training in a Part-145 organisation?

Answer

Only a Part-147 organisation has the privilege (if approved by its competent authority) to provide aircraft type training courses. This comprises both the theoretical and practical element of the aircraft type training, including the related examinations and assessments. This means that the practical element of the aircraft type training shall be completed in a Part-147 organisation.

However, the aircraft type training may be conducted physically in a Part-M Subpart F, Part-145 or Part-CAO organisation under the control (and as a part of the approval) of a Part-147 organisation issuing the Certificate of Recognition. It is not the privilege of the Part-M Subpart F, Part-145 or Part-CAO organisation to conduct aircraft type training courses on its own.

In addition, the theoretical and practical element of the aircraft type training can be conducted

by two different approved Part-147 organisations. The competent authority endorsing the type rating on the license should be convinced that the interfaces have been correctly addressed before proceeding thereof (66.B.115(b) refers).

In the special case where the aircraft type course is directly approved by the competent authority in accordance with the procedure 66.B.130 (i.e. only on a case by case basis – special authorization not granted for long term periods), the training can be conducted outside the scope of a Part-147 organisation. As a consequence, the certificate issued is not mutually recognized between Member States, which means it can only be used for aircraft type endorsement by the licensing authority who issued that direct approval.

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How should the 50% of tasks required for practical training be selected? Should it be 50% of tasks as per glossary (e.g. LOC, FOT, SGH, R/I, etc.)?

Answer

The selection of 50% of tasks cannot be selected according to the glossary. Paragraph 3.2 of Appendix III to Part-66 clearly states that ‘the tasks selected shall be representative of the aircraft and systems both in complexity and diversity. In addition, the practical training should particularly address the tasks which cannot be explained by theoretical training only. While relatively simple tasks may be included, other more complex tasks shall also be incorporated and completed as appropriate to the aircraft type.

Regarding the way to read the table in paragraph 3.2, the lines aims at covering the main systems so that no line relevant to the particular aircraft type should be omitted in the selection. Inside each line applicable to the aircraft type, half or more of the crosses can be selected. From a learning point of view, selecting 2 simple tasks as LOC and SGH would not be “representative”, while selecting LOC and TS, for example, would be much more appropriate.

When selecting the tasks, the usage of filtering method based on the criteria similar to that described in AMC to paragraph 3.1(d) of Appendix III to Part-66, point 5 f) is recommended.

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Link:
https://www.easa.europa.eu/en/faq/19081

What is the minimum duration of the practical element of the aircraft type training?

Answer

The duration of the practical training should ensure that the content of training required by paragraph 3.2 of Appendix III to Part-66 is completed. However, for aeroplanes with a MTOM equal or above 30000 kg, AMC to paragraph 1(b), 3.2 and 4.2 of Appendix III to Part-66 recommends the duration of the practical element of a type rating training course be not less than two weeks, unless a shorter duration meeting the objectives of the training and taking into account pedagogical aspects (maximum duration per day) is justified to the competent authority. This means that the duration of the a/c type practical training is not the main driver as justified by the status of that AMC. According to point 3.2 (b) Appendix III to Part-66 (having the status of requirement), the duration should be based on the content sufficiently representative in diversity and complexity in order to gain the needed competence.

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Examination

Can an examination be limited to some modules only, or one module only or part of a module only?

Answer

As mentioned in the previous question, for some particular cases, the basic training need to be conducted and the relevant examination to be passed on some modules only or one module or part of a module (this is typically the case where the holder of a licence applies for removing some limitations mentioned in his/her licence).

However, the Part-147 organisation should be capable of conducting the full course relative to the (sub)category sought, so that they can run the examination.

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Should examiners be specialists in the subjects, or can they be responsible for the proper conduct of the examination without being responsible for the content?

Answer

“Examiner” should be here understood as “invigilator” (i.e. the personnel responsible for merely running the examination).

The examiners (invigilators) are not required to be experts in the subjects examined when relative to the MCQs in accordance with Appendix II to Part-66. However, the assessment of essay questions as part of the basic knowledge has to be conducted by knowledgeable personnel with the help of a standard reply. Eventually, the invigilators must be trained to the examination process.

Examiners should demonstrate a clear understanding of the examination standard required by Part-66 and have a responsible attitude to the conduct of examinations such that the highest integrity is ensured. (GM 147.A.105(g)).

Regarding the type training examination and assessment standard as well as type examination standard as described in Part-66, Appendix III, paragraphs 4 and 5, the theoretical element examination can follow the same principle as above; however, for the practical element assessment, the examiner(s) must be appropriately qualified. Further provisions are available in Appendix III to AMC to Part-66.

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What is the maximum number of students attending the examination?

Answer

147.A.100(b) defines the facility requirements for the instructions of theory and the conduct of knowledge examinations. Point 1 deals with the facility requirement for knowledge training

whereby the number of students shall not exceed 28. Point 2 defines the facility requirements for the examination purposes, where the maximum number of students attending the knowledge examination is not limited. The number of students attending the knowledge examination is indirectly limited only by the size, layout and arrangement of the accommodation in order to fulfil the following requirements:

- … no student can read the paperwork or computer screen of any other student from his/her position during examinations (147.A.100(b)2), and
- Examination candidates shall be separated from each other so that they cannot read each other's examination papers. (66.B.200(h)).

Consequently, as long as the facility and examination standard as well as the integrity of the examination can be ensured, the number of candidates attending the examination may not be limited. In case of a larger number of candidates, two or more examiners may be used to ensure the integrity of the examination, such as separation of the candidates, no potential cheating, no speaking to each other, only examination paper on the table, no examination paper removed from the room, etc.

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https://www.easa.europa.eu/en/faq/19077

Others

Shall a Part-147 approved organisation have a mandatory occurrence reporting system according to Regulation (EU) No 376/2014?

Answer

Article 4 of Regulation (EU) No 376/2014 defines the persons and organisations obliged to report occurrences under the "mandatory reporting system". Personnel working at/for organisations approved in accordance with EASA Part-147 are not listed in paragraph 6 of article 4, therefore such organisations are not required to implement mandatory/voluntary reporting systems according to Regulation (EU) No 376/2014. This does not prevent any organisation or person involved in aviation activities, including maintenance training activities, to report any safety occurrence or other safety information they consider relevant.

Such reports would be to the voluntary reporting system to be established by all competent authorities according to Article 5.2 of Regulation (EU) No 376/2014.

Typically, a Part- 147 approved training organisation having implemented a Safety Management System (SMS) on a voluntary basis would have such a voluntary occurrence reporting system.

The European Commission (EC) published Guidance Material for Regulation (EU) No 376/2014. Paragraph 3.3 further elaborates on the organisations affected by that regulation.

An online service developed by the EC allows organisations and individuals to report aviation safety occurrences to aviation authorities.

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https://www.easa.europa.eu/en/faq/21037

Part-147 approved organisations can also give courses outside the scope of Part-66. Can these courses be certified? (e.g. continuation training for the purpose of the certifying staff privileges as required by M.A.607, 145.A.35 or CAO.A.040, task training, NDT, engine run, HF, SMS, etc.)

Answer

Courses outside the scope of Part-66 cannot be part of the Approval Schedule of the approved Part-147 organisation. This does not prevent a training organisation to provide such courses. The scope, content and the delivery methods of these courses will not be reviewed by the Agency or the EASA Member States, as part of the audit scope of the Part-147 organisation. However, when Part-M, Part-ML, Part-145 or Part-CAO requires the staff to be trained, the appropriateness of such training being delivered would be assessed during the audits of these particular organisations.

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How can I become an EASA aircraft maintenance instructor?

Answer

Part-147, in particular, 147.A.105 (f), state that the experience and qualifications of instructors, knowledge examiners and practical assessors shall be established in accordance with criteria published or in accordance with a procedure and to a standard agreed by the competent authority. There are no additional requirements or guidance published in EASA rules regarding the experience and qualification of instructors, except that it is recommended that potential instructors be trained in instructional techniques.

The eligibility of candidates to a permanent or temporary (contracted independent) instructor's position must be assessed in regards to the minimum qualifications defined by the concerned Approved Part 147 Training Organisation. The Organisation's procedures should detail these minimum qualifications and associated eligibility criteria in terms of technical knowledge, pedagogical and instructional skills and working experience.

EASA does not issue Instructor licences or equivalent, and permanent or contracted instructors can only exercise instruction privileges through the approval of a Training Organisation. Instructors are nominated by the approved organisation, which keep detailed records of their qualifications and are audited by the authority. Their authorised scope of activity is then stated on Terms of Reference provided to the instructors, as well as on the instructor/ examiners/ assessors approved list.

For any further questions, we advise you to contact the training organisation Quality Assurance Dept. and/ or the Competent Authority (the one who granted the approval), in order to enquire about the possibility to be nominated as an instructor.

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Should the Part-147 organisation's quality system be audited?

Answer

147.A.130(b) states that the approved Part-147 organisation shall establish a quality system including:

1. an independent audit function to monitor training standards, the integrity of knowledge examinations and practical assessments, compliance with and adequacy of the procedures, and
2. a feedback system of audit findings to the person(s) and ultimately to the accountable manager referred to in 147.A.105(a) to ensure, as necessary, corrective action

This means that the quality system itself should be independently audited. The competent authority cannot perform this function on behalf of the organisation.

Within its approved procedures, the organisation has to monitor the quality system's procedures. This implies that quality system monitoring itself must be subject to internal audits:

- no conflict of interest is allowed - it is not permitted that such a function be performed by quality system's staff;
- This can be also outsourced;
- the right level of the auditor(s)' position within the organisation shall be met in order to assure the objective of 147.A.130(b)2. (e.g. conflict of hierarchy, which could hinder an efficient and transparent report to the accountable manager).

In addition, the audit programme/plan needs to reflect this regulatory aspect.

The EASA Flight Standard Directorate consistently applies that policy during their standardisation inspections.

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