



EASA
European Aviation Safety Agency

Fraud in Part-147 basic examinations and possible regulatory measures

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Background information



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- **Annex III (Part-66) to Regulation (EU) No 1321/2014 allows that basic knowledge examinations for certifying staff can be conducted either by an approved Part-147 maintenance training organisation or by the competent authority.**
- **In the case of Part-147 organisations, the examination can be performed either in conjunction with the basic training course they impart or as a stand-alone examination.**



Description of the problem



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- **No concern in relation to the examinations performed by Part-147 organisations when they are part of a basic training course (typically lasting 2 or 3 years).**
- **However, a significant number of fraud cases have been reported of Part-147 organisations providing:**
 - **unofficial training as short as a few days long, where they provide information on the upcoming content of the examination, and**
 - **guarantee that they will pass the examination.**
- **These practices take place in and outside Europe, mainly away from the base location of the Part-147 organisation, where oversight by the competent authority is more difficult or not possible to plan.**
- **This is a major safety concern, with the risk of having the aviation system flooded with licence holders not having the required basic knowledge.**



Expected measures



Expected measures

- **Due to this immediate safety concern, during the summer of 2015 the Commission agreed on an expedited procedure which would result on the Agency issuing an Opinion to be presented in the EASA Committee of 14/15 October 2015.**
- **In order to ensure that the applicable consultation obligations contained in Regulation (EC) No 216/2008 are met the following has been performed:**
 - **Stakeholders and NAAs were informed of the Part-147 fraud concerns and on possible measures to be taken at the following events:**
 - **Engineering & Maintenance Sub-SSCC on 02 June 2015.**
 - **Standardisation Meeting with the NAAs on 02/03 June 2015.**
 - **Stakeholders and NAAs are being informed on the exact changes to be included in the Opinion at the following events:**
 - **Production & Maintenance TAG meeting on 08 September 2015.**
 - **Maintenance & Production Conference on 09 September 2015.**



Proposed changes to the rules

147.A.145 Privileges of the maintenance training organisation

- (a) The maintenance training organisation may carry out the following as permitted by and in accordance with the maintenance training organisation exposition:
1. basic training courses to the Annex III (Part-66) syllabus, or part thereof.
 2. aircraft type/task training courses in accordance with Annex III (Part-66).
 3. ~~the examinations on behalf of the competent authority, including~~ the examination of students who ~~did not~~ attended the basic or aircraft type training course at the maintenance training organisation.
 4. the examination of students who did not attend the aircraft type training course at the maintenance training organisation.
 5. the examination of students who did not attend the basic training course at the maintenance training organisation, provided that:
 - the examination is provided at one of the locations identified in the approval certificate, or
 - if performed at other locations as permitted by points (b) and (c), either
 - the competent authority selects the questions and supervises the examination, or
 - the examination is provided through a European Central Question Bank.
 - 4 6. 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)(1), (a)(2), ~~and~~ (a)(3), (a)(4) and (a)(5), as applicable.



Expected impacts



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POSITIVE:

- **Addresses the immediate safety concern.**
- **Should eliminate the unfair competition created by those organisations which are performing basic examinations not meeting the standards and which are attracting customers with a guaranteed examination success.**
- **Should prevent future cases of unfair competition created by individuals who obtain a Part-66 not meeting the adequate standards. These individuals are lowering the employment opportunities of those Part-66 licence holders who obtained the Part-66 licence in a fair manner.**
- **This limitation will likely accelerate the creation of the European Central Question Bank (ECQB), which is the long-term solution to the problem. This ECQB would also be beneficial from an economic point of view for the Part-147 organisations and competent authorities since they would not need to create, maintain and oversee the questions for the examinations.**



Expected impacts

NEGATIVE:

- **Affects Part-147 organisations providing examinations (without a course) at locations not listed in their approval certificate, if they cannot get an agreement with their competent authority to select the questions and supervise the examination.**
- **Impact could be minimized by having the maximum number of training facilities included in the approval certificate, once the authority has performed the corresponding audits. In such a case, the locations which will be typically affected by the limitation will be those places where the organisation is performing examinations based on an approved procedure, without the location being identified in advance.**
- **Possible impact on NAAs due to limited resources (if they cannot change the fee charging system)**



Reactions from NAAs (TAG meeting of 08 September 2015)



Reaction from NAAs (TAG meeting)

- **Possible impact on NAAs being flooded with applications to include new locations in the Approval Certificate.**
 - Some NAAs would just increase lead time (limited resources) and fees.
 - Some NAAs cannot increase the fees (they charge the same for all applications) and changing the fee national scheme takes time.
- **If the ECQB exists, the option of having the authority running the exam should not be possible.**
- **The requirement to have the authority selecting the questions is fine but having the NAA invigilating the exam maybe is too much. The objective is not completely to eliminate the cheating but to limit the number of students who inappropriately pass the exams.**



Reaction from NAAs (TAG meeting)

- **The ECQB is the solution. Until it exists, completely remove the privilege from 147 organisations.**
- **There should be a “proof of need of having the licence” in order to take part on the exams. Many students outside EU only want the Part-66 licence because it is accepted by their authority for aircraft registered in that third country.**
 - If this is not possible, introducing strong limitations would force this people to travel to the approved locations, which will deter them from applying for the licence. Requiring to have the locations approved in advance could be a good solution.