

Approved Training Organizations

EASA Part 147

Part-147 is the fourth element of EC Regulation 2042/2003

For the full implementation of Part-147 however a complete understanding of Part-66 is required.

EASA Part 147

Part-147 is also divided into two sections

Section A – Untitled, but are the requirements for compliance by the Approved Organisations

Section B – Procedures for Competent Authorities

EASA Part 147

Section A

This Section is sub-divided into;

Subpart A – General

Subpart B – Organizational Requirements

Subpart C – The Approved Basic Training Course

Subpart D – Aircraft Type/Task Training

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Section B

This section is sub-divided into;

- Subpart A – General
- Subpart B – Issue of an Approval
- Subpart C – Revocation, Suspension and Limitation of the Maintenance Training Organization approval

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- Approvals are administered by the competent authority.
- *Quote:* For the organizations having their principle place of business located in a territory of a member state, the authority designated by that member state”, will be responsible.
 - *Quote:* “For the organizations having their principle place of business located in a third country, the Agency” is responsible.
 - However the Agency usually designates a member authority to conduct the approval process on their behalf in third countries.

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Training Organizations

There are two types of Training Organization

- Basic Training Organization
- Type Training Organization
(or a combination of both).

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Requirements for an Approved Maintenance Training Organization (MTO)

- Premises appropriate to the training being conducted
- Organization management
- Processes and procedures that define how the training is organized, conducted and controlled
- Personnel to manage, deliver, examine and ensure the quality of the training

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Premises

- All Part-147 approved organizations will require as a minimum office space for management of the organization storage of records and a space for instructors / course developers to produce training material and marking and assessment of examinations.
- A training area will also be required to deliver training

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Premises

- These premises will vary enormously dependent upon the size of the training organization from the smallest organization operated from domestic accommodation to the largest organizations where large training developments teams are in place with dedicated training establishments which are equipped with the latest synthetic training devices such as fixed base and full flight simulators.
- Basic training organizations will also need to demonstrate the ability to deliver hand skills and basic maintenance training

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Management

Part-147 requires the following;

- Accountable Manager
- Training Manager
- Quality Manager

and for larger organizations Examination Manager

With the exception of the Accountable Manager EASA Form 4s should be completed for each person nominated to hold a position stated above.

However.....

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Management

All of the above posts can be held by a single person providing that the requirements of Part-147.A.105 are met.

Again the composition of the management team will be determined by the size and complexity of the organization.

For any basic training organization it would be expected that an individual would hold each of these positions

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Management

- In some very large organizations, the Accountable Manager may delegate the day to day responsibility for running the training organization to a deputy.
- This position is frequently held by the training manager
- In small training organizations the quality audit process (as opposed to the quality management requirement) may be carried out by a third party

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Processes and Procedures

- The Maintenance Training Organization Exposition (MTOE)
 - This document may take any form that the organization deems to meet the requirements.
 - Guidance is included in AMC Appendix 1 but it is not an absolute requirement that this is followed.

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Maintenance Training Organization Exposition

- The MTOE provides a declaration by the Accountable Manager that the approved organization will conduct training in accordance with the requirements of Part-147

- It also contains;

a description of the organization including staff, facilities and scope of approval

the processes and procedures used to deliver training

a description of the quality system

forms used and the analysis of the training courses

demonstrating compliance with Part-66

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Maintenance Training Organization Exposition

- In many cases the Procedures and /or the Training Needs Analysis (TNA) are not included in the MTOE but are held in separate documents.
- If this is the case it is imperative that the MTOE adequately cross refers to the procedures and that there is a robust set of procedures in place to ensure that the competent authority are made aware of any changes to the procedures or TNAs

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Personnel

- Under this heading are the staff that deliver the training, examinations and assessment, and other administrative staff who may organize the report, examination results and maintain records.
- These are really the most important people as they are the ones who deliver the product of good training.
- The training organization must ensure that appropriate support and materials are in place to ensure that they can deliver training as detailed in the MTOE

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Now that we have established what an organization looks like, we will look at the training courses themselves and for that we must return to Part-66.

It is worth amplifying here that all Part-147 training is designed to qualify the candidate for Part-66 licence issue, nothing more.

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Basic training organization conducts training courses for

Category A

Category B1.1

Category B1.2

Category B1.3

Category B1.4

Category B2

Category B3

They may also combine with higher education organisations to deliver approved degree courses.

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The Minimum Basic Training Course comprises of :

Cat A1,A3,A4: – 800 hours of which 30-35% is theoretical.

Cat A2: – 650 hours of which 30-35% is theoretical. Cat B1.1, B1.3, B1.4 and B2:

– 2400 hours of which 50–60% is theoretical.

Cat B1.2: – 2000 hours of which 50-60% is theoretical.

Cat B3 – 1000 hours of which 50–60% is theoretical.

The practical element of the training course is subdivided in order that at least

30% of the practical training is conducted in an actual PART-145 approved maintenance working environment

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The Basic Training course covers the syllabus previously described in Part 66.

It is worth reiterating here that there are significant changes to Modules 11, 12 and particularly 13 (B2 syllabus) and the examination requirements that were introduced for the Category B3 by EC 1149/2011.

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Approved Type Training

- Part 66.A.45 states the requirement for Approved Type Training prior to a Part 66 license being extended with a type rating which is required prior to exercising certification privileges. This applies to all “Group 1” aircraft and those aircraft that the Agency has determined to be complex.
- A Group 1 aircraft is defined as;
complex motor-powered aircraft as well as multiple engine helicopters, aeroplanes with maximum certified operating altitude exceeding FL290, aircraft equipped with fly-by-wire systems and other aircraft requiring an aircraft type rating when defined so by the Agency.

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- Type ratings as listed at AMC Part 66 Appendix 1 may be approved in either the B1, B2 or C categories.
- These courses must follow the syllabus and training level requirement detailed at Part 66 appendix III.
- Conversion courses or part courses may also be approved where there is a need e.g.
An airframe manufacturer who does not necessarily know the engine to the required level 3 depth for course approval.

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Winds of Change II

- One of the major changes introduced by EC 1149/2011 is to formalize type practical training and specifically approve Part-145 organizations to conduct the practical training element of a type training course.

There are many implications here especially regarding access to aircraft which are not owned by the maintenance organization.

- Appendix III to Part-66 has been heavily amended to include minimum training hour requirements for type training courses and provided a syllabus for the practical training element.

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Approval Oversight

- Part-147.B.10(c) requires the competent authority to establish procedures detailing how compliance with Part-147 will be met.
- Paragraph (d) of this rule also requires that all staff involved with approvals must be appropriately qualified and have received training on Annex III (Part-66) and IV (Part-147)

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Approval Oversight

Part-147.B.20 details the requirement for retention of records regarding approval oversight.

How this requirement is met will depend on the procedures adopted by the competent authority

In UK we use two electronic systems to meet EU and national requirements

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Approval Oversight

- Each Approved Organization shall be completely audited for compliance with Part-147 at periods not exceeding 24months.
- This requirement may be achieved in several ways for various reasons. A small organization that have demonstrated robust procedures and standards may be audited only once in the 24 month period but a large organization or one where standards are not consistently met may be audited several times per year.
In UK we tend to audit at least once per year for type training and twice per year for basic training organizations.

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Approval Oversight

Documentation

- The actual documentation used will depend on the procedures established by the competent authority, however one common record is the EASA Form 22, an example of which is given at Appendix III to Part147.
- This is an example only and may be altered, within reason, to meet national competent authority requirements. However if acting on behalf of EASA their form 22 must be used.

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Approval Oversight

Limiting, Suspension or Revocation

There may be times when action needs to be taken against an organization to limit, suspend or revoke their approval. This is rare but some examples may be;

- A nominated instructor is long term sick and a replacement can't be found. In this case the approval would be limited in the appropriate area pending the return of the instructor
- A suspension may be imposed if the approval cannot be met for example if the facilities were lost to fire or flood or confidence is lost in the organization quality

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Approval Oversight

Limiting, Suspension or Revocation

- Where an organization suffers financial failure or a serious non-compliance issue occurs, revocation action may be taken.
- In such cases it is vitally important to ensure that your legal team are aware of the circumstances in order that no breach of legal rights occur.

QUESTIONS?