Part 147 Maintenance Training Organisation Exposition Guidance

CAP 2376

Contents

Section 1- Introduction

1.1 Scope and Applicability

This user guide has been developed by the UK CAA to provide guidance to Maintenance Training Organisations (MTOs) on how to format and complete their Part 147 Maintenance Training Organisation Exposition (MTOE). This document in subject to periodic review and should be reviewed alongside the CAA website and its associated guidance pages.

- The UK CAA is the Competent Authority for MTOs, having their principal place of business located inside the UK, and is responsible for the final approval and management of these organisations.

- This user guide is only applicable to those MTOs whose principal place of business is located inside the UK.

- 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.

1.2 Purpose

This user guide is designed to be used by:

- MTOs - to assist them in the production of their own MTOE. (Initial Approval applications and existing approvals)

- The Competent Authority - as a comparison document for MTOEs submitted for approval during periodic reviews.

1.3 Entry into Force

This User Guide comes into effect 30 days after publication on the UK CAA website, or as indicated in the UK CAA Skywise industry notification.

1.4 Associated Instructions

UK CAA has developed associated instructions (user guides, forms, templates, and work instructions), that detail specific matters, which must be considered as an integral part of this procedure.

A complete listing of these documents, together with their applicability to the MTO is made available on the UK CAA website via the following links:

Part 147 Approvals page.

1.5 Communication

All documents and correspondences between the maintenance organisation and the UK CAA shall be in the English language.

Abbreviations

Abbreviations	
AMC	ACCEPTABLE MEANS OF COMPLIANCE
AMO	APPROVED MAINTENANCE ORGANISATION
MTO	MAINTENANCE TRAINING ORGANISATION
AOG	AIRCRAFT ON GROUND
CAO	CONTINUING AIRWORTHINESS ORGANISATION
CAP	CORRECTIVE ACTION PLAN
UK CAA	UK CIVIL AVAITION AUTHORITY
EASA	EUROPEAN AVIATION SAFETY AGENCY
GM	GUIDANCE MATERIAL
DfT	DEPARTMENT OF TRANSPORT
IORS	INTERNAL OCCURRENCE REPORTING SCHEME
MTOE	MAINTENANCE TRAINING ORGANISATION EXPOSITION
MOR	MANDATROY OCCURRENCE REPORT
OEM	ORIGINAL EQUIPMENT MANUFACTURER
PPB	PRINCIPAL PLACE OF BUSINESS

Section 2 - General Guidance

2.1 Exposition Format & Language

The MOE must be produced in an electronic format, such as a Portable Document Format (PDF), however a printed copy may be delivered directly to the UK CAA for review.

The MOE shall be submitted in the English language and in the case of a multilingual MOE, the English text shall precede the second language.

2.2 Terms of Use

For the purposes of this guidance material, the references to the Exposition document are identified by the following terms:

- 'MTOE Part' is used to identify the main parts of the MTOE (e.g., Part 1 – Management).
- 'MTOE chapter' is used to identify each chapter within an MTOE Part (e.g., MOE 1.3 – Duties and responsibilities etc.).
- 'MTOE paragraph' is used to identify a paragraph within an MTOE chapter (e.g., MOE 1.3.1 – Accountable Manager).

2.3 Structure of the Exposition

The Exposition may be produced in the form of a single document or of several separate documents.

- Single document: The standard MTOE is a unique and complete document. It must contain all the information required to show compliance with the regulation including detailed procedures and detailed quality system procedures.
- Multiple documents: The core MTOE must contain at least the information as detailed in section 1 to 1.11 (Management). The additional material may be published in separate documents which must be referenced from the MTOE (see below).

Associated documentation: The MTOE shall cross refer to any associated procedures, documents, appendices, forms or lists which are managed separately and should be summarized in chap 1.11.

- The associated documents must meet the same rules as described for the MTOE and shall not refer to any other national approval.
- The associated documents, procedures and forms etc. shall be provided to, and be approved by the competent authority (as part of the overall MTOE approval).
- In the case of a referenced document, each MTOE chapter shall contain a concise summary of how compliance to the regulation is established. Note: A simple reference to a separate document is not acceptable.

For MTOE chapters that are not applicable, the Exposition should clearly indicate this.

2.4 Management Control of the MOE

It is essential that the Organisation clearly identifies the edition of the MTOE and subsequent changes to it.

The MTOE 1.11 chapter is intended to detail the methods chosen to identify changes to the MTOE (e.g., issue/revision number, vertical bars, etc.).

Depending on the complexity and needs an organisation, one of the two following possibilities is recommended:

MOE identified by both an Issue number and Revision number.

This option uses two different numbering systems (Issue and Revision number).

Small changes to the MTOE may only require a revision change, however when the organisation makes a change large enough to warrant an issue number change, the revision number will start again from "0".

An organisation may use this technique to delineate between large changes requiring Authority approval (Issue change) and small changes, approved by the organisation under an Indirect approval process (revision change). This capability will be considered on request.

Issue number	Issue date	Revision number	Revision date
1 **(initial)**	1/1/2021	0	1/1/2021
		1	17/2/2021
		2	25/3/2021
2	20/4/2021	0	20/4/2021
		1	10/5/2021
		2	15/6/2021

MTOE identified only by a revision (or issue) number.

This solution requires any change to the MTOE, however small, to be identified by a change of revision (or issue) number. The numbering of the revision (or issue) will start with "0" and increase at each revision.

Revision (or issue) Nr.	Revision (or issue) date
0 **(initial)**	1/1/2012
1	17/2/2012
2	25/3/2012

Note: In either case, the modified text should be clearly identified, e.g., using vertical bars, highlighting the changed text with a specific colour, etc.)

2.5 Exposition Pages Presentation

The MTOE cover page shall include the following, where applicable:

- Title "Part 147 Maintenance Training Organisation Exposition".

- The MTO's approval reference.

- The name of the organisation, as defined on the EASA Form 11 approval certificate.

- The MTO's principal place of business address, telephone, fax numbers and any generic e-mail address.

- The copy number from the distribution list.

Each page of the MOE shall be identified with the following, where applicable:

- Name of the document "Maintenance Training Organisation Exposition".

- The name of the organisation (official name as defined on the EASA Form 11 approval certificate).

- Issue number and issue date of the MTOE.

- Revision number and revision date of the MTOE.

- MTOE chapter (e.g., 1-5).

- Page number.

2.6 MTOE Initial Approval Process

2.6.1 First Submission of the draft MTOE.

The organisation shall submit to the competent authority, a draft MTOE for approval. The Accountable Manager shall sign and date the Corporate Commitment statement (MOE chapter 1.1).

2.6.2 Tracking Changes to the Initial draft MTOE.

The Authority will review the draft MTOE for compliance to Part-147 and any deficiencies will be identified to the applicant.

The MTO shall address the issues and revise the initial draft copy, producing a revised draft to replace it. The MTO shall identify the revision change with one of the techniques detailed in 2.4 of this document.

If further issues are identified, the process will repeat until the draft copy is accepted.
Once accepted by the Authority, the MOE shall be resubmitted, removing all references to 'draft', and replacing with the initial Issue/revision number, as detailed in 2.4 of this document.

2.7 Delegation of Approval

The approval of minor changes to the MTOE, may be delegated by the surveyor to the organisation, when appropriate.

Such delegation will only be granted once the UK CAA has acquired sufficient knowledge of the organisation and confident in the quality assurance System's efficiency. Delegation should not be granted before a first 2-year surveillance cycle was completed.

The delegated approval process, including the definition of minor changes, subject to this procedure, should be described in the Part 1 of the MTOE. The process should include a notification to the surveyor after each change and within 2 weeks of the Exposition being released.

Section 3 – MTOE Structure & Content

Part 0 – Introduction

The following section provides AMC for the contents of a MTOE. The paragraph numbering conforms to that detailed in Part-147.

0.1 Table of Contents

As Applicable.

0.2 List of Effective Pages

See 2.4.1 of this document for details on Issue/revision numbering.

The example below is uses both an Issue number and Revision number and clearly indicated the revision date of each page.

Page nr.	Issue	Revision	Revision	Page nr.	Issue	Revision	Revision Date
		PART 0		121	1	1	01/01/07
001	2	0	01/01/12	122	1	1	01/01/07
002	2	0	01/01/12			PART 2	
003	2	0	01/01/12	201	1	0	19/12/06
004	2	0	01/01/12	202	1	0	19/12/06
005	2	0	01/01/12	203	1	0	19/12/06
006	2	0	01/01/12	204	1	0	19/12/06
007	2	0	01/01/12	205	1	0	19/12/06
008	2	0	01/01/12	206	1	0	19/12/06
009	2	0	01/01/12	207	1	1	01/01/07
		PART 1				PART L2	
101	1	0	19/12/06	L201	1	0	19/12/06
102	1	0	19/12/06	L202	1	0	19/12/06
103	2	0	01/01/12	L203	1	0	19/12/06
104	1	1	01/01/07	L204	1	0	19/12/06
105	1	1	01/01/07			PART 3	
106	1	0	19/12/06	301	2	0	01/01/12
107	1	1	01/01/07	302	2	0	01/01/12
108	1	1	01/01/07	303	1	1	01/01/07
109	2	0	01/01/12	304	1	1	01/01/07
110	1	1	01/01/07	305	1	0	19/12/06
111	1	0	19/12/06	306	1	0	19/12/06
112	1	1	01/01/07	307	1	0	19/12/06
113	1	0	19/12/06	308	1	0	19/12/06
114	1	0	19/12/06			PART 4	
115	1	1	01/01/07	401	2	0	01/01/12
116	1	0	19/12/06	402	2	0	01/01/12
117	1	0	19/12/06	403	2	0	01/01/12
118	1	0	19/12/06			PART 5	
119	1	0	19/12/06	501	2	0	01/01/12

MTOE **Issue 2, Revision** 0 dated **01/01/12**

MTOE internal Review by the Organisation:

Reviewed by: (name, position and signature)	Date: xx/xxx/xxxx

MTOE Approval (to be only used in case of indirect approval):

Indirectly approved by: (name, position and signature)	Date: xx/xxx/xxxx

0.3 List of Issues / Amendment Record of Revisions

This paragraph details the changes made in each Issue or revision change.

Issue number	Issue date	Revision number	Revision date	Revision type (Direct /	Reason for change
1	19/12/06	0	19/12/06	INITIAL	n/a
		1	01/01/07	Indirect	New procedure for cleaning
2	01/01/12	0	01/01/12	Direct	Change of Quality Assurance Manager and extension of the A1

0.4 Distribution List

This paragraph shall list the recipients of copies of the MOE.

Example below:

MOE COPY NUMBER	MOE HOLDER	FORMAT
Copy No. 1	Accountable Manager	Paper/PDF
Copy No. 2	Training manager	PDF
Copy No 3	Examination Manager	PDF
Copy No. 4	Quality Manager	PDF
Copy No. 5	UK CAA	PDF

Part 1 - Management

1.1 Corporate Commitment by the Accountable Manager

This exposition defines the organisation and procedures upon which the UK CAA Part- 147 Organisation approval is based.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published by the UK CAA from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the UK CAA will approve this organisation whilst the UK CAA is satisfied that the procedures are being followed. It is understood that the UK CAA reserves the right to suspend, vary or revoke the PART-147 training system approval of the organisation, as applicable, if the UK CAA has evidence that the procedures are not followed and the standards not upheld.

These procedures are approved by the undersigned and must be complied with, as applicable, whenever knowledge or practical training is being progressed under the terms of the Part-147 approval.

The undersigned fully accepts the duties and responsibilities of Accountable Manager as defined in paragraph 1.3.1 of this exposition.

Signed: ……………….. 			Print: …………………

Dated: ………………… 			Title or position in the company: …………………….

Accountable Manager ………………………

For and on behalf of (quote organisation's name)

If the Accountable Manager is not the highest level responsible of the organisation, the latter must then countersign the statement. In case of large organisations, a letter from their CEO & Board of directors confirming delegated authority will also be required.

Whenever the Accountable Manager is changed it is important that the new Accountable Manager signs the statement at the earliest opportunity as part of his/her acceptance by the UK CAA and at each subsequent revision.

Any modification to the above statement must not alter its intent.

* Note - A new AM signature is required at each revision of the exposition

1.2 Management Personnel

Part 147.A.105

This chapter shall identify the MTO's management personnel by listing as a minimum, the title and names of the accountable manager plus all the persons nominated to hold a managerial position as required by AMC 147.A.105. Their respective deputies should also be identified.

All of the Part 147 elements shall be delegated.

The MTOE chapter 1.2 shall be consistent with chapters 1.4 and 1.5 and shall represent the up to date description of the MTO's management structure.

The following is an example of a MTO's list of management personnel, where the name of the person shall also be added:

Any changes to these persons shall be advised to the UK CAA.

Management personnel List	Delegated Deputy
Accountable Manager	Deputy Accountable Manager
List of Nominated Personnel: • Training Manager • Examination Manager • Quality Manager	• Deputy Training Manager • Senior Examiner • Deputy Quality Manager
List of Managers: • Auditing Manager • Office Manager	N/A

This must be agreed with the CAA prior to implementation

1.3 Duties and Responsibilities of Management Personnel

Part 147.A.105

The duties and responsibilities of all management personnel identified in the MTOE chapter 1.3 must be detailed in this chapter.

The duties of any nominated person may be delegated to another manager within their control.

1.3.1 Accountable Manager

Part 147.A.105(a)

The Accountable Manager is responsible for:

- ensuring that instruction and examinations carried out by the approved organisation, meet the standards required by UK CAA.

- nominating the management staff.

- ensuring that the necessary finance, manpower resources and facilities are available to enable the company to perform the training and examinations to which it is committed under the requirements of Part 147.

- the supervision of the progress of the corrective actions/review of the overall results in terms of quality.

- ensuring the competence of all personnel, including management personnel has been assessed.

- ensuring that any charges are paid, as prescribed by UK CAA i.a.w. the current scheme of charges.

- chairing the annual meeting of management staff to review the overall performance of the organisation.

Any additional duties and responsibilities may be added provided that they do not conflict with those of the other management personnel. Depending on the structure of the organisation some duties may be distributed differently.

1.3.2 Training Manager

Part 147.A.105(b)

The Training Manager will undertake:

- The responsibilities of the UK CAA nominated person.
- The duties and responsibilities of the Examinations Manager during their absence.
- The delegated duties and responsibilities of the Accountable Manager during prolonged absence.

The Training Manager is responsible for:

- ensuring the organisation meets the requirements of PART-147 and the UK CAA.
- selecting, training and developing sufficient staff with appropriate qualifications, as required.
- ensuring all necessary Airworthiness data published by the UK CAA and applicable aircraft manufacturers, is made available to Part 147 staff.
- ensuring that the MTOE and any procedures are kept fully up to date.

- ensuring all changes to the Exposition and associated manuals are notified immediately to UK CAA.

- ensuring sub-contracted staff, including any part time staff conform to the requirements of PART-147 and the training procedures.

- ensuring office accommodation and facilities are available for the management of the planned training and for the use of the training staff.

- ensuring that there are sufficient storage facilities, tools, equipment, materials, and publications available to perform the planned practical tasks.

- ensuring secure facilities are available for the storage of examination papers prior to the examination and for the storage of completed student's answer papers.

- ensuring student and staff records are produced and stored in secure conditions.

- ensuring any person to whom any of these responsibilities are delegated to, is aware of current regulations.

- ensuring corrective action is carried out for the findings of quality audits.

- preparing standard practices and procedures (MTOE, including the associated procedures) in accordance with any associated requirements.

- ensuring all examinations and assessment timetables are coordinated. *(see note below).

- ensuring compliance with the examination question review procedures is as required by PART-66 and/or PART-147 *(see note below).

Note: These duties must be carried out by the training manager if the organisation is classified as small and does not have a dedicated Examinations Manager.

1.3.3 Quality Manager

Part AMC 147.A.105

The Quality Manager is responsible for:

- establishing an independent quality assurance system to monitor compliance with Part 147 and any UK CAA requirements.

- having direct access to the Accountable Manager on matters concerning the quality system.

- implementing a quality audit program in which compliance with all maintenance training procedures is reviewed at regular intervals, in relation to each course within the scope of the organisation. (Including the management and completion of audits and production of audit reports).

- ensuring that any non-compliances or poor standards are raised and assigned to the appropriate manager for actioning.

- management and closure of any non-conformance.

- establishing regular meetings with the Accountable Manager to appraise the effectiveness of the quality system. This will include details of any findings not being adequately addressed by the relevant persons.

- submission of the MTOE and any associated amendments, to the UK CAA for approval.

- issuance/renewal/cancellation of individual authorisations.

- coordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity (EU 376/2014).

- establishing feedback from any maintenance training incidents/issues and feeding these back into the continuation training program.

- assessing subcontractors, working under the quality system.

Note: The quality system is required to be <u>independent</u>, therefore the Quality Manager and the Quality Monitoring Staff are not directly involved in the Part 147 function being audited (e.g., training or examinations and issue of authorisations, etc.).

1.3.4 Examination Manager / Examiner

Part AMC 147.A.105

The Examiner is responsible for:

- the selection of examination questions/papers, appropriate to the particular phase of the training course.
- ensuring the security of all the the questions, examinations and databanks.
- the invigilation of examinations, ensuring that the conditions for examination comply with Annex III, appendix II (for basic training) or appendix III, paragraph 3 (for type training).
- the allocation of examination papers at the beginning of the examination and retrieval on completion.
- marking of the examination papers using acceptable marking standards.
- securing storage of exmaination records for a period as specified in 147.A.125.
- the follow up and rectification of findings required to re-establish the required standards of training, examination or maintenance standards.
- sufficient questions are available to produce the examination papers required to cover the syllabus I accordance with Part 66 Appendix II and III. Questions utilised for progress examinations (phase tests) should not be used in the final examination.
- the security and validity of all examinations are in accordance with the requirements of PART-66 and PART-147.
- all examinations and assessment timetables are coordinated.
- compliance with the examination question review procedures is as required by PART- 66 and/or PART-147

Any additional duties and responsibilities may be added provided they do not conflict with those of other management personnel.

1.3.5 Instructor

Part 147.A.105(c)

The instructor is responsible for:

- Carrying out instructional duties for which they are qualified (type/basic).
- Compiling questions for examination banks for which they are qualified.
- Undertaking responsibilities of invigilator (as per 1.3.7) where they are not involved in the instruction of that particular phase examination.
- Reviewing course material and advising the Training Manager of any updates that are required.

1.3.6 Practical Assessor

Part 147.A.105(c)

The practical assessor is responsible for:

- monitoring and assessing students during pre-set practical tasks and/or hand-skills. This will include handling of tools and calibration equipment.

1.3.7 Invigilator

The invigilator is responsible for:

- ensuring the examination is carried out to the standards as stipulated in Section 2.12 and/or 2.16 of this document.

- reporting to the Examination Manager immediately any incident that may have occurred during the examination.

Note: The paragraphs above should emphasis that the nominated post holders for examiner and/or assessor are responsible for ensuring that all examinations and assessments are carried out to an approved standard and describes the extent of their authority with regard to their PART-147 responsibilities. These duties may be adjusted to suit the requirements of the MTO but should not detract from the requirements of PART-147 or PART-66.

1.4 Management Organisation Chart

The organisation chart shall show the associated chains of responsibility of the nominated persons, identified in Chapter 1.3. When other managers are identified in chapter 1.3 (e.g. Auditing Manager, etc.) they also need to be reflected in the organisation chart to show that they report through a nominated person and ultimately to the Accountable Manager.

The Organisation chart needs to be consistent with the MTOE chapters 1.3 and 1.4 and shall represent the up to date status of the MTO's management structure.

The following is an example of a Part 147 Approved Maintenance Organisation structure :
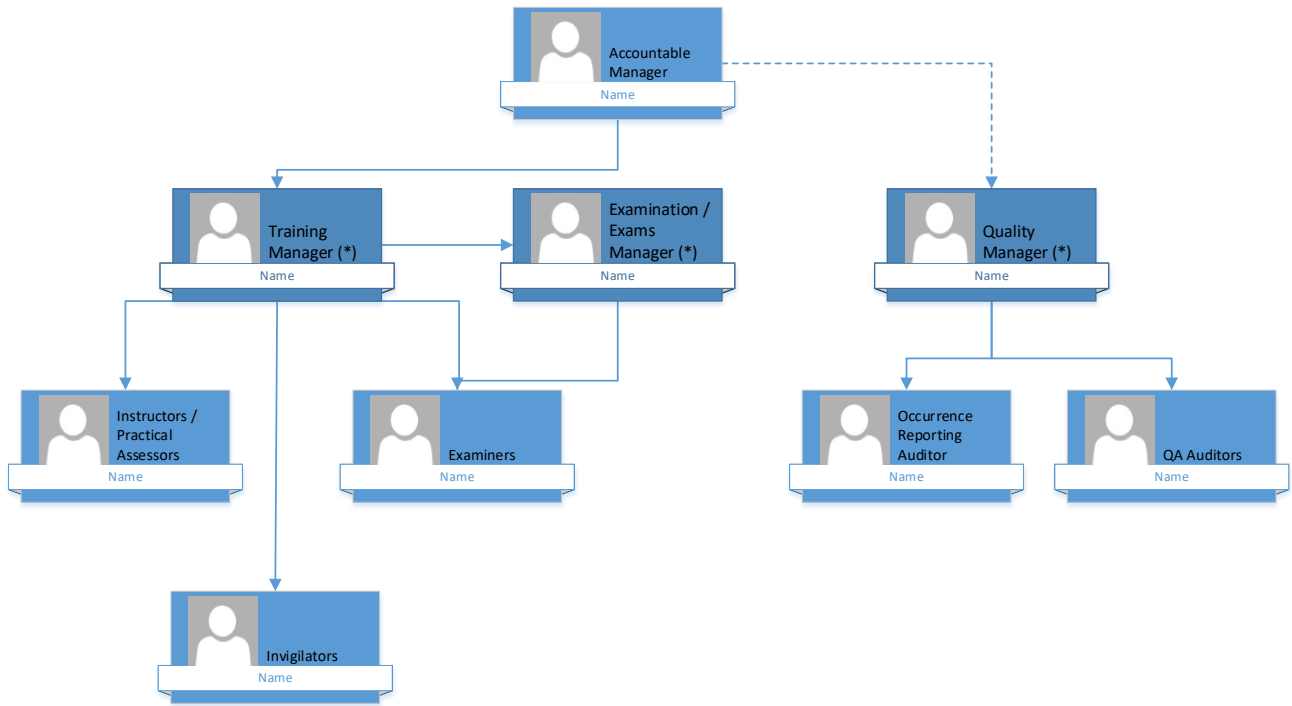
(*) Form 4 position

1.5 List of Instructional, Examination and Assessment Staff

Part 147.A.105(g)

This paragraph should indicate the number of people dedicated to the performance of the approved training activity. Where an organisation holds a number of different approvals, it is not necessary to state the number of employees of the whole company, only the number of those involved in training.

This could be presented as follows:

Appointment	Name	Competency
Training Manager Deputy Training Manager Quality Manager Examination Manager Examiner Examiner/Instructor Instructor Instructor Instructor Instructor/Invigilator Invigilator Practical assessor		Detail the specific tasking each person is qualified to carry out. E.g., B1, B2, T1, T2, Theory and Practical – Beoing B737 etc.

1.6 List of Approved Locations

Part 147.A.100

This paragraph shall list those address(s) at which instruction and/or practical training are to be carried out for the duration of the PART-147 courses. The MTOE should also detail the names, address(s) and approval numbers of any proposed Aircraft Maintenance PART 145 Organisation at which it is intending to carry out practical training.

- Principal Place of Business (PPB).

The PPB is the head office or the registered office of the organisation within which the principal financial functions and operational control of the activities, referred to in Part 147 regulation, are exercised.

The PPB is the address which will be included in the Form 11 approval certificate together with any 2nd site address(es).

- Postal (surface mail and e-mail) address.

The postal address of the maintenance training organisation to be used by UK CAA for formal mail communication needs to be clearly identified.

To ensure an efficient and stable communication channel between UK CAA and the MTO, the organisation shall create a generic email address (without reference to a family name) to be used regardless of any future personnel changes.

1.7 List of Sub-Contractors

This paragraph should list the address of any 3rd party organisation, at which training beyond the capacity of the MTO, may be carried out.

PART-66 Modules 1 to 6 inclusive and 8 to 10 inclusive, may be sub-contracted to organisations not specialising in aircraft maintenance and where the PART 147.A.200 practical training element does not apply.

1.8 Facilities

Part 147.A.100

This paragraph shall detail the general description of the facilities listed in 1.6 and include the layout of the rooms. Photographs may be inserted to demonstrate this.

1.8.1 Library

Part AMC 147.A.100(i)

This paragraph shall detail the general description of the library including access to copies of all Parts and national aviation legislation, examples of typical aircraft maintenance manuals and service bulletins, Airworthiness Directives, aircraft and component records, release documentation, procedures manuals and aircraft maintenance programmes.

1.9 List of Courses

Part 147.A.05

This paragraph must contain a list of the PART-147 courses for which approval is held. This should also include differences courses for example, *Airbus A319/320/321 (CFM 56) B1 - differences to A319/320/321 (V2500) B1.*

Example:

Rating	TC holder	Aircraft Model	CAT A	CAT B1	CAT B2	CAT B1 & B2 (combined)	CAT C	Differences Courses (from / to)
T1	Airbus	A319/320/321 (CFM56)		✔				A319/320/321 (CFM56) To A319/320/321 (V2500)
T2	Boeing	B757-200/300 (RB211-535)			✔			
T3	Textron	Beech 300 (PWTC -6A)	✔					
T4	Airbus	Airbus A330 (RR Trent 700)				✔		

1.10 Notification of Changes to the Organisation's Approval

Part 147.A.150

UK CAA approval is based on the management, organisation, resources, facilities and scope of work described in Part 1 of the Exposition. Any significant change may therefore affect the conditions under which the approval was granted. This chapter is intended to show the process to be used by the Organisation to notify the competent authority of any change affecting the approval.

The procedure shall define the changes to be notified directly to UK CAA using a revised MTOE that can be notified directly to apply@caa.co.uk

Type of change		Examples of change	MTOE Approval process (1.11)		Documentation to be provided (1.10)
			Major Amendment	**Minor Amendment**	
			Direct Approval (UK CAA Approval)	**Indirect Approval** (maintenance training organisation approval and assigned inspector acknowledgment)	**To UK CAA @ apply@caa.co.uk and Assigned Surveyor in cc**
ADRESSES	Change of Organisation Name		x		Online Application + Certificate of Incorporation MTOE & associated documents as applicable
	Change of postal address of the registered organisation without any change of the maintenance			X	MTOE & associated documents as applicable
	Change to the locations/facilities of the maintenance training ganisations with or without amendment to the scope or capability	• PPB address change; • Address change of any training site already approved; • Additional or cancellation of maintenance sites • Modification, extension, reduction or reorganisation of an approved training location. (i.e. Addition of an office or classroom within the approved facility).	x		Online Application +Certificate of Incorporation in the case of PPB change MTOE & associated documents as applicable
	Expansion or transfer of offices / storage facility layout			X	MTOE & associated documents as applicable;

	Type of change	Examples of change	MTOE Approval process (1.11)		Documentation to be provided (1.10)
			Major Amendment **Direct Approval** **(UK CAA** **Approval)**	**Minor Amendment** **Indirect Approval** (maintenance training organisation approval and assigned inspector acknowledgment)	**To UK CAA @ apply@caa.co.uk and Assigned Surveyor in cc**
PERSONNEL	Change of Nominated post holders identified in the MTOE 1.3	Change of the Accountable Manager, Training Manager or other Form 4 holders identified in the MTOE	x		• Online Application • Form 4 • MTOE & associated documents as applicable; • Form 4
	Reduction or increase of the instructional staff number when the variation: • Is more than 10% of the total staff number declared in the MTOE 1.5 or; • Is affecting the approval. Reduction or increase of the instructional staff number when the variation: • Is less than 10% of the total staff number declared in the MTOE 1.5 or; • Is affecting the approval **Note: permanent and contracted staff**	• Reduction of staff when the nucleus of permanently employed staff is insufficient to support scope	x	x	MTOE & associated documents as applicable
CAPABILTY	Reduction or increase of the scope of work or scope of approval	• Addition/removal of a Type or Course; • Addition of a new Type to the scope of approval; • Addition of differences course associated to an A/C type/model inside a rating already approved.	x		• Online Application • MTOE & associated documents as applicable

Type of change.		Examples of change	MOE Approval process (1.11)		Documentation to be provided (1.10)	
			Major Amendment	*Minor Amendment*	*To UK CAA @ apply@caa.co.uk and Assigned Surveyor in cc*	
			Direct Approval *(EASA Approval)*	*Indirect Approval (maintenance organisation approval and assigned inspector*		
PROCEDURES	Any change to the procedures that could affect the approval.		*X*		MTOE & associated documents as applicable	
	Change to the MTOE and its associated procedures/lists called out in the MTOE 1.11 that do not affect the approval.	• Instructional Staff list • List of contracted organisation • List of subcontractors • List of internal forms • MTOE typing errors		*X*	Revised MTOE andsupporting documentation MTOE & associateddocuments as applicable	

In addition, this procedure shall also detail:

- When to notify the change.
- How to notify the change (using the online application or not).
- Who in the MTO is in charge of the notification.
- Where to send the notification.

1.10.1 Management of Change with the Assigned Surveyor

Once a change has been notified, the MTO shall detail how the related change is internally managed, using either direct or indirect apporval, as per the table in Section 1.10:

- Internal audit by the Quality system.
- Composition of the package associated to any of the changes listed above (e.g. MTOE, internal audit, Certificate of Incorporation, Form 4, etc.).
- Who is the Nominated Post holder in charge of monitoring the change with the assigned Surveyor.

For initial approval and changes listed above, the organisation shall carry out an internal audit in accordance with its MTOE 3.1 audit procedure, prior to the audit by the UK CAA. This audit will confirm that processes, areas, activities and personnel subject to the application have been reviewed and audited showing satisfactory compliance with all applicable Part 147 requirements. The relevant audit report together with a statement of compliance form signed by the Quality Manager, shall be provided to the assigned Surveyor.

1.11 Expostion Ammendment Procedures

The Training Manager is responsible for reviewing the MTOE on a regular basis and amending if necessary, this includes the associated procedure manuals, and the submission of proposed amendments to the assigned Surveyor responsible for the oversight.

1.11.1 MTOE Amendment.

This procedure shall address the Exposition amendment procedure.

- Identify the person responsible for amending the Exposition.
- The definition of minor & major amendments to the Exposition and related approval process.
- The definition of criteria for new issue and/or revision (depending on the MTOE revision numbering system adopted as described in this guide).
- The record of the Part-147 approval certificate changes against the approval of the MTOE and subsequent amendment shall be described and include:
  - The approval letter from the competent authority as applicable.
  - The PART 147 approval certificate and/or appendix amendments following evolution of the scope of activity and/or evolution of the locations and/or a new issue of the MTOE.

1.11.2 Associated Procedures, Lists and Forms.

The organsition should reference the procedures that are to be considered in the table below, which are therefore an integral part of the Exposition.

This procedure shall address as a minimum:

- Summary table of associated procedures and lists:

Example:

Type of Document	Document reference	Indirect approval*	Approved by*	Minor amendment scope to which any indirect approval is limited
MTOE	MTOE-01	x	UK CAA	As defined in Section 1.10
Associated Procedures Manual (if used)	APM	x	Quality Manager	Typing errors
Instructional staff and Support staff list	AMO-DOC-1	x	Quality Manager	Addition/removal of Instructional Staff
List of Subcontractors	AMO-DOC-3	x	Quality Manager	Addition/removal of a subcontractor
List of Additional Locations/2nd Sites	AMO-DOC-4		UK CAA	

Note: When an indirect approval is granted, it is important that the chapter 1.11.3 describes the limits of the indirect approval privilege. Even if a document is subject to indirect approval, in the case of a change affecting the scope of work this document shall be approved by UK CAA.

1.11.3 Approval Process

In the case of a minor amendment, the Quality Manager may be delegated for indirect approval, provided the appropriate procedure is approved by UK CAA. Such a delegation is to be based upon the ability of the Quality System to deal adequately with the requirements of Part 147.

This privilege cannot be demonstrated at the time of an initial approval, therefore, an Indirect Approval procedure / Remote site / Distance Learning privilege, cannot be detailed in the MTOE before the first 2 year operating period has been completed.

Direct approval:

• The procedure shall describe the process to obtain approval from the competent authority. It should also take into account the application process and internal review/audit of the proposed changes, as well as a verification of continued compliance.
• The UK CAA will approve these changes.

Indirect approval:

• This privilege may be granted by the UKCAA on application.
• The list of documents for which an indirect approval privilege is granted shall be listed in the table provided in paragraph 1.11.2
• For each of the above mentioned documents, the procedure shall include:

- o Definition of minor & major amendments. In particular, the limits of changes that can be indirectly approved for each document (minor amendments).
- o The person responsible for the internal approval of the related documents (may be directly identified in the table provided in paragraph 1.11.2, refer to the example).
- o The notification of such approval to the competent authority.
- o The record of such indirect approval.

Part 2 Training and Examination Procedures

2.1 Organisation of Courses

Part 147.A.200, 147.A.300

In this paragraph the organisation should detail the procedures used for the planning and control of training courses, such as internal IT systems etc.

2.2 Preparation of Course Material

Part 147.A.120

Course material inlcudes any documentation required to manage the students and any appropriate examination documenation.

Training material includes any documenation used to facilitate learning of the subject matter and should meet the requirements of PART-66.

This paragraph shall detail how this material is sourced, controlled and diseminated to the students. It will be sufficiently detailed so that those creating the training material, understand the standards expected by the MTO and the particular requirements of Part-66, such as the training levels.

It will also detail how the MTO updates its course/training material. This may require the amendment of the course Training Needs Analysis (TNA) , which will require prior approval by the UKCAA.

2.3 Preparation of classrooms & equipment

Part 147.A.115

The MTO shall detail any procedures for the specific content and preparation of classrooms and reporting of faults to any classroom equipment, general maintenance procedures and the control of the teaching environment. This paragraph will establish the standards for the training environment.

2.4 Preparation of workshop/maintenance facilities & equipment

Part 147.A.115

Similar to the preparation of the classrooms, the MTO shall detail any procedures for the control of the workshop enviroments. It may also detail the procedures for the control of aircraft spares and consumables used in the production of practical tasks. Test equipment and/or tooling requiring calibration may require a control procedure.

2.5 Conduct of Basic /Type Knowledge & Practical Training

Part 147.A.200, 147.A.300

The MTO should describe the methodologies utilised in teaching the Basic/Type knowledge and practical training courses for which the organisation is approved.

2.6 Records of Training

Part 147.A.125

Cross refer to procedures for the production, maintenance and security of student files.

This paragraph shall detail the minimum contents of training records, to facilitate later oversight events. These may include the following as examples:

- Details of student attendance.
- Examination documentation.
- Details of the training material.
- Practical training records and assessments.
- Course records indicating training dates and Instructor details.

There may also be the Basic work experience records, required by Basic training student whilst undergoing 'live aircraft' training. The use of an Aircraft Maintenance Engineers Log Book may be used.

2.7 Storage of Records

Part 147.A.125

Cross refer to procedures for the storage of staff and students records. These may be electronically based provided that adequate safeguards are in place to prevent unauthorised access and alteration.

- Records may be retained in paper copy, digitally or a combination thereof. This will be sampled during the annual Audit.
- Records must be retained indefinitely.

2.8 Training at Locations not listed in paragraph 1.6.

Part 147.A.145(c)

Should the Maintenance Training Organisation wish to contract out part of the practical training (not including live operating aircraft experience), control procedures must be in place. These procedures should effectively reflect those of the UK CAA in auditing the PART-147 Organisation.

Any training carried out at address not listed at 1.6 above must be approved by the UK CAA and control procedures must be in place to ensure that the proposed contract organisation is in compliance with the requirements of PART-66 & PART-147.

A contract must be in place with the proposed organisation in which it is agreed that access is granted to the UK CAA for the purpose of Audit.

Organistions must declare if they wish to hold either of the following privileges:

- Remote Site Privilege (See Section 1.3 Approval Process Section).
- Distance Learning Privilege (See Section 1.3 Approval Process Section).

For further guidance, see CAP 1933 for Distance Learning

Note: the SRG 1019 should be completed in support of this and submitted to apply@caa.co.uk

2.9 Organisation of examinations

Part 147.A.135

This section of the MTOE should detail the applicable elements of the requirements below. It should clearly indicate the standards expected and the appropriate training levels to be attained.

- For a Basic training, refer to Annex III (PART-66), Appendix II, paragraph 1.
- For aircraft type training, refer to Annex III (PART-66), Appendix III, paragraph 4.

2.10 Security & Preparation of examination material

Part 147.A.135(a)

This paragraph should detail the preparation and security of Examination papers. Particular attention should be made to the storage and transportation of the examination between venues and whilst onsite. Care must be taken to ensure the examination questions are secure at all times.

There may be a requirement for differing procedures, for example where remote site training is being held abroad, as opposed to being at the MTO's primary training location.

2.11 Preparation of examination rooms

Part 147.A.135, 147.A.205 & 147.A.305

This section shall detail the standard expected by the MTO, for the examination venue. It should clearly indicate this standard in a way that the Instructor or Invigilator can readily prepare the eaxm venue in a consistent manner. This procedure should take into account any security arrangements for the exam papers.

A check sheet may be used to assist in attaining this standard.

2.12   Conduct of examinations

Part 147.A.135, 147.A.205 & 147.A.305

This section will detail the procedures for conducting the exam, with regard to how the students are organised during the event. Typical items to consider are:

• Candidates should only be identified by a numbering system, the only identifying document being held by the nominated Examiner.
• The procedure should include, checking that all the pages of each examination paper are present at the completion of the exam, and that all examination papers are accounted for.
• Both the written element and the multi-choice question element should be marked to 75% with no penalty marking. Ref Annex III(PART-66), Appendix II.
• Other than the actual examination/answer paper, no personal items should be permitted to be on the candidate's desk.
• All wall charts and/or other visual teaching aids should be removed from the examination room.

Note: Any student found during a knowledge examination to be cheating or in possession of material pertaining to the subject of the examination, other than that supplied for the examination, will be disqualified from passing the examination and may not then retake the examination for at least 12 months.

Any examiner/invigilator found to be providing answers to examination questions to any student will be immediately disqualified from acting as an examiner/invigilator, and the UK CAA must be informed within 1 calendar month.

2.13   Conduct of Basic/Type practical assessments

Part 147.A.210 & 147.A.305

This section will detail the procedures for the assessment of student hand skills during basic training courses and practical knowledge assesments during type training. This procedure shall include considerations for health and safety and any regulatory requirements of 3rd parties, such as a Part-145 organisations hosting a practical type training event.

See CAP 1529 for the Practical Training Guidance

2.14   Marking and records of examinations

Part 147.A.135, 147.A.205 & 147.A.305

Detail procedures for the marking of completed examination papers and the recording of results.

Cross refer to a procedure for practical assessments and recording of results.

2.15 Storage of examination results

Part 147.A.125

The details in 2.10 should be taken into account when storing examination results.

A copy of each examination paper, the student number/identification list, a practical task results list, an examination results list and all examination papers for each complete module must be stored for an unlimited period.

Electronic means of storage may be utilised where available, providing that suitable security arrangements are in place.

2.16 Exams at locations not listed in paragraph 1.6

Part 147.A.145(a)

This section shall detail the control procedures particular to remote site training. The venue shall comply with the requirements of 2.10, 2.11, 2.12, 2.13, 2.14 and 2.15 above. Particular consideration of the security/control of examinations and their completed examination papers and/or practical assessment results, shall be made.

2.17 Preparation & control of Basic/Type Training course certificates

Part 147.A.145

The certificates should be prepared to reflect that illustrated in Annex IV (PART-147) appendix III and tightly controlled prior to issue, with a system in place to ensure that each copy is numbered as part of a sequence and recorded as issued to a candidate by name.

This will include control procedures for the issuance of replacement certificates.

2.18 Control of sub-contractors

Part AMC 147.A.130(b)

This paragraph shall detail the controls placed on sub-contractors and shall focus on the communication of expected standards and the security of documentation. It should also detail or make reference to, internal oversight schedules.

When training or examination is carried out under the control of a sub-contractor, a pre audit procedure should be established whereby the MTO should audit to determine whether the Sub-contractor's services meet the intent of Part-147. A renewal audit should be performed at least once every 12 months to ensure continuous compliance with the Part-147 standard. The sub-contract control procedure should record audits and to have a corrective action follow-up plan in place.

2.19   Occurrence Reporting

376/2014

The MTO should detail how they handle occurrence reporting within their organisation, with respect to Mandatory and Voluntary occurrence reporting, as required by [EU 376/2014.](EU 376/2014.)

Note: If part of a larger organisation, holding other UK CAA approvals, for example Part 145, then reference to an existing procedure will be sufficient.

2.20   Certificate Templates

Appendix 1 to Annex IV (Part 147)

This section should show an example of the Certificate of Recognition, to be issued on completion of the course.

Please refer to Part-147 for the latest version of the Certificate of Recognition.

CAA Form 148

CAA Form 149

Part 3 Training System & Quality Procedures

3.1 Audit of Training

The Approved Organisation should develop an audit plan to demonstrate that all the requirements of Part 147 will be covered during the audit phase. The audit plan may be split into separate audits to cover specific events such as examinations, training or administration. Each audit may be shown against a timetable, to indicate when the particular audit is scheduled. A complete audit of the PART-147 organisation must be completed every 12 months.

The MTO shall detail the various procedures required for; the conduct of audits, the reporting and controlling of findings, and interactions with the competent authority or the MOR/internal reporting processes.

Cross referring to a quality procedures manual is permitted, but this system must relate to and make references to the relevant PART-147 paragraphs.

Definition of the Quality System:

- Independence of the quality compliance monitoring staff (e.g. quality auditor)

- Access to Accountable Manager

- Composition and functions of management quality group

In a small maintenance training organisation, the independent audit function may be contracted to another approved MTO or a competent person acceptable to the CAA. Where the small training organisation chooses to contract the audit function it is conditional on the audit being carried out <u>twice</u> in every 12-month period with one such audit being unannounced.

A large training organisation (an organisation with the capacity to provide training for 50 students or more) should have a dedicated quality audit group whose sole function is to conduct audits, raise finding reports and follow up to ensure that findings are being rectified. For the small training organisation (an organisation with the capacity to provide training for less than 50 students) it is acceptable to use competent personnel from one section/department not responsible for the function or procedure to check the section/department that is responsible subject to the overall planning and implementation being under the control of the quality manager.

The management control and follow up system should not be contracted to outside persons.

TABLE 1 – audit matrix (Subject matter- Regulatory reference- Exposition- Functional areas)

Subject Matter	Regulation/User Guide reference	Exposition	FUNCTIONAL AREAS					
			Training Facility	Second Site	Quality	Remote Site	Subcontracting	…
Facilities	147.A.100(a)	1.8	X	X		X	X	…
	147.A.100(i)	1.8	X	X		X	X	…
	…	…						…
Personnel	147.A.105(a)	1.2			X			…
	147.A.105(c)	1.5, 2.18	X	X	X	X	X	…
	…	…						…
Record Keeping	147.A.125	…	X	X		X	X	…
	…	…						…
Instructional staff	147.A.105(a)	1.5, 3.6	X	X	X			…
	…	…						…
Training Material	147.A.120(a)	2.2	X	X		X	X	…
…	…	…	…	…	…	…	…	…

TABLE 2 – audit plan

OPERATIONAL AREA	FUNCTIONAL AREA	Planned	Completed	Remarks
Training Facility	Training	mmm yyyy	dd mmm yyyy	
Second Site location 1	Training	mmm yyyy	dd mmm yyyy	
Remote Site location 2	Training	mmm yyyy	dd mmm yyyy	
Quality	Quality	mmm yyyy	dd mmm yyyy	
Subcontractor (External Provider)	Subcontracting	mmm yyyy	dd mmm yyyy	
Type Course (A320)	Training	*unannounced*	dd mmm yyyy	
Basic Course Module 10	Training	mmm yyyy	dd mmm yyyy	
………………		*……………….*	*………………*	

3.2 Audit of Examination

Part 147.A.135

This chapter must describe the procedures related to the audit of examinations. Examinations must be audited annually but may be part of the rolling audit procedure. The scope of this audit must cover all the elements of creating, securing and delivering the exam.

3.3 Analysis of Examination results

Part 147.A.135 & 147.A.210

Examination results shall be analysed after each examination to determine whether the examination holds to the standards set by Part-66. The process detailed here, shall show who is responsible for this activity and how the results of this analysis are managed – refer below for remedial actions.

3.4 Audit & Analysis remedial Action

Part GM 147.A.130(b)

This section should include a policy for the removal or correction of questions, in the exam question database, and ensure the continued compliance with the standards, set by Part-66.

Where alterations to the final pass mark are required, this section will detail the processes for its implementation and the policy for examination re-takes.

3.5 Accountable Manager Annual Review

Part GM 147.A.130(b)

The following points are suggested as a minimum, to be reviewed with the management team:

- Review of the Quality system overall results.
- Projects requiring financial support.
- Staffing levels and organisation review.
- Student acheivements.
- Student Support.
- Examinations and assessments.

The AM review must be recorded via meeting minutes.

3.6 Qualifying the Instructors

Part 147.A.105

This section shall detail the induction process for Inducting Instructors and the minimum standards to be met. It shall detail the documentation to be completed and held for each Instructor.

These procedures may include provisions for the employment of part time or contract instructors, however the minimum standards shall still apply and all staff should have an appreciation of the contents of PART-66 and PART-147.

Procedures will include details for staff development and continual assesment of competence.

See CAP 1715 for further guidance on competency assesment

Further guidance for the qualification of Part-147 staff is available in CAP 1528 and CAP 1742 continutation training guidance.

3.7 Qualifying Examiners & Assessors

Part 147.A.105 & 147.A.110

This section shall detail the induction process for Inducting Examiners and Assesors and the minimum standards to be met. It shall detail the documentation to be completed and held for each Examiners and Assesors.

All Examiners and Assesors stall be able to demonstrate an appreciation of the contents of PART-66 and PART-147.

Procedures will include details for staff development and continual assesment of competence.

See CAP 1715 for further guidance on competency assesment

Further guidance for the qualification of Part-147 staff is available in CAP 1528 and CAP 1742 continutation training guidance.

3.8 Records of Instructors, Examiners & Assessors

The company must maintain a record of all training staff which must include details of the scope of their authorisation. Training staff must be provided with evidence of the scope of their authorisation.

The following minimum information should be kept on record in respect of each instructor:

• Name.

• Date of Birth.

• Personnel Number.

• Experience.

- Qualifications relevant to the approval.

- Training History (before entry).

- Training (Basic Training, Type Training, Continuation Training) Scope of activity.

- Date of first issue of the authorisation.

- If appropriate – expiry date of the authorisation.

- Starting date of employment.

The records may be kept in any format (hard copy or computer based) subject to the usual security requirements.

Persons authorised to access the system should be maintained at a minimum to ensure that records cannot be altered by unauthorised persons (In line with current GDPR requirements).

The authorisation document should be in a style that makes its scope clear to instructors and any authorised person that may be required to examine the document. Where codes are used to define scope, an interpretation document should be readily available.

Instructional staff are not always required to carry their authorisation document but should be able produce it within a reasonable time, when requested by an authorised person such as the UKCAA (within 24 hrs).

3.9 Quality Audit Personnel 147.A.130(b)

This chapter must describe how the Quality system personnel are managed and qualified with respect to their:

- experience and competence (professional background and minimum number of audits performed under supervision).
- training including audit techniques, regulations, MTOE and continuation training.
- specific experience and/or technical training in order to be authorised to audit specific areas or to cover specific audit functions, as applicable to the organisation (e.g. Lead auditor, etc.)
- scope of authorisation for auditors (e.g. Product auditor, System Auditor, NDT auditor, etc.)
- authorisations issue, extension, renewal or withdrawal procedures.

Note: With repsect to Section 3.6, 3.7 and 3.9 the competence assessment process for the issue, extension and renewal of a Part 147 Authorisation is expected to be described in each of those respective sections. The organisation may chose to refer to a single company competence procedure / process, if the organsiation hold more that one approval.

Further guidance for the qualification of Part-147 staff is available in CAP 1528 and CAP 1742 continutation training guidance.

Part 4 Appendices

Contents

4.1 Example of documents and forms used

As applicable.

4.2 Syllabus of each training course (Course Approval Forms)

As applicable. (Contact your allocated Surveyor for the latest version of these forms)

(*Once completed and approved, the approved SF (course approval) form should be listed in this section*).

4.3 Cross reference index

As applicable.