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MAINTENANCE TRAINING PROGRAM/RECORD

1. OBJECTIVE

Inspections recently carried out by Department of Civil Aviation revealed that Air Operator Certificate's holders are not seriously following requirements with regard to training of their employee performed maintenance on their aircraft. DCA has clearly laid down the training requirements in the MCARs. Any clarifications sought on the applicability of these requirements should be referred to Airworthiness Division. This Notice provides guidance for establishing and performing an operator's maintenance training program.

2. GENERAL

2.1 Effective training is the basis for a successful maintenance program. Although many procedures for maintaining and inspecting aircraft may be similar, the equipment, procedures, and task documentation used may all be unique to the operator's specific programs.

2.2 DCA requirements normally require that maintenance be performed in accordance with the operator's manual.

2.3 Maintenance training programs are the most efficient manner to inform personnel of the requirements of the operator's program.

3. COORDINATION REQUIREMENTS AND SCHEDULING

Airworthiness Inspectors (AWIs) may encourage applicants to discuss pending maintenance training program development with the Air Operator or Maintenance Organization certification team before the program is submitted for final acceptance. It is especially important that programs be reviewed for conformity with appropriate MCAR. This review can reduce the number of major changes an operator will have to make after a program has been printed and distributed.

4. SCHEDULING MAINTENANCE TRAINING PROGRAMS

Delays in training program acceptance may result delays in the Air Operator or Maintenance Organization certification process. To facilitate the evaluation of the training programs, the applicant should be encouraged to schedule a classroom training session in a timely manner.

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5. CONTENT OF MAINTENANCE TRAINING PROGRAMS

The operator's training program should include company indoctrination and technical training (formal and on the job training). The program should contain a list of tasks to be taught and a method for recording the training. Completion of the training must be entered in the individual's training record. Without company indoctrination and technical training, the employee cannot perform maintenance on aircraft. Each maintenance employee should receive above mentioned training within one year of appointment.

5.1 Company Indoctrination. Each maintenance employee should receive instruction in the use of the operator's manuals, policies, procedures, and forms.

5.2 Maintenance Technical Training

5.2.1 Training may consist of a combination of formal (classroom) instruction and on the job training. The operator may give training credit to individuals for experience gained while employed by other operators, after getting relevant sound documented evidence.

5.2.2 Procedures unique to the operator should be taught. Training records should indicate the amount of formal training, on the job training, and experience each individual receives.

5.2.3 Technical training may be contracted to another operator, manufacturer, or in the case of a specialized process, to a person knowledgeable in that specialized process. The operator is responsible for the content and quality of such training.

5.2.4 The DCA does not establish a fixed amount of time for indoctrination or technical training courses, but should use a minimum time not less than 6 months which must be proportional to the operator's complexity.

5.3 Responsibilities for persons other than an Operator's employees.

DCA normally require each certificate holder to be primarily responsible for having a training program and ensuring that the training received throughout the operator's system is of equal quality and effectiveness. This covers all persons such as the certificate holder's employees, contract personnel for emergency maintenance and servicing, etc.

5.3.1 Each certificate holder or person who performs maintenance shall have a training program to ensure that each person, including inspection personnel, is fully informed about procedures, techniques, and new equipment in use and is competent to perform the applicable duties.

5.3.2 No person may use any person to perform duplicate inspections unless the person performing the inspections is appropriately certificated, properly trained, qualified, and authorized to do so.

NOTE: a person can be defined as an individual, firm, partnership, corporation, company, association, joint stock association, or governmental unit.

5.4 Category II/III Airborne systems and equipment Maintenance Personnel Training. Each operator for Category II/III must establish an initial and recurrent training

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program. This program must be acceptable to the DCA and cover all personnel performing quality control inspection and maintenance work on Category II/III airborne systems and equipment. Training records for such personnel are to be kept current and made available to the DCA for inspection.

5.5 Recurrent Training. The operator's training program should ensure that deficiencies discovered through continuous analysis and surveillance and/or reliability programs are corrected during recurrent training. Additionally, recurrent training should include at least the following:

a) Review, reinforcement, and upgrading of all training given in both indoctrination and technical subjects

b) Input from maintenance bulletins and/or maintenance newsletters

c) Critical tasks, such as run-up/taxi, Duplicate Inspections, and Nondestructive Inspection (NDI)

5.6 Training Records. Training records must be retained by the operator to document that personnel are adequately trained. Training records should be maintained at a central location, but may be maintained at other locations provided these locations are listed in the operator's manual.

5.7 Special Emphasis Training. Special maintenance training programs are required when new or different types of aircraft and/or equipment are introduced.

6. ACCEPTING THE MAINTENANCE TRAINING PROGRAM

The task of acceptance differs from approval in that no specific procedure or vehicle is used to accept a training program. The program is approved by the Accountable Manager upon acceptance by the DCA. A list of effective pages will show acceptance date of the maintenance training program.

7. PROCEDURES WHICH WILL BE USED BY AIRWORTHINESS INSPECTORS DURING AUDITING OPERATOR'S TRAINING PROGRAMS

7.1 Review Operator File.

7.2 Review Schedule of Events. If this task is performed as a part of an original certification, review the Schedule of Events to ensure that this task can be accomplished in accordance with the schedule.

7.3 Review Maintenance Training Programs. The program should include the following elements in the Maintenance Training Program:

a) The name of the person responsible for the overall administration of the maintenance training program.

b) The name(s) of the person(s) responsible for other processes within the maintenance training program (e.g., recordkeeping, revisions to training programs, and security of the program)

c) Designated maintenance training instructors

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d) A description of how instructors are determined to be qualified

e) Procedures used to authorize instructors

f) A file on the instructors consisting of qualifications, authorizations, and other documents pertaining to instructor assignments

g) A list describing what type of training is required for new employees (Indoctrination, on the job training, etc.)

h) Procedures for evaluating, crediting, and documenting a new employee's previous training

i) Procedures for determining what additional training is required for a new employee

j) A schedule for recurrent training, a description of recurrent training, and procedures for determining requirements for other training

k) Recordkeeping procedures, including records of the following:
   1) Training dates
   2) Who performed the training (instructor should indicate by signing)
   3) The number of hours of training performed
   4) The content of the training performed

l) Criteria for determining the quality of the training program (training standards)

m) Evaluation of the need to revise training programs

n) A training syllabus that describes the following:
   1) Content of each training course
   2) Format of training (classroom, on the job training)
   3) Duration of training courses
   4) Standards for grading students
   5) Training aids

o) Criteria to determine acceptability of contract training, to include:
   1) Qualifications of instructors
   2) Criteria to establish appropriateness of reference material being taught
   3) Reporting procedures to inform operator of student progress
   4) Criteria to determine adequacy of facilities Criteria to evaluate contractor's training syllabus.

7.4 Observe Operator Performing Training. This observation is performed regardless of whether the operator performs the training or contracts with another company.

a) Ensure that facilities are adequate, including classrooms, training aids, and reference materials.

b) Evaluate the instructor's presentation and knowledge.

c) Ensure that course content and instruction is in accordance with the training syllabus.

d) Ensure that training recordkeeping is performed in accordance with maintenance /RII inspection program.

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7.5 Analyze Findings. Evaluate all deficiencies to determine what changes will be required.

7.6 Debrief the Operator

a) If deficiencies are discovered during the review, return the program to the operator with a letter describing the problem areas, if necessary. If this review is being performed as a part of a certification, inform the operator that issuance of the certificate will be withheld until deficiencies are corrected.

b) Schedule a meeting with the operator to discuss the problem areas if it may be helpful in resolving deficiencies. Discuss how to resolve deficiencies.