

Considerations Related to EASA Part 66 Required Experience and On the Job Training (OJT) – How to Achieve?

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This document is additionally supplied as an appendix to the Sofema Aviation Services / SofemaOnline “Going it alone” document

What is Basic Experience?

Basic Experience is the number of years you have to be able to demonstrate prior to being accepted for the issue of an AMEL

From EASA FAQ - Where do I gain the required basic maintenance experience? Is it mandatory to gain the required maintenance experience in an EASA approved Part-145 organisation?

According to the AMC 66.A.30(a)(4), aircraft maintenance experience gained within different types of maintenance organisations (under Part-145, M.A. Subpart F, FAR-145, etc.) or under the supervision of independent certifying staff may be accepted by the competent authorities.

This means that the aircraft maintenance experience may be accepted by the competent authority when such maintenance is performed in a maintenance organisation which does not necessarily hold an EASA Part-145 approval.

However, it is on the competent authority to evaluate whether this experience is acceptable.

Please Note (Sofema cannot answer on behalf of the various EU authorities – This is a task for the applicant)

Consequently, please contact the competent authority where you intend to apply for a licence, in order to check whether the basic experience would be acceptable, with detailed information on the type of aircraft, its operation and the nature of the work.

Challenge No 1 – There is no documented guidance to indicate an acceptable standard related to basic experience – if it is achieved outside of an EASA/FAA background there may be issues

How Many Years of Maintenance Experience are Required?

Between 1 year and 5 years depending on the circumstances and licence which is being sought

For specific details please see 66.A.30

What is Part 66 On the Job Training – OJT?

Note: OJT means 'On-the-Job Training' (Appendix III to Part-66, Section 6) and is only required for the first aircraft rating in the licence (sub)category.

Is OJT required for an “Empty” basic licence?

No only basic experience is necessary as part of the process to obtain your BASIC “Empty” AMEL

Means you do NOT need OJT to obtain an EASA Part 66 Basic Licence but you DO need the issuing authority to accept your initial training,

Who approves OJT?

On the Job Training (OJT) shall be approved by the competent authority who has issued the licence.

Where Should OJT be carried out

It shall be conducted at and under the control of a maintenance organisation appropriately approved for the maintenance of the particular aircraft type and shall be assessed by designated assessors appropriately qualified.

It shall have been started and completed within the 3 years preceding the application for a type rating endorsement.

Important Note Regarding OJT - Up to 50% of the required OJT may be undertaken before the aircraft theoretical type training starts.

Note the OJT should correspond to the Initial Type Rating being sought - This is advised by EASA also note the following

The AMC states that the tasks are representative of the licence (sub)category applied for. This means that:

- the tasks should identify whether they relate to a B1.1, B1.3 licence ... or to a B2,
- and be adapted to the privilege of each licence category / subcategory as defined in 66.A.20(a)3:
 - for a B1 licence: aircraft structure, powerplant and mechanical and electrical systems + work on avionics system with simple test but not including troubleshooting,
 - and those related to a B2: avionics, aircraft electrical system tasks and avionics/electrical tasks within mechanical and powerplant systems.

Relationship between Type Training and Practical Training

Aircraft type training shall consist of theoretical training and examination, and, except for the category C ratings, practical training and assessment. (Shall have been started and completed within the 3 years preceding the application for a type rating endorsement.)

GM 66.A.20(b)2 Privileges

ED Decision 2015/029/R

The sentence *'met the provision for the issue of the appropriate privileges'* included in 66.A.20(b)2 means that during the previous 2 years the person has met all the requirements for the endorsement of the corresponding aircraft rating (for example, in the case of aircraft in Group 1, theoretical plus practical element plus, if applicable, on-the-job training). This supersedes the need for 6 months of experience for the first 2 years. However, the requirement of 6 months of experience in the preceding 2 years will need to be met after the second year.

3.15 Training procedures for on-the-job training as per Section 6 of Appendix III to Part-66 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same).

3.16 Procedure for the issue of a recommendation to the competent authority for the issue of a Part-66 licence in accordance with 66.B.105 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same).

6. On the Job Training

On the Job Training (OJT) shall be approved by the competent authority who has issued the licence.

It shall be conducted at and under the control of a maintenance organisation appropriately approved for the maintenance of the particular aircraft type and shall be assessed by designated assessors appropriately qualified.

It shall have been started and completed within the 3 years preceding the application for a type rating endorsement.

(a) Objective:

The objective of OJT is to gain the required competence and experience in performing safe maintenance.

(b) Content:

OJT shall cover a cross section of tasks acceptable to the competent authority. The OJT tasks to be completed shall be representative of the aircraft and systems both in complexity and in the technical input required to complete that task. While relatively simple tasks may be included, other more complex maintenance tasks shall also be incorporated and undertaken as appropriate to the aircraft type.

Each task shall be signed off by the student and countersigned by a designated supervisor.

The tasks listed shall refer to an actual job card/work sheet, etc.

The final assessment of the completed OJT is mandatory and shall be performed by a designated assessor appropriately qualified.

The final assessment of the completed OJT is mandatory and shall be performed by a designated assessor appropriately qualified.

In order to facilitate the verification by the competent authority, demonstration of the OJT shall consist of (i) detailed worksheets/logbook and (ii) a compliance report demonstrating how the OJT meets the requirement of this Part.

It is necessary in support of the First EASA Part 66 Maintenance Engineers Licence for the prospective Licenced Aircraft Maintenance Engineer LAME to complete a period of OJT

The following information is drawn from AMC to Section 6 of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. On-the-Job Training' ED Decision 2015/029/R

EASA States the following – see FAQ

How can I carry out my OJT in a Part-145 approved maintenance organisation (AMO) whose principal place of business is located outside the EASA Member States?

Answer The endorsement of the first aircraft type rating, within a given category/sub-category, requires satisfactory completion of the corresponding On-the-Job-Training (ref. 66.A.45.(c)).

The OJT shall be approved by the competent authority who has issued the licence (ref. Part 66, Appendix III, sec. 6).

It shall be carried out in a maintenance organisation approved under Part-145 (or M.A. Subpart F) with A rating and the procedures for OJT should be included in the exposition (MOE chapter 3.15 "OJT procedure") approved by the competent authority of the maintenance organisation.

However, since these procedures are approved by the competent authority of the maintenance organisation, and providing training is not one of the privileges of a maintenance organisation, they can only be used when the licensing authority (competent authority issuing the license) is the same as the competent authority of the maintenance organisation.

In other cases, it is up to the licensing authority to decide whether it accepts such procedures for the purpose of approving the OJT (ref. AMC to Section 6 of Appendix III to Part-66).

For the Part-145 AMOs, whose principal place of business is located outside the EASA Member states, the competent authority of the maintenance organisation is EASA. In such case, the OJT procedures cannot be included in the MOE, due to the fact that EASA is not a licensing authority.

The possibility still exists in this case that a licensing authority may directly approve OJT procedures, which have to be included in a separate document outside (and not being part) of the MOE.

Consequently, personnel working in these AMOs, or the AMOs wishing to support its staff on this matter, should:

Option A: apply directly to the licensing authority who has issued the license for the approval of an OJT (to be proposed in a document outside the MOE). This option should normally be considered by organisations and not by individuals.

Option B: find an agreement to follow an already approved OJT at another organisation, which was approved by the same licensing authority who has issued the license.

Possibility also exists to follow an OJT which was approved by any other licensing authority, however in such case the final acceptance of this OJT for the purpose of endorsing the first type rating in the license remains at the sole discretion of the competent authority issuing the license.

It is recommended that prior to starting any OJT, the licensing authority who has issued the license is contacted to verify its acceptance of any possible intended option.

When is OJT Required?

OJT is only required for the initial type in each licence category or sub-category:

For example; if a basic B1/B2 licence is endorsed with the Airbus A320 type in the B1 category and the engineer wishes to add the A320 in the B2 category, he/she will have to complete B2 related OJT representative of that aircraft and its systems.

If the same engineer adds the B1.3 category to the basic licence and wishes to add the first helicopter type, he/she must complete OJT representative of that first helicopter type. Endorsement of any subsequent types in each of the categories will not require OJT.

On-the-Job Training (OJT) Regulatory Requirement

6. On the Job Training Annex III (Part-66) APPENDICES TO ANNEX III (Part- 66)
Regulation (EU) No 1321/2014

On the Job Training (OJT) shall be approved by the competent authority who has issued the licence.

It shall be conducted at and under the control of a maintenance organisation appropriately approved for the maintenance of the particular aircraft type and shall be assessed by designated assessors appropriately qualified.

It shall have been started and completed within the 3 years preceding the application for a type rating endorsement.

Completion of OJT is a significant undertaking which has to be given careful consideration to enable the satisfactory completion of the objective of gaining competence and experience required in compliance with this appendix

(a) Objective:

The objective of OJT is to gain the required competence and experience in performing safe maintenance.

(b) Content:

OJT shall cover a cross section of tasks acceptable to the competent authority.

The OJT tasks to be completed shall be representative of the aircraft and systems both in complexity and in the technical input required to complete that task.

While relatively simple tasks may be included, other more complex maintenance tasks shall also be incorporated and undertaken as appropriate to the aircraft type.

Each task shall be signed off by the student and countersigned by a designated supervisor. The tasks listed shall refer to an actual job card/work sheet, etc.

The final assessment of the completed OJT is mandatory and shall be performed by a designated assessor appropriately qualified.

The following data shall be addressed on the OJT worksheets/logbook:

1. Name of Trainee;
2. Date of Birth;
3. Approved Maintenance Organisation;
4. Location;
5. Name of supervisor(s) and assessor, (including licence number if applicable);
6. Date of task completion;
7. Description of task and job card/work order/tech log, etc.;
8. Aircraft type and aircraft registration;
9. Aircraft rating applied for.

In order to facilitate the verification by the competent authority, demonstration of the OJT shall consist of (i) detailed worksheets/logbook and (ii) a compliance report demonstrating how the OJT meets the requirement of this Part.

1. 'A maintenance organisation appropriately approved for the maintenance of the particular aircraft type' means a Part-145 or M.A. Subpart F approved maintenance organisation holding an A rating for such aircraft.

2. The OJT should include one to one supervision and should involve actual work task performance on aircraft/components, covering line and/or base maintenance tasks.

Note 1 – This Effectively Rules out “Line Maintenance” as the provider of an appropriate environment in which to achieve the required OJT.

3. The use of simulators for OJT should not be allowed.

Note 2 – This means that it has to be a physically “Real” Environment which again adds to the need for an EASA 145 Base Maintenance Environment to support the OJT.

4. The OJT should cover at least 50% of the tasks contained in Appendix II to AMC to Part-66.

Some tasks should be selected from each paragraph of the Appendix II list.

Tasks should be selected among those applicable to the type of aircraft and licence (sub)category applied for.

Other tasks than those in the Appendix II may be considered as a replacement when they are relevant.

Note 3 – So it is possible to vary the list by the addition or substitution of a more appropriate task The final selection of the tasks is set by the Organisation who is managing the OJT

Typically, in addition to the variety and the complexity, the OJT tasks should be selected because of their frequency, safety, novelty, etc.

5. Up to 50% of the required OJT may be undertaken before the aircraft theoretical type training starts.

***Note 4 – This means that 25% of the overall list can be accomplished – however it is important to consider that this needs to be carried out in an “approved environment” – your background outside of EASA is not included in this assessment
The contents of the OJT is Derived from the following List***

Here is the details of Appendix 2 to Part 66 AMC – Note this list of tasks is the same for Part 66 OJT and Part 66 Practical Training following Type Training

6. The organisation providing the on-the-job training should provide trainees a schedule or plan indicating the list of tasks to be performed under supervision.

Note 5 – The OJT needs to be structured, managed and controlled to enable the delegate to receive the necessary exposure

A record of the tasks completed should be entered into a logbook which should be designed such that each task or group of tasks is countersigned by the corresponding supervisor. The logbook format and its use should be clearly defined.

7. Regarding the day-to-day supervision of the OJT programme in the approved maintenance organisation and the role of the supervisor(s), the following should be considered:

It is sufficient that the completion of individual OJT tasks is confirmed by the direct supervisor(s), without being necessary the direct evaluation of the assessor. During the day-to-day OJT performance, the supervision aims at overseeing the complete process, including task completion, use of manuals and procedures, observance of safety measures, warnings and recommendations and adequate behaviour in the maintenance environment.

Competency Requirements of the Supervisor Include the Following

The supervisor(s) should personally observe the work being performed to ensure the safe completeness and should be readily available for consultation, if needed during the OJT performance.

The supervisor(s) should countersign the tasks and release the maintenance tasks as the trainee is still not qualified to do so.

The supervisor(s) should therefore:

have certifying staff or support staff privileges relevant to the OJT tasks;

Be competent for the selected tasks;

Be safety-orientated;

Be capable to coach (setting objectives, giving training, performing supervision, evaluating, handling trainee's reactions and cultural issues, managing objectively and positively debriefing sessions, determining the need for extra training or re orientate the training, reporting, etc.);

Be designated by the approved maintenance organisation to carry out the supervision.

The Supervisor needs to be assessed by the organisation and to be personally nominated by the organisation to be authorised to perform the role of OJT “In Charge”

8. Regarding the assessor, the following should be considered:

The function of the assessor, as described in Section 6 of Appendix III to Part-66, is to conduct the final assessment of the completed OJT.

This assessment should include confirmation of the completion of the required diversity and quantity of OJT and should be based on the supervisor(s) reports and feedback.

In Section 6 of Appendix III to Part-66, the term ‘designated assessor appropriately qualified’ means that the assessor should demonstrate training and experience on the assessment process being undertaken and should be authorised to do so by the organisation.
The Assessor needs

Further guidance about the assessment and the designated assessors is provided in Appendix III to AMC to Part-66.

9. The procedures for OJT should be included into the Exposition Manual of the approved maintenance organisation (chapter 3.15, as indicated in AMC 145.A.70(a)). However, since these procedures in the Exposition Manual are approved by the competent authority of the maintenance organisation, and providing training is not one of the privileges of a maintenance organisation, they can only be used when the licensing authority is the same as the competent authority of the maintenance organisation.

In other cases, it is up to the licensing authority to decide whether it accepts such procedures for the purpose of approving the OJT (refer to AMC 66.B.115).

AMC 66.B.115 Procedure for the change of an aircraft maintenance licence to include an aircraft rating or to remove limitations ED Decision 2015/029/R

(c) For the acceptance of the OJT programme described in Section 6 of Appendix III to Part-66, the licensing competent authority should develop adequate procedures which may be similar to the procedure described in AMC 66.B.130 for the ‘direct approval of aircraft type training’.

In the case where the licensing competent authority is different from the competent authority of the maintenance organisation which provides the OJT, the licensing authority may take into consideration the fact that the maintenance organisation may already have the OJT programme accepted by their own competent authority (through chapter 3.15 of the MOE, as described in AMC 145.A.70(a)).

Tags: EASA Part 66