

EASA Approved Maintenance Program – CAMO Staff Qualification Considerations

Sofema Aviation Services (SAS) www.sassofia.com reviews the competence requirements of persons responsible for the management & development of the Aircraft Maintenance Program (AMP) to ensure compliance with EASA Regulations.

CAMO Regulatory oversight by Competent Authorities will increasingly focus on auditing the organisations ability to establish and manage the competency of all persons related to their job function in the work place.

Introduction CAMO.A.220(c)

(c) Personnel records

(1) The organisation shall ensure that the following records are retained:

(i) records of qualification and experience of personnel involved in continuing airworthiness management, compliance monitoring and safety management;

(ii) records of qualification and experience of all airworthiness review staff, as well as staff issuing recommendations and permits to fly.

(2) The records of all airworthiness review staff, staff issuing recommendations and staff issuing permits to fly shall include details of any appropriate qualification held together with a summary of the relevant continuing airworthiness management experience and training and a copy of the authorisation.

(3) Personnel records shall be kept as long as the person works for the organisation, and shall be retained until 3 years after the person has left the organisation.

Suggested Audit Points

- How are the CAMO Staff Records Managed & Maintained for Persons involved in AMP Development?
- Check all required records are included related to Training & Competency?
- Where is the Procedure Documented – Does it reflect the actual?

COMPETENCY ASSESSMENT OBJECTIVES - AMC1 CAMO.A.305(g) Personnel requirements (ED Decision 2020/002/R)

The procedure referred to in point CAMO.A.305(g) should require amongst others that technical support personnel such as, planners, engineers, and technical record staff, supervisors, post-holders, airworthiness review staff, whether employed or contracted, are assessed for competency before unsupervised work commences and competency is controlled on a continuous basis.

Competency should be assessed by the evaluation of:

- On-the-job performance and/or testing of knowledge by appropriately qualified personnel;
- Records for basic, organisational, and/or product type and differences training; and
- Experience records.

Validation of the above could include a confirmation check with the organisation(s) that issued such document(s).

For that purpose, Experience / Training may be recorded in a Document such as a Log Book.

Suggested Audit Points:

- How do Staff Members and / or the Organisation demonstrate ongoing experience related to AMP Assessment & Development Tasks for individuals?

CAMO Training Needs Analysis

As a result of this assessment, an individual's qualification should determine:

- Which level of ongoing supervision would be required and
- Whether unsupervised work could be permitted
- Whether there is a need for additional training.

Suggested Audit Points:

- How does assessment take place?
- Who performs Training Needs Analysis against what criteria ?
- What authorisation system is in place for CAMO Staff Authority – How is it documented & controlled?

What should be included in the Competency Assessment Process

CAMO.A.220(c)). A record should include copies of all documents that attest to their qualifications, such as an authorisation held, as applicable.

Example of Competency Assessment -

(a) In accordance with the job function, adequate initial and recurrent training should be provided and recorded to ensure continued competency so that it is maintained throughout the duration of the employment/contract.

(b) All staff should be able to demonstrate knowledge of, and compliance with, the CAMO procedures, as applicable to their duties.

(c) All staff should be able to demonstrate an understanding of safety management principles including HF, related to their job function and be trained as per AMC3 CAMO.A.305(g).

(d) To assist in the assessment of competency and to establish the training needs analysis, job descriptions are recommended for each job function in the organisation. Job descriptions should contain sufficient criteria to enable the required competency assessment.

(e) Criteria should allow the assessment to establish that, among other aspects (titles might be different in each organisation):

- (1) Managers are able to properly manage processes, resources and priorities described in their assigned duties, accountabilities and responsibilities in accordance with the safety policy and objectives and in compliance with the applicable requirements and procedures.
 - (2) Maintenance programme engineers are able to interpret source data (norms, data issued by the holder of a design approval or by the competent authority, etc.) and use them to develop the aircraft maintenance programme.
 - (3) Engineering staff are able to interpret source data (norms, data issued by the holder of a design approval or by the competent authority, etc.) and use them as needed (e.g. to make work cards).
 - (4) Planners are able to organise maintenance activities in an effective and timely manner.
 - (5) Compliance monitoring staff are able to monitor compliance with this Regulation and to identify non-compliances in an effective and timely manner so that the organisation may remain in compliance with this Regulation.
 - (6) Staff who have been designated safety management responsibilities are familiar with the relevant processes in terms of hazard identification, risk management, and the monitoring of safety performance.
 - (7) All staff are familiar with the safety policy and the procedures and tools that can be used for internal safety reporting.
- (f) The competency assessment should be based upon the procedure specified in GM1 CAMO.A.305(g).

Developing Job Descriptions as a fundamental part of the Management of Competence. (Best Practice)

- Job descriptions for each job function/role in the organisation.
- Job descriptions should contain sufficient criteria to enable the required competency assessment

Competency Assessment – Check Points

- Initial - staff need to be assessed for competency before unsupervised work commences
- Continuous - staff competency must be controlled continuously

- Assessment for each job function/role. (New job function/role, new assessment)
- Assessment performed by trained and qualified personnel
- Competency assessed by the evaluation of, (Example)
 - Desk-top – records for training and experience. (May include confirmation check)
 - Testing and or interview
 - On-the-job performance
- Result of the assessment – How Managed?
- Ongoing supervision or unsupervised work permitted – (CAMO Staff Authorisation System?)
- Need for additional training – Based on TNA assessment?
- Issuance of authorisation for unsupervised work for each job function/role
- All staff should be able to demonstrate knowledge of, and compliance with, the CAMO procedures, as applicable to their duties.
- Also able to demonstrate an understanding of safety management principles including human factors, related to their job function and receive safety training as per AMC3 CAMO.A.305(g)

Note - Competency may be assessed by having the person work under the supervision of another qualified person for a sufficient time to arrive at a conclusion.

Sufficient time could be as little as a few weeks if the person is fully exposed to relevant work.

- The person need not be assessed against the complete spectrum of their intended duties. If the person has been recruited from another approved CAMO, it is reasonable to accept written confirmation from the previous organisation.
- All prospective continuing airworthiness management staff need to be assessed for their competency related to their intended duties
- Record-keeping Procedure

Suggested Audit Points – How can the Organisation Demonstrate, Manage & Control the Following Aspects –

Developing a Competency Assessment Procedure - AMC2 CAMO.A.305(g) - ED
Decision 2020/002/R

(a) The organisation should develop a procedure that describes the process for conducting competency assessment of personnel. The procedure should specify:

- The persons who are responsible for this process;
- When the assessment should take place;
- How to give credit from previous assessments;
- How to validate qualification records
- The means and methods to be used for the initial assessment;
- The means and methods to be used for the continuous control of competency, including to gather feedback on the performance of personnel;
- The aspects of competencies to be observed during the assessment in relation to each job function
- The actions to be taken if the assessment is not satisfactory; and
- How to record assessment results.

(b) Competency may be assessed by having the person work under the supervision of another qualified person for a sufficient time to arrive at a conclusion. Sufficient time could be as little as a few weeks if the person is fully exposed to relevant work. The person need not be assessed against the complete spectrum of their intended duties. If the person has been recruited from another approved CAMO, it is reasonable to accept a written confirmation from the previous organisation.

(c) All prospective continuing airworthiness management staff should be assessed for their competency related to their intended duties.

Next Steps

Sofema Aviation Services (www.sassofia.com) and Sofema Online (www.sofemaonline.com) provide EASA Compliant Maintenance Planning Regulatory & Vocational Training – please see the websites or email team@sassofia.com