

## Assessing MSAT Compliance and Effectiveness, Considering Scalability and Suitability in Different Organizational Contexts

Sofema Aviation Services (SAS) considers MSAT Assessment, Compliance and Effectiveness, with Scalability & Suitability in Mind

### Introduction to Driving Effectiveness - Start from Purpose, not Paperwork

- **Dual aim:** MSAT is explicitly for both compliance and performance. Use it to confirm processes are Present & Suitable *and* to judge whether they Operate and are Effective in delivering safety outcomes.

**Important – Avoid a Checklist Mentality:** Treat the “what to look for” lines as prompts, not ticks. The objective is to understand how safe the operation actually is and whether major risks are being missed.

**Discussion Question** - Have you experienced an organisation appearing compliant on paper yet clearly underperform on risk control? What evidence changed your view?

### Distinguish Operating from Effective with targeted evidence

- **Integrate all Available Information** (docs, interviews/observation, data): For “present”, documents may suffice; “operating” needs observed use and records; “effective” requires outcome evidence.
- **Outcome Focus for “Effective”:** Focus summaries and reports on proactive risk management, safety performance, data intelligence, resilience to disruption, and overall maturity.
- **Considering Findings vs Observations:** If a process is operating but not (yet) effective, this often warrants an observation (improvement signal), not an automatic finding—unless leadership keeps ignoring evidence the MS is underperforming.

**Discussion Question** What extra proof would move your judgement from Operating to Effective?

### Make Suitability & Scalability Explicit (before and after the assessment)

- **Pre Review:** Analyse organisational context before the review, and re-check whether the overall MS is commensurate after you’ve seen it working.
- **What scalability is (and isn’t):** All MS elements must exist; scalability is adapting depth and complexity to the organisation’s size, interfaces and risks—not creating a “light” MS or dropping core functions.
- **Context factors to weigh:** size (people, sites, interfaces), approvals held, operational profile, environment, and inherent risk exposures.

- **Applicability / Customisation:** The tool works across domains; tailor it to sector specifics where needed.

**Discussion Question:** Consider small but high-hazard operation (e.g., offshore support). Which two processes must be deeper than their size suggest? Which areas could be leaner without losing control? (If any?)

### **Integrated approvals: one system, one evaluation—coordinated where needed**

- **Principle:** If the organisation runs an integrated MS for multiple certificates, assess it as one system. Where separate domain teams must be involved, coordinate and share a single, coherent oversight message.
- **Why it matters:** Integration affects interface management, flow of risk data, and change control—core drivers of *effectiveness* rather than mere *presence*.

**Discussion Question:** In an integrated CAMO + Part-145 MS, what cross-domain evidence would convince you risk controls are effective (not just “present” twice)?

### **Practical techniques to surface effectiveness (without audit fatigue)**

- **Sequence smartly:** For mature orgs, start with Safety Risk Management and Assurance: “What are your main risks? How do you know? What changed after mitigations? Are safety objectives being achieved?”
- **Credit existing oversight:** Bring in intelligence from other audits, investigations, and meetings to inform your maturity view—this is built into tool usage.
- **Summarize what matters:** Close each review with a performance-oriented assessment summary—strongest processes, ineffective controls, emerging risks, and progress against safety objectives (and any linkage to SSP/SPAS).

### **Organisation archetypes: apply proportionality without dilution**

Use the prompts below to compare **Present/Suitable/Operating/Effective** across contexts. The point is to test scalability (depth) and suitability (fit) while preserving all MS elements.

#### **Small, focused Part-145 line station (single line, 20 staff)**

- **Where to go deeper:** Reporting culture (376/2014), hazard ID, competence / authorisation control, simple but living change management.
- **“Effective” signals:** Look for fewer repeat maintenance errors; targeted toolbox talks that close a specific risk; quick cycle from report to fix to verified outcome.
- **Scalability call:** Combined safety/compliance role acceptable if independence and escalation paths remain clear.

## Medium CAMO with broad contracting

- **Where to go Deeper:** Interface management with contracted AMOs, data feedback loops into risk registers, assurance on airworthiness review findings.
- **“Effective” signals:** Contract performance terms tied to safety outcomes; recurring issues decline across providers after specific mitigations.
- **Suitability call:** Contract oversight depth scaled to volume/criticality of outsourced work.

## Airline group with integrated OPS + CAMO + multiple AOCs

- **Where to go Deeper:** Group-level SPIs/SPTs roll-up, cross-domain hazard capture (e.g., fuel, FDM,), Change Management spanning fleet and network.
- **“Effective” signals:** Enterprise risk changes resourcing/rostering/training; sustained trend improvements across several SPIs post-action.
- **Integration call:** One assessment; coordinated domain input; single performance narrative.

## DOA/POA cluster introducing new tech

- **Where to go Deeper:** Independent verification in design, handover interfaces to production/testing, and management of change for novel risks.
- **“Effective” signals:** Design escape rate down; corrective actions address systemic causes; safety objectives achieved despite pace of change.
- **Suitability call:** Depth of design assurance scaled to novelty/complexity rather than headcount.

## Decision lines: when to escalate, when to coach

- **Raise a finding** when required elements are not present/suitable at initial certification, or when an operating process has lapsed; retain *observations* to drive improvement where processes operate but outcomes lag—unless leadership persistently ignores evidence.
- **Document maturely:** Capture the evidence path (what you saw/heard/measured) and keep the narrative centred on risk, performance, resilience, and maturity—not just rules citations.

**Discussion Question:** Share a borderline case. What tipped you toward “observation” versus a formal finding, and how did you write it to drive improvement?

## Quick checklist

- Did we explicitly separate Operating vs Effective and show the evidence gap?

- Did we explain why the MS design is suitable/scalable for this organisation?
- Did we integrate intelligence from other oversight activities to avoid duplication?
- Did our write-up read like a performance narrative rather than a checklist?

### **Next Steps**

See the following 2 day course available as Classroom or Webinar - Using The EASA Management System Assessment Tool (EASA MSAT) – 2 Days

<https://sassofia.com/course/using-the-easa-management-system-assessment-tool-easa-msat-2-days/>