SOFEMA
AVIATION SERVICES

User Guide: Applying the EASA MSAT PSOE Maturity Model

Sofema Aviation Services (SAS) considers the user engagement process in detail.

Introduction

The PSOE model in EASA's MSAT is not just a compliance measure, it is a performance-based maturity framework.

"Present" means documented;
"Suitable" means tailored and proportionate;
"Operating" means in use; and
"Effective" means achieving measurable safety outcomes.

Applying it correctly requires preparation, balanced evidence gathering, and a focus on improvement, not just conformity.

Purpose of the MSAT Tool - The EASA MSAT is designed to evaluate the maturity and effectiveness of an organisation's Management System (MS), including the Safety Management System (SMS) and compliance monitoring.

It supports both:

- **Initial certification / initial implementation** – ensuring processes are in place before operations start.
- **Continuing oversight** – assessing performance, safety culture, and improvement over time.

The PSOE model—**Present, Suitable, Operating, Effective**—is central to this assessment.

When to Use the PSOE Assessment

Initial Certification:

- All required MS processes must be at least Present and Suitable before approval is granted.

Post-implementation & Continuing Oversight:

- Processes should progress to Operating and ultimately Effective within the oversight cycle.

Change Management:

- Significant organisational changes require re-assessment of suitability and effectiveness.

Integrated MS / Multiple Certificates:

Note - If the MS spans multiple approvals, assess it as one integrated system.

Definitions & Criteria

Present

Definition - There is documented evidence that the process exists within the organisation's MS documentation.
Key Evidence Sources:

- Policies, manuals, and procedures.
- Records of formal approval by the Accountable Manager.
- Documented responsibilities and reporting lines.

Assessment Focus:

- Confirm the process is written down and aligns with regulatory requirements.
- Verify reference to applicable EU regulations and standards.
- Check documentation is controlled and current.

Common Pitfalls:

- Generic templates not tailored to the organisation.
- Missing links between documented processes and actual safety objectives.

Suitable

Definition: The process is designed appropriately for the size, nature, complexity, and risk profile of the organisation.

Key Evidence Sources:

- Tailored procedures that reflect operational realities.
- Evidence of scalability (e.g., for small vs. complex organisations).
- Resource allocation plans proportionate to risk.

Assessment Focus:

- Is the process commensurate with operational scope and interfaces?
- Does it integrate contracted activities and multi-site operations?
- Are roles, responsibilities, and decision-making authorities clearly defined?

Suitability Review Tips:

- Conduct pre-assessment analysis of the organisation's structure, complexity, and risk exposure.
- Consider Annex 2 guidance on "scalability and suitability."

Understanding Scalability and Suitability in MSAT Assessments

What is "Suitability"?

Suitability means that the design and scope of a management system process is **fit for purpose** in the specific operational context of the organisation.

Key considerations for suitability:

- **Alignment with the organisation's operational profile:**
  Does the process match the actual type of operations, approval scope, and regulatory environment?

- **Clarity and practicality:**
  Are procedures understandable, easy to follow, and relevant to the day-to-day work?

- **Integration with other systems:**
  If the organisation has multiple approvals (e.g., Part-CAMO + Part-145), does the process effectively cover both without duplication or contradiction?

- **Resourcing:**
  Does the process have the right people, skills, tools, and funding to function as designed?

What is "Scalability"?

Scalability refers to adjusting the depth and complexity of the management system to match the organisation's size, complexity, and risk exposure — without removing any of the core MS elements required by regulation.

Scalability principles:

- **Same requirements, different implementation depth:**
  All mandatory processes must exist, but the way they are implemented can be more streamlined for smaller or less complex operations.

- **Risk-based scaling:**
  Processes should be robust where risks are higher, even in a small organisation.

- **Avoiding overcomplication:**
  Overly complex systems in small organisations can be counterproductive and lead to “paper compliance” without practical application.

Applying Annex 2 Guidance in an MSAT Assessment

When applying PSOE (Present, Suitable, Operating, Effective), assessors should:

Analyse context first

- Size of organisation (staff, facilities, locations)
- Scope of approvals and operational profile
- Complexity (number of interfaces, contracted activities, international operations)
- Inherent risk profile (type of aircraft, environment, criticality of tasks)

Evaluate proportionality

- Does the process design reflect the above factors?
- Has the organisation unnecessarily copied a “complex organisation” model when a simpler approach would be better?
- Or, conversely, is the system too light for the level of operational risk?

Check adaptability

- Can the process expand or adapt if operations grow or risk changes?
- Is there a mechanism to periodically re-assess suitability and scalability, especially after changes?

Document justification

- The organisation should be able to explain why the process is designed the way it is and how it meets both regulatory requirements and operational needs.

Common Pitfalls:

- Processes too complex for small organisations (over-bureaucratisation).
- “One-size-fits-all” documentation ignoring sector-specific risks.

Special Note - Revisit suitability when the MS matures or changes occur.

Operating

Definition:

There is evidence the process is actively used and produces outputs.

Key Evidence Sources:

- Operational records and logs.
- Meeting minutes (e.g., Safety Review Boards).
- Risk assessments, audit reports, safety performance monitoring data.
- Staff interviews confirming application.

Assessment Focus:

- Are processes implemented as described in the documentation?
- Is there consistency between documented procedures and actual practice?
- Are outputs relevant and timely?
- Are staff aware of their roles and applying the processes?

Operational Verification Methods:

- **Interviews:** Cross-check staff knowledge against documented procedures.
- **Observation:** Witness process steps in real time.
- **Sampling:** Review recent records to confirm ongoing activity.

Common Pitfalls:

- Processes exist in theory but are bypassed in practice.
- Sporadic application, with gaps in record-keeping.

Effective

Definition:

The process achieves its intended outcome, has a positive safety impact, and supports continuous improvement.

Key Evidence Sources:

- Demonstrated achievement of safety objectives.
- Performance trends showing risk reduction or hazard control.
- Proactive identification of emerging risks.
- Continuous improvement initiatives and lessons-learned integration.

Assessment Focus:

- Is there measurable improvement in safety performance indicators (SPIs)?
- Are risk mitigations verified for effectiveness?
- Is there agility to adapt to changing environments or emerging threats?
- Does the process contribute to a positive safety culture?

Effectiveness Verification Methods:

- **Data analysis:** Correlate performance data with implemented safety actions.
- **Case reviews:** Examine incident investigations for evidence of system learning.
- **Benchmarking:** Compare performance with industry norms or sector risk profiles.

Common Pitfalls:

- Confusing “operating” with “effective”—activity does not guarantee impact.
- Failure to act on evidence of ineffectiveness.

How to Conduct an MSAT PSOE Assessment

Step 1 – Preparation

- Review the organisation’s profile, approvals, complexity, and risk profile.
- Identify applicable regulations and alternative means of compliance.
- Select MSAT elements most relevant to the oversight scope.

Step 2 – Evidence Gathering

- Use documentation review for “Present” and “Suitable” validation.
- Apply interviews and observation for “Operating” verification.
- Rely on performance data and trend analysis for “Effective” confirmation.
- Liaise with other inspectors to integrate oversight intelligence from audits, investigations, and performance reviews.

Step 3 – Scoring & Maturity Judgement

- Treat PSOE as a maturity model, not a compliance checklist.
- Avoid linear scoring—recognise that “Effective” is a significant step up from “Operating”.
- Do not reduce assessment to a pass/fail; instead, identify strengths and improvement areas.

Step 4 – Recording & Reporting

- Document evidence for each level clearly:
  - For “Present”: cite documents.
  - For “Operating”: describe observed activity and outputs.
  - For “Effective”: note measurable improvements.

- Distinguish between:

  - Findings – non-compliance or serious risks.
  - Observations – improvement opportunities or ineffective processes.

- Provide a summary report to the organisation, highlighting:
  - Maturity level for each key process.
  - Key strengths and priority improvement areas.
  - Link to continuous improvement goals.

Good Practices for Each Level

Present → Suitable

- Tailor procedures to your operational context early.
- Involve operational staff in document review to ensure practicality.

Suitable → Operating

- Train staff and ensure leadership visibility in applying the process.
- Use safety committees and working groups to embed processes.

Operating → Effective

- Introduce performance metrics linked to safety objectives.
- Conduct regular reviews of process impact and adapt as needed.
- Share success stories to reinforce safety culture.

Potential Disconnects Include:

- Avoid treating MSAT as a tick-box exercise. The tool guides holistic assessment, not mechanical compliance checks.
- Being compliant versus being safe. Focus on whether the MS is delivering safety outcomes.
- Overly narrow focus (checking “word-by-word” compliance) risks missing systemic weaknesses.
- Avoid “overcomplication” that burdens staff without improving safety.

Using MSAT for Continuous Improvement

- Review PSOE levels periodically to track maturity progression.
- Use “Observations” positively to encourage development.
- In performance-based oversight, high PSOE maturity may justify extended oversight cycles but only if critical processes are at least “Operating” and key risk controls are “Effective”.
- Integrate MSAT results into strategic safety planning and management review processes.

Final Checklist for Assessors

When closing an assessment, ask:

1. **Present:** Is it documented and does it meet regulatory requirements?
2. **Suitable:** Is it fit for the organisation's size, complexity, and risks?
3. **Operating:** Is it being applied consistently, producing outputs?
4. **Effective:** Is it delivering intended outcomes and improving safety performance?

If the answer is "No" at any stage:

- For **Present/Suitable** gaps during initial certification → do not approve.
- For **Operating** failures post-implementation → raise a finding.
- For **Effectiveness** issues → issue observations and encourage corrective action, unless ineffective performance reflects repeated disregard for indicators.

EASA MSAT PSOE Quick Reference Matrix

Level	Definition	Key Evidence Indicators	Assessment Focus	Common Pitfalls
Present	Process exists and is documented in the organisation's MS documentation.	- Policies, manuals, procedures signed by Accountable Manager. - Documented roles, responsibilities, reporting lines. - Controlled and current documentation.	- Verify documentation exists and aligns with regulatory references. - Check completeness and currency.	- Generic, uncustomised templates. - Missing links between documents and safety objectives.
Suitable	Process is designed appropriately for the size, nature, complexity, and risks of the organisation.	- Tailored procedures reflecting operational realities. - Resource plans proportionate to scope and risk. - Consideration of scalability per Annex 2.	- Fit for operational context, interfaces, and contracted activities. - Clear role definitions and decision-making authority.	- Overly complex for small orgs; oversimplified for complex ones. - One-size-fits-all documentation.

Level	Definition	Key Evidence Indicators	Assessment Focus	Common Pitfalls
Operating	Process is in active use and producing outputs.	- Operational records and logs. - Safety Review Board minutes. - Risk assessments, audit reports. - Staff confirm application in interviews.	- Implementation matches documentation. - Outputs relevant, timely, and consistent.	- Documented but not applied. - Sporadic or partial implementation.
Effective	Process achieves intended safety outcomes, has a positive safety impact, and drives continuous improvement.	- Safety performance data shows improvement. - Risk mitigations verified for effectiveness. - Evidence of agility in addressing emerging risks.	- SPIs/SPTs met or exceeded. - Continuous improvement and lessons learned integrated. - Positive safety culture visible.	- Confusing “operating” with “effective.” - No action on evidence of ineffectiveness.

How to Use in Practice

- **Before the audit:**
  - Identify which MSAT elements you will assess.
  - Pre-read relevant documentation.

- **During the audit:**
  - For **Present/Suitable**, focus on **documentation and design**.
  - For **Operating**, confirm **application and consistency**.
  - For **Effective**, verify **outcomes and improvements**.

- **After the audit:**
  - Record maturity level and supporting evidence.
  - Issue findings for non-compliance (Present/Suitable/Operating gaps).
  - Issue observations for improvement opportunities (Effectiveness gaps).

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/