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| Foreign Part 147 approvals - User Guide for MTOE | | | | |
| **UG.CAO.00014-004** | | | | |
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|  | Name | Validation | Date |
| Prepared by: | Omar Elkhartoufi | Validated | 11/03/2020 |
| Verified by: | Karl Specht | Validated | 12/03/2020 |
| Reviewed by: | Dominique Perron | Validated | 12/03/2020 | |
| Approved by: | Thaddee Sulocki | Validated | 12/03/2020 | |

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| **DOCUMENT CONTROL SHEET** |

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| **Reference documents** |
| **a) Contextual documents** |
| Commission Regulation (EU) 1321/2014 - Commission Regulation (EU) of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks  Commission Implementing Regulation (EU) 2019/2153 of 16 December 2019 on the fees and charges levied by the European Union Aviation Safety Agency, and repealing Regulation (EU) No 319/2014  ED Decision 2015/029/R - ED Decision 2015/029/R of 17 December 2015 issuing acceptable means of compliance and guidance material to Part-M, Part-145, Part-66 and Part-147 of Regulation (EU) N°1321/2014 and repealing Decision 2003/19/RM of the ED of the Agency of 28 November 2003.  MB Decision 01-2017 - Decision of the Management Board of 13 June 2017 repealing MB Decision 01-2011 on guidelines for the allocation of certification tasks to National Aviation Authorities and Qualified Entities  Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency. |
| **b) Internal documents** |
| WI.IMS.00105 - Filing plan Maintenance and Production Department |

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| **Log of issues** | | |
| Issue | Issue date | Change description |
| 001 | 13/01/2012 | First issue. |
| 002 | 01/09/2014 | Update of Quality documents to implement the new corporate image of the Agency and the changes to the organization structure. |
| 003 | 16/05/2019 | Complete re-issue of the document due to regulatory changes  Removed appendix related to instructor qualifications. |
| 004 | 12/03/2020 | MTOE template is now in Annex 1. MTOE template was previously available in a Part 8 in format of an attachment which could not be opened by all users. |

# Table of content

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# General

The present User Guide provides general guidelines related to the compilation of the Maintenance Training Organisation’s Exposition (MTOE).

It also includes the MTOE template to be used by an organisation applying for an EASA Part 147 approval.

# Disclaimer

This User Guide is to be used by the “Foreign 147” Maintenance Training & Examination Organisations to assist them in the production of their MTOE. It does not apply to organisations located within the EU Member States and that are overseen by an EU NAA.

Note: “foreign 147” organisations refers to those organisations whose Principle Place of Business is located outside the EU Member States’ territories and for which EASA is the Competent Authority.

# Language

The MTOE and its associated documents such as Associated Procedures, lists, etc.… shall be available in English language.

By derogation to the above, these documents may also be written in a second language (English and the language of the country where the organisation is located). In such case, the English version shall prevail in case of conflicting statements.

# Exposition format

The MTOE or associated documents may be produced in hardcopy or in protected electronic format such as PDF documents.

# Structure of the Maintenance Training Organisation Exposition

The MTOE and its associated documents form the baseline for the organisation to demonstrate how it complies with applicable regulatory requirements, and these documents will subsequently be used by the surveyor as the reference documentation when carrying oversight audits.

The MTOE is in principle a standalone document that should contain all the necessary information at an adequate level of detail so to enable the reader to quickly understand the structure of the training organisation, its processes and the process owners.

It is however accepted that the MTOE contains less information when it is complemented by:

* a set of detailed Associated Procedures,
* Associated lists (e.g. the list of instructional and examination staff, the list of sub-contractors etc.…),
* Appendices or associated manuals, for instance a manual containing samples of the forms used by the organisation.

Note: Such structure would typically be used by:

* Large organisations having frequent changes of the instructional staff list, etc...
* Organisations holding approvals from several Authorities and having developed common detailed procedures so to facilitate the enforcement of procedures by the staff and to avoid a complex documentary system possibly generating inconsistencies.

The MTOE should however not become an “empty shell” and should still contain sufficient information for the surveyor to verify that the organisation has established acceptable processes in order to comply with applicable regulations. An adequate balance in the level of information must therefore be ensured between the MTOE itself and the associated procedures.

The MTOE shall contain a reference to the associated procedures, lists and to any other major document being managed separately. It is not required that the reference includes the amendment level of the associated documents provided the organisation has developed a “control procedure” and maintains an updated index of all associated documents. Such control procedure must be described in the MTOE and accepted by the surveyor.

Important: Associated documents are considered as being part of the MTOE and have to be submitted to the surveyor for review and acceptance together with the initial MTOE, or when amended. Flexibility may however be granted by the surveyor for minor changes not affecting the approval.

In the following, MTOE is to be understood as MTOE & associated documents.

# Content

When drafting the MTOE it should be kept in mind the purpose of this document. The MTOE should present PERTINENT information allowing to understand how the particular organisation is structured and managed, if the premises, the training equipment and the processes used by the Training Organisation are enabling the performance of training and examination activities in an efficient and verifiable manner, if and how the instructional staffs are and remain properly qualified etc.….

The MTOE should describe the processes, the process-owners, the corresponding procedures, the documents or forms that are used in the course of the process, and the internal or external validations, where applicable.

The principle “say what you do, do what you say” should be applied: it is important that the MTOE accurately reflects the ACTUAL practices of the particular organisation. Failure to do so will inevitably lead to findings raised during audits. Caution is necessary in particular when the training organisation is using the MTOE from another organisation, or from a consultancy provider, as an inspiration to establish its own MTOE.

Notes:

1. Certain sections of the MTOE may not be applicable to all organisations. In this case they should be annotated “not applicable”.
2. The MTOE shall not make reference to any national approval, and must be exclusively dedicated to the EASA Part 147 approval. Other associated documents may however be common to EASA and other authorities as long as the document clearly identifies which parts are or are not applicable to EASA.

# MTOE template

The template to be used when producing the MTOE is available In Annex 1:

# Corporate Commitment by the Accountable Manager.

The MTOE should include in Part 1 a Corporate Commitment Statement signed by the Accountable Manager.

Working drafts of the MTOE may be submitted without this signature. However, once the surveyor has informally agreed on the content of the MTOE, the final version of the document must be sent to the surveyor with the enclosed signed Corporate Commitment statement.

In the case of a change of Accountable Manager, the MTOE shall be revised and the new incumbent shall sign again the corporate commitment. Complete re-issues of the MTOE will require the statement to be signed again.

# Approval

The MTOE and its associated documents are formally approved via a letter sent by EASA to the applicant after EASA has received a favourable Technical Visa from the assigned surveyor.

EASA does NOT sign in the document itself. It is nevertheless recommended to report in section 0.3 (“list of issues/ amendments”) the reference and the date of the EASA letter of approval of the concerned issue/ amendment. This reference should be added before distribution of the document(s) to the MTOE holders.

Important: The approval of the MTOE by EASA does not supersede the applicable regulations. In case a conflict or an omission with regards to the applicable regulatory requirements or to the EASA policies is detected after the approval of the MTOE, EASA reserves the right to request the modification of the concerned paragraphs within a delay to be agreed between EASA and the training organisation.

# Amendments

Proposed amendments to the MTOE or associated documents should be submitted directly to the assigned surveyor for approval. It is not necessary to send draft documents to EASA headquarters.

When satisfied with the draft document, the surveyor will send a recommendation for approval (Technical Visa) to EASA.

Proposed changes should be clearly identified. To this effect,

1. For each revision or new issue, the highlights of changes should be included into the MTOE Part 0. The highlight of changes should be detailed enough for the surveyor to immediately identify which section of the document was modified and the reason for change.
2. Note: In case important changes are made and were not clearly described in the highlight of document, EASA reserves the right to retroactively consider such changes void even if the MTOE was approved.
3. A vertical bar in the margin of each concerned page should identify the modified or added paragraph (not the whole page).
4. A good practice to facilitate the document’s review by the surveyor, and consequently to reduce the approval delays, is to send with the MTOE a complementary document identifying in a table the current text and the proposed new text in regard.

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| Section / page | MTOE rev. 2 | MTOE Rev.3 (draft) |
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After approval of the MTOE, the reference of the EASA approval letter should be added in the dedicated block of the MTOE, Part 0.

# Delegation of approval

The approval of minor MTOE changes may be delegated by the surveyor to the organisation, when appropriate.

Such delegation will only be granted once the Competent Authority surveyor has acquired sufficient knowledge of the organisation and is confident in the Quality Assurance System’ efficiency. To this effect, such delegation should in principle not be granted before a first 2-years surveillance cycle was completed.

The delegated approval process, including the definition of minor changes subject to this procedure, should be described in the Part 1 of the MTOE. In any case the process should include a notification to the surveyor after each change and within a timeframe to be agreed with him/her. The periodic transmission to the surveyor of an index detailing the amendment status of the organisation’s documents may also be required to be part of such procedure.

# Distribution

Aside of the usual internal distribution, it is important for EASA to keep an electronic copy of any document that the Agency has approved.

To this effect, after receiving the confirmation letter of approval of the MTOE (or associate documents), a COMPLETE electronic copy of the MTOE should be sent both to the surveyor AND to EASA at the following e-mail address:

MOC\_147@easa.europa.eu

or be made available for download if the file is too large for direct electronic mail transmission.

The above applies to both the initial documents AND to each amendment or new issue, including to documents approved in accordance with the delegated approval procedure when this privilege has been granted to the organisation.

# Archives

The initial MTOE / associated documents and their subsequent revisions or re-issues should be permanently archived by the organisation.

# Annex 1

**MAINTENANCE TRAINING ORGANISATION EXPOSITION (MTOE)**

This Exposition supports the EASA

PART-147 Maintenance Training Organisation Approval of:

[Organisation’s official Name]

Doing business as [dba]

**EASA.147.** [xxxx]

[Address of Principle Place of Business]

Tel: [phone number]

E-mail: [Organisation contact e-mail address]

Document reference: [document reference]

**Copy No:**  [insert copy number]

**PART 0 - INTRODUCTION**

**0.1 Table of Contents**

**PART 1 – MANAGEMENT**

1. Corporate commitment by Accountable Manager.
2. Management personnel.
3. Duties and responsibilities of management personnel, Instructors, Knowledge examiners and Practical assessors.
4. Management personnel organisation chart.
5. List of Instructional and Examination Staff.
6. List of approved addresses.
7. List of sub-contractors as per 147.A.145 (d)
8. General description of facilities at paragraph 1.6 addresses.
9. Specific list of courses and type examinations approved by the Agency (EASA).
10. Notification procedures regarding changes to organisation.
11. Exposition and associated manuals amendment procedure.

**PART 2 – TRAINING AND EXAMINATION PROCEDURES**

1. Organisation of courses
2. Preparation of course material
3. Preparation of classrooms and equipment
4. Preparation of workshops/maintenance facilities and equipment
5. Conduct of theoretical training & practical training (during basic knowledge training and type/ task training)
6. Records of training carried out
7. Storage of training records
8. Training at locations not listed in paragraph 1.6
9. Organisation of examinations
10. Security and preparation of examination material
11. Preparation of examination rooms
12. Conduct of examinations (basic knowledge examinations, type/ task training examinations and type examinations)
13. Conduct of practical assessments (during basic knowledge training and type/ task training)
14. Marking and record of examinations
15. Storage of examination records
16. Examinations at locations not listed in paragraph 1.6
17. Preparation, control & issue of training course certificates
18. Control of sub-contractors

**PART 3 – TRAINING SYSTEM QUALITY PROCEDURES**

3.1 Audit of training

3.2 Audit of examinations

3.3 Analysis of examination results

3.4 Audit and analysis remedial action

3.5 Accountable Managers annual review

3.6 Qualifying the instructors

3.7 Qualifying the examiners and the assessors

3.8 Records of qualified instructors and examiners

**PART 4 – APPENDICES**

4.1 Example of documents and forms used

4.2 Syllabus of each training course

4.3 Cross reference index - if applicable

**0.2 List of Effective Page**

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| **Page Number** | **Revision** | **Date** | **Page number** | **Revision** | **Date** |
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**0.3 List of issues / amendments**

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| **Issue/amendment**  **Number** | **Date** | **Highlight of changes** | **minor / Major change** |
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Amendment number [revision number]dated [date]

This issue/ amendment has been internally approved by: [insert name, function, signature, date]

This amendment has received the approval of EASA through letter ref. [reference] dated [date]

**0.4 Distribution List**

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| **MTOE COPY NUMBER** | **MTOE HOLDER** |
| Copy No. 1 | [Insert MTOE holder’s function or department, etc…] |
| Copy No. 2 |  |
| Copy No 3 |  |
| Copy No. 4 |  |
| Copy No. 5 |  |
| Copy No. 6 |  |
| Copy No. 7 |  |
| Copy No. 8 |  |

**PART 1: MANAGEMENT**

**1.1 CORPORATE COMMITMENT BY THE ACCOUNTABLE MANAGER**

This exposition defines the organisation and procedures upon which the EASA PART- 147 Organisation approval is based.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published by EASA from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that EASA will approve this organisation whilst EASA is satisfied that the procedures are being followed. It is understood that EASA reserves the right to suspend, vary or revoke the PART-147 training system approval of the organisation, as applicable, if EASA has evidence that the procedures are not followed and the standards not upheld.

These procedures are approved by the undersigned and must be complied with, as applicable, whenever knowledge or practical training is being progressed under the terms of the PART-147 approval.

The undersigned fully accepts the duties and responsibilities of Accountable Manager as defined in paragraph 1.3 of this exposition.

Signed [insert signature of Accountable Manager]

Accountable Manager [insert name, signature]

For and on behalf of [insert company name]

* 1. **CORPORATE COMMITMENT (continued):**

**1.2 Management personnel**

**Accountable Manager**……………………..… [Insert name, function] ……… [Indicate deputy (function)]

**Quality Assurance Manager**……………… [Insert name] ……………... [Indicate deputy (function)]

**Training Manager**……………………………… [Insert name] ………….….… [Indicate deputy (function)]

**Examination Manager**……………………….. [Insert name] ……………..… [Indicate deputy (function)]

**Other** (*as required*) ……………………………. [Insert name] ……….…….… [Indicate deputy (function)]

The Managers specified above are identified and their credentials apart from the Accountable Manager have been submitted on EASA Form 4 to the Agency.

Any changes to the above personnel shall be advised to the Agency. Failure to do so may affect the status of the PART-147 approval.

**1.3 DUTIES AND RESPONSIBILITIES OF MANAGEMENT PERSONNEL, INSTRUCTORS, KNOWLEDGE EXAMINERS AND PRACTICAL ASSESSORS**

* + 1. **Accountable Manager**

[Describe duties and responsibilities]

* + 1. **Quality Assurance Manager**

[Describe duties and responsibilities]

* + 1. **Training Manager**

[Describe duties and responsibilities]

* + 1. **Examination Manager**

[Describe duties and responsibilities]

* + 1. **Instructors**

[Describe duties and responsibilities]

* + 1. **Knowledge Examiners**

[Describe duties and responsibilities]

* + 1. **Practical Assessors**

[Describe duties and responsibilities]

* + 1. **Others** (as required)

[Describe duties and responsibilities

* 1. **Management personnel organisation chart**

[Insert management personnel organisation chart]

**1.5 List of instructional and examination staff**

[Insert list of instructional and examination staff or cross-refer to a controlled separate list]

* 1. **List of approved addresses**

[Insert list of approved training / examination sites]

1. **List of sub-contractors as per 147.A.145 (d)**

[Insert list of sub-contractors or cross-refer to a controlled separate list]

**1.8 General description of facilities at paragraph 1.6 addresses**

[Describe the training & examination facilities]

**1.9 Specific list of courses and type examinations approved by the Agency**

[Insert list of approved courses]

[Insert list of type examinations] \*

(\*: “type examination” refers to standalone examinations carried out when a type training is not required as per Part 66.A.45.)

**1.10 Notification procedures regarding changes to organisation**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**1.11 Exposition and associated manuals amendment procedure**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**PART 2 TRAINING AND EXAMINATION PROCEDURES**

**2.1 Organisation of courses**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.2 Preparation of course material**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.3 Preparation of classrooms and equipment**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.4 Preparation of workshops/maintenance facilities and equipment**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.5 Conduct of theoretical training & practical training (during basic knowledge training and type/ task training)**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.6 Records of training carried out**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.7 Storage of training records**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.8 Training at locations not listed in paragraph 1.6**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.9 Organisation of examinations**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.10 Security and preparation of examination material**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.11 Preparation of examination rooms**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.12 Conduct of examinations (basic knowledge examinations, type/ task training examinations and type examinations)**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.13 Conduct of practical assessments (during basic knowledge training and type/ task training)**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.14 Marking and record of examinations**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.15 Storage of examination records**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**2.16 Examinations at locations not listed in paragraph 1.6**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

* 1. **Preparation, control & issue of training course certificates**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

* 1. **Control of sub-contractors**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**PART 3 TRAINING SYSTEM QUALITY PROCEDURES**

1. **Audit of training**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

1. **Audit of examinations**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**3.3 Analysis of examination results**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**3.4 Audit and analysis of remedial action**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**3.5 Accountable Manager annual review**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

1. **Qualifying the Instructors**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

1. **Qualifying the examiners and the assessors**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**3.8 Records of qualified instructors and examiners**

[Describe the process and, when applicable, cross-refer to the associated detailed procedure]

**PART 4 – APPENDICES**

1. **Example of documents and forms used**

[Insert templates of documents and forms used by the Training Organisation]

1. **Syllabus of each training course**

[Insert the EASA “course approval forms” ref. FO.CAO.00XXX]

1. **Cross-reference index - if applicable\***

[Insert cross-reference index]

(\* Where an organisation is approved in accordance with any other Part(s) which require an exposition, it is acceptable to combine the exposition requirements by merging the Part 1 items and adding the Parts 2, 3 and 4. When this method is used, it is essential to include the cross reference index of Part 4 item 4.3.