

OJT (On the Job Training) for a Part-66 licence

What is the intention of the requirement regarding the assessment of the OJT. What is the nature of the assessment for an OJT? What are the differences between practical assessment and OJT assessment? What are the objectives of the OJT assessment?

Answer

The practical assessment addresses the practical portion of any type training whereas the OJT assessment addresses the additional practical experience necessary to gain in a true maintenance environment as part of the first type rating in a (sub)category, as illustrated by the table below:

	PRACTICAL ASSESSMENT	OJT ASSESSMENT <i>For the purpose of 66.A.45(c)</i>
What/who is assessed:	Candidates following practical element of training.	Completeness of the OJT.
	<i>Reference: 66.A.45 (a)&(b); Appendix III, 4.2.; AMC Appendix III</i>	<i>Reference: 66.A.45 (c); Appendix III, section 6; AMC to Section 6 of Appendix III</i>
Function of assessor:	To perform the final evaluation of the knowledge, skills and attitude of the trainee following the practical element of the type training	To conduct the final assessment of the completed OJT, whereas the candidate's competence is indirectly justified.
	<i>Reference: Appendix III 4.2.; AMC Appendix III</i>	<i>Reference: Appendix III, 6.; AMC to Section 6 of Appendix III 8.</i>

<p>Organisation • Part-147</p> <p>:</p> <ul style="list-style-type: none"> • Approved maintenance environment (Part-145, M.A. Subpart F with A rating, manufacturer) under the Part-147 approval • Defined maintenance environment as described in the direct approved procedure by the competent authority (66.B.130) <p><i>Reference: Appendix III 1(b)</i></p>	<p>Always in a maintenance organisation approved under Part-145 with an aircraft rating</p> <p><i>Reference: Appendix III 6.; AMC to Section 6 of Appendix III 1.</i></p>
<p>Objectives:</p> <p>To evaluate if the candidate has gained the required competence in performing safe maintenance, inspections and routine work according to the aircraft documentation and other relevant instructions and tasks as appropriate for the type of aircraft.</p> <p><i>Reference: Appendix III, 3.2.</i></p>	<p>To confirm the completion of the required diversity and quantity of OJT, based on the supervisor(s) reports and feedback. 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.</p> <p><i>Reference: AMC to Section 6 of Appendix III 7. & 8.</i></p>
<p>Type of assessment:</p> <p>The assessment may be:</p> <ul style="list-style-type: none"> • diagnostic (prior to a course), • formative • summative (partial or final evaluation) • performed task-by-task • performed as a group of tasks • partly executed on simulation devices • performed as a final assessment <p><i>Reference: AMC to Part-66 Appendix III 2)</i></p>	<ul style="list-style-type: none"> • Continuous during OJT (confirmed by the direct supervisor) • Summative, as a final evaluation of the completeness of the OJT (based on the supervisor(s) reports and feedback) <p><i>Reference: AMC to Section 6 of Appendix III to Part-66</i></p>

<p>Qualification of the assessor:</p> <p>The assessment shall be performed by designated assessors appropriately qualified. It means that the assessors should demonstrate training and experience on the assessment process being undertaken and be authorised to do so by the organisation. Guidance about the qualification is given in AMC to Part-66 Appendix III 3.)</p> <p><i>Reference: Appendix III 4.2.; AMC to Part-66 Appendix III 3.)</i></p>	<p>The OJT shall be assessed by designated assessors appropriately qualified. It means that the assessors should demonstrate training and experience on the assessment process being undertaken and be authorised to do so by the organisation. Guidance about the qualification is given in AMC to Part-66 Appendix III 3.)</p> <p><i>Reference: Appendix III 6.; AMC to Part-66 Appendix III 3.)</i></p>
<p>Procedure included in:</p> <p>Part-147 MTOE</p> <p><i>Reference: Appendix III 1(b); Part-147</i></p>	<p>Part-145</p> <p>Maintenance organisation exposition (chapter 3.15) or “one-off” direct approval</p> <p><i>Reference: AMC 145.A.70 (a)</i></p>

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(OJT) What is the meaning of the following statement in Part-66 Appendix III, Section 6: “The final assessment of the completed OJT is mandatory and...”?

Answer

The **completeness** of the whole OJT process shall be assessed. The intent of the requirement is not to suggest that:

- there should be an assessment performed by the assessor on top of every task monitored by the supervisor; and/or
- at the very end of the OJT programme, there should be a comprehensive hands-on assessment of the candidate on a real aircraft as an additional and ultimate evaluation

All report(s) or feedback from the supervisor(s) having monitored every actual job task performance or any other source of information (use of manuals and procedures; observance

of safety measures, warnings and recommendations; adequate behaviour in the maintenance environment), the designated assessor should be in a position to:

- ensure that the OJT procedure was fully met (in terms of objective and content); and
- check that the competence of the candidate was positively assessed.

In case of doubt, the assessor may decide to proceed him/herself to an additional evaluation of the candidate or perform a gap analysis when the OJT procedure is not fully met such as an insufficient number of tasks or diversity of tasks or unclear supervisor's report regarding the candidate's performance. The supervisor should not sign the actual task if the person did not achieve the required competence in safe task performance.

Note: It is worth being reminded here that OJT addresses:

- *the first type rating in a (sub)category of aircraft; and*
- *subsequently addresses young mechanics (e.g. "newcomers") or mechanics having no experience in that new (sub)category of aircraft (e.g. extension of the license).*

AMC to Section 6. of Appendix III to Part-66 gives more clarification about the assessment process and the function of the assessor:

- *"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", and*
- *"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".*

It is left to the decision of the competent authority how to comply with this requirement: the AMC as suggested by the Agency aims at avoiding additional burden, duplication or over-regulation while proposing a simple final evaluation process.

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Tasks listed in Appendix II of Part-66 for an OJT are not suited to large aircraft. Shall we select the OJT tasks only from this list?

Answer

Not only, because it is required that:

- the tasks for an OJT must be representative of the aircraft: this means that the tasks listed in

Appendix II which are representative of the aircraft or another model in the type rating should be kept and those not representative be disregarded,

- some tasks should be selected from each paragraph of the Appendix II list: this means that it is not necessary to perform exactly 50% in each ATA chapter,
- new tasks more representative of the type of aircraft may be added by the maintenance organisation,
- the OJT tasks should be selected because of their frequency, safety, novelty: tasks selected among those frequently carried out by the organisation on this type or more related to safety should be deleted.

Note: See [AMC to Section 6 of Appendix III to Part-66 point 4 and 5](#)

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How tasks for OJT shall be selected for different licences?

Answer

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 ..., to a B2 or L5,
- and be adapted to the privilege of each licence category / subcategory as defined in 66.A.20(a):
 - for a B1 licence: aircraft structure, power plant and mechanical and electrical systems + work on avionics system with simple test but not including trouble shooting;
 - and those related to a B2: avionics, aircraft electrical system tasks and avionics/electrical tasks within mechanical and power plant systems; or
 - and those related to a L5: aircraft structure, power plant, mechanical and electrical systems, radio, Emergency Locator Transmitters (ELT), transponder systems and other avionics systems requiring simple tests to prove their serviceability.

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Since the OJT is intended for the first aircraft type endorsement within a

given licence (sub)category, does this mean that it can be performed on different aircraft types typical for that (sub)category?

Answer

OJT shall be performed on the aircraft type for which the applicant is seeking type endorsement. The objective of the OJT is to gain the required competence and experience in performing safe maintenance **on that particular aircraft type**.

However, a certain number of tasks may be performed on other aircraft type(s) (typically from the same manufacturer), only in the cases where such tasks are very similar to the tasks applicable to the aircraft type for which the candidate seeks the type endorsement. The AMC to section 6. of Appendix III to Part-66 states: *“Tasks should be selected among those applicable to type of aircraft and licence (sub)category applied for.”* Tasks applicable to the aircraft type may be found also on other aircraft types, perhaps not many, but some may fulfil the requirement. A good example would be same engine types installed on different aircraft types (i.e. CFM56 installed on A320 Family and B737). The location of LRUs, oil servicing, IDG, generator, filter change, engine standard practices, etc., those tasks often do not depend on the specific aircraft type (even could be performed off-wing or on spare engine), except the tasks belonging to the airframe - engine interface. The similar can also be applied for the same type of APU installed on different aircraft types or a limited number of other components/systems. Consequently, this may be acceptable, if properly justified to the competent authority within the MOE Chapter 3.15. **This flexibility provision is applicable for a limited number of tasks and should not be used to conduct the entire OJT on other aircraft type(s) showing similarities.**

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What should be the content of the OJT procedure in MOE chapter 3.15?

Answer

As agreed during the Standardisation Meeting with the competent authorities, as a minimum, the OJT procedure should describe the following elements:

- Content of the OJT: the list of tasks that should be performed during the OJT or a list of generic tasks and the process how to develop a list of particular tasks out of this list of

generic tasks,

- Qualifications of the assessor and supervisors performing the OJT,
- OJT logbook/worksheets format and content,
- OJT compliance report format and content,
- Production planning for the implementation of OJT (how to plan the tasks),
- Supervision process and the assessment process, what to do if the assessment is not positive,
- Safe release to service of the aircraft after OJT.

Note: AMC to Section 6. of Appendix III to Part-66 should be used when defining the content of the procedure.

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I work in a maintenance organisation approved by the competent authority of a country different from the one who issued my Part-66 licence. An OJT programme via MOE chapter 3.15 has been approved by the competent authority of my maintenance organisation. However, my licensing authority refuses to accept the OJT from the organisation I'm working for. Why? What shall I do?

Answer

Please review the extracted requirements here below from Part-66 Appendix III, Section 6:

- '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**'.
- 'OJT shall cover a cross section of tasks acceptable to the competent authority'.
- 'In order to facilitate the verification by the competent authority, demonstration of the OJT shall consist of:
 - detailed worksheets/logbook and
 - (ii) a compliance report demonstrating how the OJT meets the requirement of this Part.'

Since the procedure in MOE is approved by the competent authority of the maintenance organisation, it can only be used when the licensing authority is the same as the competent authority of the maintenance organisation. In other cases, the licensing authority may accept

such OJT after assessing and approving the programme, **which should usually be done prior to starting the OJT**. This is described in AMC 66.B.115 point (c) states that “in the case where the licensing competent authority is different from the competent authority of the maintenance organisation which provides the OJT, **your licensing authority may take into consideration the fact that the maintenance organisation has the OJT programme already accepted by their own competent authority** (through chapter 3.15 of the MOE, as described in AMC 145.A.70(a))”.

Since your competent authority is responsible for the issue and extension of your licence, please follow the instruction of your competent authority and try to find a solution based on the above AMC.

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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 with A rating or 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, 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 a 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.

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