IEP CHECKLIST

A SAFETY ASSURANCE COMPONENT OF YOUR SMS

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Maintenance 3.

Quality Assurance (PART 135)

Quality Assurance: A system that continuously analyzes the performance and effectiveness of all maintenance programs (CASS- Continuing Analysis and Surveillance System) is required for Part 135 operators with aircraft type-certificated for a passenger seating configuration of 10 seats or more (135.431). All operators should apply the quality principles described in CASS, regardless of aircraft seating structure, because of the safety benefits afforded (AC120-79A). The construct of this system should be directly related to operator size and scope, using quality assurance fundamentals consistent with effective aircraft maintenance. By applying CASS quality principles, each functional area of the maintenance organization is examined for effective performance. This allows continuous oversight and analysis of the performance and effectiveness of maintenance activities and aircraft inspection programs. The root cause of any discrepancy, or finding, discovered as part of quality assurance activities is determined, documented, and corrected. Action is taken to prevent recurrence of these discrepancies and preventive actions are monitored to ensure effectiveness. The results of preventive actions are provided to appropriate maintenance technicians. A properly executed CASS or quality assurance program promotes sound safety culture and indicates that an operation is seeking high reliability.

PART 135

SCALE OF 1-5

1 – Unsatisfactory
2 – Poor
3 – Meets Minimum Standards
4 – Excellent
5 – Best Practice

If your answer is not a 3 or better, you must record a finding that requires corrective action.

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1. **Are the findings discovered during quality audits adequately documented and tracked? Are significant matters communicated to applicable management personnel in a timely manner?**

   (FAR 135.431; AC 120-79A; IS-BAO 15.1.2, 15.1.5.1.f, 15.1.10; ARGUS Platinum 8.3.1-8.3.3; NBAA Management Guide 3.7)

   (Documentation) Each finding must be recorded for tracking and trending purposes. Historical records will indicate repeat problems and areas of weakness. Communicating maintenance performance to company management in a practical manner will improve awareness and decision making.

1	2	3	4	5

2. **Is each audit finding assigned corrective action? Are the corrective actions tracked? Is the finding corrective action validated at a later point in time? Is this process well documented?**

   (FAR 135.431; AC 120-79A; ARGUS Platinum Standard 8.3.2; NBAA Management Guide 3.7; IS-BAO 3.6.1.e, 15.1.2.2)

   (Documentation) A tracking method that keeps quality audit information organized is essential. All audit findings must be corrected and reviewed by applicable management personnel/subject matter experts and tracked until closure. Follow-up inspections are usually required to verify the validity of corrective actions. Every corrective action should address the underlying root cause of the finding.

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3. **Is data collected effectively from quality assurance audits? Is it being analyzed adequately? Are reports generated?**
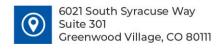
   (FAR 135.431; AC 120-79A; ARGUS Platinum 8.3; NBAA Management Guide 3.7; IS-BAO 15.1.2, 15.1.5.1.f, 15.1.10.1)

   (Documentation) Audits are also accomplished to collect information and identify trends. Data relating to maintenance performance can indicate areas needing improvement. While the FAA does not mandate specific data to be collected, they do expect a process that ensures the data is useful and meets the intent of the CASS requirement. Routine data examples include component tear-down reports and individual component failure rates. Non-routine data may include service difficulty reports and unscheduled parts replacement. Non-routine events may include uncontained engine failures and lightning strikes. The cause of any recurring discrepancy or negative trend should be researched and documented. The results of preventive actions are then communicated to appropriate maintenance technicians.

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4. Documentation: Are records retained and complete for approved vendors?

(FAR 135.426 & 135.431, AC 120-79A; IS-BAO 7.5, 12.1.1, 15.1.6.1; ARGUS Platinum 4.4.1, 6.1.1, 8.3.4-8.3.6.a; NBAA Management Guide 3.7 & 3.9.5)

(Documentation) Files on approved vendors should contain a copy of their repair certificate indicating capabilities and limitations, the last completed vendor audit checklist with results and follow-up, and a copy of the vendor's drug/alcohol program letter of authorization and/or Drug/Alcohol Ops Specs A449 (if applicable). All approved vendors should have substance abuse training programs. Documentation files should also contain any maintenance agreements including provisions that require formal controls that prevent vendor maintenance personnel from performing work on company aircraft when fatigued.

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5. Does the operation have written policies and procedures that require specific internal examination of critical maintenance functions via a coordinated system?

(FAR 135.431; AC 120-79A; IS-BAO 15.1.2 ARGUS Platinum 8.3; NBAA Management Guide 3.7)

(Programs/Procedures) Defined quality assurance policies provide authority and assign responsibility for this effort. One individual should be assigned to oversee quality programs, as an additional duty. Operators of aircraft with 9 or less passenger seats should have an effective internal quality audit program focused on maintenance operating efficiency. Operators of aircraft with 10 or more passenger seats must have a continuing analysis and surveillance system (CASS). CASS has four inseparable parts: Surveillance (auditing, data collecting), Analysis (risk assessment, root cause analysis), Corrective Action (prevention, counter measures), Follow-up (corrective action monitoring, verification). These parts line up perfectly with safety management activities but take a quality assurance approach to aircraft maintenance. Defined procedures for CASS, specific to your operation, should be followed in accordance with published company policy.

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6. Is there a defined internal quality assurance system with effective oversight of all maintenance functional areas, including satellite organizations if applicable? Are specific duties and responsibilities for the quality assurance system assigned?

(FAR 135.431, AC 120-79A, IS-BAO 15.1; ARGUS Platinum 8.3; NBAA Management Guide 3.7)

(Programs/Procedures) All operators should have a formal, documented internal audit program that examines each maintenance functional area, and verifies compliance with company policies and procedures, and FAA regulations. System complexity is dependent on operator size and scope. There should be no gap in the examination of maintenance activities by quality assurance activities. The objective is to verify all facets of maintenance performance and effectiveness. An internal evaluation program is not a substitute for CASS for 10 or more seat operators and would act as independent system. The IEP should be used to determine if the CASS is being performed and effective. Oversight of the operator's maintenance management duties and responsibilities should also be incorporated into the internal evaluation process.

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7. Is there a method in place to schedule and track results of required quality audits? Is the schedule being followed?

(AC 120-79A 9-2; NBAA Management Guide 3.7; IS-BAO 15.1.2.2)

(Programs/Procedures) An audit plan should be published with a rolling 12-month window that contains a schedule for each maintenance functional area to be audited. The schedule should include the area to be examined, and the auditor assigned. The documentation tracking quality audit results should be well organized and available to concerned individuals.

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8. Are there work interruption procedures?

(FAR 135.427; AC 120-79A; ARGUS Platinum 8.3.9; NBAA Management Guide 3.6)

(Programs/Procedures) Each technician should document work interruptions and deferred maintenance in shift turnover records to ensure that any maintenance not completed due to work interruption is properly completed prior to aircraft return to service. These procedures should be tailored to the individual operation to ensure that they are effective.

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9. Is there a maintenance vendor/supplier audit program? Is the approved vendor list current, and made available to those responsible for purchases and maintenance support?

(FAR 135.426 & 135.431; AC 120-79A; IS-BAO 15.1.6.1; ARGUS Platinum 8.3.4-8.3.6.a; NBAA Management Guide 3.7 & 3.9.5)

(Programs/Procedures) Vendor work should be validated through an audit program, as appropriate. Vendor approval may require successful accomplishment of either an on-site or desk audit, or a one-time approval checklist. Every purchaser must have access to a current vendor list. Parts must be verified received from approved vendors only. A documented process should be in place to approve new parts suppliers and distributors. The object of vendor approval is to ensure the vendor is certified to perform the work required, has an approved substance abuse and fatigue risk management programs, and has the quality programs necessary to ensure good service and compliance with FAA regulations and industry standards.

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10. Does the vendor audit program track and follow-up on discrepancies or concerns discovered during audits??

(FAR 135.426 & 135.431; AC 120-79A; ARGUS Platinum 8.3; NBAA Management Guide 3.7 & 3.9.5)

(Programs/Procedures) Vendor audit discrepancies and concerns should be reviewed by appropriate personnel and tracked until the discrepancy is resolved. The vendor should not be used until concerns are addressed at a satisfactory level. Follow-up is required to verify validity of corrective actions. This information can aid in vendor selection/use.

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11. Is there a formal maintenance tool/test equipment calibration program? Is this program documented in the GOM?

(FAR 135.427; AC 120-79A; IS-BAO 15.2.2.1; ARGUS Platinum 8.3.7; NBAA Management Guide 3.2, 3.7)

(Programs/Procedures) There must be a method to track tool inventory and calibration status. Some facilities may have bar code identification and tracking. Files should be kept that contain certification forms for each tool requiring calibration. An ongoing monitoring system must be used to verify only properly calibrated tools are available for use. Additionally, there must be a means to ensure that any employee owned tools that are allowed to be used on company aircraft are kept calibrated. Calibrated tools should be separated from non-calibrated tools.

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12. Is there evidence of a risk management process that evaluates quality audit findings and associated corrective actions? Does this process utilize root cause analysis to help determine the appropriate level of risk?

(FAR 135.431; AC 120-79A; ARGUS Platinum 8.3.2; NBAA Management Guide 3.7; IS-BAO 3.2.2; 3.6.1.e)

(Programs/Procedures) A risk management process involves realizing the risk encountered as a result of a weakness in terms of probability and severity, and indicates where to allocate resources and the potential ramifications of discovered deficiencies. Root cause analysis treats errors as defects in the system rather than personal blame. A thorough analysis will uncover the why the deficiency occurred and help identify how the organization can react in a generative way.

1	2	3	4	5

13. Is there a documented Tool Control Program?

(IS-BAO 15.2.2.2; ARGUS Platinum 8.3.8; NBAA Management Guide 3.7)

(Programs/Procedures) There needs to be a Tool Control Program to ensure that all tools are accounted for following any maintenance task. There also needs to be documented processes/procedures to ensure vendor conformance with the Tool Control Program.

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