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# IEP CHECKLIST

A SAFETY ASSURANCE COMPONENT OF YOUR SMS

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SEPTEMBER 2025

## MAINTENANCE 6.

Maintenance Control/Planning (PART 91)

### Maintenance Control/Planning:

A formal system is required to ensure maintenance activities are completed on time and within procedural and regulatory guidelines. Aircraft status must be accurately tracked using constant and effective communication; critical information must flow between maintenance and operations. Qualified personnel must monitor maintenance planning, ensure completion of maintenance actions, and track deferred discrepancies without exception. Auditing required tracking items is the most effective method of monitoring and verifying. Deferred maintenance actions should be identified to supervisory personnel and corrected in accordance with the criteria provided by the manufacturer and the operation's own MEL.



# PART 91



**1. Is there a formal system in place that provides effective methods to control and monitor all maintenance activities and track aircraft status?**

(FAR 91.405; IS-BAO 15.1; NBAA 3.6)

(Organizational) The maintenance control system should be appropriate to the number and type of aircraft flown by your flight department. Some sample software programs with this capability include AvTrack, CAMP Systems, and CTA/FOS. These tools must be used correctly and consistently to meet requirements. Examine tracking logs to verify all activities and inspections are monitored and documented.

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**2. Does the maintenance control system accurately identify all of the instances that require a service difficulty report (Malfunction or Defect Report)?**

(FAR AC 20-109B)

(Program/Procedures) The maintenance control system should identify defects or malfunctions and document the submission of the SDR. The SDR can be submitted into the Service Difficulty Program (General Aviation) using the FAA Form 8010-4, Malfunction or Defect Report (10-92).

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**3. Is a periodic conformity check used to audit exiting aircraft safety equipment item due dates as compared to the computerized tracking program to ensure equipment is inspected accurately?**

(IS-BAO 15.1.5.1; NBAA Management Guide 3.7)

(Program/Procedures) Verifying the accuracy of the tracking system will indicate planning and management effectiveness. An electronic tracking program is most often used to ensure these required inspections are completed. A maintenance control system will periodically audit this tracking system to ensure it is working.

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**4. Are maintenance personnel appropriately familiar with the specific details and requirements of the company's maintenance control system? Are they familiar with its description and procedures as listed in the operating manual as applied to the work they perform?**

(IS-BAO 15.1.6.2)

(Program/Procedures) Each maintenance technician should have easy access to a copy of the company operating manual containing the maintenance control procedures. Training on this subject should be conducted for new personnel with subsequent yearly recurrent training. This training curriculum should be comprised of a defined set of topics and reviewed at least annually.

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**5. Are there existing procedures in-place that adequately track MEL/deferred maintenance issues to closure? How well are these issues managed?**

(FAR 91.213 & 91.405; IS-BAO 14.4 & 15.1.10; NBAA Management Guide 3.9)

(Program/Procedures) A process must be in place to track the status, parts/equipment/manpower requirements, and critical dates of all deferred maintenance issues until final closure. The effective use of these tracking procedures should be thoroughly reviewed via an internal maintenance review process like an internal evaluation program specifically focused on this area with frequent audits of deferred MEL items. Managers should be measuring the effectiveness of the maintenance control system using MEL/deferred issues performance as an indicator.

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**6. Are maintenance release practices in compliance with minimum equipment list (MEL) procedures and do all flight releases match the requirements as outlined in the company operating manual?**

(FAR 91.213; IS-BAO 15.1.9.1; NBAA Management Guide 3.9)

(Program/Procedures) An MEL program should be effectively described to ensure adherence with correct procedure. Maintenance write-ups and signoffs must be accessible to the flight crew. Verify all the proper procedures are followed before an aircraft is returned to service under a provision of the MEL, and all aircraft releases follow proscribed procedures and regulations.

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**7. Are there defined criteria to identify and classify repeat discrepancies? Examine how these discrepancies are managed. Are repeat items appropriately identified and tracked? Is root cause analysis used to determine the cause?**

(IS-BAO 15.1.10.1[c]; NBAA Management 3.9)

(Program/Procedures) Items written up by flight crews multiple times should be identified and tracked as repeat discrepancies. The maintenance control system should identify, track, and document repeat items for trend analysis over long periods of time. MEL data should be utilized to help identify repeat discrepancies and trends for analysis. A defined method for analyzing this metric to provide visibility and enable effective decision making is critical.

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**8. Does the appropriate company manual contain a thorough description of the maintenance control system?**

(IS-BAO 15.1.1)

(Policy) The descriptive outline of the maintenance control system in the company operations manual should contain details of what maintenance functions are assigned to whom, what procedures are used in the performance of such work, and the identification of required maintenance schedules. The manual should also outline the technical dispatch instructions for each aircraft, defect reporting and rectification procedures, and assessment procedures for Service Bulletins and Airworthiness Directives.

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**9. If the operation conducts ferry flights does the company operating manual contain procedures describing the approval process for these flights?**

(FAR 21.197; IS-BAO 15.1.11.2; NBAA Management Guide 3.9)

(Policy) Is there a documented procedure for the approval of ferry flights? Company procedures should contain detailed instructions for ferry flight approval and a list of those individuals authorized to request approval for a ferry flight.

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**10. Are there specific provisions in the company operations manual for flight crew to obtain maintenance services when away from home base, and how is the repair information incorporated into the maintenance control system? Is this away from home base repair information tracked without exception?**

(IS-BAO 15.1.6; NBAA Management Guide 3.9.5)

(Policy) Well thought out procedures should be established to deal with this possibility. The dynamics of being "stuck on the road" lend themselves to potential human factors problems like get-home-itis. Effective repair options can alleviate these issues.

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**11. Are maintenance managers/directors effectively communicating maintenance control and planning issues to operations personnel?**

(NBAA Management Guide 3.9)

(Communication) Does the location and structure of the maintenance organization support effective communication of planning items with the rest of the operation? Operations and Maintenance should be organizing the management and allocation of resources together to determine the best solutions for scheduling and returning aircraft to service. Are scheduled aircraft down periods communicated to operations well in advance? Look for a calendar-based plan that has been published and is available for operational planning. Airworthiness issues should be communicated to flight crews to coordinate deferrals and maintenance actions.

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**12. Is there sufficient oversight in-place to ensure that contracted maintenance companies comply with the operators' maintenance control and return to service procedures as defined in the company operating manual?**

(IS-BAO 15.1.6; NBAA Management 3.9.5)

(Supervisory) All contract maintenance organizations should be approved through an internal vendor approval process. Applicable vendors should be periodically audited to assure compliance and to update their capabilities. This can be accomplished via an on-site or mail-in audit, if appropriate.

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**13. Does the scheduling and utilization of aircraft provide sufficient time to adequately troubleshoot problems and complete repairs? Are maintenance personnel ever pressured to compromise required work? Is there a hazard reporting process that is responsive to hazards or fatigue issues reported by maintenance personnel?**

**(IS-BAO 3.2, 12; NBAA Management 1.3.2.22.1, 3.7, 3.11)**

(Safety Culture) Managers must allow adequate time to work on aircraft, within the design of the maintenance system. Determine if maintenance crews are asked to work odd hours; fatigue is not only measured by the total number of hours worked but also the time of day in which the work is performed. Aircraft discrepancies must be resolved adequately, and maintenance personnel given appropriate time and resources to maintain aircraft according to directives and procedures.

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