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IEP CHECKLIST

A SAFETY ASSURANCE COMPONENT OF YOUR SMS

Attention:

If you are using the new PRISM SMS Tools, the checklist will appear in the IEP Manager - Manage Templates area where you can select "use a copy".

If you are using the legacy PRISM ARMOR SMS Tools, the checklist will appear on the IEP Manager homepage where you can modify it or use it as is.

If you need some assistance, please send an email to prism@argus.aero.

JANUARY 2026

MAINTENANCE 8.

Maintenance Records (PART 91)

Maintenance Records:

All aircraft maintenance actions are completely documented and provide a thorough record of all maintenance accomplished. Records such as aircraft logbooks and maintenance documentation are legibly prepared, dated, clean, readily identifiable, and maintained in an orderly fashion. Inspection compliance, airworthiness release, and maintenance release records, etc. are complete and signed by designated personnel in a timely manner.



PART 91



- 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.

1. Are all maintenance records audited internally at an adequate frequency to ensure compliance with regulatory and manufacturer requirements?

(FAR 91.417; IS-BAO 15.1.8; NBAA Management Guide 5.7)

(Program/Procedures) An internal audit review process should exist to examine maintenance records on a set frequency. This quality audit approach will discover findings, or discrepancies, that indicate latent record keeping deficiencies. Look for evidence the root cause of identified findings is determined and a corrective action plan to remedy the deficiency is executed and documented. These audits should have supervisory review that provides a “second set of eyes” to eliminate conflict of interest concerns.

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2. Assess the quality of all maintenance record audits. Are all pertinent aircraft inspection and compliance documents evaluated?

(FAR 91.405; IS-BAO 15.3.1.1; NBAA Management Guide 5.6)

(Program/Procedures) Internal audits should examine the completeness and consistency of items such as: Aircraft logbooks, MEL records, AD compliance, CASS meeting minutes (if utilized), vendor audits, status reports, training records, etc. Audits should follow a checklist or similar guide for standardization. Be wary of any audit that has the appearance of “checking the box.”

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3. Is the operation’s maintenance inspection program identified in aircraft logbooks?

(FAR 91.409; IS-BAO 15.1.2.1; NBAA Management Guide 5.5)

(Program/Procedures) In aircraft maintenance logbooks, one of the following inspection programs must be identified: One of the inspections stated in 91.109. For large airplanes, a continuous airworthiness maintenance program under 135.411 (a)(2), an approved aircraft inspection program under 135.419, a current inspection program approved by the manufacturer, or another inspection program approved by the FAA.

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4. Is documentation supporting the aircraft operational empty weight current and show evidence of being consistently maintained throughout all aircraft and equipment changes and modifications?

(FAA AC 120-27F; IS-BAO 15.1.4; NBAA Management Guide 5.7)

(Program/Procedures) The procedure used to ensure operational empty weight is accurately maintained should be described in the appropriate company manual. Equipment permanently used in the galley, closets, and lavatory should be accurately included in the empty weight.

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5. Are maintenance records detailed and do they contain appropriate information?

(FAR 91.417; IS-BAO 15.1.8; NBAA Management Guide 5.7)

(Program/Procedures) Records of maintenance must contain: The total time in service of the airframe, each engine, each propeller, and each rotor. The current status of life-limited parts of each airframe, engine, propeller, rotor, and appliance. The time since last overhaul of all items installed on the aircraft which are required to be overhauled on a specified time basis. The current inspection status of the aircraft, including the time since the last inspection required by the inspection program under which the aircraft and its appliances are maintained. The current status of applicable airworthiness directives (AD) and safety directives including, for each, the method of compliance, the AD or safety directive number and revision date. If the AD or safety directive involves recurring action, the time and date when the next action is required. Copies of the forms prescribed by § 43.9(d) of this chapter for each major alteration to the airframe and currently installed engines, rotors, propellers, and appliances. Records of maintenance must include: A description (or reference to data acceptable to the Administrator) of the work performed, the date of completion of the work performed, the signature, and certificate number of the person approving the aircraft for return to service.

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6. Are maintenance records consistently kept organized and well maintained?

(FAR 91.417c; IS-BAO 15.1.8; NBAA Management Guide 5.7)

(Safety Culture) Organized records reflect pride in maintaining the aircraft in the best possible manner and facilitate accurate information flow. All required paperwork should be available in one location for easy access. In the event of an emergency response aircraft records must be supplied to the NTSB in an organized condition.

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7. Evaluate the maintenance aircraft release process in action. This process must follow the procedures contained in company manuals.

(IS-BAO 15.1.9.1; NBAA Management Guide 5.5)

(Supervisory) Flight crews must readily determine if the aircraft they will operate is legal and mission ready. They need to be informed of the next required maintenance event, flight time remaining to that required maintenance event, and an indication that no outstanding maintenance actions remain incomplete or any MEL items exist. This release process and associated procedures should be completely defined in the appropriate company manual.

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8. Is there proper oversight of information entered into the organization’s maintenance tracking system?

(IS-BAO 15.1.9.1e, 15.3.1.1, 15.3.2.1; NBAA Management Guide 5.7)

(Supervisory) When technicians submit completed work to be entered into electronic tracking systems such as CMP, CESCO, CAMP etc., a verification process should ensure the submitted information matches the aircraft logbook entry in accuracy and completeness. Be wary of administrator work sign off when technician sign off is required.

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9. Are maintenance records kept in a secure location? Is access limited to the appropriate personnel?

(PRISM Recommended Practice)

(Security) Lockable fireproof cabinets are recommended for storage. Access to maintenance records should be limited to appropriate employees only and defined by a published access list or in the appropriate manual. Typically, the Director of Maintenance will determine access to aircraft maintenance records.

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10. Are all aircraft record management procedures described adequately in the GOM/GMM?

(IS-BAO 15.1.8.1; NBAA Management Guide 5.7)

(Policy) A detailed outline and the specific requirements of all maintenance record management procedures, and associated assigned duties and responsibilities is in the GOM/GMM. This formalizes and standardizes how maintenance information is gathered, processed, and stored.

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11. Does the appropriate company manual describe procedures for maintenance vendors to sign off repairs or inspections IAW operator specific requirements, airworthiness program (AAIP) and FAR 43.9 & 43.11?

(FAR 43.9, 43.11; IS-BAO 15.1.6, 15.1.9; NBAA Management Guide 5.8.5)

(Policy) FAR 43.9 & 43.11 pertain to the content, form, and disposition of maintenance records. Maintenance vendors should be formally guided via published procedures to comply with any specific operator requirements and return to service statements.

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