

Safety Attribute Inspection (SAI) Data Collection Tool

4.4.1 Recency of Experience (AW)

ELEMENT SUMMARY INFORMATION

Purpose of This Element (Certificate Holder's responsibility):

- To ensure certificated maintenance technicians meet Recency of Experience requirements.

Objective (FAA oversight responsibility):

- To determine if the Certificate Holder's Recency of Experience process meets all applicable requirements of the Federal Aviation Regulations and FAA policies.
- To determine if the Certificate Holder's Recency of Experience process incorporates the System Safety Attributes.
- To identify any shortfalls in the Certificate Holder's Recency of Experience process.

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirement(s) (SRRs):

- SRRs:
 - 121.135(a)(1)
 - 121.135(b)(1)
 - 121.135(b)(2)
 - 121.135(b)(3)
 - 121.383(a)(3)
 - 65.83

Related CFR(s) & FAA Policy/Guidance:

- Related CFRs:
 - Intentionally left blank
- FAA Policy/Guidance:
 - Intentionally Left Blank

SAI SECTION 1 – PROCEDURES ATTRIBUTE

Objective: Procedures, instructions and information contained in Certificate Holder's manual are documented methods for accomplishing a process. Policies contained in the Certificate Holder's manual should establish the Certificate Holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions or information regarding a particular regulatory requirement. The questions in this section of the data collection tool are designed to assist the inspector in determining if the Certificate Holder's manual has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated who, what, when, where and how type questions. This section of the data collection tool contains policy questions, procedural questions and instructional or informational questions pertaining to various types of Certificate Holder requirements such as actions, prohibitions or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the information listed in the Supplemental Information section of this data collection tool.
- 2 Review the duties and responsibilities for management and other personnel identified by the Certificate Holder who accomplish the Recency of Experience process.
- 3 Review the Certificate Holder's manual to ensure that it contains policies, procedures, instructions and information necessary for the Recency of Experience process.

Questions

To meet this objective, the inspector must answer the following questions:

- 1 Does the Certificate Holder's manual content meet the specific regulatory and FAA policy requirements for a Recency of Experience process:

- | | |
|---|--|
| 1.1 Does the Certificate Holder's manual contain general policies for the Recency of Experience process that comply with the specific regulatory requirements?
SRRs: 65.83; 121.135(b)(1); 121.383(a)(3) | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |
| 1.2 Does the Certificate Holder's manual cite the regulatory requirements listed in the Supplemental Information section of this SAI?
SRRs: 121.135(b)(3)
Related CFRs: Intentionally left blank | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |
| 1.3 Does the Certificate Holder's manual contain the duties and responsibilities for personnel who will accomplish the Recency of Experience process?
SRRs: 121.135(b)(2) | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |
| 1.4 Does the Certificate Holder's manual include instructions and information for personnel to meet the requirements of the Recency of Experience process?
SRRs: 65.83; 121.135(a)(1); 121.383(a)(3) | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |

Related Design JTIs:

- Check that the certificate holder's manual has instructions and information that no person may be used as an airman unless that person is otherwise qualified for the operation for which he is to be used.

<i>Sources:</i> 121.383(a)(3); 121.135(a)(1) <i>Interfaces:</i> 1.3.14-aw; 4.1.2-aw; 4.4.3-aw	
1.5 If alternate procedures exist for use during irregular conditions, do the alternate procedures provide an equivalent level of safety to achieve the same results as the primary procedures?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable

SAI SECTION 1 – PROCEDURES ATTRIBUTE –Drop Down Menu
1. No procedures, policy, instructions or information specified.
2. Procedures or instructions and information do not identify (who, what, when, where, how).
3. Procedures, policy or instructions and information do not comply with CFR.
4. Procedures, policy or instructions and information do not comply with FAA policy and guidance.
5. Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
6. Procedures, policy or instructions and information unclear or incomplete.
7. Documentation quality (e.g., unreadable or illegible).
8. Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM – Flight Operations Manual to GMM – General Maintenance Manual, etc.).
9. Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10. Resource requirements incomplete (personnel, facilities, equipment, technical data).
11. Other.

SAI SECTION 2 – CONTROLS ATTRIBUTE

Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the data collection tool are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the manual system to ensure that the most important manual policies, procedures or instructions and information will be complied with.

Controls may be in the form of "administrative controls" which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to the associated who, what, when, where and how type questions. Controls may also be in the form of "engineered controls" such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the control questions below.
- 2 Review the Certificate Holder's policies, procedures, instructions and information to gain an understanding of the controls that it has documented.

Questions

To meet this objective, the inspector must answer the following questions:

- 2 Are the following controls built into the Recency of Experience process:
 - 2.1 Is there a control in place to ensure that personnel required to exercise the privileges of their certificate meet the Recency of Experience requirements?

<input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain
 - 2.2 Does the Certificate Holder have a documented method for assessing the impact of any changes made to the controls in the Recency of Experience process?

<input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain

SAI SECTION 2 – CONTROLS ATTRIBUTE –Drop Down Menu
1. No controls specified.
2. Documentation for the controls do not identify (who, what, when, where, how).
3. Controls incomplete.
4. Controls could be circumvented.
5. Controls could be unenforceable.
6. Resource requirements incomplete (personnel, facilities, equipment, technical data).
7. Other.

SAI SECTION 3 – PROCESS MEASUREMENT ATTRIBUTE

Objective: Process measurements are used by the Certificate Holder to measure and assess its processes to identify and correct problems or potential problems and to make improvements to the processes. The questions in this section of the data collection tool are designed to assist the inspector in determining if the Certificate Holder measures or assesses information to identify, analyze and document potential problems with the process. Process measurements are basically a Certificate Holder's internal evaluation or auditing of the most important policies, procedures or instructions and information associated with an element.

To prevent the duplication of work that would otherwise occur, Process Measurements are most commonly addressed through a combination of auditing features contained in both the Certificate Holder's Safety Program/Internal Evaluation Program (for Operations and Cabin Safety related issues) and the auditing function of the Continuous Analysis & Surveillance System (for Airworthiness or Maintenance/Inspection related issues). The Director of Safety and the Quality Assurance Department often work in conjunction to accomplish this function for the Certificate Holder. This approach simply requires amendment of the Safety Program/Internal Evaluation Program audit forms or checklists and the Continuous Analysis & Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the process measurement questions below.
- 2 Review the Certificate Holder's policies, procedures, instructions and information to gain an understanding of the process measurements that it has documented.

Questions

To meet this objective, the inspector must answer the following questions:

- 3 Does the Certificate Holder's Recency of Experience process include the following process measurements:

3.1 Process measurements that would reveal when personnel required to exercise the privileges of their certificate failed to meet the Recency of Experience requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.2 Does the Certificate Holder document its process measurement methods and results?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.3 Does the organization that conducts the process measurements have direct access to the person with responsibility for the Recency of Experience process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

**SAI SECTION 3 – PROCESS MEASUREMENT ATTRIBUTE
–Drop Down Menu**

- | |
|--|
| 1. No process measurements specified. |
| 2. Documentation for the process measurements does not identify (who, what, when, where, how). |
| 3. Inability to identify negative findings. |
| 4. No provisions for implementing corrective actions. |
| 5. Ineffective follow-up to determine effectiveness of corrective actions. |
| 6. Resources requirements (personnel, facilities, equipment, technical data). |
| 7. Other. |

SAI SECTION 4 – INTERFACES ATTRIBUTE

Objective: Interfaces are used by the Certificate Holder to identify and manage the interactions between processes. The questions in this section of the data collection tool are designed to assist the inspector in determining whether or not interactions between the procedures, policies or instructions and information associated with other independent processes within the Certificate Holder's organization are documented. Written procedures, policies or instructions and information that are interrelated and located in different manuals within the Certificate Holder's manual system need to be consistent and complement each other. For the interfaces to be effectively managed, it is not only important to identify what the interfaces are, but it is imperative to document the specific location of the interfaces within the Certificate Holder's manual system.

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the interfaces associated with the Recency of Experience process that have been identified along with the individual questions in the Procedures Section (1) of this data collection tool.
- 2 Review the Certificate Holder's policies, procedures, instructions and information to gain an understanding of the interfaces that it has documented.

Questions

To meet this objective, the inspector must answer the following questions:

NOTE: ALL EXPLANATIONS IN THE DROP DOWN MENU FOR "NO" ANSWERS MUST INCLUDE THE INDIVIDUAL QUESTION NUMBER FROM THE PROCEDURES SECTION (1) OF THIS DATA COLLECTION TOOL AND THE ELEMENT NUMBER(S) OF THE INTERFACE(S) THAT WERE NOT ADDRESSED.

4. Does the Certificate Holder's manual:

- | | |
|--|--|
| 4.1 Properly address the interfaces that are identified along with the individual questions in the Procedures Section (1)? | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |
| 4.2 Document a method for assessing the impact of any changes to the associated interfaces within the Recency of Experience process? | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |
| 4.3 List additional interfaces identified during the accomplishment of this SAI? | |

<i>SAI SECTION 4 – INTERFACES ATTRIBUTE –Drop Down Menu</i>
1. No interfaces specified.
2. The following interfaces not identified within the Certificate Holder's manual system:
3. Interfaces listed are inaccurate.
4. Specific location of interfaces not identified within the manual system.
5. Other

SAI SECTION 5 – MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE

Objective: The questions in this section of the data collection tool address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified and knowledgeable person who is responsible for the process, is answerable for the quality of the process and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Identify the person who has overall responsibility for the Recency of Experience process.
- 2 Identify the person who has overall authority for the Recency of Experience process.
- 3 Review the duties and responsibilities of the person(s), documented in the Certificate Holder's manual.
- 4 Review the appropriate organizational chart.

Questions

To meet this objective, the inspector must answer the following questions:

- 5 Are the following aspects of the Management Responsibility and Authority Attributes addressed in the Recency of Experience process:

5.1 Does the Certificate Holder's manual clearly identify who is responsible for the quality of the Recency of Experience process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title: <input style="width: 100%;" type="text"/>
5.2 Does the Certificate Holder's manual clearly identify who has authority to establish and modify the policies, procedures, instructions and information for the Recency of Experience process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title: <input style="width: 100%;" type="text"/>
5.3 Does the Certificate Holder's manual include the duties and responsibilities of those who manage the work required by the Recency of Experience process? SRRs: 121.135(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.4 Does the Certificate Holder's manual include instructions and information for those who manage the work required by the Recency of Experience process? SRRs: 121.135(a)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.5 Does the Certificate Holder's manual clearly and completely document the authority for this position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.6 Does the Certificate Holder's manual clearly and completely document their qualification standards for the person having responsibility for the Recency of Experience process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.7 Does the Certificate Holder's manual clearly and completely document their qualification standards for the person having authority to establish and modify the Certificate Holder's policies, procedures, instructions and information for the Recency of Experience process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

5.8 Does the Certificate Holder's manual clearly and completely document the procedures for delegation of authority for the Recency of Experience process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
--	--

<i>SAI SECTION 5 – MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE –Drop Down Menu</i>

1. Not documented.

2. Documentation unclear.

3. Documentation incomplete.

4. Other.
