



NOTICE OF PROPOSED DASR AMENDMENT NPA for DCP 2021-038

PROPOSED INCLUSION OF QUALIFICATION AND EXPERIENCE REQUIREMENTS FOR KEY PERSONNEL, TO DASR 147.A.105(b)

INTRODUCTION

Applicability

1. This proposal is applicable to DASR 147 - Aircraft Maintenance Training Organisations.

Purpose

2. The purpose of this NPA is to enable community input in regards to:
 - a. proposed new Guidance Material (GM) to DASR 147.A.105(b), which provides guidance on the expected qualifications and experience for key position holders of a DASR 147 Aircraft Maintenance Training Organisation (MTO); and
 - b. a draft copy of a factsheet that is to be released at the same time as the proposed new GM. The aim of the factsheet is to provide guidance on the nomination and competency assessment of instructional staff detailed in DASR 147.A.105(f).
3. The changes proposed in this NPA aim to provide clarification of the expected qualifications and experience for the following specific DASR 147 MTO key positions:
 - a. Training Manager,
 - b. Examination Manager, and
 - c. Quality Manager.

Need Statement

4. This GM is to set DASA's expectation for qualifications and experience requirements for DASR 147 Key personnel, to enable successful and timely approval of applicable DASA Form 4.

Background

5. Currently there is no Acceptable Means of Compliance (AMC) or GM on what are the expected qualifications and experience of DASR 147 Key position holders within DASR 147.A.105(b).

Proposed Amendment

6. Annex A details the proposed new GM to DASR 147.A.105(b).

Implementation Strategy

7. The changes in this NPA are intended to be released in the October 2022 DASR update. GM will be applicable to all new Form 4 applications from the date of publication.



HOW TO SUBMIT COMMENTS ON THIS NPA

Format

8. Responses to this NPA are to be recorded on the NPA Response Sheet at Annex B. Responses are to be submitted by email to dasa.dasr@defence.gov.au.

Timing

9. Comments are to be forwarded to DASA by close of business 16 Sep 22.

Additional Information

10. Requests for additional information concerning this NPA should be send to dasa.dca@defence.gov.au – addressed to Mr Mushihur Rahman.

DISPOSITION OF RESPONSES RECEIVED

11. A Comment Response Document will be prepared and published on the [DASA Website](#). DASA will not individually acknowledge or respond to comments or submissions.

P. CARTER

CAPTAIN, RAN
Directorate of Continuing Airworthiness
Defence Aviation Safety Authority
Tel: (07) 3903 6475

Annexes:

- A. NPA for DCP 2021-038 - Proposed Changes to DASR
- B. NPA for DCP 2021-038 - Response Sheet

Enclosure:

- 1. Factsheet – DASR 147 ‘Personnel Requirements’



NPA FOR DCP 2021-038

PROPOSED NEW GM TO DASR 147.A.105(B)

GM 147.A.105(b) - Personnel requirements (AUS)

1. Training Manager (TM)

a. Qualifications:

(i) Recommended:

- Certificate IV in Training and Assessment or equivalent qualification in Training or other comparable qualification acceptable to DASA

(ii) Desirable:

- Tertiary qualifications in management
- Graduate Diploma in Adult and Vocational Education and Training
- Graduate Diploma of Adult Language, Literacy and Numeracy
- Bachelor or Masters degree in education with an adult education focus
- Diploma of Aeroskills
- DASA/CASA B or C category licence

b. Experience:

- At least three years of Aviation experience including:
Two years experience as staff of DASA or an organisation holding an Organisational Approval, under DASR, CASA or other comparable experience acceptable to DASA, and
One year experience in aviation training.

2. Quality Manager (QM)

a. Qualifications:

(i) Recommended:

- Diploma level, or equivalent qualification in Quality Management or other comparable qualification acceptable to DASA.

(ii) Desirable:

- Diploma level, or equivalent, qualification in Quality Auditing issued by an Australian registered training organisation (RTO) or other comparable qualification acceptable to DASA

b. Experience:

- At least five years of Aviation experience including:
Two years experience as staff of DASA or an organisation holding an Organisational Approval, under DASR, CASA or other comparable experience acceptable to DASA, and
Three years experience in aviation quality management.



3. Examination Manager (EM)

a. Qualifications:

(i) Recommended:

- Certificate IV in Training and Assessment or equivalent qualification in Training or other comparable qualification acceptable to DASA

(ii) Desirable:

- Tertiary qualifications in management
- Graduate Diploma in Adult and Vocational Education and Training
- Graduate Diploma of Adult Language, Literacy and Numeracy
- Bachelor or Masters degree in education with an adult education focus
- Diploma of Aeroskills
- DASA/CASA B or C category licence

b. Experience:

- At least three years of Aviation experience including:
Two years experience as staff of DASA or an organisation holding an Organisational Approval, under DASR, CASA or other comparable experience acceptable to DASA, and
One year experience in aviation training.



NPA for DCP 2021-038 Response Sheet

PROPOSED INCLUSION OF QUALIFICATION AND EXPERIENCE REQUIREMENTS FOR KEY PERSONNEL, TO DASR 147.A.105(b)

Please forward this sheet as an email attachment to [DASA](#) by 16 Sep 22. A word version of this response sheet can be found via Objective no: [BO3960659](#) or alternatively contact [DASA](#).

Please indicate your acceptance or otherwise of this proposal by ticking the appropriate box below. Additional comments, suggested amendments or alternative action are welcome and may be provided on this response sheet or by separate correspondence.

- The proposal is **acceptable without change**.
- The proposal is **acceptable but would be improved if the following changes were made:**
- The proposal is **not acceptable but would be acceptable if the following changes were made:**

LSN	NPA Reference: (i.e Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation
1			
2			
3			
4			
5			

RESOURCE IMPLICATIONS

Please provide specific comment on any significant resource implications that this proposal may have for your organisation, for both its implementation and ongoing compliance. Your comments should address both financial and human resource considerations.

Resource implications – Proposal implementation	
Resource implications – Proposal sustainment	



RESPONDENT DETAILS

Your name:	
Submission date:	
Your organisation:	
Email address:	
Postal address:	
Phone:	
<p>Whose views are represented in your response?</p> <p>i.e. Is your response the authoritative response from your organisation?</p>	<p>Responding on behalf of :</p> <p>Individual []</p> <p>Regulated Military entity []</p> <p>Regulated Commercial entity []</p> <p>Wing HQ []</p> <p>Group HQ []</p> <p>ADF Regulatory, Technical or Logistics policy agency []</p> <p>Other commercial entity [],</p> <p>Other [] Please describe:</p>
<p>Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:</p>	<p>YES []</p> <p>NO []</p>



FACTSHEET – DASR 147 “PERSONNEL REQUIREMENTS”

Aim

The aim of this factsheet is to provide guidance on the nomination, and competency assessment, of instructional staff detailed in DASR 147.A.105(f).

Introduction

The qualification and experience of the instructors, knowledge examiners and practical assessors are fundamental to ensuring the quality of a training course – only appropriately qualified personnel should be appointed to carry out training and examinations. In addition to the published Acceptable Means of Compliance (AMC) and Guidance Material (GM) to DASR 147.A.105(f), this Factsheet provides additional guidance on the knowledge and skills that are expected of authorising instructors, knowledge examiners and practical assessors employed by a DASR 147 Maintenance Training Organisations (MTOs).

Key Personnel Requirements

Instructors:

A nominated person who will deliver a DASR 66 module or unit of competency (DASR 66 appendix I), a DASR 66 element (DASR 66 appendix III), or part thereof either of these. The instructor is not necessarily the person involved in drafting of the course material (content, duration etc.), however they should be involved in the continued development of the lessons themselves (creation of the instructor notes, slides, sequencing etc.).

Instructors should be:

1. Conversant with the DASR 66, 145 and 147 regulations, AMC, GM and specific procedures (MTOE, instructions, etc.) that are assigned to their scope of approval within a DASR 147 MTO.
2. Pedagogic – should know how to organise a lesson and how to efficiently deliver a course that clearly highlights the fundamental points. They should also be able to adapt when communicating to a particular audience including with pre-existing knowledge/experience.
3. Able to promote the appropriate attitude towards regulation and procedures; in particular the strict adherence to approved maintenance practices and quality standards through the lens of their own experience in a regulated aviation environment.
4. Familiar and proficient with the tools and training techniques used by the training organisation to deliver lessons.
5. Appropriately experienced in the aircraft maintenance environment.
6. Able to demonstrate good knowledge, complimented with communication skills in the English language.
7. Able to demonstrate a good understanding of the workplace environment, human performance and safety culture.
8. Able to demonstrate good knowledge of technical publications (Aircraft Maintenance Manual, Component Maintenance Manual, Airworthiness Directives, Service Bulletin, Maintenance Programme, etc.).
9. In receipt of continuous training in the company's procedures and DASRs.



Knowledge Examiners:

A nominated person who will determine the level of theoretical knowledge of the trainees on a particular module, unit of competency, element, or part thereof. The function may include the drafting and/or the selection of questions (Multi-Choice Questions and Essays), the evaluation of the correctness of answers (except when correct answers are pre-determined) and the final judgement regarding the level of knowledge demonstrated by the trainee. Persons solely supervising an exam session are not considered as examiners but are considered as support staff (invigilators) and, in this context, are not subject to knowledge and experience requirements, but need to be trained to the examination procedure described in the MTOE.

Knowledge examiners should be:

1. Conversant with the DASR 66, 145 and 147 regulations, AMC, GM and specific procedures (MTOE, instructions, etc.) that are assigned to their scope of approval within a DASR 147 MTO, including the examination standards required by DASR 66.
2. Able to demonstrate a responsible attitude to the conduct of examinations, so that the highest integrity is ensured.
3. Trained in contemporary examination techniques and able to conduct an examination in such a way that the true abilities of the candidate are demonstrated.
4. Able to remain neutral at all times and behave in a manner that will not influence or prejudice the final result of the examination, for example by providing undue assistance or clarification to a candidate.
5. Familiar and proficient with the tools or the examination techniques used by the training organisation to perform the exams.
6. Appropriately experienced in the aircraft maintenance environment.
7. Able to demonstrate good knowledge, complimented with communication skills in the English language.
8. Able to demonstrate a good understanding of the workplace environment, human performance and safety culture.
9. Able to demonstrate good knowledge of technical publications (Aircraft Maintenance Manual, Component Maintenance Manual, Airworthiness Directive, Service Bulletin, Maintenance Programme, etc.).
10. In receipt of continuous training in company's procedures and DASRs.

Practical Assessors:

A nominated person who will determine the level of practical knowledge/practical skills of the trainees on a particular module, element, or part thereof. The function may include the drafting and/or the selection of practical tasks, the performance oversight and assessment of the practical activities.

Practical assessors should be:

1. Conversant with the DASR 66, 145 and 147 regulations, AMC, GM and specific procedures (MTOE, instructions, etc.) that are assigned to their scope of approval within a DASR 147 MTO.
2. Experienced and show solid judgement regarding the abilities of the assessed trainees – the assessor should have the required knowledge and experience of the task/s to be assessed. They should also be able to determine if the trainee accomplishes the tasks in compliance with current regulation, approved procedures, maintenance practices, etc.



3. Trained to contemporary assessment techniques. The assessor should be fully aware of the aim of the assessment and conduct a practical assessment in such a way that the true abilities of the candidate are demonstrated.
4. Familiar and proficient with the tools or the techniques used by the training organisation to assess the practical abilities of trainees (maintenance simulators, mock up etc.).
5. Appropriately experienced in the aircraft maintenance environment.
6. Able to demonstrate good knowledge, complimented with communication skills in the English language.
7. Able to demonstrate a good understanding of the workplace environment, human performance and safety culture.
8. Able to demonstrate a good knowledge of technical publications (Aircraft Maintenance Manual, Component Maintenance Manual, Airworthiness Directive, Service Bulletin, Maintenance Programme, etc.).
9. In receipt of continuous training in company's procedures and DASRs.
10. Able to act safely, apply safety precautions and prevent dangerous situations.
11. Able to demonstrate knowledge and understanding of areas requiring special emphasis or novelty (areas peculiar to the aircraft type, domains not covered by DASR-66 Appendix, practical training elements that cannot be imparted through simulation devices, etc.).
12. Able to demonstrate an understanding of the aircraft systems interaction.
13. Able to navigate, execute and obey to the prescribed maintenance procedures.

Invigilators:

A nominated person who will ensure the correct conduct of an examination in accordance with the examination procedures of the DASR 147 organisation. The invigilator is responsible for ensuring that examinations are conducted in accordance with the MTOE and Training Procedures and operates under the direction, responsibility and delegation of the Training Manager. The organisation can nominate permanent exam invigilators who should then be listed in MTOE Part 1 and qualified in accordance with Training Procedures.

Training organisations often delegate the invigilation of an examination to staff not listed as an examiner for the particular subject. These "invigilators" do not need to be qualified to the same extent as an examiner, and in particular, they do not need to demonstrate specialty knowledge, as long as their duty is strictly limited to the invigilation itself.

Invigilators should however be trained to the organisation's examination procedures with a specific emphasis on the exam's integrity aspects and on the handling of cheating or misconduct cases. Such staff should be listed by the organisation with records of their training kept in the individual's personnel file.

Assessment and acceptance of staff

Assessment and acceptance of instructors, examiners and assessors should be performed, and documented by the approved training organisation in accordance with dedicated procedure described in the MTOE. Appropriate staff in the maintenance training organisation should physically interview proposed candidates in order to ensure their competency. Once completed, detailed result of this assessment, including any supporting documents (diplomas, DASR 66 licence, etc.) should be filed in accordance with MTOE procedure. The staff should be listed in MTOE with intended scope of instruction, examination or assessment.



Continued qualification

The qualification criteria and experience requirements only address the initial acceptance of instructor, examiners and assessors. The training organisation should develop and document a program in MTOE to ensure the continued competence of these staff.

Additional information

For further information, please contact dasa.dcadar147@defence.gov.au.

DRAFT

