

Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation (LI) 100-013

EFFECTIVE DATE: October 1, 2005

TERMINATION DATE: Until Superseded or Incorporated in ASA-100

ISSUE: Training Record Contents

AFFECTED SECTIONS: ASA-100 Revision 3.4 para. 4 (C)

BACKGROUND:

The ASA-100 quality system requires that an accredited distributor meet the requirements of both ASA-100 and the FAA Advisory Circular AC 00-56A (Voluntary Industry Distributor Accreditation Program).

Paragraph 4 (C) of the standard requires that all training must be documented. It does not indicate how to document training. Specific documentation requirements are often required for training. For example, there is a specific requirement for the documentation of hazardous materials training under 49 C.F.R. § 172.704(d), and repair station training record must be in a format acceptable to the FAA according to 14 C.F.R. § 145.163(c).

The CASE 3(A) standard requires that training records include:

- 1) A description of the training.
- 2) Date and number of hours of instruction.
- 3) Name of instructor and student and/or signature of both.
- 4) Name of the organization conducting the training if performed by an outside agency.

INTERPRETATION:

Each accredited organizations shall provide the following minimum information in each record of training prepared on or after 90 days after the effective date of this Letter of Interpretation ("the deadline"):

- A description of the training.
- Date(s) and length of instruction.
- Name of the student.
- Name of the person (instructor) and organization conducting the training (the organization may be the accredited organization itself, such as when on-the-job training is provided).
- Any additional information required by law or regulation.

This standard is in harmony with the record-keeping standards established under CASE, and in the Federal Regulations.

Each ASA-100 accredited organization that is not currently in compliance with the requirements of this LI shall revise its manual, if necessary, to become compliant with this LI; if a revision is

necessary, such revision shall be submitted to the Accreditation Organization not later than the deadline. Each ASA-100 accredited organization shall ensure that training records created on or after the deadline comply with the training records requirements of ASA-100.

Notwithstanding this LI, an accredited distributor is required to follow the written guidance found in its quality manual, as well as the standards to which it is accredited. If this LI contradicts the accredited distributor's quality manual, ASA-100 or AC 00-56A, then the controlling authority is determined in the following order of precedence:

- 1) AC 00-56A
- 2) ASA-100
- 3) Quality Manual

ANTICIPATED FUTURE ACTION:

This interpretation is offered to improve record keeping of accredited distributors and to meet current industry and regulatory standards for those records. In the next revision to ASA-100, Paragraph 4 (C) shall be changed to read:

All training, both formal (classroom) and on-the-job training (OJT), shall be documented and the records shall be maintained for all employees who underwent training. Each training record shall include:

- A description of the training.
- Date(s) and length of instruction.
- Name of the student.
- Name of the person (instructor) and organization conducting the training (the organization may be the accredited organization itself, such as when OJT is provided).
- Any additional information required by law or regulation.

Records subject to this subparagraph shall be retained for at least two years after the employee has left employment with the company.

**QUESTIONS/INQUIRES SHOULD BE ADDRESSED TO:
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