

Frequent CARs – ASA-100

Reviewing audits conducted since September:

- 36 audits with CARs
- Total number of findings = 125
- Average number of findings per audit = 3.5
- The largest number of CARs continues to relate to QM & Supporting Documents being current and readily available.
- The implementation deadline of 3.6 provided an increase of new CARs, the biggest dealing with having the QM revised and to Unapproved & Counterfeit Parts Training of personnel (including Procurement).

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Frequent CARs – ASA-100

1. - 1C -The quality manual and/or related documents shall be kept current and readily available to employees and to the customer's auditor or designee.
 - No manual distribution list
 - Assigned QM copies not recorded on Distribution list
 - Org chart does not show relationship of QC dept. to rest of the organization
 - Pages do not contain revision date or revision level
 - Quality documents are not current (QM, TOC, LEP, Stamp control Log, org. chart, App. A, QM distribution list, material certification, ATA Spec 300 (2000 or later))
 - Quality manual/documents on Intranet are not current
 - **QM not updated with required revisions from previous ASA audits or to include new language from ASA-100 Rev. 3.6**

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Frequent CARs – ASA-100

- Quality docs not available (ATA Spec 300, ASA-100, AC 00-56, docs referenced on App.B of standard). Or personnel not aware of how to access these docs (ASA / FAA website).
- Forms or docs referenced in QM not included in manual
- Forms in quality manual are not the current forms in use
- Forms in use are not the latest revision as noted in manual
- Forms not assigned revision levels
- No reference to EASA Form 1

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Frequent CARs – ASA-100

2. - 4E - **Training: The distributor shall have a training program that addresses unapproved parts; and counterfeit parts and materials. Personnel involved in procurement, receiving inspection, shipping inspection and material control shall be trained in these topics.**
 - **Training was not conducted**
 - *Many companies have asked where to find formal training on this. ASA reminds companies that OJT is acceptable and has also referred people to ASA 2012 Workshops and 2012 Conference presentations covering the topic. This can account as formal training for the person that was in attendance and separately shared with other personnel in a company as a form of OJT. There is also a FAA SUPs CD, while several years old, that provides a starting point for this topic and can be utilized as a part of OJT. Please contact ASA for this material, if needed. (Companies are **not** required to use ASA's resources to meet this requirement, but the requirement still needs to be addressed and documented in the quality system.)*

ASA Quality Committee - 12/2012

Frequent CARs – ASA-100

3. - 2A - **Self-Audit/Evaluation:** The distributor shall have in place a self-audit/evaluation program to insure that the ASA-100 Standard has been implemented and that the quality system as adopted continues to meet the company's needs. The program shall provide the necessary feedback for continuous quality improvement. Self-audit/evaluations shall be conducted, at a minimum, on an annual basis. The distributor shall perform the self audit/evaluation in accordance with written procedures or checklists that determine the effectiveness of the quality system. Audit results shall be documented, including identifying who conducted the audit, the frequency of the audit, and corrective action of non-compliance.

- Required annual audit not accomplished
- Audit not accomplished within manual requirements' timeline
- Ineffective auditing
- Checklist not filled out completely (reference to procedures, parts sampled)
- Checklist used not the one referred to in procedures
- Outdated ASA self-audit checklist

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Frequent CARs – ASA-100

4. - 1B -These documents shall be readily available to at least first line supervisors responsible for the activities described. The system shall contain all of the elements of the governing specification adopted by the organization and should be described in the manual or supporting documents, e.g., work cards or check sheets, in sufficient detail to be used as operating instructions.

- Elements of the ASA standard not described in QM or supporting documents or not described in enough details to be used as operating instructions

ASA Quality Committee - 12/2012

Frequent CARs – ASA-100

5. - 8A - **Material Handling:** Material shall be handled in an appropriate manner and shall be protected from damage and deterioration. Special packaging shall be maintained as necessary. The storage area for aircraft parts should be periodically checked for overall effectiveness of storage and identification methods.

- Inadequate material packaging
- Parts info incorrectly or not recorded on inventory list or computer system (location, condition, qty, P/N, S/N, etc.)
- Material not properly identified (tagged)
- Warehouse areas not properly marked for identification

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Frequent CARs – ASA-100

6. - 5C - **Procurement :** The distributor shall maintain a list of their approved suppliers and a quality history for each source.

- No vendors' list maintained
- Vendors' list is not current
- Vendors' list does not include all approved vendors
- No vendor surveys on file when required per manual procedure
- Vendors not approved in accordance with manual procedure

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Frequent CARs – ASA-100

7. - 4C - **Training:** 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. Training records shall be retained for at least two years after the employee has left employment with the company.

- Training records not maintained for all authorized personnel
- All training new and recurrent not documented on training records (don't forget to include OJT)
- Info missing on record (duration, names, dates)

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Frequent CARs – ASA-100

8. - 5A - **Procurement** (previous LI implemented into 3.6): The distributor shall maintain a procurement system such that materials and components purchased (1) are traceable to a prior source and (2) bear acceptable documentation that conforms to at least one of the receipt requirements listed in Appendix A.

- Incomplete traceability documentation
- No procurement history

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Frequent CARs – ASA-100

9. - 6A - **Receiving Inspection:** Inspectors shall conduct a complete visual inspection of all incoming parts and materials. The inspection shall include, but not be limited to:

- 1) a check for any obvious physical damage,
- 2) verification that all appropriate plugs and caps are installed, if applicable,
- 3) verification that part numbers (including dash numbers and letters), model numbers, serial numbers, lot and/or batch numbers, etc., of the items, match the accompanying documentation,
- 4) verification that the quantity, part numbers or noted part number substitutes (including dash numbers and letters), model numbers, etc., of the items match the request/purchase order and agreed upon method between the aircraft operator and supplier for part number substitution,
- 5) verification that all appropriate required documentation (maintenance release, material certification, traceability documents, etc.) is at hand, and is properly completed, and signed.

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Frequent CARs – ASA-100

- Evidence of incomplete receiving inspection process
- Inadequate checklists or failure to rely on a manual required checklist
- Problems with identification of shelf-life or lot/batch control
- Lack of proper documentation
- Bypassing the complete receiving system for scrap or quarantined parts

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Frequent CARs – ASA-100

10. - 9A - **Shelf Life Control:** The distributor shall have a system to adequately identify and control shelf life-limited parts and materials. The program shall specify a system that will assure that no expired material or part will be represented as having remaining shelf life. This program includes component subassemblies containing shelf life-limited parts.

- Inbound outbound inspections do not include checking for shelf life status of parts.
- Expired shelf life parts not segregated as required.
- Shelf life not monitored as required.
- Inventory checks not completed as required.
- Reports not generated as required.

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