

Project Plan:

To address ASA-100 Accredited Distributors contracting QMS functions within their QMS and its impact on the ASA-100 Accreditation Program to oversee compliance to ASA-100.

Problem Statement:

What is the problem?

- As of June 2022, ASA-100 auditors have experienced an increasing number of ASA-100 accredited organization that are utilizing suppliers for contracted services, to perform various and/or multiple ASA-100 required QMS functions. ASA-100 standard does not address contracting of required QMS functions.

Why is it a problem?

- ASA has an obligation to verify compliance to ASA-100 and in order to do this ASA needs to be informed of contract functions so as to properly plan the audit.
- ASA is unable to verify conformance to the requirements of ASA-100 that have been contracted to an external party.
- In almost all cases, the use and/or administration of the contracted functions are not defined or documented within the accredited organizations QMS.

Where is it a problem?

- This problem is observed during ASA-100 audits.

Who is impacted?

- ASA is unable to properly plan for audits.
- Client risks suspension or revocation of certificate due to being unable to provide objective evidence that they are in compliance with ASA-100 and AC 00-56.
- Customers may be affected due to quality escapes from ineffective QMS functions that are required by ASA-100.

When was the problem first observed?

- The issue has been around for many years, but recent market changes have created an environment in which contracting functions has increased dramatically.

How is the problem observed?

- ASA cannot verify compliance to ASA-100 and AC 00-56.
- Accredited organization is not performing to ASA-100 standard because the contractor of the contracted function is not meeting requirements of ASA-100 or the Clients QMS.
- Accredited organizations not fulfilling customer requirements for aviation spares, due to product and/or QMS non-conformities that ASA-100 is designed to prevent/mitigate.

How often is the problem observed?

- Feedback from ASA auditors indicate that a significant number of ASA-100 audits conducted, included some type of contracted services of ASA-100 required QMS function(s).

Project Charter:

Background and Purpose:

An increasing number of ASA-100 accredited organizations are contracting services to third parties, to perform various and/or multiple ASA-100 required QMS functions in an undefined and/or undocumented manner. This has resulted in increased difficulties for ASA auditors to effectively audit the QMS, along with an increased risk to customers of quality escapes from ASA-100 QMS requirements that may not be properly followed by the contracted suppliers.

Mission Statement:

QC Sub-Committee to define, develop, and implement a solution that accommodates the defined, documented, and auditable use of contracted suppliers, in the performance of ASA-100 required QMS functions.

Scope:

1. Boundaries & Limitations:
 - a. Additions to ASA-100, II Definitions as needed.
 - b. Adherence to ASA-100, clause 1 Quality System and Quality Manual, sub-part D (notifications to ASA of system and system changes).
 - c. Addition to ASA-100, clause 1 Quality System and Quality Manual, sub-part E. with the addition of a number 17), for contracted QMS functions.
 - d. Addition to ASA-100 of a new clause 16. Contracted QMS functions.
 - e. Conforming amendments as necessary to ensure internal compatibility.
2. Expected Project Goals:
 - a. Establish Project QC Sub-Committee members.
 - b. From ASA-100 Rev 5.0. Project committee to draft revision verbiage to resolve the Project Mission Statement, within the Boundaries & Limitations outlined above.
 - c. Create and/or update supporting documents and audit system to allow for implementation of changes, including training materials.
3. Timeline of Steps
 - a. August 1 – August 31 subcommittee will be drafting language.
 - b. September 1 – 15 executive review, including legal review, and revisions.
 - c. September 15 - Send to a subset of members for review (possibly the Quality Committee members and ASA-100 Accredited Distributors) and ask for comments by September 30.

- d. September 30 – October 13 subcommittee to address comments, with executive and legal team.
 - e. By October 14, ASA shall share with the applicable authorities. Ask authorities to offer comments within 30 days.
 - f. By October 31, have a draft ready to share with the Committee
 - g. December 2, 2022, Quality Committee discusses and votes on the “Proposed Revision” to ASA-100.
 - h. ASA Board of Directors to address the product of ASA QC voting.
 - i. Training of ASA-100 auditors.
 - j. Training for ASA-100 accredited companies and industry.
4. Deliverables of Project when completed
- a. Quality Committee members vote to accept the revision.
 - b. Presentation of proposed revision to the ASA Board of Directors.
 - c. Training for Auditors, Accredited Distributors, and Industry.
 - d. ASA-100 Revision 6 released with the new revision incorporated, date to be determined by ASA Board of Directors.
5. Organization interfaces
- a. Jared Knights, chair of the subcommittee.
 - b. Michele Dickstein, updates to the ASA Board of Directors
 - c. Jason Dickstein, coordination and communication with CAA authorities.
 - d. Nin George, coordination with Michele Dickstein, Jason Dickstein, and Sam O’Connor.
 - e. Sam O’Connor coordination with ASA-100 Accredited Distributors and ASA-100 Auditors.
6. Urgency of the project
- a. The problem will continue to grow.
 - b. Voting and acceptance at the 2022 Fall QC meeting is important to enable timely implementation of planned ASA-100 Revision 6 in 2023.
 - c. Failure to achieve deliverables by the 2022 Fall QC meeting will result in a potential implementation delay until 2024.

Team Involved and Roles:

- a. Michele Dickstein, ASA President
- b. Jason Dickstein, ASA General Counsel
- c. Nin George, QC Chair & Project Coordinator
- d. Jared Knights, QC Vice Chair & Project Sub Committee Leader
- e. Sherry Chaput, QC Secretary & Project RAIL updates
- f. Chris Anderson, QC Past Chair & Project Guidance
- g. Sam O’Connor, ASA VP Technical Services
- h. Lea Kinney, ASA-100 Program Manager
- i. ASA-100 Auditors
- j. QC Sub-Committee volunteers (TBD)

Operational Framework:

- a. Location: web meetings and phone calls.
- b. Accountability: meeting commitments and project timelines.
- c. Jason Dickstein, ASA Counsel, must approve each draft.
- d. Sherry Chaput shall take minutes of each meeting.
- e. Decision-Making Process:
 - Final draft verbiage: Michele Dickstein and Jason Dickstein.
 - Draft verbiage for QC member review: QC Leadership Team.
 - In-Process draft verbiage: QC Sub-Committee.
- f. Conflict Resolution:
 - Consolidated discussion: QC Leadership Team.
- g. Participants must have signed the QC Participant Agreement.

Performance Measures:

- a. Commitments delivered.
- b. Timeline/deadline achieved.

Support Requirements:

- a. TBD.