



# Notice of Proposed Amendment 2023-10 (A)

in accordance with Article 6 of MB Decision 01-2022

## Review of Part-147

RMT.0544

### EXECUTIVE SUMMARY

The objective of the proposal in this NPA is to eliminate or reduce fraud cases in examinations conducted by Part-147 maintenance training organisations (MTOs) for the obtention of aircraft maintenance licences. It also intends to ensure an adequate language proficiency for the trainer and students. Lastly, it aims at improving the structure and readability of Part-147 while ensuring a greater consistency with the other Annexes to Regulation (EU) No 1321/2014, in particular in relation to the oversight principles.

To achieve these objectives, Part-147 is reviewed to a great extent, proposing a more robust organisation set-up, introducing measures and mechanisms for fraud prevention and requirements for the language proficiency, aligning competent authority requirements with those of Part-CAMO and Part-145, and addressing miscellaneous shortcomings in the approval of MTOs.

The proposed regulatory material is expected to increase the overall safety in the EU maintenance licensing system. The changes are expected to improve organisational processes and to ensure delivery of better-quality training activities.

NPA 2023-10 is divided in two parts. The present NPA 2023-10 (A) includes the background information pertaining to the regulatory proposal. NPA 2023-10 (B) includes the proposed amendments.

### REGULATION(S) TO BE AMENDED/ISSUED

Regulation (EU) No 1321/2014 (Continuing airworthiness)

### ED DECISION(S) TO BE AMENDED/ISSUED

ED Decision 2015/029/R — AMC and GM to the Annexes to Regulation (EU) No 1321/2014 — Issue 2'

### AFFECTED STAKEHOLDERS

Member States and national competent authorities (NCAs), MTOs, Aircraft Maintenance Licence holders.

### WORKING METHODS

#### Development

By EASA with the support of a Rulemaking Group

#### Impact assessment(s)

Light

#### Consultation

Public – NPA

### RELATED DOCUMENTS / INFORMATION

- [EVT.0002 Evaluation report related to the EASA maintenance licensing system and maintenance training organisations](#), issued on 2.3.2018
- [ToR RMT.0544](#), issued on 14.8.2019
- Safety Promotion Task SPT.0106
- MST.0035 Oversight capabilities / focus area: fraud cases in Part-147

**PLANNING MILESTONES:** Refer to the latest edition of the EPAS Volume II.



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## 1. About this NPA

### 1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) identified the need to mitigate a risk (as described in Chapter 2), and after having assessed the impacts of the possible intervention actions, identified rulemaking as the necessary intervention action.

This rulemaking activity is included in Volume II of the European Plan for Aviation Safety (EPAS) for 2023–2025<sup>1</sup> under Rulemaking Task (RMT).0544.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139<sup>2</sup> (the Basic Regulation) and the Rulemaking Procedure<sup>3</sup>, as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT<sup>4</sup>.

When developing the regulatory material EASA received inputs from a Rulemaking Group (RMG) composed of associations and competent authorities members, and from Technical Advisory Bodies.

### 1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for consultation of all interested parties.

Please submit your comments using the **Comment-Response Tool (CRT)** available at <http://hub.easa.europa.eu/crt/><sup>5</sup>.

The deadline for the submission of comments is **4 March 2024**.

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<sup>1</sup> <https://www.easa.europa.eu/en/domains/safety-management/european-plan-aviation-safety>

<sup>2</sup> Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

<sup>3</sup> EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 (<https://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-01-2022-rulemaking-procedure-repealing-mb>).

<sup>4</sup> <https://www.easa.europa.eu/en/document-library/terms-of-reference-and-rulemaking-group-compositions/tor-rmt0544>

<sup>5</sup> In case of technical problems, please send an email with a short description at [crt@easa.europa.eu](mailto:crt@easa.europa.eu).



### Specific request to stakeholders

1. Do you recommend to link privileges given to an MTO (e.g. examinations in 'unapproved' locations) to its (safety) performance?
  - 1.1. Would you link it to an effective SMS which the MTO could voluntarily adopt?
  - 1.2. Would you link it to other more precise mitigations of fraud? If yes, which ones?
2. Do you agree that a CEFR level of language competence or equivalent should be required for the students attending training or taking examination? If yes, what level?
3. Do you agree that a CEFR level of language competence or equivalent should be required for the instructors and examiners? If yes, what level?
4. Would you recommend potential alternatives to CA inspector attendance of examinations taking place in 'unapproved' locations, as referred to in point 147.A.135(g)? If yes, which ones?
5. Do you agree to condition the privilege to conduct examinations in 'unapproved' locations' to a maximum number of sessions before having to approve such location? If yes, what should be the maximum number of sessions?
6. Do you agree to condition certain MTO privileges to carrying out a minimum number of training sessions? If so, what should be the minimum number?
7. Do you agree that the competent authority should cooperate with and involve as much as possible the competent authority(-ies) of the Member State(s) where facilities of the organisation are located, if different, in the oversight of such locations?
8. Do you think that the competent authority of the MTO should agree to have supervision of examinations performed by the Authority of the Member State where the examination is delivered, if different?
9. Do you have any comments on the benefits and drawbacks analysis proposed in Chapter 3 of this NPA?

### 1.3. The next steps

Following the consultation of the draft regulatory material, EASA will review all the comments received and will duly consider them in the subsequent phases of this rulemaking activity.

As a result of this process, EASA will revise, if necessary, the proposed amendments to Regulation (EU) No 1321/2014<sup>6</sup> (the 'continuing airworthiness Regulation'), and issue an Opinion. The Opinion will be submitted to the European Commission which shall consider its content and decide whether to issue amendments to the related Regulation.

If the European Commission decides to amend the Continuing Airworthiness Regulation based on the opinion, EASA will issue a decision to amend the acceptable means of compliance (AMC) and guidance material (GM) to support the implementation of the amendments to the continuing airworthiness Regulation.

When issuing the Opinion and Decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments during the

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<sup>6</sup> Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R1321&qid=1699615487493>).



consultation of the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.



## 2. In summary — why and what

### 2.1. Why we need to act

This rulemaking task focuses on areas of improvements in Part-147 MTOs as identified in the evaluation report related to the EASA maintenance licensing system and maintenance training organisations issued in 2018.

In addition to the evaluation report, the Agency received feedback, including confidential safety reports, related to potential cases of fraud and malpractices in the performance of examinations by MTO.

Such cases are a standing problem identified by the national competent authorities (NCAs) as well as by the students and licence holders, and needs to be addressed, as explained in more detail in the following section.

#### 2.1.1. Description of the issue

A survey on the maintenance licensing and training system, launched by EASA at the end of 2016, highlighted shortcomings and areas of improvement for Annex IV (Part-147) to Commission Regulation (EU) No 1321/2014. The assessment of this survey led to an evaluation report issued in 2018.

The issues identified through the survey and that are addressed by the proposal in this NPA are:

- (a) Impact on safety and the credibility of the maintenance training system due to fraud cases and, in some cases, cultural acceptance of cheating

The general feedback received by EASA indicates that most of the fraud cases reported occur in the examinations that are performed by MTOs outside their approved locations in general, and in particular when the examinations are performed outside the territory for which their authority is competent, which includes EU Member States, but also third countries.

While it is very difficult to evaluate the real extent of the problem and to confirm the fraud cases themselves, the frequency of the feedback suggests that such occurrences are more than just isolated cases.

In the notable case of fraud at the Hellenic Aviation Training Academy (HATA) MTO, Commission Decision (EU) 2016/2357<sup>7</sup> withdrew certain certificates of recognition (CofR) issued by this MTO, as well as the aircraft maintenance licences based upon these, leading also to the revocation of the MTO's approval (see 'related safety issue' below). This case is a noticeable example of the need for regulatory action to combat fraud.

- (b) Requirement for an adequate level of knowledge of the language in which the training is delivered

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<sup>7</sup> Commission Decision (EU) 2016/2357 of 19 December 2016 regarding the lack of effective compliance with Regulation (EC) No 216/2008 of the European Parliament and of the Council and its implementing rules in respect of certificates issued by the Hellenic Aviation Training Academy (HATA), and Part-66 licenses issued on the basis thereof (OJ L 348, 21.12.2016, p. 72) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016D2357>).

The general feedback received by EASA indicates a need for language assessment of both student and organisation personnel alike.

In addition to the issues identified through the survey, there is also the need to:

- implement the output of RMT.0281 (MDM.082) *New training methods or new teaching technologies (Part-66/Part-147)*<sup>8</sup>, as long as not implemented by Commission Implementing Regulation (EU) 2023/989<sup>9</sup>;
- update, clarify and correct some points, given that Part-147 was not subject to a revision since it was initially adopted.

### Related safety issues

On 9 December 2014, EASA issued Safety Information Bulletin (SIB) No 2014-32R1<sup>10</sup> to inform about the potential safety concern associated with the alleged examination fraud at HATA and to recommend concrete measures to the Member States' competent authorities in order to address this situation.

Subsequently, the European Commission published on 21 December 2016 Commission Decision (EU) 2016/2357 withdrawing the recognition without further investigation of certain CofR issued by HATA, and the licences based upon these.

Commission Regulation (EU) 2018/1142<sup>11</sup> amending the continuing airworthiness Regulation already establishes limitations on the privilege of performance of examinations for basic knowledge examinations.

#### NOTE:

At the time of adoption of the ToR for RMT.0544 *Review of Part-147* and RMT.0255 *Review of Part-66*, the two RMTs were scheduled to run in parallel. Due to the Covid-19 pandemic, EPAS 2021-2025 postponed RMT.0544 and, as a result, some changes to Part-147 were included in Opinion No 07/2022<sup>12</sup> as an outcome of RMT.0255. As a consequence, the changes to Part-147 that are already published with Commission Implementing Regulation (EU) 2023/989 are not included in this NPA even if they were part of the actions stated in the ToR. This includes in particular the optimisation of the structure of the Basic Knowledge (BK) syllabus and its impact on the training courses and examinations.

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<sup>8</sup> <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0281-mdm082>

<sup>9</sup> Commission Implementing Regulation (EU) 2023/989 of 22 May 2023 amending Regulation (EU) No 1321/2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks, and correcting that Regulation (OJ L 135, 23.5.2023, p. 53) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R0989&qid=1699614799394>).

<sup>10</sup> <https://ad.easa.europa.eu/ad/2014-32R1>

<sup>11</sup> Commission Regulation (EU) 2018/1142 of 14 August 2018 amending Regulation (EU) No 1321/2014 as regards the introduction of certain categories of aircraft maintenance licences, the modification of the acceptance procedure of components from external suppliers and the modification of the maintenance training organisations' privileges (OJ L 207, 16.8.2018, p. 2) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1142&qid=1699615273937>).

<sup>12</sup> <https://www.easa.europa.eu/en/document-library/opinions/opinion-no-072022>



### 2.1.2. Conclusion of rulemaking needs

EASA concluded, as explained further in Chapter 3 below, that an intervention was necessary and that non-regulatory actions cannot effectively address the issue. Therefore amendments to the continuing airworthiness Regulation, as well as to the associated AMC and GM, are required.

## 2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the issues described in Section 2.1.

More specifically, with the regulatory material presented here, EASA intends to achieve:

- (a) eliminating or reducing the examination cheating and fraud, and conflict of interest within Part-147 organisations;
- (b) enhancement of the consistency of Part-147 with the other Annexes to the continuing airworthiness Regulation;
- (c) improvement of the structure and readability of Part-147, and alignment of its terminology with the other Annexes to the continuing airworthiness Regulation;
- (d) correct understanding by students of the subjects taught during the training in terms of language used.

Additionally, since Part-147 was not subject to a substantive amendment since its adoption as part of Regulation (EC) 2042/2003<sup>13</sup>, some points need to be updated, clarified and corrected.

## 2.3. How we want to achieve it — overview of the proposed amendments

The review affects the entire Part-147 with a main focus on the issues specified above. With the support of a rulemaking group (RMG), EASA has identified certain measures that could address or mitigate such issues:

- (a) Introduction of management system requirements for the MTO to clearly identify lines of responsibilities and duties within the organisation, as well as to identify and define the main processes to be described by the organisation  

Note: Such management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.
- (b) Introduction of requirements for qualification and responsibilities of the organisation's personnel, including competence assessment and language requirements, and amendments to initial and recurrent training requirements for personnel
- (c) Amendments to the requirements for the compliance monitoring process
- (d) Amendments to the requirements for training procedures

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<sup>13</sup> Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 315, 28.11.2003, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32003R2042&qid=1699616850547>).



- (e) Amendments to the requirements for the examination process and the security of examination material e.g. notification to the CA, attendance of CA inspector during examinations in 'unapproved' locations
- (f) Amendments to the privileges of the organisation and introduction of limitation(s) and conditions in regard to exercising certain privileges e.g. limited number of training activities in 'unapproved' locations, privileges for examinations conditioned to delivering training over a certain period of time
- (g) Introduction of provisions for alternative means of compliance
- (h) Amendments to the requirements for the maintenance training organisation exposition (MTOE) to include the changes mentioned in the points above
- (i) Requirements for activity reports (containing information on delivery of training and examinations with particular focus on the results) to be regularly provided to the CA by the MTO
- (j) Promotion of agreement between the CAs for the supervision of examinations by the local Authority where the examination is conducted

Legal basis is Article 17(1)(b) and (e), Article 62(14)(a), (c), (d) and (e), and Article 62(15)(a), (b) and (c) of the Basic Regulation.

#### 2.4. What are the stakeholders' views

The issues identified in section 2.1 are well known among the stakeholders, both among CAs and industry. EASA has received requests to address these issues before and during the development of this RMT through various means such as the Advisory Bodies, standardisation inspections and other channels.

In particular, the issue of fraud in MTOs is understood as a major concern by all categories of stakeholders. This aspect is highlighted in Section 2.12 of the Evaluation report related to the EASA maintenance licensing system and maintenance training organisations.

Stakeholders' views on language competence of students undertaking training are also aligned for the most part, requesting a minimum level to be required, such as the Common European Framework of Reference for Languages (CEFR) recognised levels, as highlighted in Section 2.9 of the Evaluation report related to the EASA maintenance licensing system and maintenance training organisations.

Views on other elements of the RMT such as the consideration of safety management system (SMS), and activity reports are also presented in the other sections of the Evaluation report related to the EASA maintenance licensing system and maintenance training organisations.



### 3. Expected benefits and drawbacks of the proposed regulatory material

EASA concluded that an intervention was required and that new or amended requirements, AMC and GM, are necessary to effectively address the issues described in Section 2.1, because the objectives described in Section 2.2 cannot be achieved effectively by non-regulatory action.

The amendment to Annex IV (Part-147) aims at clarifying and detailing existing requirements and introduces new provisions to improve organisational processes and to ensure delivery of better-quality training.

The main topic addressed through this amendment is fraud and cheating in the examination process, and it represents the main focus of the proposed regulatory material in this NPA. The measures presented are therefore mainly the changes envisioned to correct the shortcomings identified in relation to the security and integrity of examinations. Feedback on fraudulent activities has been reported to take place mostly in unapproved locations.

EASA also assessed the impacts of the proposed regulatory material to ensure that the regulatory material delivers its full benefits with minimum drawbacks.

The vast majority of MTOs are expected to experience an overall minor impact, whilst some organisations may not experience any difference in their processes, as the proposed measures are correlated to the requirements for well-functioning organisations. Should the proposed measures be adopted, a small number of organisations that base their business model on activities in unapproved locations would be able to maintain their privilege, but they would be more affected than others due to the implementation of the proposed mitigation measures in unapproved locations; for instance, investments in facilities, equipment (hardware and/or software) and personnel. Certain organisations that apply business models that have been proven to be prone to fraudulent activities may be adversely affected by these proposed measures.

These proposed measures are expected to generate in the short to medium term a major decrease in fraudulent activities, and in the medium to long term an increase in the competence of aircraft maintenance licence (AML) holders as a result of improved training to be delivered by more mature and effective MTOs. It is expected that the proposed changes in personnel requirements and responsibilities, and the implementation of a management system will ensure an enhanced and standardised approach to delivering training, and will facilitate the oversight activities for competent authorities. The current shortage of personnel in aircraft maintenance is also a compelling factor in the decision-making process in relation to the proposed measures, with a view to limiting the effect on the AML holders shortage, affecting only those applicants attending organisations that are prone to fraudulent activities.

Apart from the solutions included in these proposed measures, while analysing the fraud situation, three other options were considered, but were finally discarded due to their infeasibility or adverse effects on the market. These discarded options are summarised below:

- Restricting privileges to examinations only in approved locations, eliminating thus the privilege to provide examinations in unapproved locations. Such a measure was deemed too radical and restrictive towards compliant organisations applying appropriate measures to ensure the security of the examination process. A potential market distortion was also taken into account as a possible unintended consequence.



- Restricting the organisation privileges to conduct examinations only where these examinations are conducted in conjunction with a training, thus eliminating the privilege to provide examinations without corresponding training. Such a measure was deemed too radical and restrictive towards both students (future AML applicants) and organisations. Furthermore, this measure would contradict the provisions of Annex III (Part-66) which does not require undertaking training prior to examinations.
- Withdrawing in general the privilege for organisations to conduct examinations, maintaining such a process only at the level of competent authorities. Such a measure was also deemed too radical, affecting the entire maintenance training industry, especially organisations focusing on examinations rather than training, and generating a major increase in workload and resource needs for competent authorities.

The table below presents the benefits and drawbacks of the proposed measures:

Proposals	Benefits	Drawbacks
Replacing quality system requirements and expanding further into the management system	<p>Establishing lines of responsibility and duties of personnel</p> <p>Managing training activities more effectively</p> <p>More robust organisation processes, contributing to fraud prevention</p> <p>Facilitating the work of CAs</p>	Limited burden: mainly administrative; changes to the organisation set-up and the associated procedures & MTOE
Introducing new requirements and responsibilities for the organisation's personnel	<p>Ensuring clear delineation of roles and responsibilities of management personnel</p> <p>Ensuring that every position in the organisation is filled by an appropriately qualified person who understands their role and the risks inherent to the activity</p>	<p>Limited burden on organisation, depending on the competence of the affected personnel</p> <p>introducing a personnel evaluation process; update of MTOE</p> <p>Limited burden on competent authorities</p> <p>new procedure for the acceptance of the organisation's personnel through the MTOE approval</p>
Introducing language requirements for the organisation's personnel and for students and candidates to examinations	<p>Ensuring appropriate communication and understanding of the training</p>	<p>Limited burden on organisation, depending on the organisation's strategy (e.g. could be as simple as a proof of language proficiency or more complex if an organisation's internal language assessment scheme is developed</p> <p>New procedure ensuring personnel and candidates' language proficiency</p>



## 3. Expected benefits and drawbacks of the proposed regulatory material

Proposals	Benefits	Drawbacks
Adaptation of the organisation privileges (e.g. new controls for activities in unapproved locations)	<p>Ensuring effective control over activities, particularly in unapproved locations</p> <p>Reducing fraud cases</p>	<p>Limited burden on organisation, depending on the organisation's business model: continue or not examinations in unapproved locations. If yes, development of procedures, potential investment on recording material (video and audio) or other resources (e.g. security personnel)</p> <p>Limited burden on CAs related to increased workload to supervise work in unapproved locations or potential increase in travel costs</p>
Clarifying requirements for examination process	<p>Ensuring the security of examination material, and the integrity of the examination process</p> <p>Reducing fraud cases</p>	<p>Limited burden on organisation, depending on the organisation's business model, and potential need for investment in material or resource (e.g. software for selection of MCQs); changes to the organisation set-up and the associated procedures &amp; MTOE</p>

The proposed regulatory material has been developed in view of the better regulation principles, and in particular the regulatory fitness principles.



#### 4. Proposed regulatory material

Please refer to NPA 2023-10 (B).



## 5. Monitoring and evaluation

EASA plans to monitor as follows whether the objectives described in Section 2.2 will be achieved with the regulatory material:

Monitoring is a continuous and systematic process of data collection and analysis about the implementation/application of a rule/activity. It generates factual information for future possible evaluations and impact assessments and it also helps to identify actual implementation problems.

The proposal on the indicators to be checked is as follows:

What to monitor	How to monitor	Who should monitor	How often to monitor
Suspected cases of examination cheating and fraud	EASA standardisation inspections/NCAs' feedback	EASA/NCAs	On a recurrent basis, e.g. once every 2 years
Language competence for both the organisation's personnel and students	EASA standardisation inspections/NCAs' feedback	EASA/NCAs	On a recurrent basis, e.g. once every 2 years
Examination success rate	Reports provided to EASA by NCAs	EASA/NCAs	On a recurrent basis, e.g. once every 2 years
Number of examinations in 'non-approved' locations	EASA standardisation inspections	EASA	On a recurrent basis, e.g. once every 2 years

In addition, EASA shall monitor the implementation of the proposed regulatory framework applicable through regular standardisation activities as well as through regular feedback received from the EASA Advisory Bodies.



## 6. Proposed actions to support implementation

In order to support affected stakeholders in the implementation of the new regulatory material, EASA plans to take the following actions:

- Focused communication for Advisory Body meeting(s) (MAB/SAB/TeB/TEC/COM)
- Detailed explanations/clarifications on the EASA website
- Dedicated thematic workshop/session
- Combination of the above-mentioned means



## 7. References

### 7.1. Related EU regulations

N/A

### 7.2. Related EASA decisions

N/A

### 7.3. Other references

Commission Decision (EU) 2016/2357 withdrawing the recognition without further investigation of certain certificates of recognition issued by HATA and the licences based upon these

RMT.0281 (MDM.082) New training methods or new teaching technologies (Part-66/Part-147)

SPT.0106 Prevention, detection and mitigation of fraud cases in Part-147 organisations





## Appendix 1 — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published (e.g. as part of the CRD).

### 1. The regulatory proposal is of technically good/high quality

*Please choose one of the options*

Fully agree / Agree / Neutral / Disagree / Strongly disagree

### 2. The text is clear, readable and understandable

*Please choose one of the options*

Fully agree / Agree / Neutral / Disagree / Strongly disagree

### 3. The regulatory proposal is well substantiated

*Please choose one of the options*

Fully agree / Agree / Neutral / Disagree / Strongly disagree

### 4. The regulatory proposal is fit for purpose (achieving the objectives set)

*Please choose one of the options*

Fully agree / Agree / Neutral / Disagree / Strongly disagree

### 5. The regulatory proposal is proportionate to the size of the issue

*Please choose one of the options*

Fully agree / Agree / Neutral / Disagree / Strongly disagree

### 6. The regulatory proposal applies the ‘better regulation’ principles<sup>[1]</sup>

*Please choose one of the options*

Fully agree / Agree / Neutral / Disagree / Strongly disagree

### 7. Any other comments on the quality of this document (please specify)

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<sup>[1]</sup> For information and guidance, see:

- [https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how\\_en](https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en)
- [https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox\\_en](https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en)

