

Information and Advisory Notice No. 21

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Training Needs Analysis for the Theoretical Element of the Aircraft Type Training

1. Introduction:

As per Regulation (EC) No 2042/2003 Annex III (Part-66), amended by (EU) No. 1149/2011 Part-147 organisations shall develop a Training Needs Analysis (TNA) to adapt and justify the duration of the theoretical element of a course for a specific aircraft type.

The requirements for TNA's entered into force on 1st August 2013 for any type training course.

In the particular case of type training courses approved on the requirements valid before Regulation (EU) 1149/2011 was applicable (1st August 2012), and having a duration for the theoretical element equal to or above the minimum duration contained in paragraph 3.1(c) of Appendix III to Part-66, it is acceptable that the TNA only covers the differences introduced in paragraph 3.1(d) "Justification of Course Duration" related to the minimum attendance and the maximum number of training hours per day.

2. Scope:

The TNA is the main driver for determining the duration the Theoretical Element of the course, regardless of whether it is above or below the minimum duration described in Appendix III to Part-66.

The TNA procedure of the organisation shall be included as part of the MTOE.

Typically, the TNA for a course covering a smaller aircraft would demonstrate that a shorter duration would satisfy the requirements. However, where a TNA shows that more hours are needed, course lengths shall be longer than the minimum specified in the table listed in section 3.1(a) of Appendix III, (Part-66).

The content and the duration delivering the TNA may be supported by an analysis from the Type Certificate Holder.

3. Consideration:

The hour duration and the coverage of the full syllabus based upon a TNA shall consider:

- The design of the aircraft type, its maintenance needs and the types of operation.
- A detailed analysis of the applicable chapters located in section 3.1(e) of Appendix III (Part-66).

- A detailed competency analysis, showing that the objectives of the theoretical elements as stated in section 3.1(a) Appendix III (Part-66), are being met.

The TNA shall thus focus on developing training material that focuses on what engineers need to do the job, and shall also act as a justification of any deviation from the EASA minimum required training time.

The course must describe and justify the following:

- The minimum attendance required to the trainee, in order to meet the objectives of the course.
- The maximum number of hours of training per day, taking into account pedagogical and human factors principles.
- The content shall include, and cover as a minimum the elements in the syllabus listed in section 3.1(e) of Appendix III that are specific to the aircraft type.
Additional elements introduced due to type variation, technological changes, etc. shall also be included.
- The training syllabus shall be focused on mechanical and electrical aspects for B1 personnel, and electrical and avionic aspects for B2.

If the minimum attendance required is not met by an individual, the certificate of recognition shall not be issued. Additional training may be provided by the training organisation in order to meet the minimum attendance time.

4. References:

Relevant Legislation:

- Commission Regulation (EC) No: 2042/2003 amended by Commission Regulation (EU) No 1149/2011, & 593/2012
- AMC Part 147/3 – Annex to ED Decision 2012/004/R dd: 19/04/2012

<http://easa.europa.eu/agency-measures/acceptable-means-of-compliance-and-guidance-material.php#Part-147>

Information on Training Needs Analysis:

- EASA TNA Explanatory note
- EASA TNA user guide.

<http://easa.europa.eu/approvals-and-standardisation/organisation-approvals/CAO-foreign-part-147-organisations.php>
