

► This RA has been substantially re-written; for clarity no change marks are presented – please read RA in its entirety ◀

RA 4821 - Findings and Observations (MRP 145.A.95)

Rationale

Following the Notification of an Assurance finding against a Maintenance organization, it is essential that the Regulatory non-compliance or other non-conformance is appropriately addressed and actioned by the Accountable Manager (Maintenance) (AM(M)). If findings are not acted upon, the Continuing Airworthiness of the Air System(s) may be compromised. This RA requires Root Cause Analysis (RCA) to be carried out on all findings, and observations (where applicable), to enable the identification and rectification of issues, to reduce the likelihood of Reoccurrence.

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Regulation

4821(1)

Findings (MRP 145.A.95)

4821(1) After receipt of Notification of an MAA finding the AM(M) **shall** devise and execute a Corrective Action Plan (CAP) to demonstrate how the finding and the root Cause will be rectified to reduce the likelihood of Reoccurrence.

Acceptable Means of Compliance 4821(1)

Findings (MRP 145.A.95)

Common AMC

1. All findings **should** be investigated and rectified using an RCA approach, tool, or technique¹.
2. Where necessary the organization **should** take immediate containment actions to preserve Air Safety.
3. The CAP **should** be provided to the MAA in accordance with MAA03² and include the RCA, corrective actions, preventive actions, and the implementation plan.

Additional AMC – Military Maintenance Organizations only

4. Nil.

Additional AMC – Approved Maintenance Organizations only

5. Instructions for the use of RCA **should** be detailed in the Maintenance Organization Exposition.

Guidance Material 4821(1)

Findings (MRP 145.A.95)

6. There are 2 types of MAA findings, non-compliance and non-conformance, each of which can lead to the MAA raising a Corrective Action Requirement (CAR). Findings are sub-divided into 2 levels as follows:

- a. Non-compliance:
 - (1) Level 1: A failure to meet MRP Part 145 Regulation, that could lead to a major Risk to Air Safety.
 - (2) Level 2: A non-compliance that is judged not to be a Level 1.
- b. Non-conformance:

¹ Guidance can be found in Civil Aviation Authority – [CAP 1760 Effective Problem Solving and Root Cause Identification Stage 6](#) or [JSP 940 MOD Policy for Quality: Part 2: Guidance](#) and training is available through [MAA Training Courses](#) as applicable.

² Refer to MAA03: MAA Regulatory Processes, Annex F: MAA Assurance.

**Guidance
Material
4821(1)**

- (1) Level 1: A deviation from or an omission of a requirement that may contribute to a major Air Safety Risk.
- (2) Level 2: A non-conformity that is judged not to be a Level 1.

Route Cause Analysis

7. RCA focuses on why the finding occurred not who or what were responsible. Establishing the root Cause(s) often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, technical, human, organizational, etc.) in addition to the direct factors.

8. A narrow focus on single events or failures, or the use of a simple, linear model, such as a Fault Tree Analysis, to identify the chain of events that led to the finding may not properly reflect the complexity of the issue, increasing the Risk that important factors to be addressed to prevent a Reoccurrence will be missed. An inappropriate or partial RCA could lead to 'quick fixes' that only address the symptoms of the finding.

9. A peer review of the results of the RCA may increase its reliability and objectivity.

**Regulation
4821(2)**

Corrective Actions (MRP 145.A.95)

4821(2) The actions in the CAP **shall** be implemented to the satisfaction of the MAA and within the agreed timescales².

**Acceptable
Means of
Compliance
4821(2)**

Corrective Actions (MRP 145.A.95)

10. After receipt and acceptance of the CAP has been confirmed by the MAA, the organization **should** implement the actions within the agreed period.

11. The organization **should** inform the MAA when the CAP has been completed and provide sufficient evidence to justify closure.

**Guidance
Material
4821(2)**

Corrective Actions (MRP 145.A.95)

12. Nil.

**Regulation
4821(3)**

Observations (MRP 145.A.95)

4821(3) Any observations² noted during MAA Audits **shall** be given due consideration by the organization, and any decisions taken in respect of those observations recorded.

**Acceptable
Means of
Compliance
4821(3)**

Observations (MRP 145.A.95)

13. For each negative observation notified by the MAA, the organization **should** analyse the related issues and determine when actions are needed.

14. The organization **should** record the analysis and the outputs, such as the actions taken or the reasons for not taking actions.

**Guidance
Material
4821(3)**

Observations (MRP 145.A.95)

15. The handling of the observations may follow a process similar to the handling of findings by the organization.