ASA-100 Frequent Findings

- Bi-annual review of the top findings over the last six (6) months.
- Surprisingly, the sections that have the most write-ups remain the same.
- The data compiles findings from all audits conducted since the last presentation, not broken down by type (initial, surveillance, re-accreditation, special audits).

Frequent CARs – ASA-100

Reviewed audits conducted over 12 months (since May 2013):

- 141 audits with CARs (20 AA, 67 SA, 44 RA, 10 SPA)
- Total number of findings = 572
- Average number of findings per audit = 4.05
- Finding can relate to more than one audit section
- The largest number of CARs continues to relate to QM & Supporting Documents not being current and/or readily available. This accounts for 17% of CARs, the same as in 2013
- Unapproved & Counterfeit Parts Training of personnel (including Procurement) and issues related to the annual self-audit are next at 9%

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 and/or ASA LI 020

Frequent CARs – ASA-100

- Quality docs not available (ATA Spec 300, ASA-100, AC 00-56, docs referenced on Appendix 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

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.)

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

Frequent CARs – ASA-100

4. - 5C - The distributor shall maintain a list of their approved suppliers and a quality history for each source.

- No suppliers' list maintained
- Suppliers' list is not current
- Suppliers' list does not include all approved suppliers
- No supplier surveys on file when required per manual procedure
- Suppliers not approved in accordance with manual procedure

Frequent CARs – ASA-100

5. - 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.

Frequent CARs – ASA-100

6. - 4C - 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)

Frequent CARs – ASA-100

7. - 5A - 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

Frequent CARs – ASA-100

8. - 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

Frequent CARs – ASA-100

- Procedure does not describe the current scrapping process
- Scrap log is not current
- Scrap log is maintained only for LLPs not all serialized scrapped parts
- Scrap date is not recorded on log
- P/N and/or S/N are not recorded on scrap log
- P/N and/or S/N are not recorded accurately on scrap log

Frequent CARs – ASA-100

9. - 1E - For distributors, the quality control manual shall include, but not be limited to a detailed description of:
   10) the storage facilities and applicable specifications,

   - QM does not include detailed description of the storage facility with applicable specifications

Frequent CARs – ASA-100

10. - 4D - The distributor shall maintain a roster of the personnel and their alternates authorized to perform inspection functions and identify the inspection function(s) that each person is authorized to perform.

- No roster of inspectors maintained
- Roster of inspectors is not current (update when employees leave or new employees are hired)
- Roster of inspectors does not include functions that each inspector is authorized to perform
- Roster of inspectors does not include all inspectors (alternate, part time, bulk receiving)
- Roster of inspectors does not include signatures/initials as required
- Inspector is not properly authorized (not on roster, didn't receive required training)