

ASA-100 Revision 5

Tutorial regarding changes to ASA-100

ASA-100 Revision 5.0 – Important Dates

- The new update to ASA-100 is revision 5.0
 - Released Date: January 1, 2020 (this is when it is available)
 - Effective Date: July 1, 2020 (this is the deadline for everyone to be compliant)
- Initial Accreditation Audits performed after February 14, 2020 shall be conducted to ASA-100 Revision 5.0
- Clients may choose Revision 4.0 or Revision 5.0 for surveillance or reaccreditation audits performed before July 1, 2020
- All audits conducted July 1, 2020 and thereafter will be to ASA-100 Revision 5.0
- Detailed information can be found in Section III of the standard: Cancellation and Implementation

What Do You Need to Do to Show Compliance?

- Clients must provide ASA with a Statement of Compliance to ASA-100 Revision 5.0
- The Statement of Compliance to ASA-100 Revision 5.0 must be submitted by July 1, 2020
- The Verification of compliance will be conducted at the next scheduled ASA-100 audit as follows:
 - After July 1, 2020
 - Or prior to July 1, 2020 if Distributor *elects* for the audit to be performed to rev. 5.0 rather than rev. 4.0
 - ASA may choose to review manual changes based on past audit performance or length of time before surveillance audit. ASA will contact those companies as appropriate.
- A SurveyMonkey has been established (link on next page) to submit the Statement of Compliance to ASA-100 Revision 5.0. The submission takes 30 seconds. An upload of the manual is not required but you must list the compliant Quality Manual Revision level number when submitting the Statement of Compliance to ASA-100 Revision 5.0.
- What happens if you submit a Statement of Compliance to ASA-100 Revision 5.0 and during the verification audit the auditor finds the Company is not in compliance?
 - If the NCR finding is of the nature that the Company did make changes to meet Revision 5.0 but those changes are not correct or ineffective then the normal NCR process will apply
 - If the NCR finding is of the nature that the company did not make the changes and/or did changes that clearly did not meet the intent of Revision 5.0 then the Client will be placed on immediate suspension. The need for an onsite audit to lift the suspension will be dependent upon the NCR finding and input from the ASA auditor. This is not the path ASA wants to implement and we hope to not find ourselves in this position.

Link To SurveyMonkey

- <https://www.surveymonkey.com/r/ASA100Rev5ComplianceStatement>

Comments on Changes

- On the ASA Website shown below you can find:
 - Rev 5
 - Rev 5 red lined (exhaustive listing of all updates)
 - LI 100-009 (SPEC 300)
 - Best Practice – ESD
 - Best Practice – Disposition of Unsalvageable Parts
 - Self-Audit Checklist updated for Rev 5
 - Updated ASA-100 Test for Rev 5
 - Updated link for Counterfeit Parts training (not affiliated with ASA)
- <https://www.aviationsuppliers.org/ASA-100-Documents>
- Not included in the ASA-100 Rev 5.0 initial release is the new ASA Certificate of Conformance (CoC), since it has not yet been approved by the ASA Board of Directors. Once the ASA CoC is approved it will be included in ASA-100 as a new appendix section. Use of the ASA CoC will **not** be mandatory for accreditation.

There are Three Classes of Changes

- **NON-SUBSTANTIVE:** There are numerous edits due to grammar, spacing, change of dates, etc. These items are not substantive changes.
- **SUBSTANTIVE, SELF EXPLANATORY:** There are also changes that are substantive but don't require an explanation. Examples are those in 3C, 8C, 8H, and 11 B4. This new language is clearer and doesn't require a detailed explanation. Please review these sections closely; remember you must at minimum meet ASA-100.
- **SUBSTANTIVE, REQUIRE EXPLANATION:** Detailed descriptions are needed for 3 areas of change: HazMat, Drop Shipment, and Supplier Approval.
 - These detailed descriptions follow on the next pages

HAZMAT: What is New?

- In section 1 (Quality System and Quality Manual), we added a new paragraph (E)(16); the text reads:
 - “ 16) the system for hazmat control and transport”
- WHY DID WE DO THIS?
 - This is a requirement in FAA AC 00-56 B. Section 6(B)(17) of the Advisory Circular requires “A system for hazmat control and transport that meets Title 49 of the Code of Federal Regulations (49 CFR) requirements”
- HISTORY
 - There was a prior ASA-100 standard reference under the training provisions. This reference was removed to clarify that the training requirements encompass more than just hazmat. But this removal left an inconsistency in the standard. To correct this inconsistency, ASA added a Section 15 that uses the exact language from AC 00-56B in order to clarify the link between the requirement of the AC and the requirement of ASA-100.
- OTHER DETAILS
 - Language is added as a required element in subsection (E)(16)
 - This is further explained in newly added language found in Section 15 of the ASA-100 standard.

HAZMAT: Using IATA/ICAO Standards

- AC 00-56B specifically mentions Title 49. What if I have received other training?
 - Many companies have IATA/ICAO Dangerous Goods Training. In fact, the ASA class (offered 2-3 times per year) focusses on IATA/ICAO Dangerous Goods standards.
 - Most distributors ship by air. Title 49 specifically permits reliance on the ICAO standards (as an alternative) when shipping by air.
 - Where US has an explicit variation (like oxygen generators) then you must follow the US variation (the ASA hazmat class covers the variations that could apply to aircraft parts).
 - IATA republishes the ICAO standards and therefore following IATA standards is equivalent to following ICAO standards. Your training records should indicate that you have been trained to Title 49 C.F.R. subpart H (this includes the additional US elements in addition to the standard IATA / ICAO training).

HAZMAT: Control and Transport

- What is “control and transport”?
 - In addition to transport functions, it also includes pre-transportation functions like (this is only a partial list):

(1) Determining the hazard class of a hazardous material.

(2) Selecting a hazardous materials packaging.

(3) Filling a hazardous materials packaging.

(4) Securing a closure on a filled or partially filled hazardous materials package or container or on a package or container containing a residue of a hazardous material.

(5) Marking a package to indicate that it contains a hazardous material.

(6) Labeling a package to indicate that it contains a hazardous material.

(7) Preparing a shipping paper.

(8) Providing and maintaining emergency response information.

(9) Reviewing a shipping paper to verify compliance with the US or international requirements.

HAZMAT: Can I Take an “N/A”?

- Typically, an aviation company that *could* ship/receive hazmat will be considered to be subject to the hazmat training requirements, even if it does not regularly ship hazmat
 - FAA published a memo explaining this philosophy as it applied to repair stations, and the logic of that memo would apply to most distributors
- If Distributor handles *no* Hazardous Materials, then the company may take a N/A to this requirement if it has adequate controls in place:
 - Need to show how you prevent hazmat from shipping
 - How is it identified?
 - Who is responsible for correct identification?
 - How is the responsible person’s qualification managed and kept current?
 - Need to show your response mechanisms for receipt of unanticipated hazmat
 - How is identified hazmat controlled to maintain compliance?

HAZMAT: What Will the Auditors Be Looking For?

- If Distributor takes N/A to the section, then auditors will be looking for positive controls to prevent the inadvertent shipping of hazmat:
 - Companies can handle it differently, but the questions on the previous slide may help you to develop such controls.
 - Shipping and receiving personnel should typically have hazmat identification training so they can recognize and control HazMat (ASA offers this sort of training, periodically).
- Typically, auditors will be looking for training that meets 49 C.F.R. Subpart H. Record of training, can be for IATA-based class as long as also fully trained on U.S. state variations.
 - Oxygen Generators are an example of a difference between Title 49 Hazmat and IATA Dangerous Goods training.
 - Note that Title 49 requires training every 3 years. If Distributor is part of an operator's system, or ships internationally, then the requirement is every 2 years.
 - The company is responsible for ensuring that the employees are trained and remain current. Where the company provides the training, the Record of Training needs to specifically detail the employee HazMat subject training.

DROP SHIPMENT: Change to Definition Section

- Added a Definition for Drop Shipment: A Drop Shipment occurs when a distributor causes an article to be shipped from the distributor's supplier to the distributor's customer.

DROP SHIPMENT

- Drop Shipments are now specifically referenced in the Procurement Section 5 which specifies that paragraph 5 A also applies to drop shipments.
- Section 11 has a new item: When a distributor causes an article to be shipped as a drop shipment, the distributor shall review and approve the documentation relating to each article in the drop shipment.
- Collectively these changes bring new focus to drop shipments and clarify that the Distributor must:
 - Follow its own purchasing requirements;
 - Flow-down to the shipper any purchase requirement for shipping; and
 - Follow-through on documentation review and approval.
- With business models changing towards a focus on drop shipments, distributors should consider detailing how they will handle drop shipments.
 - ASA feels a company should consider writing a specific process for drop shipments, but this is not currently required.

SUPPLIER APPROVAL: What's New?

- WHERE IS THE CHANGE?
 - We have amended Section 5 (C) concerning approved suppliers
- WHAT WAS THERE BEFORE?
 - Distributors are required to maintain a list of approved suppliers and a quality history for each approved supplier.
- WHAT HAS BEEN ADDED?
 - Under the new language, the distributor is required to describe the criteria for supplier approval

SUPPLIER APPROVAL: What Will Auditors be Examining?

- WHAT WILL AUDITORS BE LOOKING FOR?
- The auditor should be able to look at a list and identify your approved suppliers
 - Does the list need to be printed? No it can be digital.
- The auditor should be able to tell the quality history for your suppliers.
 - There may be no details to pull if the supplier has never had an error in shipment to you. But if there are errors, then you need to know it.
 - You can determine what is tracked for quality history, but it must include supplier errors, even ones that can be corrected quickly.
 - The Auditors are not here to tell you what to track but they will not accept tracking nothing.
- The auditor should be able to identify your criteria for supplier approval. You determine the criteria, but examples might include (this list is not meant to be exhaustive):
 - Requirements for becoming an approved supplier
 - How often suppliers are re-evaluated to remain on the approved supplier list
 - What happens when an approved supplier no longer meets the criteria (how does a supplier become unapproved)
- Can the initial quality approval criteria be they are approved as long as they are AC 00-56?
 - Yes, but you should still take into account factors like legal impediments (denied parties), accounting review, etc.
 - You should consider how you will verify their AC 00-56 status
 - Continued approval should be subject to your quality criteria

Questions?

- ASA's PoC for Technical Services is Sam O'Connor. Sam not only oversees the ASA-100 Accreditation Program but is also an ASA-100 auditor. Feel free to email him at sam@aviationsuppliers.org
- Email your auditor, if you want to discuss the changes. The Auditors can't tell you what to do but can review with you the options you are considering. Below is a list of possible ASA-100 auditors. Not included are auditors that were not involved in the ASA-100 rewrite. If you don't see your auditor, the appropriate Point of Contact is Sam O'Connor.
 - Kelly Lyon
 - Michelle Billoir
 - Roy Resto
 - Sam O'Connor
- Not sure who your auditor is? Then please email Sam O'Connor.
- If ASA sees a common question being asked, we will email the ASA-100 companies the question/issue and ASA's possible answers.