

Transferring Qualification

Interpretation CZ NANDTB No: 1/2024

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1. Preamble

- 1.1 Certificates acc. to EN 4179 / NAS 410 standards are by their nature non-transferrable.
- 1.2 Personnel changing employers is bringing knowledge and skills that may be used to simplify the qualification process within the new Employer, provided the previous qualification process (or their parts) are sufficiently documented and at least part of this process can be deemed as Representative to the new Employer.
- 1.3 This interpretation may be used by the same principles for the following cases:
 - 1.3.1 Transferring qualification acc. to EN4179 / NAS 410 between employers.
 - 1.3.2 Transferring qualification from NAS 410 to EN 4179 (e.g. for the EASA Part 145 approval) and vice-versa within the Employer or between employers.
 - 1.3.3 Transferring qualification from ISO 9712 or SNT-TC-1A to EN 4179 / NAS 410 (i.e. where other previous qualification systems were utilized) within the Employer or between employers.

2. Citation from the standard

NON-APPLICABLE

3. Terminology

3.1 Designated Level 3

Level 3 acc. to EN 4179 / NAS410 standard designated by the Responsible Level 3 to perform a part of the duties on behalf of the Responsible Level 3 at the Employer. Designated Level 3 has to be available at least for each individual method to which the Responsible Level 3 does not hold Level 3 certification acc. to the EN 4179 / NAS 410 standard, that is implemented by the Employer in its Written Practice. Designated Level 3 provides recommendations to the Responsible Level 3 in topics where Responsible Level 3 does not have sufficient qualification in the given method. He/she shall not be authorized to replace Responsible Level 3's final approval authority.

3.2 Equivalent

So similar in content and extent that it may be considered as equal.

3.3 Employer

Organization responsible for given personnel to be certified, no matter if this personnel is directly employed or subcontracted and working under Employer's certificates.

3.4 Gap analysis

Documented analysis of the gap between the qualification process of the previous employer and the new Employer, which is based on objective evidence of Previous qualification Records.

3.5 Previous

Traceable Record of documented topic subject to assessment (e.g. training, experience) was performed by previous employer or in another qualification system by the Employer to some extent.

3.6 Qualification part (Part)

Individual Qualification steps may be further divided into Parts, which include at least the following – general, specific, and practical part of the Qualification training Step; general, specific, and practical part of the Qualification examination Step.

Note: Employer may have other qualification parts integrated within his certification criteria, e.g. additional specific examination, quality management training etc.

3.7 Qualification plan (Training plan)

Document approved by the Responsible Level 3 that summarizes requested qualification content and extent necessary to qualify and certify the candidate based on Gap analysis between the previous employer or system and Employer's requirements for qualification acc. to the Written Practice.

3.8 Qualification step (Step)

Individual step of qualification that is mandatory in order to comply with certification criteria at the Employer. By default, Qualification steps include for each individual method at least the following: training, experience, examination, education and visual acuity.

3.9 Record(s)

Documents in paper or electronic form, approved by the Responsible Level 3 of the employer at the time of processing, providing tangible proof that qualification requirement(s) was/were met and how.

3.10 Representative to the Employer

Topic (content of training, examination, experience, education, type of parts manufactured or inspected etc.) is deemed representative if the difference between the applicable topic in Employer's conditions and those assessed for being representative is not having impact on the output knowledge and skills of the personnel being assessed.

4. Justification

4.1 Employer shall qualify his NDT staff in accordance with his Written Practice, which is in compliance with the EN 4179 / NAS 410 standard.

4.2 When changing the employer, the Previous certificate acc. to EN 4179 / NAS 410 is being revoked. The new Employer then should qualify the person again in compliance with his Written Practice.

4.2.1 If transferring qualification from other qualification system to EN 4179 / NAS 410 (either from previous employer or within the Employer), the Previous certificate may not be revoked, but is not fully compatible with Employer's Written Practice, therefore requires similar assessment.

4.3 Personnel changing employers (or transferring qualification from other qualification systems) are bringing to the (new) Employer knowledge and skills gained in the past.

4.4 Despite a certificate acc. to EN 4179 / NAS 410 is non-transferable, the knowledge and skills generally are (at least partially). Employer may therefore use the existing knowledge and skills of the candidate to facilitate the qualification process within the requirements of Employer's Written Practice.

4.5 Because EN 4179 / NAS 410 standard requires that the personnel shall have knowledge and skills Representative to the Employer, the Employer needs to ensure that the personnel changing employers (or transferring from other qualification system) shall have Representative knowledge and skills prior certification in accordance with the Employer's Written Practice.

4.6 In order to effectively define previous knowledge and skills and the gap between the knowledge and skills needed based on requirements of the Employer's Written Practice, the Responsible Level 3 has to perform a Gap analysis.

4.7 Interpretation aims to set a benchmark for correct transfer of qualification and Gap analysis process.

5. Interpretation of CZ NANDTB

Written Practice

5.1 Employer's Written Practice shall define (in terms of transferring qualification):

- 5.1.1 Whether transferring qualification is acceptable for the Employer
- 5.1.2 Which Steps and Parts of the qualification may be accepted
- 5.1.3 What are the conditions for acceptance
- 5.1.4 Who may decide on acceptance

Qualification plan

5.2 Responsible Level 3 (where relevant in cooperation with Designated Level 3) shall create Qualification plan for each candidate for certification within the Employer. This Qualification plan shall list at least:

- 5.2.1 Employer's qualification requirements (current requirements based on the Written Practice)
- 5.2.2 Accepted Previous qualification Parts (if any).
- 5.2.3 Required further qualification Steps and/or Parts (if any).
- 5.2.4 On-the-job training (must be done always).

5.3 Where Previous qualification Parts were accepted, Records providing objective evidence on acceptability and Gap analysis of the Equivalency shall be attached to the Qualification plan.

5.4 Qualification plan shall be approved by the Responsible Level 3 (approval only by the Designated Level 3 is considered insufficient to prevent conflict of opinions).

- 5.4.1 Designated Level 3 shall provide written co-approval where the Responsible Level 3 does not possess Level 3 in the given method.

Previous qualification acceptance

5.5 Previous qualification Part may be accepted when individual qualification Part is deemed Equivalent.

- 5.5.1 Qualification Part may be deemed fully Equivalent only if the Part is Representative to Employer's product / maintenance portfolio.
- 5.5.2 Qualification Part may also be deemed partially Equivalent, e.g. when a part of the general training or specific training was Representative to the Employer's product / maintenance portfolio, but part not. In such case the given Part always require further assessment.

5.6 Responsible Level 3 shall decide on the level of Equivalency.

5.7 Assessment of Equivalency with the Employer's requirements shall be done by the Gap analysis.

Gap analysis

5.8 Gap analysis shall include at least the following steps:

- 5.8.1 Collection of Records from the previous employer / qualification system(s).
- 5.8.2 Identification of Previous qualification Parts that have objective evidence.
- 5.8.3 Assessment of Previous qualification Equivalency.
- 5.8.4 Decision on (partial) acceptance of Previous qualification.
- 5.8.5 Justification of acceptance (where decided on acceptance).

5.9 As an objective evidence may be considered:

- 5.9.1 TRAINING: **training outlines (syllabus)** and/or related **training program** and **attendance list** with signatures of the candidate.
- 5.9.2 EXPERIENCE: **experience record** with listed individual tasks on specific components, length of the task performance and signature of a competent observer (i.e. at least Level 2 in the given method and technique).

- 5.9.2.1. Alternatively, previous Responsible Level 3 (or employer in other qualification systems) may issue a *declaration of experience* listing at least the number of total experience hours collected and characteristic types of tasks and component types assessed. In such case the Experience Step shall be deemed only partially Equivalent and further assessment is necessary at least for personnel performing Level 2 tasks.
- 5.9.3 EXAMINATION: **examination record** with percentage scores for individual examination Parts.
- 5.9.3.1. Where specific Part should be considered, including list of standards used during specific examination.
- 5.9.3.2. Where practical Part should be considered, including the number of samples and list of techniques used during practical examination and scores for each sample.
- 5.9.4 CERTIFICATION: **certificate** with information on certified method, level and technique(s).
- 5.9.4.1. Where Level 3 practical should be considered, see para. 5.9.3.2.
- 5.10 Assessment of Equivalency shall consider the Equivalency in:
- 5.10.1 **Extent** (i.e. if Previous training/experience length meets the Employer's Written Practice).
- 5.10.2 **Content** (i.e. if the Previous training / experience / examination covers the same scope including *sufficiently similar* techniques).
- 5.10.3 **Representativeness** (i.e. if the standards and product / maintenance portfolio are being *sufficiently similar*).

Acceptance assessment

- 5.11 For the purpose of the Gap analysis, a length meets the Employer requirements if it agrees with both total length and length of individual Parts.
- 5.12 For the purpose of the Gap analysis, a term is considered *sufficiently similar* if:
- 5.12.1 **Techniques** are based on the same physics-related methodology no matter their name.
- 5.12.2 **Standards** are exactly the same documents (except their revision, which may differ).
- 5.12.3 **Components being tested** are from the same component group (e.g. wheels, breaks, engine blades, axles, etc.) no matter the producer of those components.
- 5.13 For the purpose of the Gap analysis, the Part may be considered as:
- 5.13.1 **Equivalent**, if all criteria to the qualification Part meet the Employer's requirements and there is sufficient objective evidence to prove Equivalency.
- 5.13.2 **Partially Equivalent**, if some criteria to the Step and/or its Part are met but some not, criteria are met with reservations, or there is insufficient objective evidence to prove full Equivalency.
- 5.14 Gap analysis and related Records (objective evidence) shall be kept available for review at least for the whole initial certification period at the Employer acc. to EN 4179 / NAS 410 standard (even if certificates were suspended or revoked).

Examination scope

- 5.15 Examination shall always include at least all non-Equivalent or partially Equivalent examination Parts as per the outcome of the Gap analysis.
- 5.16 All necessary examination Parts shall be listed unambiguously in the Qualification plan.

Acceptance without examination

- 5.17 Where (a Part of) examination Step is being accepted, the certificate at the Employer shall have the expiry no later than at the time of expiry of the Previous employer's (or given qualification system's) certificate in the given method and technique.

Certification scope

- 5.18 Certification scope at the Employer shall not be extended by transferring qualification process.
- 5.19 If certification scope should be extended, at least an additional examination shall be performed. Gap analysis shall define its extent and requirements for additional training / experience where applicable.

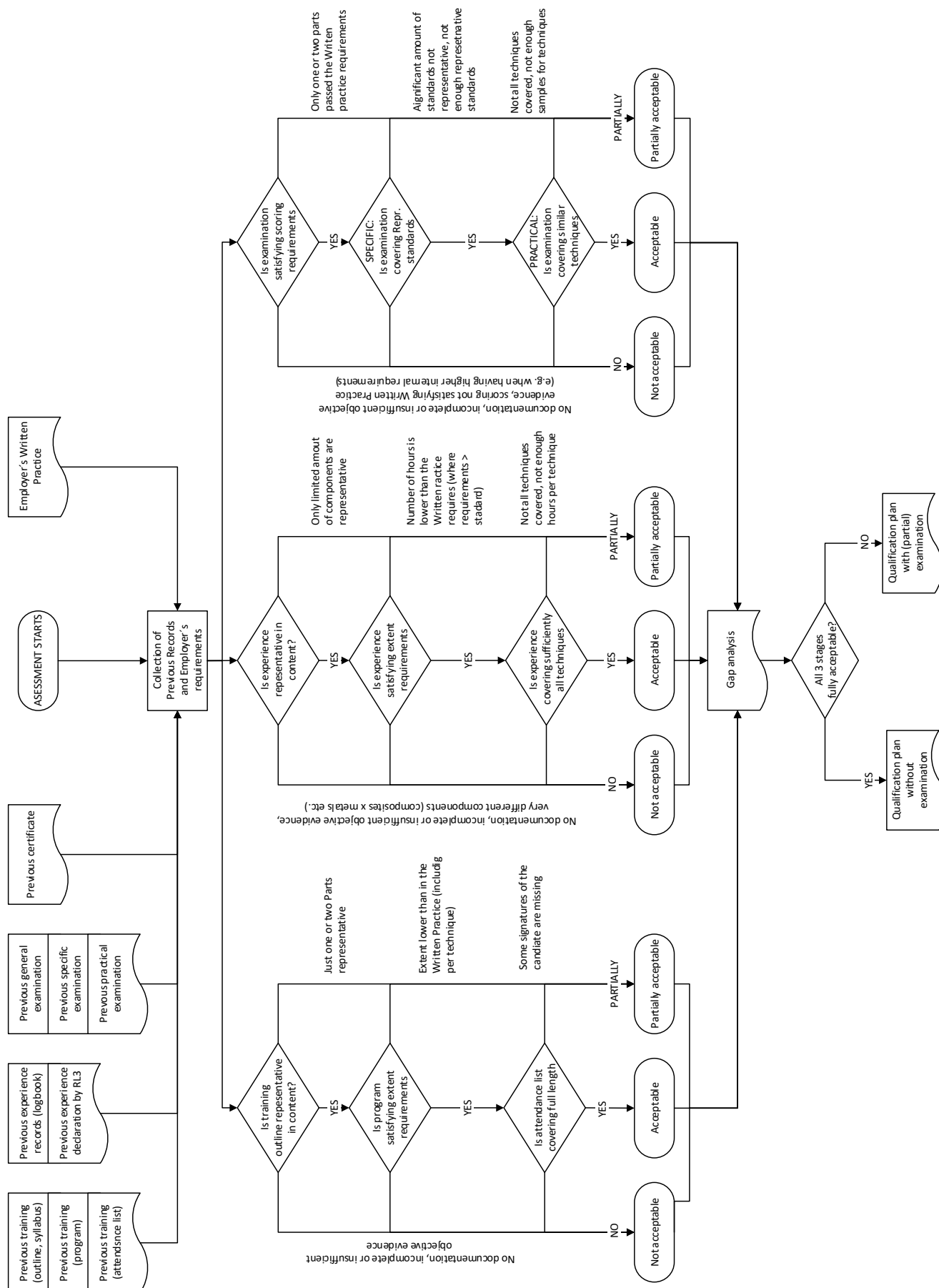


Exhibit 1 – Flowchart of the Gap analysis. The flowchart is only a guideline, it does not represent an exhaustive step-by-step assessment.