Federal Aviation Administration

Memorandum

Date: August 19, 2014

To: All Manufacturing Inspection Offices
All Aircraft Certification Offices

From: James D. Seipel, Acting Manager, Design, Manufacturing, & Airworthiness Division, AIR-100

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Subject: Deviation to Federal Aviation Administration (FAA) Order 8120.23, Certificate Management of Production Approval Holders, Appendix I, Preparation Instructions for FAA Form 8100-6, Noncompliance Record, and FAA Order 8120.22, Production Approval Procedures

Memo No.: AIR100-14-140-DM13

Background

The Aircraft Certification Service (AIR) will transition from its current Certificate Management Information System (CMIS) to the new Aircraft Certification Audit Information System (ACAIS), which is a component of the Aviation Safety Knowledge Management Environment (ASKME). CMIS will be shut down at the close of business on October 3, 2014 to allow for the data in CMIS to be migrated into ACAIS. ACAIS will replace CMIS and is scheduled to be implemented on October 20, 2014. Once implemented, ACAIS will be available at the following URL: *http://acais.avs.faa.gov*.

FAA Form 8100-6, Noncompliance Record, has been revised. Appendix I, Preparation Instructions for FAA Form 8100-6, Noncompliance Record, of Order 8120.23, *Certificate Management of Production Approval Holders*, is no longer applicable to this revised form.

The newly revised FAA Form 8100-6 provides areas to record supplemental information that may be relevant to the recording of a noncompliance. The form introduces some new fields/terms from the previous version (reference Figure A-1, attached):

- Noncompliance No.: This replaces "No." and has the same purpose as described in paragraph 2g of Appendix I (block 7).

- Noncompliance Code: This replaces the Audit Criteria Number and uses the same code as FAA Order 8120.23, Appendix H.

- Process Code: This is a new field to capture what process deviated to cause a product to be in noncompliance. A code is needed when the type (see below) is a product nonconformity. The codes are listed in SAE Aerospace Standard AS9131. A link to the standard is provided on the AIR Work Tools website: *https://my.faa.gov/org/linebusiness/avs/offices/air/tools/cert.html*.

- Scope: "Systemic" and "Isolated" are now listed under "Scope," with the expectation that one is selected.

- Origin: This is a new field to capture the source from where the noncompliance originated (the production approval holder or its supplier).

- Type: This is a new field to capture whether the noncompliance was the result of a nonconformity in a product, or the facility was not following a procedure. If the nonconformity was found in a product, the process code and Joint Aircraft System/Component (JASC) code fields need to be completed.

- Immediate Safety Impact: This replaces "Safety-Related" and better aligns with the description in paragraph 4-18a(1) of FAA Order 8120.23, which states: "... an unsafe condition exists on a product, article, or part that requires immediate action."

- JASC System Code: This is the first two digits of the four-digit JASC code and identifies the product's corresponding system. The JASC System Code is also known as the Air Transport Association of America (ATA) chapter code. A code is needed when the type is a product nonconformity. The codes are listed in the Federal Aviation Administration Joint Aircraft System/Component Code Table and Definitions document. A link to the document is provided on the AIR Work Tools website: *https://my.faa.gov/org/linebusiness/avs/offices/air/tools/cert.html*.

- JASC Component Code: This is the four-digit JASC code that generically identifies a product. It is also known as an ATA code. A JASC Component Code is needed when the type is a product nonconformity.

Information provided in this memorandum, and related to the ongoing use of ACAIS, will be included in a future revision of FAA Order 8120.23.

Deviations to FAA Orders 8120.23 and 8120.22

Effective October 1, 2014, the newly revised FAA Form 8100-6 should be used to record non-compliances. Attachment A to this deviation memorandum should be used for the completion of FAA Form 8100-6, in lieu of Appendix I to FAA Order 8120.23. In addition to the instructions provided by Attachment A to this deviation memorandum, an ACAIS user's guide will be available on the ACAIS website.

ACAIS should be used in lieu of CMIS for all FY15 procedures that FAA Order 8120.23 requires to be completed using CMIS. All fiscal year 2014 certificate management activities must be completed in CMIS before the close of business on October 3, 2014.

All references to “CMIS” and “forms available within CMIS” as stated in FAA Order 8120.22, *Production Approval Procedures*, are now recognized as “ACAIS” and “forms available within ACAIS.”

If you have any questions regarding this memorandum, or require any additional information, please contact the Surveillance and Oversight Policy Section, AIR-143, at (202) 267-1575.

Attachment A. Preparation Instructions for FAA Form 8100-6, Noncompliance Record

1. Purpose. This attachment provides instructions for completing FAA Form 8100-6 for all audit activities.

2. Specific Guidance. Figure A-1 shows FAA Form 8100-6 with numbered blocks. The form will be prepared as a stand-alone document. Write the noncompliance against the responsible production approval holder (PAH) or associate facility. Prepare the form by inserting in:

a. Block 1. When the activity is a Quality System Audit (QSA), enter the QSA Number/Audit Number. For all other activity, enter an appropriate Audit/Report Number or "N/A" as applicable.

b. Block 2. Enter the project number(s) applicable to the production approval(s) activity.

c. Block 3. Number the noncompliance sequentially beginning with the number "1."

d. Block 4. Insert a checkmark in the appropriate box to indicate the type of audit that was conducted.

e. Block 5. Under "System Element Audited," enter the name of the system element in appendix H of FAA Order 8120.23 to which the noncompliance is relevant. Under "Noncompliance Code," enter the audit criteria number from appendix H of FAA Order 8120.23. Under "Process Code," when the type of noncompliance identified in block 10 is a "Product Nonconformity," enter the process that deviated to cause the noncompliance. The process codes are available in the Aircraft Certification Audit Information System (ACAIS), as well as in table 1 of the latest revision of SAE Aerospace Standard AS9131. Do NOT insert more than one number.

> **Note:** More than one noncompliance may be recorded for an audit criteria number. When an audit criteria contains several statements of condition, it is possible to find noncompliances to some or all of those conditions. When multiple statements of conditions under one criterion are affected, complete an FAA Form 8100-6 for each condition. When recording noncompliances for a common condition, only complete one FAA Form 8100-6.

f. Block 6. The controlling document is defined as the FAA-approved data, purchase order/quality requirements from a PAH or associate facility, or internal procedures used in producing the product, article, or part(s). Enter the complete reference number, or as a minimum, the document title and effective date. (Examples: ABC Company Quality Manual dated March 5, 2005; XYZ QOI 32-6 dated June 23, 2007; BCD Drawing No. 9825333-2 dated May 20, 2009.) Insert a check in the "Yes" or "No" block, as appropriate, to indicate whether the controlling document is FAA-approved.

> **Note:** Purchase orders and/or quality requirements flowed down to a supplier by a PAH or associate facility are generally not considered to be FAA-approved data. In some cases, quality requirements for use at a supplier facility are specifically

approved by the FAA before use. Determine the approval status of any referenced PAH supplier quality requirement before checking the "Yes" or "No" block.

g. Block 7. Enter the applicable Title 14 of the Code of Federal Regulations (14 CFR) part or section that establishes the responsibility of the PAH (for example, § 21.316 or § 21.616). If the observed condition is not directly traceable to one of these requirements, leave the block blank. Insert the applicable 14 CFR reference for each approval type affected.

Note: When a facility holds multiple production approvals, and a noncompliance is found that applies to more than one of those approvals, use the highest level quality requirement; for purposes of this attachment, the quality levels, from highest to lowest, are production certificate, technical standard order authorization, and parts manufacturer approval.

h. Block 8. Insert a checkmark in the appropriate box to indicate the scope of the noncompliance:

(1) Systemic: a noncompliance to 14 CFR, FAA-approved data, the facility's internal procedures, or purchase order requirements that is systemic in nature; that is, is pervasive, repeatable, and represents a breakdown in the quality system.

(2) Isolated: a noncompliance to 14 CFR, FAA-approved data, the facility's internal procedures, or purchase order requirements that is isolated or nonsystemic in nature; that is, is not pervasive or repeatable, and does not represent a breakdown in the quality system.

i. Block 9. Insert a checkmark in the appropriate box to indicate whether the origin of the noncompliance can be traced back to the PAH or the PAH's supplier.

j. Block 10. Insert a checkmark in the appropriate box to indicate whether the noncompliance was the result of a nonconformity in a product or a procedure. If a product nonconformity, also enter a process code in block 5 and complete blocks 13 and 14.

k. Block 11. Insert a check in the "Yes" or "No" block, as appropriate, to indicate whether it is a noncompliance to 14 CFR, FAA-approved data, the facility's internal procedures, or purchase order requirements that compromises immediate continued operational safety and requires immediate corrective action. This includes any noncompliance to § 21.3, including an isolated noncompliance. For a QSA, record as an immediate safety impact only when the managing office determines that immediate action is required.

l. Block 12. Insert a check in the "Yes" or "No" block, as appropriate, to indicate whether it is a noncompliance to 14 CFR that is discovered in FAA-approved data.

m. Block 13. Enter the applicable Joint Aircraft System/Component (JASC) system code when the type of noncompliance identified in block 10 is a "Product Nonconformity." The system codes are available in ACAIS, as well as in the latest version of the Federal Aviation Administration Joint Aircraft System/Component Code Table and Definitions document.

n. Block 14. Enter the applicable JASC component code when the type of noncompliance identified in block 10 is a "Product Nonconformity." The component codes are available in ACAIS, as well as in the latest version of the Federal Aviation Administration Joint Aircraft System/Component Code Table and Definitions document.

o. Block 15. Enter the condition required by the controlling document, applicable supporting documents, or the applicable 14 CFR part or section. Use the same wording as the controlling document, the applicable supporting document, or the applicable 14 CFR part or section, whenever possible. List all documents that demonstrate the link back to the controlling document or 14 CFR.

p. Block 16. Enter a detailed explanation of the encountered condition.

(1) Explain why the encountered condition differs from the required condition.

(2) Identify where the encountered condition was found.

(3) Identify the total number of items checked and the total number of items found to be in noncompliance.

(4) List the items found to be in noncompliance using identification numbers or other specific identifiers whenever possible.

(5) Record any evidence the facility provided during the audit to show that corrective action was taken or initiated.

(6) When the encountered condition finds FAA-approved data to be in noncompliance with an applicable 14 CFR part or section, include a note that further investigation by the Aircraft Certification Office, Manufacturing Inspection Office, Manufacturing Inspection District Office, or Certificate Management Office may be required.

(7) List all objective evidence obtained that describes the encountered condition.

q. Block 17. Enter the name of the person that discovered the finding/observation.

r. Block 18. Enter the routing symbol of the person listed in block 17.

s. Block 19. Enter the typed or printed name and signature of the person recording the noncompliance. If the form is completed within ACAIS, the signature is not required.

t. Block 20. Enter the routing office symbol of the person listed in block 19.

u. Block 21. Enter the date the form is completed.

Figure A-1. Sample FAA Form 8100-6

	Noncompliance Record	QSA No./Audit No. *(1)* Project No. *(2)* Noncompliance No. *(3)*

Type of Audit: ☐ MIDO ☐ PI ☐ QSA ☐ SCA ☐ Product ☐ Other *(4)*

System Element Audited: *(5)* **Noncompliance Code:** **Process Code:**	**Controlling Document:** *(6)* **FAA-approved data?** [*Select one*] ☐ Yes ☐ No	**Applicable CFR Section:** *(7)*

Noncompliance Characteristics

Scope: [*select one*] Systemic ☐ Isolated ☐ *(8)*	**Origin:** [*select one*] PAH ☐ Supplier ☐ *(9)*	**Type:** [*select one*] Product *(10)* Nonconformity ☐ Procedural Noncompliance ☐	**Immediate Safety Impact?** [*select one*] *(11)* Yes ☐ No ☐	**Certification Related?** *(12)* [*select one*] Yes ☐ No ☐
JASC System Code: *(13)*		**JASC Component Code:** *(14)*		

Required Condition: *(15)*

Encountered Condition: *(16)*

Team Member Discovering Noncompliance: *(17)*		Office Symbol *(18)*
Name and Signature of Recorder: *(19)*	Office Symbol *(20)*	Date *(21)*

FAA Form 8100-6 (10-14)

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