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Agenda Item 2: Safety Oversight
2.1 USOAP

**THE UNIVERSAL SAFETY OVERSIGHT AUDIT PROGRAMME (USOAP):
LESSONS LEARNED**

(Presented by the United States of America)

SUMMARY

Under the Universal Safety Oversight Programme (USOAP), all ICAO Contracting States have begun to implement the new “comprehensive systems approach” to auditing under the sixteen safety-related Annexes of the Convention on International Civil Aviation. Thus far, the United States has finished the first phase of its pre-audit activity, that is, the completion of the State Aviation Activity Questionnaire (SAAQ) and the Compliance Checklists for each Annex. The intent of this information paper is to share a few of the lessons we have learned, in essence, a “snapshot” of relevant issues that Contracting States may encounter during their pre-audit preparations.

1. Introduction

1.1 During the 35th Session of the ICAO Assembly, the comprehensive systems approach for the conduct of safety oversight audits of safety-related provisions in all safety-related Annexes - *an initiative strongly supported by the United States* - was endorsed by all Contracting States. The United States designated the Federal Aviation Administration’s (FAA) Office of the Assistant Administrator for International Aviation, Global Issues Branch, as the National Safety Coordinator. The role of this office is to facilitate and coordinate pre-audit, audit, and post-audit activities among those U.S. Government entities affected by the audit.

1.2 The first milestone in the pre-audit phase included the successful completion of the State Aviation Activity Questionnaire (SAAQ) and the Compliance Checklists for each of the safety related Annexes to the Convention by May 31, 2005. This entailed a comprehensive, detailed review of more than 10,000 ICAO Standards and Recommended Practices (SARPs). As with any project of this size, scope, and magnitude, there were numerous challenges to overcome, some of which will be addressed in the discussion below. Most recently, twenty-four FAA employees were trained in ICAO auditing techniques as part of the United States’ pre-audit activity planning – eighteen of whom succeeded in meeting all ICAO requirements to become fully certified International Auditors.

1.3 The United States will undertake numerous pre-audit activities in calendar year 2006 to continue its preparatory work for the ICAO audit, presently anticipated for the first half of 2007. These important activities include the following: assisting ICAO in the successful implementation of their soon-to-be-operational Audit Findings and Differences Database (AFDD), filing our differences to ICAO SARPs as prescribed in the Convention, and conducting an internal “self-assessment” using recently published ICAO audit protocols.

2. Discussion

2.1 Under USOAP, ICAO had been using an “Annex by Annex” approach to auditing, wherein only Annexes 1, 6, and 8 of the Convention were audited. Due to the narrower focus of this audit approach, the ICAO audit affected only those U.S. Government entities responsible for Annexes 1, 6, and 8. Although useful and generally successful, this approach has been replaced by the more comprehensive “systems approach” which covers sixteen Annexes and is presently being implemented by all ICAO Contracting States. Due to the enormity of this task, there is a need to educate the employees of every affected entity on all aspects of the new systems approach. Since many of the Annexes are multi-disciplinary and various entities responsible for safety oversight within the United States must review them, a change in the ways of doing business on behalf of those affected entities is instrumental in achieving successful audit results. For example, in order to complete the Annex 11 (Air Traffic Services) Compliance Checklist, numerous entities both within and outside the FAA had to be consulted including the Air Traffic Organization (e.g. NOTAMS, telecommunications, and weather), Flight Standards/Operations, Airports, and the U.S. Coast Guard (for Search and Rescue). Therefore, a thorough and comprehensive briefing on the intricacies of the systems approach prior to the start of any Compliance Checklist activity would be useful to stimulate increased cooperation among the entities affected by the audit. Moreover, we recommend that this briefing stress all aspects of the systems approach, more specifically, the eight critical elements that define an effective safety oversight system.

2.2 Under the systems approach, all Contracting States must conduct a detailed review of the more than 10,000 individual SARPs. Per ICAO’s instructions, every SARP must contain a minimal amount of information. This includes citing legislative references and marking the most appropriate box to describe whether the State has “Differences” to ICAO SARPs or whether the SARP is “not applicable.” Given the complexities of a State’s regulatory system and level of aviation activity at a particular point in time, the State may find that many of the SARPs do not apply to its regulatory system. The United States for instance, has noted numerous areas in which the SARPs are “not applicable” to our system. Furthermore, while a Contracting State must provide detailed information for every “Standard” in the Compliance Checklists, it is under no obligation to provide such data for “Recommended Practices.”

2.3 Although the audit process requires an extensive outlay of resources on behalf of the Contracting State, the process is mutually beneficial for both the State and ICAO. The State will possess key documentation that will be transferable to ICAO’s AFDD and updatable at any time. It will be easier for ICAO to evaluate this data, and ICAO may eventually change the SARPs if deemed pertinent. The audit process will require extensive coordination and communication among the responsible entities in order to ensure the uniformity and standardization of a State’s response to the various Compliance Checklist data requests.

2.4 In accordance with each Contracting State's obligations as signatories to the Chicago Convention on International Civil Aviation, each State must conform to the provisions of Articles 37 and 38 with respect to the implementation of international SARPs. In order for a State to better prepare for the ICAO audit and meet its international obligations, it will need to educate the affected entities and make them aware of the following three major outcomes of the USOAP:

- 1) the audit process is vital for the internal growth of a State's internal aviation safety system, ensuring ICAO Convention obligation compliance,
- 2) the audit promotes international cooperation and confidence building among States, and
- 3) the audit enables the uniform implementation of international safety standards, contributing significantly to the safety and efficiency of the air transport system.

2.5 The National Coordinator plays a crucial role in assisting the organization with important audit preparations including the following: planning and coordinating pre-audit activities, liaising with ICAO Safety Oversight Audit Officers, establishing on-site audit requirements, submitting documentation to ICAO, and disseminating pertinent post-audit information. The U.S. National Coordinator has found it quite beneficial to form a small working group consisting of a member from each FAA Line-of-Business (LOB), as well as other U.S. Government agencies with aviation oversight responsibility, to take charge of completing those relevant Compliance Checklist questions. (Note: Earlier this year, the Canadians expressed their view of the importance of the National Coordinator upon completion of their audit).

3. **Conclusion**

3.1 The systems approach to auditing is designed to verify that the aviation-related organization of a Contracting State is evaluated as a whole, rather than as the sum of its parts. The audit process provides a framework for evaluating those cross-divisional relationships within an organization that are critical to the Contracting State's ability to successfully perform its safety regulatory oversight function. In the case of the United States' pre-audit activities, the planning and execution phase of the pre-audit became much easier to implement once all affected entities fundamentally understood that the implementation of the USOAP systems approach required collaboration among all internal and external stakeholders. The United States is firmly committed to the USOAP systems approach to auditing, and we would be pleased to discuss USOAP issues with the Contracting States represented at this meeting.