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**Agenda Item 4: Safety Oversight Matters**

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

(Presented by the United States of America)

**SUMMARY**

Under the Universal Safety Oversight Audit Program (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 35<sup>th</sup> 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 endorsed 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 Coordinator. The role of the National Coordinator is facilitate and coordinate all 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 or 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 scheduled for October 2007. These important activities include the following: assisting ICAO in the successful implementation of their recently operational Audit Findings and Differences Database (AFDD), filing our differences with ICAO SARPs as prescribed in Article 38 of the ICAO 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 approach, the ICAO audit affected only those U.S. Government entities responsible for personnel licensing, and the operations and airworthiness of aircraft. Although useful and generally successful, this approach has been replaced by the more comprehensive “systems approach” which covers 16 of the 18 safety-related Annexes and is presently being implemented by all ICAO Contracting States. Due to the enormity of this task, we found an immediate need to educate FAA employees on all aspects of the new audit regime. Since many of the annexes are multi-disciplinary in scope and various elements within the FAA organizational structure are responsible for safety oversight and must review them, a change in the ways of doing business was instrumental in achieving successful pre-audit results. For example, in order to complete the Annex 11 (Air Traffic Services) Compliance Checklist, numerous elements 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 USOAP audit, before commencing any Compliance Checklist activity would be useful to stimulate increased cooperation among those elements 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 As part of the “systems approach,” all Contracting States must conduct a comprehensive review of the more than 10,000 individual SARPs. Per ICAO’s instructions, every SARP on the Compliance Checklist 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” with the particular ICAO SARP 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 updateable 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 within the organization 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 Contracting State to better prepare for the ICAO audit and meet its international obligations, it will need to educate its entire organization and make them aware of the following two major outcomes of the USOAP:

- 1) the audit process is vital to the organization's internal growth which will help ensure ICAO Convention obligation compliance, and
- 2) the audit promotes international cooperation and harmonization in the interest of international commercial aviation safety. This will undoubtedly prove quite challenging given the strong resistance to change that characterizes many organizations.

2.5 The National Coordinator within each Contracting State 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 "line-of-business" (certification, air traffic services, etc...) who is able 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 organization responsible for safety oversight in 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 a Contracting State's organization that is critical to that 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 elements within the organization 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