



**ASSEMBLY — 40TH SESSION**

**EXECUTIVE COMMITTEE**

**Agenda Item 13: Audit Programmes — Continuous Monitoring Approach (CMA)**

**REPORT ON THE REVIEW OF THE SCOPE AND METHODOLOGY OF THE  
UNIVERSAL SECURITY AUDIT PROGRAMME – CONTINUOUS MONITORING  
APPROACH (USAP-CMA)**

(Presented by the Council of ICAO)

**EXECUTIVE SUMMARY**

This paper presents a consolidated report on the work undertaken during the past triennium pursuant to Assembly Resolution A39-18, requesting the Council to direct the ICAO Secretariat to review the scope and methodology of the Universal Security Audit Programme – Continuous Monitoring Approach (USAP-CMA). In addition, this paper includes proposals in the Appendix, approved by the Council, for the streamlining of the audit programme, together with expected benefits and impact assessment.

**Action:** The Assembly is invited to:

- a) note the work carried out in conducting the review of the scope and methodology of the USAP-CMA, as requested by the 39th Session of the ICAO Assembly and supported by the Second High-Level Conference on Aviation Security (HLCAS/2);
- b) direct the Council to ensure the Secretariat undertakes a prioritization of these recommendations, based on their feasibility and resource availability;
- c) direct the Council to ensure the continuous improvement of the Programme, through the ongoing consultation between the Secretariat and the Secretariat Study Group on the USAP-CMA (SSG);
- d) call upon all States to support the USAP-CMA by signing the Memorandum of Understanding (MoU) and accepting audits as scheduled; and
- e) call upon States to allocate sufficient financial and human resources to the USAP-CMA to enable the implementation of these proposals and the ongoing evolution of the USAP-CMA.

<i>Strategic Objectives:</i>	This working paper relates to the <i>Security and Facilitation</i> Strategic Objective.
<i>Financial implications:</i>	The implementation of the proposals approved by the Council and attached to this paper will be subject to the resources allocated to the USAP-CMA in the 2020-2022 Regular Programme Budget and/or from extra budgetary contributions.
<i>References:</i>	Doc 10075, <i>Assembly Resolutions in Force</i> (as of 6 October 2016)

## 1. BACKGROUND

1.1 In accordance with Assembly Resolution A39-18, Appendix E, and as further supported by the Second High-Level Conference on Aviation Security (HLCAS/2), the Secretariat, in collaboration with the SSG, conducted a comprehensive review of the scope and methodology of the USAP. This review aimed to ensure that the Programme provides reliable information regarding the effective implementation of aviation security measures on the ground, that the methodology takes into consideration a risk-based approach for the implementation of aviation security measures, and that it is able to effectively support the Global Aviation Security Plan (GASeP).

## 2. DISCUSSION

2.1 The SSG and the Secretariat adopted a structured approach to the review of the USAP, encompassing the recommendations from Assembly Resolution A39-18, Appendix E and the HLCAS/2. The four main areas of interest addressed were:

- a) **Interpretation of Standards and auditor training:** to ensure the consistent interpretation of Annex 17 – *Security* Standards, as well as the supply, training and certification of well-qualified auditors;
- b) **Auditing operational implementation:** to ensure that the USAP is able to comprehensively assess the operational implementation of security measures on the ground, as well as provide a more self-explanatory representation thereof;
- c) **Addressing serious deficiencies in a timely manner:** to ensure that serious audit deficiencies, that do not constitute Significant Security Concerns (SSeCs), are addressed with the necessary urgency and that Corrective Action Plans and other audit outcomes enable the targeting of capacity development resources; and
- d) **Reinforcing the risk-based approach to prioritization:** to adjust the risk-based approach to the prioritization of audit activities and identifying audit scope and duration.

2.2 This examination led to the development of a list of 27 recommendations that were submitted for endorsement to the Thirtieth meeting of the Aviation Security Panel (AVSECP/30), which took place from 13 to 17 May 2019. The Panel expressed its appreciation and support for the outcome of the review, and stressed that these recommendations, with a few modifications, would provide enhanced confidence in the global aviation security system and better clarity on operational compliance. It was further agreed that the proposed changes would enable the accurate measurement of GASeP implementation targets, through more operationally focused compliance monitoring, the provision of well-qualified auditors, the risk-based prioritization of USAP audits, and by addressing serious deficiencies in a timely manner.

2.3 Based on the recommendations of the AVSEC Panel, the Council, during its 217th Session, approved a finalized list of recommendations together with their expected benefits and impact assessment (C-Dec 217/12, refers). These approved recommendations are presented to the Assembly for endorsement in the Appendix to this paper.

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## APPENDIX

### APPROVED RECOMMENDATIONS FOR THE COMPREHENSIVE REVIEW OF THE USAP-CMA

#### A) INTERPRETATION OF STANDARDS AND AUDITOR TRAINING

With regard to the harmonized and consistent interpretation of Standards and auditors' training, the SSG recommends the Secretariat to:

**1. Enhance the training of certified USAP-CMA auditors by providing standardized interpretation of audited Annex 17 Standards, and Annex 9 Standards that support both border management and border security objectives, and USAP-CMA Protocol Questions (PQs). This will require the establishment of international baseline (key) performance indicators and an FAQ document on issues that have come up on audits, as well as a mechanism to deliver the training to the auditors.**

Expected benefits:

- Provides minimum requirements to ensure consistent, impartial and fair interpretation of audited Annex 9 and Annex 17 Standards and USAP-CMA PQs by all certified auditors with ambiguity removed;
- Ensures the effective implementation of the USAP-CMA principles;
- Gives assurance to States on what Standards require and clarity on the measures and resources needed to meet them; and
- Provides reassurance on the credibility of audit results and the sustainability of States' oversight systems.

Proposed actions:

- Establishment of international baseline (key) performance indicators in coordination with the WGA17 and WGGM; and
- Establishment of FAQ documentation on issues that have come up during audits and establishing a series of training options for auditors to stay current.
- Delivery of recurrent training on the above two points could include:
  - a) conducting annual global conferences bringing together all certified auditors; and/or
  - b) conducting periodic regional seminars for certified auditors of the targeted region; and/or
  - c) development of e-learning training; and/or
  - d) use of quarterly ICAO newsletters/bulletins that can be accessed through the USAP secure portal (<http://portal.icao.int>).

Impact assessment:

- The establishment of minimum requirements to meet Annex 9 and Annex 17 Standards audited under the USAP will require coordination between the SSG and various AVSEC Panel Working Groups, and approval by the Council;
- Additional resources will be required to develop an e-learning platform to provide the training but once validated this training could also be made available to State representatives to improve their knowledge and understanding of Annex 17, Doc 8973 – *Aviation Security Manual* and the Global Aviation Security Plan (GASeP); and
- A global annual conference will incur recurring costs for States providing auditors, but could be managed by the Secretariat; a series of periodic regional seminars will incur recurring costs for States and the Secretariat; additional facilitators would be needed for seminars to minimize the impact on the annual audit schedule should only Team Leader be used.

**2. In order to support the professionalization of the AVSEC audit function, remove from the roster list any auditor that does not meet expected performance during an actual audit and/or does not meet the re-certification requirements and/or is no longer active in the field of aviation security.**

Expected benefits:

- Supports the professionalization of the AVSEC audit function; and
- Ensures only qualified, highly skilled and capable auditors are maintained on the roster, thereby giving confidence and sustainability to the USAP-CMA Programme.

Proposed actions:

- The ICAO Secretariat already implements this process and conducts ICAO Auditor Certification Courses when needed to ensure sufficient auditors are available for the Programme.

Impact assessment:

- None.

**3. In order to continue to strengthen the USAP, consider all possible opportunities to invite SSG members to provide input into Programme changes such as assessment methodology, PQs, training, etc. In addition, hold at least one annual face-to-face SSG meeting to discuss Programme priorities, changes in approach and current/upcoming activities.**

Expected benefits:

- Ensures the USAP-CMA meets the needs of all States and offers opportunities to develop/share best practices on conducting quality control;
- Maintains confidence in the global aviation security system; and
- Ensures the effective tracking of the implementation of the GASeP and delivery of its Priority Outcomes.

Proposed actions:

- At a minimum, annual face-to-face meetings of the SSG are conducted to discuss Programme priorities, updates to PQs, changes in approach and current and upcoming activities.
- Ad hoc solicitation of input from SSG members to support ongoing USAP policy, methodology and implementation discussions throughout the year.

Impact assessment:

- Increased commitment from States and Secretariat to coordinate and attend meetings.

## B) AUDITING OPERATIONAL IMPLEMENTATION

With regard to the comprehensive assessment of operational implementation of aviation security measures and the provision of a more straightforward readable representation of the latter, the SSG recommends to:

### 4. Determine the PQs assessing compliance of individual Standards, and present compliance by Annex 17 chapters and subchapters, and Annex 9, solely based on these PQs.

#### Expected benefits:

- Provides a stronger indication of operational compliance with Annex 17 Standards, and Annex 9 Standards that support both border management and border security objectives, thus providing a clearer picture of the compliance status of aviation security at the global, regional and State levels.

#### Proposed actions:

- A review of the PQs to determine those that directly assess compliance has already been conducted by the Secretariat; and
- The current compliance indicator should be modified to include only USAP-CMA PQs assessing compliance with the audited Standards and would be displayed by Annex 17 chapter and/or subchapter, and Annex 9 (a sample graph is available in the Attachment to this Appendix).

#### Impact assessment:

- Tools to report are already available.

### 5. Maintain existing oversight indicator and update compliance indicator to better reflect USAP State performance, based on PQs that assess compliance of individual Standards.

#### Expected benefits:

- Provides a stronger indication of operational compliance with Annex 17 Standards, and Annex 9 Standards that support both border management and border security objectives, thus providing a clearer picture of the compliance status of aviation security at the global, regional and State levels. This could help measure the success of the GAsEP and help understand where efforts are succeeding and where more needs to be done.

#### Proposed actions:

- The current oversight indicator would be maintained; and
- The current compliance indicator will be replaced by the compliance indicator proposed in Recommendation 4, above.

#### Impact assessment:

- No impact to produce the chart as the tools to generate the revised compliance graph are already available;
- Need to determine if the MoU needs to be modified; and
- A review of the GAsEP targets would be required to take advantage of the additional information available as a result of the new compliance indicator.

**6. Consider deploying larger audit teams and adapt the number of auditors depending on the local context.**

Expected benefits:

- Optimizes time allocated to operational compliance assessment; and
- Covers a greater range of entities.

Proposed actions:

None.

Impact assessment:

- None.

*Secretariat comment: Considerations to adjust the audit team size currently exist and will continue to be applied. The principle is that the team remains within a size that is manageable by a team leader for the scope and nature of the audit. In this regard, when needed, the Secretariat adds additional days to the audit, instead of additional people due to the significant additional cost related to the additional auditors. This is done to accommodate audits of larger airports or when multiple airports are visited during the audit. Cost implications are an important consideration, as only approximately 60 per cent of audits are funded by the Regular Programme.*

**7. Merge the pre-audit questionnaire (SASAQ) and non-operational PQs into one document which should be submitted to the ICAO Secretariat prior to the audit. Currently, audited States do not provide PQ responses to the ICAO Secretariat.**

Expected benefits:

- Enhances pre-audit preparation for all parties in order to optimize time allocated for operational compliance assessment;
- Encourages greater cooperation/preparation and professionalism between ICAO and the State to be audited; and
- Covers a greater range of entities operationally.

Proposed actions:

- Merge the pre-audit questionnaire (SASAQ) and non-operational PQs into one document and request the receipt of all relevant information in good time before the audit.

Impact assessment:

- Benefit will only be realized if information is received with sufficient time before the audit (which the Secretariat will request and offer early advice on). Unfortunately, pre-audit documentation is often not received two months prior to the audit, as currently required by the Programme;
- States could be asked to submit the completed PQs on a “best endeavours basis”, but if completion of the PQs is made a condition for the audit to be conducted, then changes to the MoU would be required.
- In such an event, any amendment done after the deadline will not be considered during the audit, potentially leading to findings that may have already been addressed at the time of the on-site audit. Currently, many audited States are finalizing document reviews and approvals leading up to the audit, and the updated documents are provided to the team on the preparation day;
- Completion of the PQs by States would represent an additional workload but would help focus minds and aid their pre-audit preparation;
- The current MoU may need to be revised if States are required to submit the pre-completed PQs as a condition for the audit to be conducted; and
- If completed PQs are made mandatory for audits to be conducted, there would be an increased risk of long-term audit deferrals with associated costs.

**8. Provide State documentation to auditors in advance of the audit so that they are familiar with the documentation at the commencement of the audit and can potentially perform some desk-based assessments of non-operational PQs.**

Expected benefits:

- Enhances pre-audit preparation in order to optimize time allocated for operational compliance assessment; and
- Covers a greater range of entities operationally.

Proposed actions:

- Option 1: Provide State documentation to auditors in advance of the audit so that they are familiar with the documentation at the commencement of the audit and perform some desk-based assessments of non-operational PQs; or alternatively;
- Option 2: Increase the audit preparation days to two instead of one at the start of the audit to provide team members additional time to review documentation on-site.

Impact assessment if documents provided ahead of audit (Option 1):

- Team members will need to be released from their regular duties ahead of the audit in order to dedicate sufficient time to prepare;
- Secure process to share documentation with audit team members under the leadership of the Team Leader ahead of the audit will need to be established (see Recommendation 9). Currently this is shared upon arrival by memory stick;
- Confidentiality of national aviation security documentation will be more difficult to ensure since it will be made available to team members in different States rather than under the supervision of the Team Leader on-site;
- Benefit will only be realized if documentation is received by the established deadline. Unfortunately, documentation is often not received two months prior to the audit, as currently required by the Programme;
- States could be asked to submit the documentation on a “best endeavours basis”, to make efficiencies but if submission by a set deadline is made a condition for the audit to be conducted, then changes to the MoU would be required;
- In such an event, audited States will have to freeze their documentation review and approval process ahead of the audit and any amendments done after submission will not be considered during the audit. Currently, many audited States are finalizing document reviews and approvals leading up to the audit, and the updated documents are provided to the team on the preparation day;
- The current MoU may need to be changed for the State’s documentation to be shared ahead of the audit with the team members; and
- If the provision of documentation ahead of the audit is made mandatory for audits to be conducted, there will be an increased risk of audit deferrals with associated costs when States do not provide the documentation to the ICAO Secretariat by the deadline.

Impact assessment if an additional preparation day is added (Option 2):

- The team will have additional time together to review documentation and prepare their areas of responsibility, thus making the on-site document review more efficient. It will also give the team additional time to discuss interpretations of the documentation together; and
- Additional costs and possible knock-on effects to back-to-back audits might arise but mitigation measures would be explored.

**9. Strengthen secure data transmission between Member States and ICAO.**

Expected benefits:

- Enhances circulation of information and facilitates communication of State documentation ahead of audit activities;
- Enhances preparation in order to optimize time allocated for operational compliance assessment;

- More efficient communications with Member States regarding pre-audit documents, audit reports and corrective action plans (CAPs); and
- Covers a greater range of entities.

Proposed actions:

- The Secretariat has contacted the ICAO Information Security Team to examine improved secure transmission and storage solutions. An analysis of the available means is underway; and
- The ICAO Secure Box is being used to exchange information with Member States and is proving effective so far. The hope is to eventually send all information in this manner, including audit reports and CAPs.

Impact assessment:

- The cost of the establishment of the secure data transmission and storage is currently being assessed.

**10. Assess a second airport where it is relevant and on a risk assessment basis.**

Expected benefits:

- Provides a more comprehensive assessment of the overall compliance by the audited State and its security culture.

Proposed actions:

- The current USAP-CMA process allows for the assessment of more than one airport, either planned in advance or during the audit itself to get a wider security understanding of other airports and entities in that State. There have been cases where audits were extended on-site to add an airport to the audit.

Impact assessment:

- No additional cost if current process is maintained.

*Secretariat comment: In some cases, more than one airport may be selected to visit during the course of a single USAP-CMA audit. Currently, for States that have multiple airports with at least 1,000 departures per year, the ASA Section selects airports to visit on the basis of the following parameters: previous airport(s) visited during USAP audits; number of departures per year; proximity to the appropriate authority for aviation security; any potential SSeC of which ICAO is aware; and any substantial infrastructure or organizational change in a given airport.*

**11. Increase the prioritization options for recommendations from “low”, “medium”, and “high” priorities to include “very high” priority recommendations when serious operational deficiencies are determined by the audit team, and explore establishing a mechanism for sharing data on States with “very high” priority recommendations, over and above existing processes for SSeCs.**

Expected benefits:

- Enhances the impact of operational compliance assessment;
- Helps States properly prioritize their corrective actions;
- Encourages States to take more immediate actions to strengthen their operational compliance with Annex 17 (see Recommendation 15) since Secretariat records indicate many States have serious deficiencies; and
- Focused and optimal use of resources to address the critical problems.

Proposed actions:

- When serious operational deficiencies are identified, prioritize the associated recommendations in the audit report as “very high” to give greater visibility to the State of the operational deficiencies that have a significant impact on aviation security and require an accelerated timeframe for resolution;
- The Secretariat, in consultation with the SSG, will develop guidance for Team Leaders and audit teams to identify what would constitute a “very high” priority recommendation; and
- Establish a mechanism for sharing information on States with operational findings that lead to “very high” priority recommendations. SSeCs would be retained for the complete absence of measures which should be flagged and addressed immediately.

Impact assessment:

- The current MoU will need to be changed to establish an accelerated timeframe for resolution of “very high” priority recommendations and to introduce a mechanism for sharing information related to such recommendations.
- The sharing of information related to “very high” priority recommendations would create additional workload for the Secretariat.

**12. Consider the establishment of a programme of short follow-up operational compliance visits where key serious deficiencies are addressed for rectification by a smaller team of auditors.**Expected benefits:

- Increases operational compliance monitoring; and
- Enhances CAP follow up.

Proposed actions:

- No additional actions are being proposed at this time.

Impact assessment:

- None at this time.

*Secretariat comment: The USAP currently provides for the conduct of limited-scope audits to States, which focus on PQs from the previous audit that were assessed as not satisfactory, not applicable and undetermined, as well as ongoing obligations. As the Programme matures, it is envisaged that a majority of activities will consist of such limited scope audits, starting with a significant increase in limited-scope audits in 2020.*

*Significant progress in CAP implementation is one of the key indicators used to prioritize States for such limited-scope audits. Furthermore, follow-up missions to assess mitigations or the implementation of corrective actions that fully address SSeCs are already being implemented. The decision on a follow-up visit or a limited-scope audit is made on a case-by-case basis and depends on the progress made by the State to address the deficiencies identified during the audit.*

**13. Turn the current Recommendation concerning the bilateral information sharing into a Standard, in particular when two countries have air services or air agreements.**Expected benefits:

- Provides increased transparency of actual audit results for States needing assistance and those able to provide assistance.

Proposed actions:

- Referred to the AVSEC Panel Working Group on A17.

Impact assessment:

- None at this time.

*Secretariat comment: IATA proposed, at the Working Group of Annex 17 (WGA17) (February 2018 – South Africa) meeting, to upgrade RP2.4.6 into a Standard. Following discussions, WGA17 rejected to upgrade RP2.4.6 to a Standard and indicated that it should remain an RP.*

### C) ADDRESSING SERIOUS DEFICIENCIES IN A TIMELY MANNER

With regard to addressing serious deficiencies that are not necessarily SSeCs with an adequate level of urgency, the SSG recommends to:

**14. Encourage States to reduce timescales for CAP development and submission following an audit, from 120 days to 30 days through more detailed information of serious deficiencies provided at the out-brief, as well as more resources allocated to finalizing the report. Alternately, the timeframe for producing a CAP could be adjusted depending on the seriousness of given findings.**

Expected benefits:

- Addresses serious deficiencies that are not necessarily SSeCs with an appropriate level of urgency; and
- Increased pressure on States to act to rectify deficiencies to improve aviation security.

Proposed actions:

- Modify the reporting process to identify serious deficiencies with operational impact as “very high” priority recommendations with accelerated timelines, similar to what is done for SSeCs; and
- Develop a process to encourage States to address serious deficiencies with operational impact with similar urgency as an SSeC, including, but not limited to, possible referral of the State to other States with traffic ties.

Impact assessment:

- If made mandatory, the current MoU will need to be changed to modify the CAP production timelines for these recommendations;
- There is potential that increased resources would be required from States to take urgent action to address serious operational deficiencies in an accelerated manner alongside the political will;
- The current SSeC process has made a significant positive impact, since most potential SSeCs are addressed during the audit or within the 30-day limit to avoid posting of the SSeC. Therefore, a similar process for serious deficiencies that lead to “very high” priority recommendations could have a similar effect;
- If made mandatory, reducing the timeframe for CAP production for “very high” priority recommendations would be based on preliminary findings and recommendations left by the team at the conclusion of the audit. As a result, the quality assurance process would not have been implemented fully and there is a greater possibility that the findings, recommendations and CAP might need further revision at the end of the process; and
- Additional workload on the Secretariat as there would be a significantly higher number of States that would be subject to “very high” priority recommendations. Additional staff may be required to implement this recommendation.

**15. Implement a process to provide greater transparency for States that defer audits.**

Expected benefits:

- Focuses greater attention on States requesting deferrals, thus decreasing the number of USAP audit deferrals.

Proposed actions:

- Publish the list of States that request deferrals on the USAP secure site.

Impact assessment:

- Update of the USAP secure site; and
- Council approval is needed.

*Secretariat comment: It should be noted that the majority of deferral requests stem from changes in government and/or senior management in the appropriate authorities, and the need to complete improvement activities. The Secretariat believes that audits conducted following a change of administration are ideal to provide the new*

administration with a clear picture on the status of their aviation security system, along with the prioritized recommendations on how to address the deficiencies. Similarly, audits will provide a clear indication on whether or not the corrective measures being implemented are adequate or if additional considerations should be taken into account. On the other hand, deferrals are accepted and proposed when a State is faced with a response to a natural disaster, or there is a significant international event that would prevent their personnel from attending to the audit team.

**16. Transform the current USAP-CMA Regional Seminar into a National Coordinators Workshop, to encourage States to send their National Coordinators so that they can better understand their role before, during and after USAP activities.**

Expected benefits:

- Ensures that State National Coordinators are better prepared to participate in the audit process and to address serious deficiencies in a timely manner.

Proposed actions:

- Transform the current ICAO USAP-CMA Regional Seminars into a workshop format to more clearly target National Coordinators;
- Encourage States to ensure staff assigned the responsibility of being the National Coordinator for the USAP-CMA are released by their administration to attend these workshops; and
- The frequency of the workshops would be maintained at an average of two to three per year, so that all regions can benefit from a workshop every two years.

Impact assessment:

- Review of current seminar material which is done prior to every delivery to ensure up-to-date information is provided.

*Secretariat comments: Beginning in 2018, the material in the USAP-CMA seminars was comprehensively overhauled to apply to National Coordinators. Attendance at these seminars is not restricted, though participating States are urged to send the individual who will be acting as National Coordinator to receive the training.*

**17. Develop a Network of National Coordinators. The Network would help some National Coordinators in their tasks, especially in establishing and following the implementation of CAP.**

Expected benefits:

- Provides increased support to National Coordinators in preparation for and following a USAP-CMA audit activity, including assistance in establishing and implementing CAPs.

Proposed actions:

- The Secretariat to work with the ICAO information technology department to develop a network parallel to the Aviation Security Point of Contact (PoC) network.

Impact assessment:

- Information technology (IT) resources would be required to set up such a network.

## D) RISK-BASED APPROACH TO PRIORITIZATION

With regard to the strengthening of the risk-based approach with the purpose of prioritization of USAP-CMA activities, the SSG recommends to/that:

**18. The Working Group on Threat and Risk be requested to map out the Annex 17 Standards most affected by the various threat scenarios. This mapping activity would then be used as a means to ensure areas of highest risk are always included in audit activities.**

Expected benefits:

- Enhances the risk assessment approach to ensure that areas of highest risk are always covered during USAP-CMA activities.

Proposed actions:

- Refer this request to the WGTR to complete the mapping exercise.

Impact assessment:

- The WGTR to regularly maintain and update the mapping as threats and the affected Standards evolve; and
- Additional time on-site may be required if the scope of the audit is expanded.

**19. Use the UN Department of Safety and Security (UNDSS) Threat Assessments and Profiles to inform the risk process (Secretariat suggestion) and consider in the future other possible sources of threat information.**

Expected benefits:

- Enhances the risk assessment approach to prioritize USAP-CMA activities and supports GAsEP Priority Outcome 1: Enhance Risk Awareness and Response.

Proposed actions:

- The ICAO Secretariat to liaise with the UNDSS to obtain up-to-date information more seamlessly. Currently, the data is manually collected from the UNDSS security clearance site with regard to the overall assessment for the capital, the terrorism threat level, the armed conflict threat level and the civil unrest threat level; and
- The ICAO Secretariat to identify and consider any other possible sources of threat information for their subsequent inclusion in the risk identification process.

Impact assessment:

- Starting in 2019, the planning for future schedules includes UNDSS data, and efforts have been initiated to facilitate data collection.

*Secretariat comments: Although the UNDSS products are State specific, they are not focused on aviation security. However, they do provide an overall evaluation of the safety and security in a State.*

**20. Update Doc 9807 – Universal Security Audit Programme Continuous Monitoring Manual on the way in which the “performance” and “opportunity” parameters are used in prioritizing States for audits, including a scoring system that provides greater clarity on the weighting of each criteria.**

Expected benefits:

- Provides greater transparency and strengthens confidence on the risk assessment methodology used by the USAP-CMA.

Proposed actions:

- Doc 9807 to be updated.

Impact assessment:

- Expected to be completed by the end of 2019.

**21. Focus audits on areas identified as serious deficiencies and those areas identified in an SSeC, as well as those Standards to which a State has filed a difference.**

Expected benefits:

- Ensures potential areas of higher risk are always included in audit activities; and
- Ensures that such critical problem areas are addressed through the optimal use of limited resources.

Proposed actions:

- Actions in Recommendation 19 address this recommendation, as the remainder is already part of the current process in place.

Impact assessment:

- Impact is addressed in Recommendation 19.

*Secretariat comments: The current methodology to establish the scope of an audit includes previously identified SSeCs, previous deficiencies (including operational deficiencies) and differences filed by the State that is to be audited. Moreover, areas that may have the potential for SSeCs are also systematically included in establishing the scope of an audit.*

**22. Encourage States to conduct a self-audit and submit their results to the USAP-CMA to assist determining the scope/duration of the audit.**

Expected benefits:

- Better addresses potential areas of higher risk to adjust the scope and duration of audits based on States' own assessments; and
- Encourages States to embrace GASeP Priority Outcome 4: Improve Oversight and Quality Assurance and its priority actions.

Proposed actions:

- Request States to complete self-audits using the existing USAP-CMA PQs and submit them to the Team Leaders ahead of audits to facilitate audit on-site planning; and
- Develop a secure system for States to submit this information online.

Impact assessment:

- Risk assessment will need to be conducted to determine the possibility of providing States access to a secure online platform to submit data that would need to be developed (with accompanying training rolled out);
- The current MoU will need to be changed to require States to submit completed PQs by a predetermined deadline to ensure sufficient time is available to consider the data provided;
- Increase in workload for States, similar to current requirements for the Safety Oversight related On-line Framework (OLF), but the action would aid their audit preparation and help rectify gaps and implement immediate response measures;
- The accuracy of the data provided by the State would have to be reviewed as a pre-audit activity adding additional time to the process. This could impact the number of audits conducted annually if the accumulative time spent by Team Leaders on additional document review becomes significant; and
- Considering that the majority of States do not provide audit documentation within the prescribed timeframes, if the provision of completed PQs is made a condition for the on-site activity to be conducted, there is a high risk that the number of deferred audits will increase dramatically.

*Secretariat comments: During the transition period between the end of the second cycle of audits and the CMA, the Secretariat was specifically tasked to create a system that did not impose a burden on States similar to the OLF.*

**23. Apply a two-phased approach for auditing, in that ICAO conduct and complete the required document review and assessment (State programmes) and then the on-site operations, especially in cases where they have identified potential deficiencies in the submitted documents. This would require some on-going support from the Secretariat to seek clarification from States as required.**

Expected benefits:

- The documentation provided in advance will assist in targeting on-site activities.

Proposed actions:

- Document reviews are already done, when documents are available under the current methodology.

Impact assessment:

- No impact, unless the document review is made a condition for the on-site audit to be conducted. If this were the case, there would be a risk that the number of deferred audits will increase. See Recommendation 8 above.

*Secretariat comments: The current process requests States to submit their documentation two months in advance of the audit, such that the Team Leader can review it and answer as many Protocol Questions as possible (when documentation is in the language of the audit). These completed PQs are provided to the team members at the start of the audit. The document review also provides the Team Leader with important information on the areas where potential concerns may exist, which are also shared with the team members during the preparation day.*

*However, should an advance document review process be made mandatory for the on-site audit to be conducted, there is a high risk that the number of requests for deferral will increase significantly as many States already have challenges completing their pre-audit obligations.*

**24. Absence of a Corrective Action Plan in responding to an audit could focus future assessment type and scope.**

Expected benefits:

- States not developing corrective action plans are effectively tracked.

Proposed actions:

- No additional action is required.

Impact assessment:

- No impact.

*Secretariat comments: the current USAP-CMA prioritization model already considers the absence of Corrective Action Plans in determining the type, scope and frequency of future audit activities.*

**25. Use a States' Quality Control Programme and any significant developments in the programme towards reducing the priority of a State to be audited.**

Expected benefits:

- Audits are prioritized for States that do not have strong oversight capacity. An effective quality control regime is likely to mean greater consistency and sustainability.

Proposed actions:

- No additional action at this time.

Impact assessment:

- No impact.

*Secretariat comments: The State's oversight capacity is considered and holds some weight in the prioritization model currently used based on their oversight indicator as determined by previous audit results. States with validated strong oversight have a lower priority for future audits. Additionally, significant developments in a State's activities, including oversight capacity are also considered, as reported by the Regional Offices during the planning process. The delivery of effective physical security measures remains the key consideration as the core function of any aviation security system is to prevent and detect terrorist interference with civil aviation.*

**26. Make improvements in relation to the corrective action plan process by rolling out a secure integrated CAP management system.**

Expected benefits:

- Accelerated and easier means to track progress on the implementation of CAPs.

Proposed actions:

- The Secretariat has begun work with IT developers to create a new format for the CAP which will be more usable and provide a project management tool for States. In addition, this new format will be up-loadable into the existing audit management software and CAP updates will be more easily tracked to assist in the prioritization process.

Impact assessment:

- The CAP format will be developed with existing resources. No impact.

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ATTACHMENT - SAMPLE GRAPH

