



ASSEMBLY — 42ND SESSION

EXECUTIVE COMMITTEE

Agenda Item 14: Audit Programmes – Continuous Monitoring Approach

DRIVING THE CONTINUED IMPROVEMENT OF THE ICAO USOAP CMA – ACCELERATING IMPLEMENTATION OF PROGRAM ENHANCEMENTS

(Presented by the United States)

EXECUTIVE SUMMARY

Since 1999, the Universal Safety Oversight Audit Programme (USOAP) has provided valuable information to ICAO, Member States, and the public regarding Member State capability to provide effective safety oversight of their aviation systems. Over this timeframe, ICAO, Member States, and international/regional organizations have also collaborated to identify and implement improvements to the Programme, such as the transition to the Continuous Monitoring Approach (CMA) in 2010, intended to ensure that the USOAP remains operable within available resources while providing timely, accurate, and relevant information about aviation safety oversight worldwide. However, USOAP CMA activities conducted over the last several years underscore the need for ICAO to enhance implementation of programmatic improvements and maintain focus on meeting the CMA objectives. This paper invites the Assembly to agree on an approach to accomplish these outcomes for the benefit of both Member States and ICAO.

Action: The Assembly is invited to:

- a) direct ICAO to prioritize its USOAP CMA activities to States deemed to be of the highest risk based on its risk prioritization, beginning no later than January 2027 and not to exceed 24 months in duration, to enable dedicated focus on completing all pending and recommended programmatic enhancements, including those put forward in this paper, while allowing the appropriate flexibility to address emerging safety issues in States with the greatest need;
- b) direct ICAO to establish a permanent steering committee composed, at minimum, of Monitoring, Analysis and Coordination (MAC) personnel, representatives from the ICAO Regional Offices and Member States, and other stakeholders as appropriate, to advise and support the administration, accountability, and continuous improvement of the USOAP CMA;
- c) direct ICAO to implement the recommendations set forth in paragraph 2 of this paper, in coordination with the steering committee established pursuant to sub-paragraph b), above; and
- d) request ICAO to provide regular reports documenting the progress of the activities in sub-paragraphs a) through c), including the ongoing work of the steering committee, to future divisional-type meetings and sessions of the Assembly.

*Strategic
Goals:*

This working paper relates to *Every Flight is Safe and Secure*.

<i>Financial implications:</i>	<i>Impact for States</i> Fully implementing the recommendations in this paper would decrease the burden on States to fulfil their obligations related to participation in the USOAP CMA. <i>Impact for ICAO</i> Implementing the recommendations will also decrease the future financial and personnel resources that ICAO requires to operate the USOAP CMA, though there may be an initial resource expenditure in supporting the establishment of a USOAP Steering Committee.
<i>References:</i>	Doc 10184, <i>Assembly Resolutions in Force (as of 7 October 2022)</i> A42-WP/4, <i>Implementation of the ICAO Continuous Monitoring Approach (CMA) Safety And Security Audit Programmes</i> A41-WP/325-EX/138, <i>Optimizing Development of ICAO Standards and Associated Procedures for Effective Implementation</i> A40-WP/114-EX/48, <i>Relevant, Robust and Up-to-Date USOAP-CMA</i> AN-Conf/14-WP/121, <i>Evolution of Audit Methodologies in Response to New Aviation Technologies</i> AN-Conf/13-WP/21, <i>The Evolution of the Universal Safety Oversight Audit Programme (USOAP) Continuous Monitoring Approach (CMA)</i>

1. INTRODUCTION

1.1 The Universal Safety Oversight Audit Programme (USOAP) Continuous Monitoring Approach (CMA) is, first and foremost, intended to be a global resource to prioritize action to strengthen aviation safety oversight. Consistent with this objective, the 40th Session of the ICAO Assembly in 2019 directed the Secretary General to continue to evolve the USOAP CMA into a more evidence-based, risk-informed and result-oriented program that can be applied on a universal basis to assess the effectiveness and sustainability of States' safety oversight systems (*Assembly Resolutions in Force (as of 7 October 2022)* (Doc 10184)), Resolution A40-13 refers). The Assembly also urged all Member States to support ICAO in the evolution of the USOAP CMA.

1.2 This working paper outlines an approach to accelerate the implementation of programmatic improvements, manage risks, and ensure the USOAP CMA remains aligned with its primary objective of providing timely, accurate, and relevant information about aviation safety oversight worldwide.

2. DISCUSSION

2.1 The Group of Experts for a USOAP CMA Structured Review (GEUSR) was established following the 39th Session of the ICAO Assembly to conduct a structured review of the USOAP CMA to identify adjustments, to include its processes and methodology and to provide Member States an opportunity to provide user feedback. The GEUSR produced 37 recommendations consolidated into six Groups, A-F. The Ad Hoc USOAP CMA Advisory Group (USOAP-AG) was established following the Thirteenth Air Navigation Conference (AN-Conf/13) to further evolve the USOAP CMA, beyond the GEUSR recommendations. The USOAP-AG produced 42 recommendations contained in six Groups, A-F.

2.2 The ICAO Monitoring, Analysis and Coordination (MAC) branch in the Air Navigation Bureau continues to execute various work streams to streamline and improve the administration of the USOAP CMA and integrate the recommendations from the GEUSR, USOAP-AG, and other fora, such as the High-level Conference on COVID-19 and external audits/evaluations (A42-WP/4 refers). However, risks and delays in the day-to-day execution of the USOAP CMA impact resource availability and complicate the ongoing implementation of longer-term programmatic enhancements that can improve the quality of results from the USOAP CMA.

2.3 Enhancing GEUSR and USOAP-AG Recommendations – What is still needed

2.3.1 The GEUSR recommended (A1, A5 refer) that ICAO eliminate Protocol Questions (PQs) not directly linked to safety oversight or accident investigation; and PQs whose requirements extend beyond ICAO Standards, especially those based solely on guidance material or Recommended Practices (RPs), such as 7.521, 8.151, 8.279 and 8.283. Outcomes from recent USOAP CMA audits have included findings based on RPs, confirming that the GEUSR vision is not yet fully realized. ICAO should review PQs to ensure relevance and update auditor guidance accordingly.

2.3.2 The GEUSR recommended (A7 refers) ICAO cap the number of PQs at the post-PQ rationalization exercise number from 2019. The number of PQs dropped to 790 in 2020 but rose to 851 in 2024 due to new State Safety Program PQs. ICAO should ensure a reasonable number of PQs, limiting and minimizing redundancy to avoid undue burdens on States and ICAO.

2.3.3 The GEUSR recommended (C10 refers) flexible audit activities, focusing on Priority Protocol Questions (PPQs). Although ICAO has developed the methodology for conducting focused audits, it has deployed the concept sparingly. The USOAP-AG expanded on this idea (F.3 refers) and addressed exploring alternative scoping and frequency of USOAP CMA activities tailored to the State. ICAO should increase focused audits (linked to Standards) that exclusively cover PPQs and adjust activities to maximize resources and reduce burdens. One such approach that ICAO should consider is a tiered framework to adjust the focus as the Effective Implementation score increases, beginning with foundational elements and progressing through mature elements such as the sustainability of safety oversight performance.

2.3.4 The GEUSR recommended (E19 refers) ICAO improve USOAP CMA training on the USOAP CMA Online Framework (OLF) which includes, but is not limited to, how to complete a PQ Self-Assessment through the analysis of PQs, the review of evidence and references, and the identification of areas of deficiency based on critical elements (CEs); how to develop effective and acceptable CAPs; the provision of examples of “good” and “bad” CAPs for States’ reference; and how to manage and monitor the progress of CAPs.

2.4 Feedback from participation in the USOAP CMA and recent activities – What’s needed

2.4.1 As discussed in para. 2.1.1, above, PQs should focus on safety-related content in Standards, avoiding other interests, such as harmonization of international practices – e.g., format of a certificate or manual versus the required content. PQs should be based not only on Standards, but specifically on the safety content within the Standards. This includes ensuring that PQ outcomes stemming from lack of implementation acknowledge the State’s prerogative to notify differences and consider the content of and rationale for the differences in relation to desired safety results.

2.4.2 Introduce “alternate means of compliance” in PQ outcomes to reflect that States can meet the intent of a PQ through an equivalent level of safety protection and recognize partial compliance. This approach could also incorporate a weighted scoring model to emphasize effective implementation of identified criteria, such as Critical Elements 6-8 (e.g., certification and/or surveillance processes and activities).

2.4.3 Include auditors with appropriate backgrounds for the respective audit areas, such as auditors with legal backgrounds for the Primary aviation legislation and specific operating regulations PQs and aerodrome operational backgrounds for the Aerodromes and ground aids PQs.

2.4.4 Standardize evidence presentation to auditors and communicate the framework to States before audits.

2.4.5 Assign at least two auditors per area in States with large and/or complex aviation systems.

2.4.6 Enhance auditor guidance to improve team coordination and consistency in PQ interpretation (i.e., limit drift), and ensure sufficient detail in audit findings to enable focused CAP development (i.e., avoid generic and repetitive findings that do not pinpoint the issue(s) of concern).

2.4.7 Improve auditor training and qualification processes, automate computer-based training enrolment, and increase in-person training to enhance standardization and minimize the drift described in para. 2.4.6.

2.4.8 Extend CAP submission timelines relative to the number of findings, and/or institute a rolling/phased submission timeline to prioritize the most significant findings.

2.5 Proposal for a USOAP CMA Steering Committee

2.5.1 Over the years, ICAO has requested States and other stakeholders participate in temporary groups to analyze and improve the USOAP CMA. The United States applauds ICAO’s efforts to solicit assistance periodically; however, regular support is necessary to ensure the continued enhancement and strengthening of the USOAP. A steering committee, similar to the one utilized for the Universal Security Audit Program (USAP), would afford States and ICAO a regular forum to coordinate on the continuous improvement of the USOAP’s implementation and effectiveness while aligning with objectives for global aviation safety.

3. CONCLUSION

3.1 The USOAP CMA serves as the only globally standardized means to assess States’ capabilities in providing effective safety oversight, to include accident investigation capability.

3.2 The complexity of integrating multiple work streams related to USOAP CMA programmatic enhancements while continuing to operate the Program within the available human and financial resources allocated to the MAC branch is recognized and acknowledged.