



ICAO

International Civil Aviation Organization
North American, Central American and Caribbean Office

WORKING PAPER

NCMC/3 — WP/04
07/11/18

Third Regional Meeting for National Continuous Monitoring Coordinators (NCMC/3)
Mexico City, Mexico, 13 to 15 November 2018

Agenda Item 2: Overview and updates of the Universal Safety Oversight Audit Programme-Continuous Monitoring Approach (USOAP CMA)

USOAP SIMULATED AUDITS THROUGH SELF-ASSESSMENT AND PEER-ASSESSMENT

(Presented by Canada)

EXECUTIVE SUMMARY

This paper identifies certain limitations of the existing ICAO USOAP simulated audit framework. Although ICAO has provided States with strong guidance for understanding expectations of USOAP simulated audits, different States often have differing interpretations of specific questions. Canada recognizes the advantage of the peer-assessment methodology in alleviating some of the concerns faced by States. This paper calls on ICAO and Member States to acknowledge and support the value of both the self-assessment and peer-assessment processes.

Action:	Recognize the benefits of USOAP simulated audits through both self-assessment and peer-assessment; and Support the Air Navigation Bureau in exploring giving credit to candidate auditors who have participated in peer-assessments.
<i>Strategic Objectives:</i>	<ul style="list-style-type: none">• Safety
<i>References:</i>	<ul style="list-style-type: none">•

1. Introduction

1.1 The ICAO USOAP Continuous Monitoring Approach (CMA) is particularly critical for States preparing for an upcoming ICAO audit. The self-assessment methodology allows States to identify processes that are well-functioning or may require improvement. This methodology is highly valuable, but is nevertheless subject to certain limitations.

1.2 As States have highly complex and distinct civil aviation systems, it is not unprecedented that, often, interpretation of guidance material and protocol questions differ amongst regulators. Canada recognizes the potential of a peer-assessment methodology, one in which States work cooperatively to complete the self-assessment, in removing some of these obstacles.

1.3 Canada is collaborating with Brazil on a self-assessment, which has already highlighted potential benefits of a peer-assessment methodology. While Canada's auditors have not completed all the necessary components of the USOAP training program, the peer-assessment is providing them with the means to further build experience. As official certification is not necessary for peer-assessments, the methodology may also result in the increased recruitment of potential ICAO auditors.

1.4 As the peer-assessment methodology is relatively new, States may agree that cooperation is beneficial to further explore the many avenues the methodology could take. Canada plans to further develop a cohesive structure based on research on peer-assessment methodologies from other sectors (e.g. medicine, education, etc.).

1.5 Canada supports the possibility of using results of self-assessments to expedite USOAP audits. Furthermore, these results may parallel development of new international agreements and arrangements, as States will have likely developed increased knowledge of each other from participation in the assessment process.

2. Discussion

2.1 Benefits of Self-Assessment and Peer-Assessment

2.1.1 Discussion and Interpretation of ICAO USOAP Simulated Audits

- While ICAO has provided strong guidance for understanding expectations in USOAP simulated audits, interpretation of specific questions and subjects often differs. States have very distinct and complex civil aviation systems, and so it is expected that understanding of certain subject matter sometimes differs. Peer-assessments provide the opportunity to increase knowledge of Member States in the way of interpretations of protocol questions and acceptable responses (including evidence). In the end, this would identify opportunities for additional guidance while increasing compliance with international standards and recommended practices.
- There is significant value added when support is provided—through peer-assessment—to fellow Member States. All parties benefit from the sharing of lessons learned and best practices that identify both strengths and opportunities to improve. Therefore, States engaging in self-assessments will likely find the development of increased regulatory capacity before an upcoming ICAO USOAP audit.

- Member States engaging in peer-assessments may provide auditors who have not completed training under the USOAP program. It should be noted that the auditors would nonetheless be knowledgeable and confident in the process due to their participation in the USOAP program and Member State experience.

2.1.2 Peer Assessment with National Civil Aviation Agency of Brazil (ANAC)

- Brazil approached Canada to perform USOAP simulated audits in the areas of airworthiness and operations. Canada and Brazil have since agreed to collaborate on this capacity building opportunity to explore the value of peer assessments.
- The cooperation of various Subject Matter Experts (SMEs) throughout the peer-assessment will allow auditors to discuss face-to-face the different approaches adopted by regulators when completing simulated audits.
- Initial knowledge-sharing between Brazil and Canada demonstrates that the peer-assessment process will provide significant on-the-job training for Canada's auditors, presenting them with the opportunity to build familiarity with the USOAP audit process. This has better prepared Canada's inspectors for the next stages of the USOAP auditor training program and will likely do the same for other States.
- There are also benefits to conducting audits from an ICAO point-of-view. Not only will States be able to examine audit outcomes on an individual level, but also process benefits may be reaped if States share similar concerns at home. This will allow States to be better prepared for their next ICAO audit.
- Above all, the peer assessment process has allowed for increased cooperation and coordination between Canada and Brazil. The process provides a key opportunity for relationship-building with likeminded States, and may also open doors for new partnerships and agreements.

2.1.3 Encouraging Auditors and Capacity Building

- Completion of training under the USOAP program and receiving supporting certification is a process that takes multiple years. As previously mentioned, the peer assessment methodology provides inspectors with the opportunity to perform auditing exercises in preparation for official certification. If ICAO were to recognize some of these peer assessment exercises as legitimate on-the-job training under USOAP, the certification process could accelerate.

- The peer assessment methodology may also assist in the recruitment of potential ICAO auditors. As peer assessment does not require auditors to have official USOAP recognition, this may encourage prospective auditors to gain initial experience on the subject.

2.2 *Peer-Assessment Methodology*

2.2.1 The feasibility of peer-assessment in providing knowledge-sharing and ameliorating comprehension has long-since been a central concept in many professions and sectors. Not only does peer-assessment build accountability and support transparency, but it also provides the grounds for the generation of new ideas and skills transfer.

2.2.2 Research on the benefits of the peer-assessment methodology demonstrates that by collaborating with peers, individuals learn to target their ideas accordingly. This includes a stronger understanding of assessment criteria and higher work ethic toward improving performance. Therefore, not only does peer assessment facilitate deeper understanding of subject matter, but it also targets and effectively changes the culture defining work-ethic and knowledge-sharing in a given environment.

2.2.3 Research on the benefits of the peer-assessment methodology demonstrates that by collaborating with peers, individuals learn to target their ideas accordingly. This includes a stronger understanding of assessment criteria and higher work ethic toward improving performance. Therefore, not only does peer assessment facilitate deeper understanding of subject matter, but it also targets and effectively changes the culture defining work-ethic and knowledge-sharing in a given environment.

2.2.4 As there is not yet a consensus on approaches to peer assessment within civil aviation, it may prove valuable for States to explore the methodologies used by other groups in various industries. Member States are encouraged to further examine the value of peer assessments, as not enough attention has been paid to the significant advantages of the process.

2.3 *Results of Assessments as a Precursor to Expedited Audits and Bilateral Agreements*

2.3.1 The results of simulated self and peer-assessments may facilitate ICAO being able to expedite USOAP audits. It is likely that after participation in the simulated audit, significant positive improvements will be identified within Member States. Building off self-assessments and adopting a multi-layered approach may prove to be more critical, eventually accelerating an official ICAO USOAP audit.

2.3.2 The results of USOAP peer-assessments could provide new avenues for agreements and arrangements between Member States. Greater confidence in States' respective civil aviation system would be achieved with a deeper understanding of what regulatory program infrastructure is in place in support of the Effective Implementation (EI) score. This increased understanding between Member States pave the way for potential agreements and arrangements in areas of airworthiness, maintenance, and etc. In turn, these agreements will facilitate new opportunities for respective States' economic markets and consumers engaging in the industry.

3. Conclusion

3.1 The self-assessment methodology presents States with the opportunity to identify processes that are either effective or deficient before an official ICAO USOAP Audit. Due to the complex nature of States' respective civil aviation systems, it is not unprecedented that interpretation of protocol questions differs amongst regulators. Canada highlights the potential of a peer-assessment methodology in facilitating harmonized views.

3.2 Canada's deployment of auditors to Brazil, all of whom are participating in the USOAP auditor training program, has highlighted many of the benefits of the peer-assessment methodology. As official certification is not necessary for peer-assessments, the methodology could result in the increased recruitment of potential ICAO auditors.

3.3 Canada encourages the cooperation of States in further exploring the framework that peer assessment methodology may take. Investigation of peer-assessment methodologies from other sectors would further support the development of a coherent peer-assessment structure.

3.4 Canada supports using results of self-assessments to expedite USOAP audits. It is likely that these results could parallel development of new international agreements and arrangements, as States will have likely developed capacities and knowledge from participation in the assessment process.

4. Suggested Action

The NCMC/3 is invited to:

- a) Recognize the benefits of USOAP simulated audits through both self-assessment and peer-assessment; and
- b) Support the Air Navigation Bureau in exploring giving credit to candidate auditors who have participated in peer-assessments.