INTERNATIONAL CIVIL AVIATION ORGANIZATION

# EIGHTH MEETING OF THE STEERING COMMITTEE OF THE REGIONAL AVIATION SAFETY GROUP FOR AFRICA-INDIAN OCEAN (RASC/8).

## From 29 to 30 August 2022.

**Agenda Item 8: Implementation of USOAP CMA off-site validation activities and Integrated Validation Activities (IVA) for the AFI Region: challenges and way forward.**

*(Presented by the Secretariat)*

| SUMMARY |
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| This paper outlines the planning and implementation of USOAP CMA activities, with special emphasis on off-site validation activities and Integrated Validation Activities, cites associated challenges to their implementation and proposes possible mitigation measures and the way forward. |
| **REFERENCE(S):**<br>Doc 9735 — *Universal Safety Oversight Audit Programme Continuous Monitoring Manual* (4th edition, 2014)<br>Guidance for States on developing Corrective Action Plans (CAPs) (Revised June 2021)<br>USOAP CMA 2020 Protocol Questions — LEG, ORG, PEL, OPS, AIR, AIG, ANS, AGA |
| **Related ICAO Strategic Objective(s):**<br>This working paper relates to the Safety Strategic Objective. |

## 1.    INTRODUCTION:

**USOAP activities**

1.1    The USOAP CMA audits are conducted under USOAP framework to asses the level of effective implementation of the Critical Elements of a State safety oversight system. In addition to the audits, validation activities have been introduced to assess the level of progress in the implementation of the Corrective Action Plan (CAP) aimed at confirming the resolution of findings including Significant Safety Concerns (SSCs), if applicable. These validation activities include:

      a)     ICAO Coordinated Validation Mission (ICVM);
      b)     Off-site validation activity; and
      c)     Integrated validation activities (IVAs)

## USOAP Corrective Action Plans (CAPs)

1.2     In response to the findings of the USOAP audits,  the State is required to develop and implement a CAP for each not satisfactory Protocoal Question (PQ) and ensure reporting through the USOAP CMA online framework (OLF) initially and on an ongoing basis until the CAP is fully implemented.

## 2.     DISCUSSION:

## Objectives of USOAP CMA activities

2.1     The objective of an **audit** is to determine a State's capability for safety oversight by assessing the effective implementation of the CEs of the safety oversight system. ICAO identifies the need for the audit, determines its scope and pays for its conduct.

2.2     The objective and methodology of a **safety audit** are the same as an audit except that a Member State requests an audit of its current safety oversight system, determines its scope and pays for its conduct on a cost recovery basis.

2.3     The objective of an **ICVM** is to assess and validate CAPs (or mitigating measures for SSCs) implemented by a State to address previously identified findings, including SSCs. A State may request ICAO to conduct an ICVM, in which case ICAO will schedule and conduct a cost recovery ICVM

2.4     The objective of an **off-site validation activity** is to assess and validate CAPs implemented by a State to address certain PQ findings without conducting an on-site activity.

      a)     Not all PQ findings are suitable for off-site validation.
      b)     However, most of those associated  with "Establishment" Critical Elements (CE-1 to CE-5} are eligible.
      c)     The majority of PQs associated  with "Implementation" CEs (CE-6 to CE-8} need to be assessed in an on- site or virtual, if possible, USOAP CMA activity.
      d)     In addition, at least 75% of the State's CAPs related to qualifying PQs in each audit area that is being considered for the off-site activity must:
            i)   fully address the PQ finding;
            ii)  be fully implemented; and
            iii) include all evidence of implementation attached and submitted by the State.

2.5     The scope of an off-site validation activity is determined based on:

      a)     the number of qualifying CAPs, i.e. CAPs addressing PQ findings associated with CEs 1 to 5 (some CE 1 to 5 PQ findings still require an on-site activity);
      b)     whether the State has fully implemented CAPs associated with those PQs; and
      c)     whether the State has submitted evidence that is complete and relevant to the CAP implementation.

2.6     The key objectives of an IVA are to:

a)   validate the progress made by States in implementing their corrective action plan (CAP) in a more dynamic and cost-efficient manner;

b)   address protocol questions (PQs) with implementation aspects, in particular PQs related to critical elements (CEs) 6, 7 and 8;

c)   meet the requirements for evidence-based approach, i.e. on-site sampling of evidence by independent subject matter experts (SMEs); and

d)   document progress made by States in implementing their CAP.

2.7     Specifically, an IVA is a USOAP CMA limited scope on-site activity, integrated within a scheduled visit/activity in a State by ICAO or its safety partners.

2.8     During an IVA, SMEs sample, collect and assess evidences provided by the State demonstrating effective implementation of corrective actions to address findings previously identified by ICAO. ICAO validates the collected evidences and information.

2.9     An IVA is triggered when there is an indication that a State has made sufficient progress in implementing its CAPs. The indicators of sufficient progress are:

a)   the CAP fully addresses the finding;

b)   the CAP is fully implemented;

c)   the State posts relevant evidence/examples of effective implementation on the OLF to enable ICAO to validate the CAP; and

d)   the State completes or updates the self-assessment for relevant PQs on the OLF.

**Roles and Responsibilities**

2.10    **ICAO HQ** determines the scope of the off-site validation activities and IVAs (i.e. audit areas to be covered) and the specific PQs that need to be addressed,  accomplishes the validation taking into account the recommendations by the SMEs and generates the report.

2.11    Upon completion of the foregoing USOAP activities, ICAO recalculates the State's EI, generates or updates PQ findings for not satisfactory PQs and updates the OLF accordingly.

2.12    ICAO Regional Offices and Partners should share well in advance their mission plans to States with ICAO HQ to enable effective planning and implementation of IVAs.

2.13    Member States shall ensure, in particular, timely provision of information through the CMA online framework.

States must submit and update CAPs that meet certain criteria, including:

1)   *Relevant* — CAPs should address the issues and requirements related to the finding and corresponding PQ and Critical Element (CE).

2)   *Comprehensive* — CAPs should be complete; including all elements or aspects associated with the finding.

3)   *Detailed* — CAPs should be laid out in a step-by-step approach, as required, to outline the implementation process.

4)   *Specific* — CAPs should identify who will do what, when, in coordination with the responsible office or entity.

5)   *Realistic* — CAPs should be realistic in terms of contents and implementation timelines.

6) *Consistent* — CAPs should be consistent in relation to other CAPs and with the State self-assessment.

**Challenges and the Way Forward**

2.14    Only few States in the RASG-AFI region have benefitted from off-site validation activities and IVAs

2.15    States' weaknesses that impede their benefiting from off-site validation activities and IVAs include the following:

a)    failure to develop acceptable comprehensive CAPs initially following a USOAP activity;
b)    failure to implement CAPs; and
c)    failure to upload and update adequately the relevant modules of the OLF initially and on an ongoing basis as and when the CAPs are amended or implemented

2.16    Other stakeholders' weaknesses that impede their benefiting from off-site validation activities and IVAs include the following:

d)    ICAO Regional Offices' failure to share well in advance their mission plans to States with ICAO HQ to enable effective planning and implementation; and
e)    Partners' failure to share well in advance their mission plans to States with ICAO HQ to enable effective planning and implementation;

**3.      ACTION BY THE MEETING:**

That in order for States to benefit from off-site validation activities and IVAs,

3.1.    The meeting is invited to recommend to RASG-AFI to:
1      urge States to:
a)    develop acceptable comprehensive CAPs initially following a USOAP activity;
b)    implement CAPs and collect the associated evidences; and
c)    upload the evidences and update adequately the relevant modules of the OLF initially and on an ongoing basis as and when the CAPs are amended or implemented; and
2      urge ICAO Regional Offices and Partners to share well in advance their mission plans to States with ICAO HQ to enable effective planning and implementation.

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