

#/##/202#



USOAP Audit of the United States

Lessons Learned & Best Practices



Federal Aviation
Administration

Purpose

The purpose of this presentation is to share the lessons learned and best practices from the ICAO USOAP CMA Audit of the United States from July 10-24, 2024.



Overview of the U.S. Civil Aviation System



U.S. Civil Aviation Statistics



Operating Certificates	12,164
Air Operators	5,692
Major Air Carriers	63
Commuter/Air Taxis	1,833
Commercial	51
Foreign Air Carriers	511
External Load	353
Agricultural	2,557
Public Use	323
Air Agencies	6,427
Pilot Schools	915
Training Centers	411
Maintenance Schools	201
Repair Stations	4,945



Active Pilots	806,939
Pilot Certificates	1,227,925
Airline Transport Pilot	180,738
Commercial	122,282
Private	180,233
Recreational	68
Sport	7,174
Student	316,470
Foreign	52,327
Remote (UAS)	368,633
Flight Instructor Certificates	131,577
Ground Instructor Certificates	79,624



Air Personnel	740,314
Mechanics & Repairmen	357,337
Inspection Authorized	36,133
Flight Attendant	302,368
Control Tower Operator	23,332
Other	57,277
Dispatcher	25,562
Flight Navigator	23
Flight Engineer	23,917
Parachute Rigger	7,775

Current as of 6/12/24.



U.S. Civil Aviation Statistics



Aircraft	1,074,418
Piloted Aircraft	295,525
Approved Manufacturers	1,420
Unpiloted Aircraft Systems (UAS)	778,893
Commercial	378,729
Hobby	394,032
Paper Registration	6,132

Aeromedical Examinations	462,806
ATCS Medical Clearance Examinations	12,840
Air Traffic Controller Workforce	13,075
Flight Service Station Workforce	102
Airmen Medical Examinations	449,966
Standard Issuances	388,036
Special Issuances	45,275
Industry Drug & Alcohol Programs	7,000

Designees*	8,371
Aircraft Certification Service	2,102
Flight Standards Service	3,924
Individual Designees	3,624
Aerospace Medicine	2,345
Organizational (ODA)	74
AIR Lead	65
FS Lead	9

Air Operator Check Pilots	11,509
14 CFR Part 121	7,363
14 CFR Part 121 & 135	103
14 CFR Part 135	3,952
14 CFR Part 125	89

* Some designees hold more than one designation.

Credentials	24,046
FAA AOV	19,161
ATCS	14,076
ATSS	4,756
AIS	329
Department of Defense	4,885
Navy & Marine Corps.	1,210
National Guard	228
Army	1,052
Air Force	2,395

International Engagement	
Relationships with Foreign CAAs	194
Bilateral Safety Agreements	52
Standards and Recommended Practices	12,000+

Current as of 6/12/24.

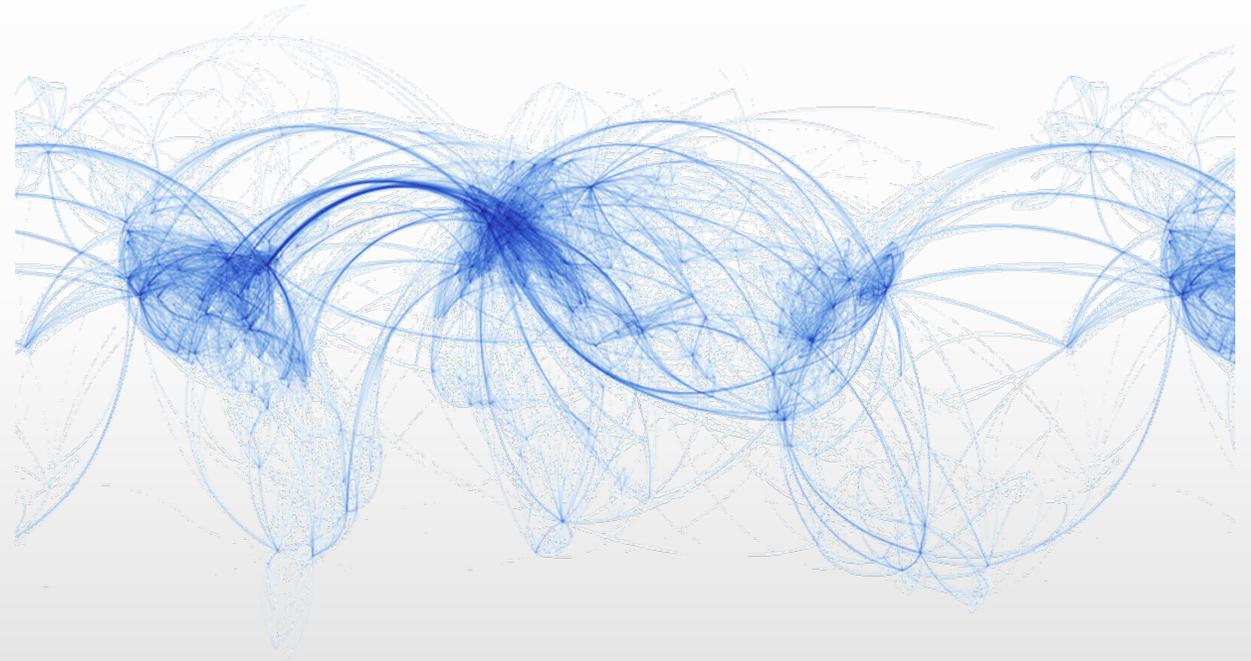


U.S. Civil Aviation Statistics

- 520 Air Traffic Control Towers
- 21 En Route Traffic Control Centers
- 147 Terminal Radar Approach Control (TRACON) Facilities
- 5,400 aircraft in the sky at peak operational times
- 92.3% on-time NAS Performance
- 0.2324 accidents per 100K departures with last fatal accident

The FAA's Air Traffic Organization (ATO) provides **daily** service to:

- Over 45,000 flights
- Over 2.9 million airline passengers
- Over 29 million square miles of airspace
 - Including 24.1 million square miles of oceanic airspace



U.S. Departments & Agencies with Roles in Civil Aviation



USOAP Audit of the U.S.



USOAP Audit Background

ICAO conducted a USOAP Audit of the United States from July 10-24, 2024.

U.S.' last audit was in 2007 (nearly 17 years ago)

In 2007, the U.S. EI was 91.13% (changed to 90.9% in 2020)

Audit preparation activities commenced in January 2023

Official notification letter acknowledged in August 2023



Pre-Audit Activities



Pre-Audit Activities

- Conducted monthly meetings with USG USOAP POCS
- Completed ICAO USOAP training
- Developed and delivered USG-specific USOAP webinars
- Conducted outreach meetings with all affected USG entities
- Completed the PQ Self-Assessment and SAAQ
- Reviewed the CAPs from the 2007 USOAP Audit
- Conducted mock audits using FAA USOAP-qualified auditors and PQ reviews and practice assessments with the assistance of the NACC RO
- Ensured the CC/EFOD and the U.S. Aeronautical Information Publication (AIP) were up-to-date



Pre-Audit Activities *(cont'd)*

- Developed audit logistics and communications plans
- Coordinated with FAA labor unions
- Coordinated with legal counsel on objective evidence approval
- Developed extensive internal audit preparation material
 - Briefings
 - Background reading (i.e., ICAO documentation)
 - Familiarization/refresher training on ICAO and the USOAP
 - Videos for auditee training



Pre-Audit Activities *(cont'd)*

- Developed Introductory Information Material for USOAP audit team to better understand the U.S. safety oversight system
- Identified possible vulnerabilities in the overall system and acted to mitigate findings
- Consulted with other States on their recent audit experiences



Pre-Audit Challenges

- Few USG staff remaining from 2007 audit
- Need to coordinate across various USG organizations
- Part-time participation from all organizations
- Need to develop internal training and documents to “personalize” the USOAP material for U.S. use
- Documenting the complexity of the U.S. system for ICAO’s understanding



Pre-Audit Challenges *(cont'd)*

- Coordinating an extensive Audit Mission Plan with ICAO
- Ensuring USG understanding of the USOAP at all levels
- Ensuring USG Executive commitment throughout audit preparations
- Coordinating Industry/Service Provider visits across more than one USG entity
- Coordinating with Labor Relations, General Counsels, and Communications staffs on various items across the USG



Pre-Audit Key Takeaways

- Thorough audit preparation is vital for success!
 - Develop a plan for your overall preparation effort
 - Consider both the ICAO-required activities (e.g., PQ Self-Assessment, SAAQ), but also auditor and government familiarization efforts
 - Consider timelines for CC/EFOD and AIP update processes
 - Identify boundaries and process for sharing different types of evidence
 - For PQs specifically, always consider the Critical Element when developing responses and identifying evidence
- For multi-organizational oversight systems, ensure all stakeholders are involved in preparation (i.e., CAA, ANSP, AIA, etc.)



Pre-Audit Key Takeaways *(cont'd)*

- Identify a single “program management” function to centralize the preparation activities is helpful
- Build relationship/rapport with Audit Team with regular contact throughout the audit to ensure open lines of communication and to address any issues that arise
- Consider developing “personalized” USOAP material and training for internal use
- Utilize USOAP-qualified auditors and/or ICAO RO resources to conduct mock audits &/or review PQ responses



On-Site Audit Activities



On-site Audit Challenges

- Auditors' limited time to cover PQs (i.e., only 9 “on-site audit” days out of 11 days in-country)
- Need to clearly and consistently explain the various aspects of the U.S. system
- Need to understand exactly what the auditor wanted to demonstrate compliance with the PQ
- Repeat provision of identical evidence across audit areas for similar questions



On-site Audit Challenges *(cont'd)*

- Provide objective evidence using a secure, standardized method
- Auditors' request for large amounts of evidence within short periods of time and organized in various ways
- Lack of coordination among the auditors as to how they were conducting their discussions and what they were looking for
- Lack of authority to address questions about consistency or audit area outcomes, leaving the U.S. with no venue for State to raise questions and get answers about disagreements during the on-site activity



On-site Key Takeaways

- Daily meetings with the Audit Team Lead are beneficial to address concerns on both sides
- Consider assigning a lead auditee (“Champion”) to act a primary facilitator for each audit area
- Establish a system for collecting the requested evidence and providing it to the auditors by USB flash drive
- Establish a system for notetaking to ensure internal tracking for individual PQs
- Consider conducting daily recap meetings on the PQ status



On-site Key Takeaways *(cont'd)*

- Consider PowerPoint slides, as needed, or screenshots of evidence with highlighted applicable paragraphs for more efficient discussions with auditors
 - Note: This is for visual use only and does not replace providing the full document as evidence
- Work to manage time to maintain the momentum of conversations
- Establish a team with the role of overseeing auditor support throughout the day
- Be prepared for work over the weekend (i.e., obtaining evidence, responding to auditor requests, meeting with the Audit Team Lead)



On-site Key Takeaways *(cont'd)*

Be prepared for anything!!!



Questions?

