Guidance for Developing and Updating Corrective Action Plans (CAPs) Effectively

Universal Safety Oversight Audit Programme (USOAP)

Continuous Monitoring Approach (CMA)

Objectives

✓ Provide specific guidance on how to provide a CAP that fully addresses ICAO findings and recommendations (F&Rs)

✓ Provide examples of common shortcomings

✓ Provide guidance on how to submit an effective CAP update

Effective Development of CAPs

Why is it important for States to provide good CAPs and updates of these?

✓Required as per the CMA Memorandum of Understanding (MOU)

✓Ensure that States are fully addressing the ICAO F&Rs

✓CAP updates allow the State to report on their level of progress

✓Enable ICAO to assess the next course of action (e.g. an ICAO Coordinated Validation Mission [ICMV])

CAP Development Guidance

<table>
<tr><td colspan="3" align="center">AUDIT FINDING XXX/XX</td></tr>
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<table>
<tr><td colspan="3">[Example]
The CAA has not developed a formal training policy and training programme for all technical staff within the Airworthiness Inspection Department (AID).</td></tr>
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<table>
<tr><td colspan="3" align="center">STATE'S COMMENTS AND OBSERVATIONS</td></tr>
<tr><td colspan="3">The CAA agrees with the finding of the ICAO audit team.</td></tr>
<tr><td>CORRECTIVE ACTION(S) PROPOSED</td><td>ACTION OFFICE</td><td>ESTIMATED IMPLEMENTATION DATE(S)</td></tr>
<tr><td>Develop a formal policy document highlighting the high priority to be given to the training of all technical CAA staff.</td><td>CAA</td><td>21/09/2012</td></tr>
</table>

State's Comments and Observations

Enter comments on the ICAO F&Rs.

- If no comments, the State should enter "The CAA agrees with the F&R of the ICAO audit team".
- If the State disagrees with the F&R, it should describe the point(s) of disagreement.

Common Shortcomings

- The State indicates that it disagrees with the F&R, but does not provide a reason.
- The State uses this portion of the template to explain its approach or reasoning behind its corrective actions.
- The State uses this portion of the template to provide the level of progress.

CAP Development Guidance

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Develop a formal policy document highlighting the high priority to be given to the training of all technical CAA staff.	CAA	21/09/2012
Develop a training programme including details on initial training, on-the-job training, recurrent and specialized training for all technical positions, including airworthiness inspectors and engineers.	CAA	15/10/2012
Develop an annual training plan to reflect the new policy and programme and commence training as required in accordance with the established training plan.	AID	12/11/2012

Corrective Action(s) Proposed

Enter corrective actions for addressing the ICAO F&Rs.

- Describe corrective actions in a detailed and clear manner.
- For CAPs that address implementation, try to avoid repeating the ICAO recommendation word for word.
- For CE-6 protocol questions, provide the necessary details on how to implement the requirements and procedures.
- Address all items indicated in the ICAO F&R and the related protocol questions.
- If needed, divide actions into several steps.

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Corrective Action(s) Proposed

Common Shortcomings

- The CAP does not address the entire scope of the F&R and the related protocol questions.
- The State does not provide enough details, especially with regard to the means for implementation of the CAP.
- The sequence of actions in the CAP is not in correct chronological order (for example, the implementation of a procedure is mentioned before its establishment).

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Action Office

Enter the full name(s) or acronym(s) of organization(s) in charge of accomplishing the corrective actions.
- If the corrective action is taken in different organizations or entities, enter each name of the organizations (i.e. CAA, Ministry, Accident Investigation Board, etc.).
- If the corrective action is taken by several divisions within the CAA, identify them individually.
- For high-level corrective actions, such as the promulgation of primary aviation legislation, enter the name of entity which has the authority to complete the task.
- If the action is divided into steps, indicate the action office for each step.
- Spell out the acronym of office name the first time it is used, unless acronym is obvious, such as CAA.

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Action Office

Common Shortcomings

- The action office identified does not have the authority to complete the corrective action(s) (this is especially common with respect to the promulgation of legislation and/or regulations).
- For multiple-step CAPs, not all involved action offices are identified for each step.

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Estimated Implementation Date (EID)

Indicate a realistic EID considering the level of risk associated with the finding.

•Enter the exact date in dd/mm/yyyy format.

•Do not enter additional text, such as "before 18 September 2011".

•If action is completed, indicate the date of completion.

•For multiple-step CAPs, enter the EID for each step.

•For ongoing activities, such as training (recurrent or specialized) and surveillance, the EID should be the date of completion for current/upcoming period, do not put "ongoing".

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EID

Common Shortcomings

•The State does not enter a specific date, they enter text like "ongoing".

•The date is not realistic. For example, the State may indicate that it is going to fully implement a safety management system within a few months.

•The date is not commensurate with the level of risk associated with the finding. For example, the State may indicate that it will implement critical surveillance activities in three years.

CAP Update Development Guidance

CAP Updates

The same guidelines stated above also apply to CAP updates. In addition, here are some additional instructions:

✓ For completed items, indicate the date of completion.

✓ For items not yet completed, provide an estimated level of completion (i.e. 25% complete).

✓ If the original EID has passed and the item is not yet complete, provide a new EID.

✓ For those CAPs which did not fully address the F&Rs, enter a revised CAP, with an emphasis on addressing the shortcomings indicated in the ICAO assessment.

✓ Highlight any new or revised actions by differentiating text (**bold**, <u>underline</u>, colour, ~~strikethrough~~, etc.) from the original corrective action(s).

CAP Update Development Guidance

CAP Updates

<u>Common Shortcomings</u>

- ✓ The CAP update has not been submitted in a workable format, such as MS Word.
- ✓ The CAP update has been provided in multiple documents, for example, one CAP update for each F&R or protocol question.
- ✓ A CAP update has not been clearly linked to an ICAO F&R (i.e. LEG/01).
- ✓ A specific completion date is not indicated.
- ✓ A given CAP assessed as partially addressing or not addressing the ICAO F&R has not been revised.

Effective Development of CAPs

Conclusion

- ✓ You now have sufficient information on how a State should submit a CAP that fully addresses ICAO F&Rs.

- ✓ You now also have guidance on how a State should submit an effective CAP update.

- ✓ You will have the opportunity of practising these techniques on CAP examples provided during the Seminar/Workshop.

Group Exercise on CAPs

Group activity

❑ The class will be divided into groups.

❑ For each group, a facilitator will be appointed and will coordinate the discussion.

❑ Flip charts may be used to facilitate your discussions.

❑ A member of the group will present the evaluation of the assigned example to the participants of the Seminar/Workshop using laptop/projector.

Group Exercise on CAPs

Package contents for each of the eight examples

❑ F&Rs for Futureland

❑ Protocol questions identified in the F&Rs

❑ Futureland's Appendix 3 (original CAP)

❑ For CAP update exercises, there is also the following:

    ❑ F&Rs along with ICAO assessment of the original CAP

    ❑ Updated CAP

❑ Checklist for assessing CAP or CAP update (hardcopy)

❑ Blank CAP template (for assigned example only)

Group Exercise on CAPs

Required task

❑ Everybody has the eight examples on their CDs. For Spanish versions, these will be in hardcopy instead.

❑ Each person in his/her group should study and complete the checklist for their assigned example and:

    ❑ Carefully read the text related to each F&R, related protocol questions and CAP and, if applicable, CAP update; and

    ❑ Complete the checklist for their example: Sections 2 and 4 for CAPs, and Sections 3 and 5 for CAP updates, if applicable.

❑ Revise the CAP or CAP update for your assigned example so that it fully addresses the F&Rs using a blank template.

Group Exercise on CAPs

Required task (cont.)

❑ If time allows, complete the checklists for the other 7 examples.

❑ The selected person for each group gives a presentation to the class for the assigned example (limit time to 10 minutes):

  ❑ Briefly summarize F&R and flawed CAP or CAP update for assigned example

  ❑ Review answers to checklist questions;

  ❑ Explain the rationale behind your assessment of the CAP or CAP update; and

  ❑ Present your revised CAP or CAP update that fully addresses the F&Rs using completed Word template.

Guidance for Developing and Updating CAPs Effectively

THANK YOU!