

MRO - Panel: Industry View on Updates and Implications

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Steve Douglas

Vice President

CAVOK, a division of Oliver Wyman
720 Whitley Road | Keller, Texas 76248
Office: +1 817-380-2939 | Mobile: +1 682 444 1597
sdouglas@cavokgroup.com

Federal Aviation Administration's new Compliance Philosophy

The FAA's safety system is largely based on, and dependent upon, voluntary compliance with regulatory standards

FAA Compliance Philosophy

FAA Order 8000.373

- **Compliance Philosophy**
 - FAA's safety system is largely based on, and dependent upon, voluntary compliance with regulatory standards
 - Aviation communities have a statutory obligation to comply with established regulatory standards. This obligation includes a duty to develop and use processes and procedures that will prevent deviation from regulatory standards
 - To promote the highest level of safety and compliance with regulatory standards, the FAA is implementing Safety Management System (SMS) constructs based on comprehensive safety data sharing between the FAA and the aviation community
 - To foster an open and transparent exchange of data, the FAA believes that its compliance philosophy, supported by an established safety culture, is instrumental in ensuring both compliance with regulations and the identification of hazards and management of risk

When Deviations Or Occur

- **Deviations from Regulatory Standards**
 - When deviations from regulatory standards do occur, the FAA's goal is to use the most effective means to return an individual or entity that holds an FAA certificate, approval, authorization, permit or license to full compliance and to prevent recurrence
 - FAA recognizes that some deviations arise from factors such as flawed procedures, simple mistakes, lack of understanding, or diminished skills. The FAA believes that these deviations can most effectively be corrected through root cause analysis, training, education or other appropriate improvements which are documented and verified to ensure effectiveness.

Intentional Or Reckless

- **Intentional or Reckless Deviation**
 - Intentional or reckless deviations from regulatory standards, or deviations that otherwise present an unacceptable risk to safety, as posing the highest risk to safe operation require strong enforcement.
 - Regulatory violations involving law enforcement-related activities may be addressed with enforcement

Why do I need to know about SAS? How will it affect me?

SAS
Safety Assurance System

System Safety

- Employs a risk-based, data-supported system
- Optimizes safety by aiding in the identification of risks
- Verifies that safety is built into system design

Standardized Oversight

- Forms a closed-loop business process
- Allocates resources based on risk
- Allows for scalability to Certificate Holder's size and complexity

SAS Roles

Include the following:

- Initial Certification
- Continued Operational Safety
- Assurance Support

Continuous Improvement

- Builds on current successes
- Improves the safest aviation system in the world
- Meets future demand and complexity

SAS Tools

Includes data collection tools to:

- Collect, report, and review data
- Conduct objective and repeatable oversight

The Next Evolution of System Safety Oversight

To leave comments or ask questions about SAS, send an email to 9-AWA-AFS-900-SASO@faa.gov or contact your office START Member.

Federal Aviation Administration

- SAS tools can be extremely useful as your internal job aids
- The SAS tools are what your FAA inspectors will be using on you... if you use them first on yourself and discover a problem you may utilize the Self Disclosure process and may avoid civil penalty
- The FAA will most likely want to see completed SAS tools when you apply for a change to your certificate
- You will have access via an SAS “External Portal” to scoped SAS tools applicable to your certificate
- You will have access thru the External Portal to request changes to your certificate

“Its hard to play the game if you don't know what the rules are”

Source: FAA Order 8900.1 and FAA website AFS-900

References:

- FAA Order 8000.373, Federal Aviation Administration Compliance Philosophy
http://www.faa.gov/documentlibrary/media/order/faa_order_8000.373.pdf
- Flight Standards Service (AFS) Notice, N 8900.343, effective 2/2/2016. Flight Standards Service Compliance Policy. This established the AFS Compliance Philosophy Focus Team. This cancelled N8900.323
http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgOrders.nsf/0/080F718C592A5DE386257F54006A2D57?OpenDocument&Highlight=8900.343
- Flight Standards Information Management System (FSIMS) Order 8900.1, Volume 14, Chapter 1, Section 2 and Section 2
<http://fsims.faa.gov/PICResults.aspx?mode=EBookContents&restricttcategory=all~menu>
- Flight Standards Service (AFS) Notice, N 8900.331, effective 10/13/2015, Aviation Safety Action Program (ASAP), Voluntary Disclosure Reporting Program (VDRP) and the New Compliance Philosophy. Supplements current policy in FAA Order 8900.1.
[http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgOrders.nsf/0/7d736922efa05d7f86257ee60056c6f6/\\$FILE/N_8900.331.pdf](http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgOrders.nsf/0/7d736922efa05d7f86257ee60056c6f6/$FILE/N_8900.331.pdf)
- Flight Standards Service (AFS) Notice, N 8900.352, effective 3/9/2016, Aviation Safety Action Program (ASAP), Voluntary Disclosure Reporting Program (VDRP) and the New Compliance Philosophy. This notice cancelled Notice 8900.331
http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgOrders.nsf/0/56E0706B250D999586257F720077568F?OpenDocument&Highlight=8900.352
- FAA Compliance and Enforcement Program, Order 2150.3B, Chg 11, dated 01/24/2016 (Change 9 adopted FAA's New Compliance and enforcement program)
http://www.faa.gov/documentLibrary/media/Order/FAA_Order_2150_3B_W-Chg_11.pdf