



U.S. Department
Of Transportation
**Federal Aviation
Administration**

SOC

Safety Oversight Circular

SOC 11-01
DATE: September 30, 2011

Air Traffic Safety
Oversight Service (AOV)

Subject: Guidance to the Air Traffic Organization Regarding Corrective Action Plan Development in Response to Safety Compliance Issues

1. **PURPOSE OF THIS SAFETY OVERSIGHT CIRCULAR (SOC).** This Air Traffic Safety Oversight Circular provides guidance to the Air Traffic Organization (ATO) regarding the development of corrective action plans (CAP) submitted in response to safety compliance issues.
2. **WHERE CAN I FIND THIS SOC?** – This document can be downloaded from http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/aov/policies_forms/.
3. **DISPOSITION.** This guidance does not constitute a change to any requirement contained in FAA orders, manuals, etc. However, appropriate standard operating procedures should be changed to reflect the processes defined in this SOC.
4. **DEFINITIONS.** For the purposes of this SOC only, the following definitions apply:
 - a. **Noncompliance.** Failure to meet a requirement or standard.
 - b. **Safety Compliance Issue.** A failure to follow an FAA safety standard or ATO Safety Management System requirement that may manifest as a hazard in the National Airspace System (NAS). A safety compliance issue is resolved in accordance with FAA Order 8000.86, *Air Traffic Safety Oversight Compliance Process*.
 - c. **Corrective Action:** Any intervention or activity undertaken by the ATO to address a noncompliance with a safety standard or ATO SMS requirement.
 - d. **Corrective Action Plan.** A sequence of activities that the ATO proposes to resolve a safety compliance issue.
 - e. **Factors.** Those elements, that are root, causal or contributing, that led to the noncompliance.
 - f. **Milestone.** Any significant or important intermediate event or action.
 - g. **Systemic.** Relating to the entire system; in this case the NAS.
5. **BACKGROUND.** Experience has shown that guidance is needed to clarify what constitutes an acceptable CAP through which a safety compliance issue will be resolved. Excessive information exchange between the ATO and AOV has led to an inordinate amount of time and resources being spent to resolve safety compliance issues. A cooperative effort between the ATO and AOV, along with this guidance, should decrease the time it takes to resolve safety compliance issues and improve the safety of the NAS.

6. RELATED PUBLICATIONS.

FAA Order 1100.161 *Air Traffic Safety Oversight*

FAA Order 8000.86 *Air Traffic Safety Oversight Compliance Process*

7. ELEMENTS OF CAP. An acceptable CAP should include the following:

a. Factors.

A description of the factors (root, causal or contributing) that led to the noncompliance and the methodology used to identify them.

b. Steps to Eliminate Identified Factors.

A description of the actions the ATO proposes to take to eliminate the factors. The following items should be clearly explained.

1. Specific action(s) to be taken
2. The party responsible for:
 - i. Developing each action
 - ii. Executing each action
3. The expected outcome of each action.

c. Method to Determine Effectiveness.

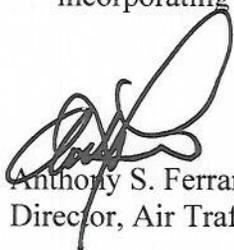
A description of the methods the ATO will use to determine the effectiveness of the actions described in paragraph 7b above. Examples include, *but are not limited to*; internal audits, monitoring, spot checks (30, 90, 120 days), and random sampling.

d. Timeline.

A timeline that includes the following actions and their associated milestones (when applicable):

1. Corrective actions.
2. When the corrective actions will be completed
3. When methods to determine effectiveness are expected to begin
4. When methods to determine effectiveness are expected to be completed
5. When the ATO expects to be in full compliance

Note: If a previously approved CAP is changed in any way by the ATO, a revised CAP incorporating that change must be submitted to AOV for approval.



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Appendix 1. Example of an ATO Response with an Acceptable Corrective Action Plan (with background noted)

The Air Traffic Safety Oversight Service conducted an audit to determine the Air Traffic Organization's compliance with safety logic systems requirements. The auditors found that X percent (X of X) of the facilities did not make required entries on FAA Form 7230-4, *Daily Record of Facility Operation*, regarding safety logic system alerts as required by FAA Order 7210.3, paragraph 11-9-3 b. Specifically, the audit team reviewed a total of XX cases of safety logic system alerts and found that X percent (X of X) were not logged on FAA Form 7230-4. As a result of this finding, informal safety compliance issue COMP-FYXX-XX was initiated.

Corrective Action Plan

Factors.

The ATO conducted a systemic assessment of facilities' procedures and practices for logging safety logic system alerts. The assessment revealed that safety logic system tests were conducted by technical operations personnel as required by FAA JO 6330.36A, *Maintenance of Airport Surface Detection Equipment Model X (ASDE-X) Facilities*, Chapter 3, Section 3, paragraph 593 b. These tests generated safety logic alerts, which air traffic personnel were directed to ignore. As a result of this practice, the required logging entries were not made.

Steps to Eliminate Identified Factors.

The ATO will send a mandatory training item to each Airport Traffic Control Tower (ATCT) describing the requirements to log safety logic system alerts, including "maintenance generated alerts outside of scheduled maintenance." ATO Terminal (AJT) will be assigned responsibility to develop and disseminate the training item. Each facility manager will be responsible to ensure the training is accomplished for all operationally current personnel. Upon completion of the training, it is expected that all operationally current personnel will have a clear understanding of their responsibilities to log all safety logic alerts and will execute those responsibilities for the required events.

Method to Determine Effectiveness.

The QCG will conduct assessments at randomly selected facilities over a three (3) consecutive month period to determine compliance with the requirement to log safety logic system alerts on the facilities' FAA Form 7230-4. The assessments will be forwarded to and reviewed by HQ AJT to determine the effectiveness of the corrective actions.

Timeline.

- No later than October 1, 2011 – ATJ will disseminate training item
- No later than November 1, 2011 – Operationally current personnel at ATCTs will complete training
- No later than November 15, 2011 – AJS will notify AOV when training has been completed
- No later than December 1, 2011 – QCG will conduct first random review of facilities' FAA Form 7230-4
- No later than January 1, 2012 – QCG will conduct second random review of facilities' FAA Form 7230-4
- No later than February 1, 2012- QCG will conduct third random review of facilities' FAA Form 7230-4.
- QCG will report the results of each review to HQ AJT within 10 business days after its completion.
- HQ AJT will report the monthly results to AJS within 10 business days of receipt from QCG.
- No later than February 20, 2012 - AJS will assess results to determine effectiveness of the corrective actions
- No later than April 1, 2012 – AJS will notify AOV of successful completion of the CAP, including the assurance that ATO is back in compliance with the requirement.