



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

**Air Traffic Safety
Oversight Service (AOV)**

SOC

Safety Oversight Circular

SOC: 13-13A

DATE: August 1, 2016

Subject: Corrective Action Plan Development and Acceptance in Response to Safety Compliance Issues

1. Purpose: This Safety Oversight Circular (SOC) provides information and guidance to the Air Traffic Organization (ATO) regarding the development of corrective action plans (CAP) in response to observations of noncompliance and observations of potential adverse safety impact. It describes the structure of a complete CAP and a process where by the ATO may submit a CAP to AOV for approval. It also provides information on types of feedback the ATO may receive from AOV. It explains how the ATO can submit an Interim Mitigation (IM) while working towards a complete CAP.

2. Audience: All offices of the ATO involved in the Safety Risk Management (SRM) process.

3. Where Can I Find this SOC:

http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/aov/policies_forms/

4. Background: To promote the highest level of safety and compliance with regulatory standards, this SOC was updated to reflect the Federal Aviation Administration's Compliance Philosophy by fostering a safety culture to ensure compliance with regulations and identification of hazards and management of risk. The development of corrective action plans is a complex and frequently lengthy process which requires collaboration between AOV and the ATO. When the ATO submits a complete CAP, AOV may provide feedback on individual sections rather than rejecting the plan in its entirety. This increases the opportunity for feedback, improves collaboration and reduces the processing time for CAP acceptance. This SOC also describes the different categories of noncompliance and provides procedures to assist the ATO to return to full compliance by the most effective means and prevent recurrence. This SOC 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.

5. Structure of a CAP. AOV recommends the use of the CAP template (see Appendix 1) for submission of CAPs. An acceptable CAP must be constructed in the following order:

- a. **Interim Mitigation (IM):** Identify the immediate actions taken to reduce the risk of the safety compliance issue. This is also known as Short Term Corrective Action. This element may be approved by AOV prior to submission of the remainder of the CAP. Include date(s)

of IM implementation.

b. **Factors:** Identify the causal and contributing factors that led to the noncompliance and the methodology used to identify them.

c. **Corrective Action Strategy:** Identify the specific actions to be taken to address the factors and to prevent recurrence. The following items should be clearly explained:

1. Specific action(s) to be taken.
2. The person and/or organization responsible for developing and executing the actions.
3. Proposed dates of implementation and completion for all actions.

d. **Compliance Verification:** Identify the specific actions to be taken to verify the effectiveness of the Corrective Action Strategy. The following items should be included:

1. Methods to be used to verify implementation and effectiveness of the actions taken to address the factors.
2. Safety Performance Targets (if applicable)
3. The person and/or organization responsible for developing and executing the actions.
4. Proposed dates of initiation and completion of the CAP.
5. The date the ATO expects to be in full compliance.

6. Observations of Noncompliance:

a. **CO Procedures:** AOV will notify the ATO of the noncompliance and expects the ATO to take corrective action to resolve the noncompliance. A compliance number will be assigned. COs do not require a response or CAP. AOV will monitor the noncompliance through various surveillance activities.

b. **C1 Level Compliance Procedures:** These observations relate to safety compliance issues that were previously reported as AOV CO noncompliances. These may include repeat noncompliances that have been reported to ATO from other organizations, such as NTSB. These procedures provide an avenue for the ATO to take corrective action to resolve the noncompliance at the lowest appropriate organizational level. AOV will notify the ATO of the noncompliance by sending a Memorandum of Noncompliance (MON). A compliance number will be assigned. No CAP is required. The ATO is expected to inform AOV upon correction of the noncompliance. AOV will monitor the noncompliance through various surveillance activities.

c. **C2 Level Compliance Procedures:** AOV will notify the ATO of the noncompliance by sending a MON. A compliance number will be assigned. A CAP is required. AOV requires the ATO to respond within 10 business days of receipt of the MON. If the issue is complex in nature, AOV may accept an Interim Mitigation which allows the ATO to provide the remainder of the CAP no later than 21 business days from acceptance of the IM or request an extension for CAP development. AOV may also consider a memorandum acknowledging the noncompliance with a date AOV can expect a CAP. For all submissions, AOV will respond within 10 business days with:

1. Approval of an IM with a date to provide the remainder of the CAP or
2. Disapproval of an IM with reason(s) for not approving or
3. Acceptance of a complete CAP or
4. A request for more information.

When the CAP has been determined to be complete and acceptable, AOV will send a CAP Acceptance memo, which closes the issue. AOV will continue to track and monitor the issue, which may be subject to follow-on verification.

d. **C3 Level Compliance Procedures:** AOV will notify the ATO of the noncompliance by sending a MON. A compliance number will be assigned. A CAP is required. AOV requires the ATO to respond within 5 business days of receipt of the MON. AOV may accept an Interim Mitigation which allows the ATO to provide the remainder of the CAP no later than 21 business days from acceptance of the IM or request an extension for CAP development. For all submissions, AOV will respond within 10 business days with:

1. Approval of an IM with a date to provide the remainder of the CAP
2. Disapproval of an IM with reason(s) for not approving
3. Acceptance of a complete CAP
4. Request for more information

When the CAP has been determined to be complete and acceptable, AOV will send a CAP Acceptance memo. Implementation of the CAP is monitored by AOV. After the ATO provides satisfactory verification that the CAP adequately mitigated the noncompliance, AOV will conduct follow-on actions to verify the effectiveness. When verification is confirmed, AOV will send a Letter of Correction (LOC) to the ATO which closes the issue.

e. If a previously accepted CAP is modified by the ATO, a revised CAP, incorporating that change, must be submitted to AOV for review and acceptance.

7. **Observations of Potential Adverse Safety Impact:** These are issues that may have a potential adverse impact on the safety of the NAS, but do not relate to specific requirements, and would not be considered noncompliances. Examples may include a break in continuity of management controls or requirements or discrepancies in procedures between controllers or facilities. AOV will notify the ATO of the issue by identifying it in a report or memorandum. A compliance number will be assigned. A CAP is not required. AOV expects ATO to use its SMS procedures to examine the potential safety risk and to validate safety concerns. AOV will monitor the issue through various surveillance activities, such as a surveillance plan.

8. Definitions:

- a. **Business Day:** A day of the week when HQ, FAA in Washington DC is open and operating.
- b. **CAP Acceptance:** Acceptance of a complete CAP by AOV.
- c. **Complete CAP:** Contains in order: Interim Mitigation, Factors, Corrective Action Strategy and Compliance Verification.
- d. **Compliance Verification:** Methods used to verify implementation and effectiveness of actions identified in approved CAPs by ensuring those actions were successful in correcting the non-compliance and preventing recurrence
- e. **Corrective Action Plan (CAP):** A plan of action that documents the interim mitigations, factors, corrective actions, and methods of verification to resolve a safety compliance issue. This plan includes dates of completed actions and/or expected dates for completion of all actions.
- f. **Corrective Action Strategy:** Specific actions taken to address the factors (causal and contributing) and prevent recurrence.
- g. **CAP Sections:** One of four distinct parts of a CAP: Interim Mitigation, Factors, Corrective Action Strategy and Compliance Verification.
- h. **Factors (contributing and causal):** Action(s), condition(s) and/or event(s) that led to the noncompliance.
- i. **Interim Mitigation (IM):** Immediate actions taken to reduce the risk of a hazard. This is also known as Short Term Corrective Action.
- j. **Letter of Correction (LOC):** The Letter of Correction is sent from AOV to ATO to document ATO's correction of instances of noncompliance. An LOC is only sent to close a C3 level safety compliance issue.
- k. **Noncompliance:** Failure to meet a requirement or safety standard.
- l. **Requirement:** An essential attribute or characteristic of a system. It is a condition or capability that must be met or passed by a system to satisfy a contract, standard, specification, or other formally imposed document or need.
- m. **Risk:** The composite of predicted severity and likelihood of the potential effect of a hazard.
- n. **Safety Compliance Issue:** Failure to follow an FAA safety standard or the ATO Safety Management System requirement that may manifest as a hazard in the National Airspace System (NAS).



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Attachment: Appendix 1 – Example of Acceptable Corrective Action Plan

Appendix 1 – Example of Acceptable Corrective Action Plan

Compliance Number: COMP-FY27-219

AOV Surveillance Number: ADT-FY27-25

Requirement: FAAO 1100.161, Air Traffic Safety Oversight, paragraph 4-2- b(1), JO 7210.54, FAA Contract OTwer (FCT) Operation and Administration, parpagraph 12c(1), JO 7210.3, Facility Operation and Administration, paragraph 2-1-7b1.

Description/Summary of Noncompliance: The ATO was not in compliance with FAA Order 1100.161 whi states that air traffic control services provided by ATO, and by each person or provider with whom it arranges for the performance of that work, must be performed in accordance with appropriate FAA directives, manuals, and orders. This finding is supported by the following evidence.

Supporting Data/Evidence: The FCT Program Office and the Terminal Service Area Office did not provide supporting documnetation demonstrating coordination regardaing the number of FAA controllers to be assigned to specific events. A supervisory plan for special events requiring FAA supplemental satffing had not been developed as required by JO 7210.54. Seven (7) percent (1 out of 24) of the FCTs did not have the operational contingency plan (OCP) posted in the facility opertions quarters as required by JO 7210.3.

1. Interim Mitigation: (Actions taken to address the immediate issue)	Persons or Organizations Responsible for developing and executing the identified actions	Date Interim Mitigation was implemented
Add maintaining the OCP in the operations quarters as a special emphasis item to the FCT June 2007 monthly report.	FCT Program Office	2/7/07
Have vendors continue to conduct facility inspections/audits and report the results to ensure the OCP is properly maintained in the facility operations quarters.	FCT Program Office Personnel	2/7/07

2. Factors: (Identify the causal and contributing factors that may have caused the noncompliance)	Person/Organization responsible for identifying Factors	Methods used to determine factors (i.e. Statistical sampling, inspections, etc.)
FCT Program Office did not ensure plans for supplemental staffing for special events were developed or distributed due to an oversight of their responsibility.	FCT Program Office Personnel	FCT Program Office conducted a 100% sampling of the 14 FCTs. It was determined that 35% (5 out of 14) of the sampled FCTs did not have the OCPs posted in the facility operations quarters as required.
Employees take documents out of the operations quarters and do not return them.	FCT Program Office Personnel	FCT Program Office conducted a 100% sampling of the 14 FCTs. It was determined that 35% (5 out of 14) of the sampled FCTs did not have the OCPs posted in the facility operations quarters as required.

3. Corrective Action Strategy: (Actions to address the factors and prevent recurrence)	Person/Organization responsible for developing and executing actions	Proposed implementation Dates	Proposed Completion Dates
Every year, develop a supervisory plan for FAA supplemental staffing at least two months before upcoming special events take place.	District Managers, Service Center Quality Control Groups (assistance from FCT Program Office)	5/30/08	4/30/11
Request and maintain a copy of supervisory plans to post on the FCT KSN site.	FCT Program Office	5/30/08	4/30/11
Post the FAA Supplemental Staffing Schedules with the supervisory plans on the FCT KSN site.	FCT Program Office	5/30/08	4/30/11
Add auditing supervisory plans as a yearly auditable item.	FCT Program Office	5/30/08	4/30/11
Establish Quality Assurance Team to include ISO auditors.	Vendors - FCT Program Office will verify what vendors have done	5/30/08	4/30/11
Utilize a checklist to ensure the OCP and other required documents is maintained in the operational quarters.	Vendors - FCT Program Office will verify what vendors have done	5/30/08	4/30/11

4. Compliance Verification: (methods used to verify implementation and effectiveness. Include Safety Performance Targets if applicable)	Person/Organizations Responsible for developing and executing the identified actions	Proposed Dates of Initiation of methods	Proposed Dates of completion of methods
Audit FCT KSN site to verify supervisory plans and FAA Supplemental Staffing Schedules for special events were developed, maintained and current	FCT Program Office and Service Center Implementaion Managers	5/1/10	5/8/11
Conduct service verification evaluations to ensure that the facilities are in compliance with air traffic control regulations and procedures.	FCT Program Office and Service Center Implementaion Managers	5/1/10	5/8/11
Conduct facility inspections to ensure that the facilities are in compliance with air traffic control regulations and procedures.	FCT Program Office and Service Center Implementaion Managers	5/1/10	5/8/11
Create a facility checklist for both service evaluations and facility inspections to reflect tht the required documentation be maintained in the operational quarters.	FCT Program Office and Service Center Implementaion Managers	5/1/10	5/8/11

Date ATO expects to be in full compliance: 5/15/11	Date of AOV CAP Acceptance: 5/12/08	Date ATO reported returning to compliance: 4/30/11	Date AOV verified return to compliance: 8/22/11
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