



## Compliance Philosophy

The FAA's Compliance Philosophy constitutes a major cultural change with respect to how the agency goes about ensuring regulatory compliance. It is an important step towards fostering an open and transparent exchange of safety information and obtaining a higher level of safety and compliance with regulatory standards.

### What is Compliance Philosophy?

Simply put, the goal of the Compliance Philosophy is to identify safety issues that underlie deviations from standards and correct them as effectively, quickly, and efficiently as possible. To do this, Compliance Philosophy embraces self-disclosure of errors. It also involves collaborating with the aviation community to share information about safety issues that underlie deviations from standards. Errors must be identified, reported, and analyzed in a non-blaming manner so that appropriate remedial or system-wide corrective action can be taken based on the specific facts and circumstances of each case.

A "just culture" allows for due consideration of honest mistakes. But, even unintentional errors can have a serious impact on safety, so it's critical that the underlying safety concern is always addressed. The key is where to draw the line between blameless unsafe acts that can be addressed by using compliance tools, and unacceptable behavior that requires enforcement action.

### It's All About Safety

The Compliance Philosophy is all about improving safety. Our safety record shows that the majority of National Airspace System users have a good safety culture. The success of FAA voluntary reporting programs such as the Aviation Safety Action Program (ASAP) and Voluntary Disclosure Reporting Program (VDRP) has demonstrated that a collaborative compliance philosophy, supported by a positive safety culture, provides the highest levels of



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compliance with regulations, the most effective identification of hazards, and the most efficient management of risks. Through increased sharing of safety data, we can better identify emerging hazards and predict aviation risks, including many of those that may contribute or directly lead to a loss of control situation.

## Compliance Action

The FAA's Compliance Philosophy emphasizes non-enforcement, or "Compliance Action" where appropriate. A Compliance Action is the FAA's method for correcting unintentional deviations that come from things like flawed systems and procedures, simple mistakes, lack of understanding, or diminished skills. The FAA believes that deviations of this nature can be most effectively corrected through root cause analysis and training, education, or other appropriate improvements to procedures or training programs.



A Compliance Action is not a finding of a violation. Rather, it is an open and transparent exchange of safety information between you and the FAA. Its only purpose is to restore compliance and correct the underlying causes that led to the deviation. In other words, if you've made an honest mistake, a temporary lapse of judgment, or have let your skills become rusty, you may be able to 'fix' the problem without facing a violation.

However, an airman who indicates that he

or she is unwilling or unable to comply, or shows evidence of intentional deviation, reckless or criminal behavior, or other significant safety risk, would be ineligible for a Compliance Action.

## Compliance and Enforcement

The FAA expects compliance to be the standard. This evolved approach to oversight does not mean that the agency is going to go easy on compliance. It will continue to use enforcement action when needed. The FAA will maintain strict accountability for inappropriate risk-taking and will have zero tolerance for intentional or reckless behavior.

However, the FAA will not use enforcement as the first tool in the toolbox. In all cases, the goal of the FAA Compliance Philosophy is to achieve rapid compliance, to eliminate a safety risk or deviation, and to ensure positive and permanent change.

In summary, the Compliance Philosophy will help to identify the root cause of a safety issue, find a fix, and monitor the success of that fix. With the data collected from this process, the FAA hopes to predict and prevent future occurrences through education, training, and improvement to systems and processes.

## Resources

- FAA Order 8000.373 on Compliance Philosophy [www.faa.gov/documentLibrary/media/Order/FAA\\_Order\\_8000.373.pdf](http://www.faa.gov/documentLibrary/media/Order/FAA_Order_8000.373.pdf)
- Online overview of Compliance Philosophy [www.faa.gov/go/cp](http://www.faa.gov/go/cp)
- Compliance Philosophy brochure [www.faa.gov/about/initiatives/cp/media/CP\\_Brochure.pdf](http://www.faa.gov/about/initiatives/cp/media/CP_Brochure.pdf)
- Jan/Feb 2016 issue of *FAA Safety Briefing* [www.faa.gov/news/safety\\_briefing/2016/](http://www.faa.gov/news/safety_briefing/2016/)

