

GUIDANCE FOR STATES ON DEVELOPING CORRECTIVE ACTION PLANS (CAPs)

(Revised July 2016)

To enable ICAO, through the Monitoring and Oversight Branch, to review and assess the acceptability of a proposed corrective action plan (CAP) as well as monitor progress in the implementation of the accepted CAPs, States must submit and update CAPs that meet certain criteria.

Following the tips and suggestions in this guidance will assist States to develop effective CAPs that would meet ICAO's criteria.

Criteria

Initial proposed CAPs and subsequent CAP updates should meet the following six criteria:

- 1) *Relevant* — CAPs should address the issues and requirements related to the finding and corresponding PQ and Critical Element (CE).
- 2) *Comprehensive* — CAPs should be complete; including all elements or aspects associated with the finding.
- 3) *Detailed* — CAPs should be laid out in a step-by-step approach, as required, to outline the implementation process.
- 4) *Specific* — CAPs should identify who will do what, when, in coordination with the responsible office or entity.
- 5) *Realistic* — CAPs should be realistic in terms of contents and implementation timelines.
- 6) *Consistent* — CAPs should be consistent in relation to other CAPs and with the State self-assessment.

State Comments

If the State disagrees with a finding issued by ICAO and does not submit a CAP for the finding, the State must provide a clear and detailed reason in the "State Comment" field on the USOAP CMA online framework (OLF).

General

- Ensure that the required information for each part of the CAP are entered in the correct field of the CAP module on the USOAP CMA online framework (OLF).

- The fields for the CAP module (as they appear on the OLF) are as follows:

	Step	Proposed Action	Action Office	Evidence Reference	Est. Imp. Date	Rev. Imp. Date	Date of Completion	Progress
		See "Developing a CAP" section below.	See "Action Office" section below.	See "Evidence Reference" section below.	See "Estimated implementation Date" section below.	If there is a change to EID, indicate new revised date.	Indicate actual date of completion of action plan.	Indicate if "completed" or percentage of implementation progress (i.e. 25%, 50% or 75%).

Developing a CAP — Steps and proposed action items

- Ensure that the proposed actions in a CAP directly and fully address the PQ finding and ICAO provisions as stated in the ICAO reference/guidance.
- Break down large action items into smaller, more manageable elements.
- Describe each proposed action in a clear and detailed manner.
- List the step-by-step corrective actions in the correct sequential and/or chronological order (e.g. establishing a requirement, elaborating supporting procedure(s), generating associated checklists, and providing training before implementing it).
- Provide a good and clear working plan and adequate detail for the implementation of each step of the proposed corrective actions.
- For PQ findings associated with CEs 6, 7 and 8, i.e. "implementation" CEs, provide necessary details (i.e. evidences and examples) on implemented requirements and procedures.

Note.— Evidences of progress in CAP implementation are attached ("imported") by using the "self-assessment" field on the USOAP CMA online framework. ([Click to Update PQ Status or Attach Evidence](#))

Action office

- Ensure that the responsible action office is indicated for each one of the corrective action steps.
- If more than one organization or entity are involved in each step, identify and record each one clearly.
- Ensure that the action offices identified in each step of the corrective action have the authority to complete the action, especially with respect to the promulgation of legislation and/or regulations.
- For higher-level corrective actions, such as the promulgation of primary aviation legislation, enter the name of the entity which has the authority to complete the action.
- Spell out the acronym for the title of an action office the first time it is used in the CAP; use the acronym thereafter.

Evidence reference

- Indicate the document containing the evidence in a clear manner.
- Provide a specific and clear reference to the page, section or paragraph of the document that contains the information that ICAO needs to review and validate.
- Avoid broad and generic reference to a large document. Be as specific as possible.

Estimated implementation date

- Ensure that an estimated implementation date (est. imp. date or EID) is entered for each step in order to save the CAP.
- Ensure that the EID is realistic for the action item.
- Ensure that the EID is appropriate for the level of risk associated with the finding.
- The EID should be the date of completion for the action item.

Responding to ICAO's assessment

- If ICAO initially assesses a CAP as not addressing or only partially addressing the PQ finding, revise the CAP and ensure that it addresses the shortcomings indicated by ICAO.

Updating CAPs

- As per the signed MOU between the Member State and ICAO, ensure continuous updating of CAPs by indicating all of the following:
 - a) a progress level (in percentage %) for each action item as it is implemented; and
 - b) the date of completion for each completed action item.
- If the initial estimated implementation date of an action item has passed and the action has not been completed (or not fully implemented yet), provide a revised implementation date.

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