IOSA Support Program

1. Introduction

The crisis has brought aviation to a halt. Travel restrictions have limited operators and governments to execute routine operations. The same crisis introduced the urgent need to introduce new operation types such as transporting cargo in the passenger cabin.

In alignment with the IATA Board's declaration of the Five principles for re-starting aviation, the IATA Operational Safety Audit program (IOSA) is being revised to offer a safety focused, attainable, flexible and effective approach in light of the COVID-19 crisis.

The IOSA Support Program is based on the following three objectives:

1	Support Airlines with pertinent & affordable audit solution.	2	Ensure minimum industry-wide safety assurance activity during the crisis.	3	Contribute to reopening of air traffic by providing trustworthy audit results to CAAs.

2. Background

Under the governance IOSA Oversight Council (IOC), and the guidance of the Safety, Flight and Ground Operations Advisory Council (SFGOAC), IATA introduced a series of relief measures for IOSA registered Operators and IOSA Auditors to manage the impact of the COVID-19:

- Registration expiry dates are calculated from the on-site closing meeting date instead of the last expiry date.

- IOSA Standards Manual (ISM) Edition 14 has been deferred until further notice with a future effective date anticipated for September 2021.

- Temporary Revision to ISM Edition 13 has been issued to extend Active Implementation and Parallel Conformity Option dates therein.

- Rules on consecutive use of Audit Organizations were clarified and IOSA Auditor qualification and currency requirements were revised.

- IOSA Guidance for Safety Monitoring under COVID-19 Ed 1 and Ed 2 are issued.

- Until 31 July 2020, Operators that are unable to undergo or complete a registration renewal audit prior to the current expiry date will be able to submit a claim of Extenuating Circumstances for Audit Conduct. A validated claim grants them with additional 180 calendar days following the current expiry date. Following 31 July 2020, this option will remain available for carriers that ceased operations.

Documentation related to above information can be found at www.iata.org/iosa.

IATA has received support and acceptance from CASA, EASA & FAA regarding the introduced measures.

The following chapters summarize the new measures that are being introduced under the IOSA Support Program.
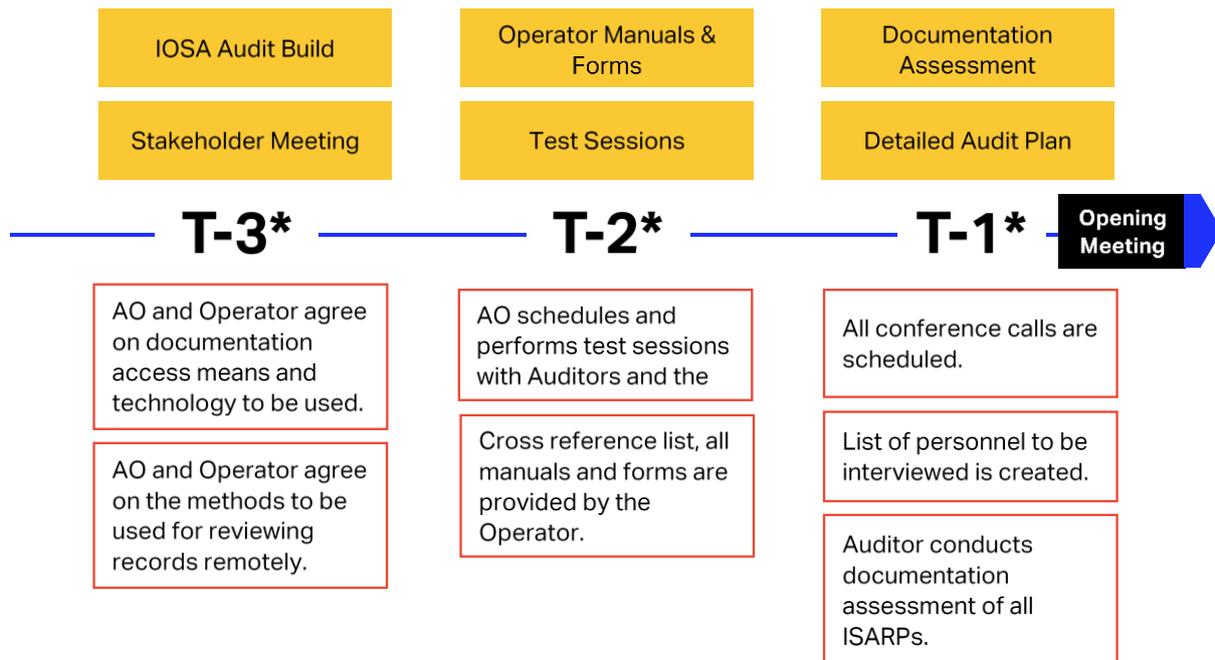
3. Remote IOSA Audit

3.1 General

One objective of the IOSA Support Program is to ensure a minimum industry-wide safety assurance activity during the crisis, especially in light of constrained regulatory safety oversight. Travel restrictions pose a challenge to the conventional onsite IOSA Audit. Therefore, a remote IOSA Audit option is introduced while the full scope on site audit option remains available.

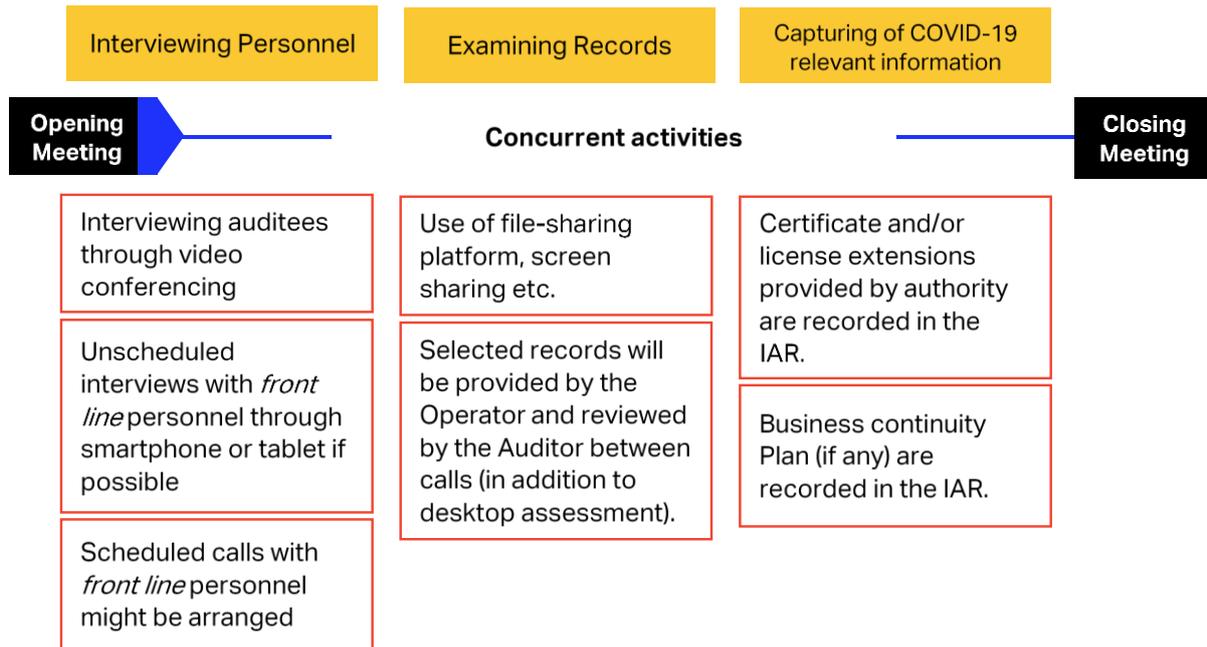The Remote IOSA Audit is introduced as following:

- The scope of the Audit is considerably reduced to comprise:
    - IOSA Standards that are safety-critical during the COVID-19 crisis;
    - The number of the provisions for the Audit have been reduced using a simplified risk rating method;
    - Capturing of information related to extensions and exemptions granted to the Operator by its civil aviation authority in line with the ICAO COVID-19 Contingency Related Differences (CCRD);
    - Capturing of information related to business continuity plans of the Operator.
- The task of reducing the scope has been performed by the IOSA Task Forces and IATA under the governance and control of the IOC.
- The Audit is available at a lower fee, travel and accommodation costs of the auditors are eliminated.
- IOSA registered Operators can select between a full scope on site or reduced scope remote audit. IATA recommends the onsite audit whenever feasible.

3.2 Remote Audit Methodology

The Audit will be performed remotely without onsite presence of the auditors. Mandatory observations will not be performed, however new methods will ensure the evaluation of the implementation is effective. The Audit will be performed in the following phases. Detailed audit procedures will be released in the IOSA Audit Handbook at www.iata.org/iosa.

IOSA Audit Build	Operator Manuals & Forms	Documentation Assessment
Stakeholder Meeting	Test Sessions	Detailed Audit Plan

T-3* ———— **T-2*** ———— **T-1*** — Opening Meeting

AO and Operator agree on documentation access means and technology to be used.	AO schedules and performs test sessions with Auditors and the	All conference calls are scheduled.
AO and Operator agree on the methods to be used for reviewing records remotely.	Cross reference list, all manuals and forms are provided by the Operator.	List of personnel to be interviewed is created.
		Auditor conducts documentation assessment of all ISARPs.

* Weeks

3.3 Registration Periods

3.3.1 Initial Registration Audits

Initial registration Audits can only be performed onsite and following the conventional audit process laid down in the IOSA Program Manual Edition 12.

3.3.2 Registration Renewal Audits

The following paragraphs outlines different types of registration renewal audits which are introduced with new IPM revision. The legend to the below graphics can be found in Appendix one.

3.3.2.1 Full Scope Onsite Registration Renewal Audits

Full scope onsite Audits are performed within the operator's 150-day window prior to the registration expiry date. The Operator will have maximum 90 calendar days following the expiry date to close any findings and the Audit.

Additionally, the Operator can project closure of findings that are related with regulatory extensions in an additional 270-day window following the expiry date. This will be achieved through an Active Implementation Option in which the operator has to demonstrate how the finding will be rectified in the future.

COVID-19 Contingency Related Differences (CCRD) provided by States are publicised on the ICAO website here and on the IATA website here

Following a successful Audit closure, the airline will be registered for 24 months following the expiry date. Following the 24 months registration period, it is expected that the Operator will be able to undergo a full scope onsite registration renewal audit.

3.3.2.2 Reduced Scope Remote Registration Renewal Audits

If the Operator choses to perform the renewal Audit remotely, the Audit will still be performed in the 150-day window prior to the registration expiry date. The Operator will have maximum 90 calendar days following the expiry date to close any findings and the Audit.

Additionally, the Operator can project closure of findings that are related with regulatory extensions in an additional 270-day window following the expiry date. This will be achieved through an Active Implementation Option in which the Operator has to demonstrate how the finding will be rectified in the future.

Following a successful Audit closure, the airline will be registered for 12 months following the expiry date.

The registration renewal rules for the Audit following the twelve months registration period are yet to be determined.

3.3.2.3 Reduced Scope Remote Audit while under Claim of Extenuating Circumstances

If the Operator is currently under a claim of extenuating circumstances, the Operator remains registered until the expiry of the extension period. Therefore, the operator might perform the renewal Audit during the 150-day window prior to the IOSA registration expiry, or within the extenuating circumstances period after the IOSA registration expiry.

If the Operator choses to undergo the renewal Audit remotely, the Operator will have maximum 90 calendar days following the Extended Deadline Date (typically 180 calendar days following the registration expiry) to close any findings and the Audit.

Additionally, the Operator can project closure of findings that are related with regulatory extensions in an additional 270-day window following the expiry date. This will be achieved through an Active Implementation Option in which the operator has to demonstrate how the finding will be rectified in the future.

Following a successful Audit closure, the airline will be registered for 12 months following the expiry date. The registration renewal rules for the Audit in twelve months are yet to be defined.

3.3.2.3 Full Scope Onsite Registration Renewal Audit while under Claim of Extenuating Circumstances

If the Operator is currently under a claim of extenuating circumstances, the operator remains registered until the Extended Deadline Date (typically 180 calendar days following the registration expiry). Therefore, the Operator might perform the renewal audit during the 150-day window prior to the IOSA registration expiry, or within the extenuating circumstances period after the IOSA registration expiry.

If the Operator choses to undergo the renewal audit full scope and onsite, the Operator will have maximum 180 calendar days following the onsite closing meeting date to close to close any findings and the audit.

Additionally, the Operator can project closure of findings that are related with regulatory extensions in an additional 270-day window following the expiry date. This will be achieved through an Active Implementation Option in which the operator has to demonstrate how the finding will be rectified in the future.

Following a successful audit closure, the airline will be registered for 24 months following the expiry date or following the onsite closing meeting date, whichever is later.

Following the 24 months registration period, it is expected that the operator will be able to undergo a full scope onsite registration renewal audit.

4. Audit Reports and Operator Questionnaires

Numerous states complement their operator oversight with the information provided through IOSA Audits. IOSA requirements are embedded into regulations or are mandated. For this purpose, IATA has numerous Memorandums of Understanding in place with states.

Operators submitting a claim of Extenuating Circumstances provide relevant information by means of an Operator Questionnaire. With IPM Ed. 12 TR 4, this requirement is now extended all registered, regardless if a claim of extenuating circumstances is in place or not.

Completed questionnaires are shared with authorities and partner airlines under the same principles as the IARs. No IAR or questionnaire will be shared without the Operator's consent.

5. Discontinuation of the EC Policy

The Program option for Extenuating Circumstances for Audit Conduct was introduced to allow operators to defer their IOSA Audits to a later date. Claims can be made once an Operator enters its registration renewal window 150 calendar days prior to the registration expiry date.

In the meantime, the Remote Audit has become available as a Program option.

Therefore, the IOSA governance decided that claims of Extenuating Circumstances for Audit Conduct will be replaced with the Remote Audit option. The Remote Audit can be accomplished under the majority of circumstances.

With the introduction of IPM Ed.12 Temporary Appendix Operators can submit a claim Extenuating Circumstances for Audit Conduct until 31 July 2020.

Starting 1 August 2020, claims of Extenuating Circumstances for Audit Conduct will only be considered for Operators that do not conduct any flights due to the COVID-19 outbreak.

If an Operator's validity of the Claim of Extenuating Circumstances for Audit Conduct is before 21 February 2021, IATA will extend the validity to 21 February 2021.

6. Guidance and Webinars

To further assist Operators, the IOSA Guidance for Safety Monitoring under COVID-19 was published in May 2020 and reissued in June 2020. The document can be found at www.iata.org/iosa.

This guidance is continuously revised in alignment with IOSA program policies and industry best practices.

IATA will introduce webinars and workshops as necessary to communicate the Remote Audit process and related options as well as to provide assistance regarding safety, quality and compliance monitoring.

Appendix I – Graphic Legends

	Registration Renewal Window (begins 150 calendar days prior to registration expiry date)
	Extended Deadline Date The Extended Deadline Date is the date given to an Operator with a validated claim of Extenuating Circumstances for Audit Conduct, by which a renewal audit must be conducted and closed in order to retain IOSA registration. Up to 90 days following expiry date/deadline date
	Closing Meeting
	Regular Closure Period
	Extended Deadline Date The Extended Deadline Date is the date given to an Operator with a validated claim of Extenuating Circumstances for Audit Conduct, by which a renewal audit must be conducted and closed in order to retain IOSA registration. Up to 180 days following closing meeting date
	Conformity – Active Implementation Conformity – Active Implementation is the assessment used for provisions where an Operator has demonstrated conformity using an active implementation plan. This type of assessment is reserved for cases where an operator would be in non-conformity, however the operator has received a COVID-19 related exemption from the regulator for the same requirement.
	Extenuating Circumstances Period Typically, six months following the expiry date.