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Subcommittee on Aviation
United States Senate**

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Progress and Challenges in Responding to Key Provisions of the Airline Safety Act

**Statement of
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Madam Chairman and Members of the Subcommittee:

Thank you for inviting me here today to testify on the Federal Aviation Administration's (FAA) progress in implementing advanced standards for pilot training and new safety measures for air carriers. As you know, following the 2009 Colgan Air crash, Congress and FAA took swift action to implement measures for improving pilot training and qualifications programs, reducing flight crew fatigue, and ensuring operators meet safety standards. These efforts culminated with the August 2010 passage of the Airline Safety and FAA Extension Act,¹ which contains new requirements to enhance safety in these areas. Effective implementation of these requirements should go a long way in improving safety in commercial airline travel.

Prior to passing the Act, this Subcommittee, as well as the House Committee on Transportation and Infrastructure, requested that we review FAA and industry efforts to enforce new Federal regulations for flight crew rest requirements and address fatigue issues and airline pilot training program weaknesses. Since we began our work in 2009, we have issued three reports.² Our testimony today is based on those reports as well as our ongoing work regarding implementation of the Act. Today, I will focus on (1) FAA's progress in responding to provisions of the Act, (2) the challenges FAA faces in implementing certain provisions, and (3) concerns related to achieving the full measure of safety enhancements intended by the Act.

IN SUMMARY

FAA has met or is on schedule to meet many of the Act's requirements, such as improving pilot rest requirements and establishing better processes for managing safety risks. However, FAA has not met timelines for raising pilot training standards, implementing mentoring programs, providing enhanced leadership skills to captains, and increasing minimum pilot qualifications. FAA also faces challenges in establishing a pilot records database—an important component for enhancing the air carrier screening process for pilot applicants. In addition to overcoming these challenges, FAA needs to provide additional guidance and assistance to industry—especially smaller carriers—in developing and managing new safety programs.

BACKGROUND

The 2010 Act included 16 provisions to improve airline safety and pilot training with milestones spread over a 3-year period. The Act called for advanced standards for

¹ Airline Safety and Federal Aviation Administration Extension Act of 2010, Pub. L. No. 111-216, August 1, 2010.

² OIG Correspondence Number CC-2009-074, "Letter to Senators Rockefeller, Hutchinson and DeMint Regarding Commercial Aviation Accidents, Pilot Experience and Pilot Compensation," February 9, 2011. OIG Report Number AV-2011-176, "FAA and Industry Are Taking Action To Address Pilot Fatigue, but More Information on Pilot Commuting Is Needed," September 12, 2011. OIG Report Number AV-2012-027, "New Approaches Are Needed To Strengthen FAA Oversight of Air Carrier Training Programs and Pilot Performance," December 20, 2011. OIG reports are available on our Web site: www.oig.dot.gov.

pilots, including required rulemaking activities for training programs, crewmember screening and qualifications, and new fatigue regulations to improve passenger safety. These rulemaking activities are complex, and some have encountered significant air carrier opposition. In addition to notice and comment periods required by law, FAA must conduct detailed analyses of each rule's likely effects and coordinate with stakeholders. The Act also included several important initiatives that FAA did not complete during its Call to Action on Airline Safety,³ such as developing mentoring and professional programs for pilots and following up with air carriers on efforts to adopt voluntary safety programs. In addition, the Act requires FAA to establish a pilot records database that air carriers must access to review qualifications and past performance data before hiring pilots. (See exhibit for further detail and current status of FAA's efforts in each section of the Act.)

FAA MET ACT REQUIREMENTS TO ADDRESS PILOT FATIGUE AND ADVANCED SOME SAFETY INITIATIVES AT AIR CARRIERS

FAA developed a concerted strategy to meet the Act's stringent timelines and implement new safety programs, including issuing a final rule on crew rest and fatigue, increasing air carrier use of voluntary safety programs, and advancing Safety Management Systems (SMS).

FAA Overhauled Flight and Duty Time Regulations

In January 2012, FAA updated its flight and duty time regulations for Part 121⁴ air carrier pilots to better ensure pilots are rested when they fly. This is a significant achievement for the Agency given that these updates were the first modifications to the regulations since 1985 and that the proposed rule received over 8,000 comments from the aviation industry, mostly opposing the planned requirements.

Unlike the old rules—which included different rest requirements for domestic, international, and unscheduled flights—the new regulations establish one set of rules that are based on scientific factors, such as the time of day pilots begin their first flight, the number of scheduled flight segments, and the number of time zones crossed. Pilots are also now required to affirmatively state that they are fit to fly and are prohibited from flying during a scheduled duty period when they report fatigue. Other key changes in the new flight and duty time regulations include a 10-hour minimum rest period prior to duty, a 2-hour increase over the previous rule, and 30 consecutive hours free from duty per week—an increase of 25 percent over the previous regulation requirements.

³ FAA's Call to Action Plan, announced on June 24, 2009, consisted of 10 short- and mid-term initiatives to enhance pilot performance and training, increase air carrier participation in voluntary safety programs, and expand pilot records review. FAA also set goals to develop new safety oversight guidance to its inspectors, issue rulemakings on pilot fatigue and training, conduct regional safety forums to discuss industry best practices, and develop programs addressing pilot professionalism.

⁴ 14 CFR Part 121, Operating Requirements: Domestic, Flag, and Supplemental Operations.

FAA Promoted Air Carriers' Use of Voluntary Safety Programs

In March 2011, FAA completed a congressionally required review of Part 121 air carriers' use of voluntary safety programs⁵ and later devised a plan to help smaller air carriers implement these programs. Data gathered through voluntary safety programs can be used to identify the trends and patterns that represent risks. The Act targets air carrier participation in three such programs that FAA oversees:

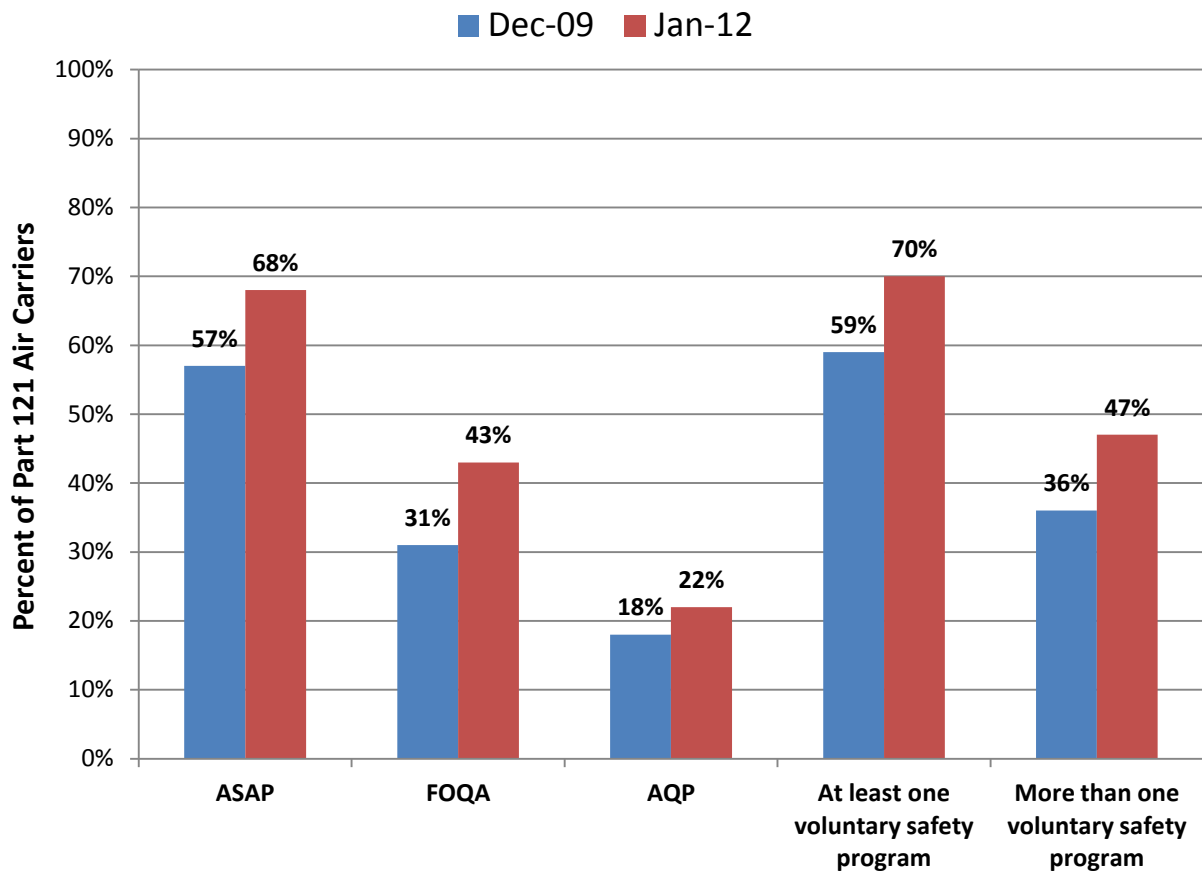
- *Aviation Safety Action Program (ASAP)*, which encourages air carrier and repair station employees to voluntarily report safety information that may be critical to identifying potential precursors to accidents without fear of enforcement or disciplinary action.
- *Flight Operational Quality Assurance (FOQA)*, which collects and analyzes digital flight data generated during scheduled flights to provide greater insight into performance and operations.
- *Advanced Qualification Program (AQP)*, which provides a voluntary alternative to traditional training standards by incorporating data-driven quality control processes to refine pilot training based on the individual's proficiency and identified training needs.

The review found that, as of March 2011, 68 percent of Part 121 air carriers participate in at least one voluntary safety program and just under half of those carriers use more than one. Our ongoing analysis of current FAA data as of January 2012 shows a continued rise in voluntary safety program use—70 percent of Part 121 air carriers have at least one program, up from 59 percent 2 years ago. Further, for the same time period, 47 percent of Part 121 air carriers have multiple programs, compared to 36 percent 2 years ago.

As shown in figure 1 below, the highest concentration of new growth for these air carriers has been with ASAP and FOQA. We also determined that the majority of carriers that transitioned to AQP training were regional carriers. Air carriers that use AQP benefit from improved data collection and analysis techniques and enhanced flight crew coordination.

⁵ Voluntary Safety Programs, Response to P.L. 111-216, Sec. 213, January 28, 2011.

Figure 1. Increase in Voluntary Safety Program Participation



Source: OIG analysis of FAA-reported data

FAA Is Ahead of Schedule for Implementing SMS

Increasing use of voluntary safety programs is important for Part 121 air carriers of all sizes, as the data generated by these programs is a large driver of SMS, a systemic and comprehensive process for managing safety risks. Specifically, SMS provides operators with business processes and management tools to examine data from everyday operations, isolate trends that may be precursors to incidents and accidents, and develop and carry out appropriate risk mitigation strategies. FAA has nearly completed its efforts to issue a final rule on SMS for air carriers. The Agency released a proposed rule in October 2010 and, according to the Act, has until August 2012 to issue a final rule.

FAA has also taken steps to assist air carriers in developing SMS before the completion of the final rule. FAA developed an SMS pilot program in 2007 to develop implementation strategies and oversight responsibilities. SMS pilot projects allow FAA and air carrier input in developing guidance and provide carriers an opportunity to share best practices and lessons learned. Currently, 83 percent of all Part 121 air carriers (73 of 88) are participating in the pilot program.

The new system, when fully implemented across all carriers, has the potential to significantly advance safety. However, there is industry concern that the SMS rule will not be scalable for air carriers of varying size and operational complexity, posing a larger burden on smaller air carriers for their implementation. Currently, 14 of the 15 carriers that are not yet participating in FAA's SMS pilot program are smaller carriers (with less than 20 aircraft). Additionally, air carriers are concerned about public disclosure of SMS-collected data. Most of these concerns focus on whether the data can be used in legal proceedings. The current proposed rule does not address these concerns.

FAA FACES CHALLENGES IN MEETING ACT PROVISIONS ON PILOT TRAINING AND SAFETY ISSUES

FAA efforts to issue Act-mandated rules to improve training standards, establish mentoring and leadership programs, and enhance screening and qualifications for pilots are delayed. While FAA is responsible for raising pilot qualifications, the successful implementation of such rules depends on FAA's ability to address air carrier concerns and work through the regulatory process in a timely manner, which has been a significant challenge for FAA. The Agency also faces several challenges in establishing a new centralized electronic pilot records database to provide air carriers with better background information on pilots they intend to hire.

Industry Concerns Have Delayed FAA's Rulemaking Efforts To Enhance Pilot Training Standards

FAA is almost 6 months overdue on issuing a final rule revising pilot training requirements—the delay is due in part to significant industry opposition. This is an important safety initiative that will require pilot training programs to incorporate flight simulators and enhance pilots' ability to work together during emergencies. In January 2009, FAA issued the Notice of Proposed Rulemaking (NPRM). However, FAA received extensive industry comments, primarily opposing that the rule imposes overly prescriptive training hours rather than basing pilot training on skills most needed to safely perform flight operations. As a result, FAA issued a second proposed rule in May 2011. The revised proposal requires more thorough ground and flight training for pilots on how to recognize and recover from stalls, as well as remedial training for pilots who perform poorly in training.

With advancements in pilot training on the horizon, it is important that FAA enhance its oversight practices. For example, under the new rule, carriers will be required to provide remedial training for pilots with performance deficiencies. However, it will be difficult for FAA to gauge the effectiveness of this training unless it corrects weaknesses we identified in our December 2011 report on pilot training. We found that FAA was not tracking poorly performing pilots due to inadequate guidance for its inspectors on how to gather data on pilot performance. Specifically, FAA guidance requires inspectors to compare pilot proficiency checks that they have performed

against those conducted by the carriers' check airmen.⁶ However, we questioned the viability of this requirement since nearly all pilot proficiency checks are conducted by check airmen, not FAA inspectors. As a result, FAA inspectors may not have sufficient data to make a meaningful comparison.

FAA's Rule To Require Pilot Mentoring, Leadership, and Professional Development Committees at Air Carriers Is Overdue

FAA is also almost 8 months overdue in meeting a mandated timeline to issue a proposed rule requiring that air carriers establish pilot mentoring, leadership, and professional development committees to improve pilot performance. This is due, in part, to a lengthy delay in developing an appropriate balance between the costs and benefits of these programs. FAA intends to issue a proposed rule that it believes would generate benefits by reinforcing safe flying practices.

Pilot performance issues are longstanding safety concerns—pilot performance was cited in 7 of the 10 major accidents that occurred over the last decade, indicating that the quality of training, professionalism, and mentoring is important to safety. In February 2011,⁷ we also reported that poor pilot performance—such as poor decision-making, inadequate aircraft control, improper flying techniques, and a disregard for operating procedures—is a high-ranking causal factor in airline accidents,⁸ a finding consistent with the National Transportation Safety Board (NTSB) review of the Colgan accident.

After the Colgan accident, FAA focused on advancing pilot mentoring as part of its 2009 Call to Action on Airline Safety and Pilot Training but never released a detailed plan to implement programs at air carriers. In December 2011, we reported that regional air carriers were not pursuing mentoring opportunities for their pilots. Officials at these carriers expressed concerns that a mentoring program would have to be scaled to their business model and that pilot turnover at these carriers could outweigh the benefits of establishing these often costly programs. Seven of nine large and small carriers we recently visited as part of our ongoing audit did not have formal mentoring programs, and none had professional development programs to instill and reinforce high performance standards for their pilots.

⁶ Pilots employed by air carriers who evaluate a pilot's proficiency during training and examinations.

⁷ OIG Controlled Correspondence CC-2009-074, "Letter to Senators Rockefeller, Hutchison, and DeMint Regarding Commercial Aviation Accidents, Pilot Experience and Pilot Compensation," February 9, 2011.

⁸ We analyzed the experience (i.e., total flight time and total make and model flight time in the accident aircraft) of pilots involved in 322 scheduled Part 121 passenger accidents that occurred from January 2000 through December 2009.

FAA Is Behind Schedule and Will Likely Miss the Deadline To Issue a Rule Increasing Minimum Qualifications for Commercial Airline Pilots

The Act requires FAA to issue a final rule to substantially raise airline pilot qualifications by August 2012. However, FAA did not issue the proposed rule until February 2012 and expects to issue the final rule by August 2013—a year after the mandate. Given the significant increase in pilot flight hours that the Act mandates for the final rule, FAA has encountered industry opposition.

FAA's rule would require first officers to hold an Airline Transport Pilot (ATP) certificate,⁹ requiring 1,500 hours of pilot flight time—up from the current mark of 250 hours with a commercial pilot's license. The proposed rule would also require first officers to have an aircraft type rating, which involves additional training and testing specific to the airplanes they fly. Air carrier representatives are opposed to the increased flight hour requirement because they feel a pilot's quality and type of flying experience should be weighted more heavily than the number of flight hours. They state that the supply of qualified and available pilots will decrease because it will be difficult for entry-level pilots to attain this amount of hours before being qualified to fly at a commercial air carrier.

Further, while FAA's pilot qualification proposal satisfies most of the Act's requirements in this area, it may fall short in ensuring sufficient pre-employment screening. For example, the Act states that applicant pilot screening must include an assessment of skills, aptitudes, airmanship, and suitability specific to each air carrier's operations. However, it is unclear whether FAA intended for the enhanced ATP requirements in the proposed rule to also satisfy the pre-employment screening measures contained in the Act. If so, air carriers may not make appropriate changes to their pre-employment screening procedures specific to their operations.

Finally, FAA has not acted to ensure carriers are ready to transition to these new pilot qualification requirements. For example, at two regional air carriers we visited as part of our ongoing review, more than 75 percent of current first officers did not have an ATP. Yet, neither carrier had developed a plan to ensure these pilots would be able to meet the enhanced requirements by the deadline, nor had the local FAA inspectors followed up with these carriers to assess their ability to comply with enhanced requirements. Additionally, FAA has not taken steps to determine the potential impact the new ATP requirement would have on current pilots, information that will be important for safety oversight.

⁹ Airline Transport Pilot (ATP) Certificate is the highest level of pilot certification. Pilots certified as ATP are authorized to act as pilot-in-command of an aircraft in commercial airline service. Additional eligibility requirements are contained in 14 CFR 61.153.

FAA Lacks a Clear Strategy for Transitioning to a New Centralized Electronic Pilot Records Database

FAA met the Act's initial milestone in developing a centralized electronic pilot records database that will include records previously maintained by air carriers. The Act did not prescribe any additional milestones for the database's implementation, but the Agency has recognized that a rulemaking will be necessary to fully develop the intricacies of this electronic system and is in the preliminary stages of writing this proposal. However, to create a robust, complete, and secure data repository that carriers can use when hiring pilots, FAA must overcome three key challenges:

- First, FAA must address what level of detail should be captured from air carrier pilot training records, such as whether recurrent flight training will be included. The Act stipulates that comments and evaluations made by the pilot examiner¹⁰ be included in the database; however, industry is highly protective of these data and opposes including them in the database. FAA must also address how to include historical air carrier pilot training records into its new system. Gathering the historical records while keeping them standardized across sources will be difficult because information in the records varies based on differences in air carrier training programs and the record retention period varies from 5 years to indefinitely, depending on the carrier.
- Second, FAA does not expect to issue a final rule and launch the database for at least another 2 years, so FAA will have to determine how to transition from current recordkeeping practices mandated by the Pilot Records Improvement Act (PRIA)¹¹ to the new database without disrupting the flow of information. Therefore, until air carrier records are fully integrated into the new database, carriers may need to continue requesting data from both FAA and previous employers.
- Finally, a pilot records advisory committee identified multiple challenges for FAA in accessing records from the National Driver Register (NDR)¹² and incorporating them into the database. For example, FAA must decide how to ensure data reliability of pilot records and resolve conflicting data retention policies for the database versus NDR.

In addition to these challenges, we reported in December 2011 that FAA lacks a centralized process to receive and respond to carriers' requests for pilot records. This raises questions about whether air carriers are getting all the relevant information FAA has on pilots before they are hired. While this problem may be mitigated once

¹⁰ An FAA inspector or air carrier pilot who is qualified, and permitted, to conduct flight checks or instruction in an airplane, in a flight simulator, or in a flight training device for a particular type airplane.

¹¹ Pub. L. No. 104-264, Section 502 (codified at 49 U.S.C. § 44703(h)-(j)).

¹² NDR is a central information system that allows states to electronically exchange information on licensed drivers through a computerized network.

the new database is launched, it remains a concern in the interim, especially since FAA's 2009 Call to Action on Airline Safety and Pilot Training called on carriers to obtain more comprehensive records on pilots prior to hiring. As a result, FAA experienced an influx of record requests from carriers and an increased workload.

SUSTAINED COMMITMENT AND OVERSIGHT ARE NEEDED TO ACHIEVE THE FULL MEASURE OF SAFETY ENHANCEMENTS INTENDED BY THE ACT

Sustained FAA management commitment and oversight are needed to ensure that provisions of the Act are effectively implemented and have the desired impact of improving safety. Specifically, FAA needs to (1) effectively communicate with local FAA offices and industry on the status of new rules and guidance, (2) provide additional direction and support for developing new safety programs at smaller air carriers, and (3) address pilot commuting issues.

FAA Has Not Provided the Level of Education, Outreach, and Guidance Needed for Industry To Implement New Safety Programs

A lack of key stakeholder involvement and poor communication between FAA and industry is impeding progress on several Act initiatives. FAA created six aviation rulemaking committees (ARC) to develop recommendations on multiple initiatives, such as identifying and promulgating best practices in pilot training and developing the pilot record database. However, FAA did not inform its field offices or airlines of many of the ARCs' results, such as status of rulemakings, or engage in effective outreach efforts for new safety programs other than SMS. For example, none of the nine field offices we visited during our ongoing review had received information from FAA on the Agency's progress in developing mentoring, professional development, and leadership programs for air carrier pilots. If FAA had provided early outreach to field offices on the status of rulemaking and best practices, air carriers could be better positioned to implement new pilot safety programs when the rules are finalized.

Further, FAA did not follow up to ensure proper implementation of guidance it has issued to air carriers. For example, while FAA issued guidance for retaining and submitting pilot training records for the new electronic, centralized pilot records database, it did not follow up to see that air carriers were following the new requirements. Four of the six carriers we visited during our ongoing review had not clarified their policies to reflect this change. As a result, important details concerning pilot training and proficiency may be lost and not available for air carriers to use in future hiring decisions.

Additionally, some air carriers that had moved forward with new programs encountered obstacles in obtaining FAA approval. For example, one regional air carrier attempted to proactively develop a program for first officers to obtain advanced certification as prescribed by the Act. While the local FAA office initially

approved the program, FAA rescinded the approval 1 day before it was set to launch because national-level guidance had not been issued. Although most actions taken by air carriers thus far are voluntary, a lack of clear and timely communication by FAA provides little impetus for air carriers to move forward with new initiatives.

FAA Does Not Have a Focused Plan To Help Smaller Air Carriers Establish New Safety Programs

Despite overall gains, implementation of voluntary safety programs has mostly occurred at larger air carriers. Yet, the Act instructed FAA to develop a plan to help all Part 121 carriers establish such programs, with particular emphasis on ASAP and FOQA. FAA devised an implementation plan for ASAP and FOQA at smaller air carriers, but a lack of funding has prevented FAA from enacting the FOQA plan. As a result, smaller carriers have been unable to purchase and install the equipment needed to run this program. With a focused plan and dedicated funding, FAA can help smaller air carriers establish voluntary safety programs and realize the benefits of increased safety reporting and trend analyses.

As shown in table 1, while all large carriers with more than 50 aircraft in their fleet have an incident reporting system (ASAP), the system has been adopted by only 41 percent of small carriers with 15 or fewer aircraft. Similarly, just over 10 percent of these small operators have FOQA, compared to more than 90 percent of large operators.

Table 1. Air Carrier Voluntary Safety Program Participation

Program	Number of Carriers Participating	Large Carriers (more than 50 aircraft)	Medium Carriers (16-50 aircraft)	Small Carriers (15 or fewer aircraft)
Aviation Safety Action Program	60 of 88 (68%)	24 of 24 (100%)	19 of 23 (83%)	17 of 41 (41%)
Flight Operational Quality Assurance	38 of 88 (43%)	22 of 24 (92%)	11 of 23 (48%)	5 of 41 (12%)
Advanced Qualification Program	19 of 88 (22%)	13 of 24 (54%)	3 of 23 (13%)	3 of 41 (7%)

Source: OIG analysis of FAA-reported data as of January 2012

Despite the disparities between the large and small air carriers, FAA has not fully implemented its plan to assist smaller air carriers with the resources needed—such as best practices and guidance—to establish new safety programs. Smaller air carriers have fewer resources than their mainline counterparts to handle the operation and management of new safety programs. As a result, they will have to prioritize development of these programs based on feasibility and importance and will face difficulties in implementing new programs simultaneously—especially without guidance or program assistance from FAA.

FAA's Fatigue Rule Does Not Address Pilot Commuting

FAA's changes to the flight and duty time regulations represented a significant safety achievement; however, the regulations do not require air carriers to identify pilots who commute. These are significant factors that may contribute to fatigue given that many pilots in the industry reside hundreds or even thousands of miles from their duty locations. While FAA considered mandating that pilots arrive in time to receive a pre-flight rest period in the proposed rule, it stated that the requirement would be difficult to enforce and would not guarantee responsible commuting.

Pilot commuting and related issues were concerns that came to light after the Colgan accident. The NTSB investigation into the crash revealed that both pilots had commuted hundreds of miles before the flight. NTSB also found that Colgan did not proactively address the pilot fatigue hazards associated with basing its operations at an airport where pilots typically have to commute long distances in order to begin their work shifts. In its investigative report, the NTSB stated that "operators have a responsibility to identify risks associated with commuting, implementing strategies to mitigate these risks, and ensure that their commuting pilots are fit for duty."

NTSB issued a recommendation to FAA to address fatigue risks associated with commuting, including identifying pilots who commute. The National Academy of Sciences similarly noted in a July 2011 report that there are not enough data to determine the role commuting plays in contributing to fatigue or whether it should be regulated.¹³ This underscores how collecting and analyzing these data could help FAA make well-informed decisions on commuting. In our September 2011 report on pilot fatigue, we recommended that FAA collect and analyze data regarding pilot commuting for all Part 121 flight crews and determine if additional changes are needed or if airlines need to take further mitigating actions in their fatigue management systems. In its response, FAA stated that it will review available data on pilot commuting and determine if additional data could offer added safety benefits. FAA committed to completing these actions by October 1, 2012.

CONCLUSION

FAA plays an integral role in maintaining the excellent safety record of the U.S. National Airspace System. FAA acted swiftly to address safety concerns highlighted by the Colgan crash and has since made commendable progress in meeting new Act requirements. FAA still faces several challenges, however, in updating pilot training and leadership programs, developing screening and qualifications standards, and ensuring carriers have the data they need to make sound hiring decisions. To effectively implement these initiatives in a timely manner, FAA must balance industry concerns with a sustained commitment to oversight. We are encouraged by FAA's

¹³ The National Academy of Sciences, *The Effects of Commuting on Pilot Fatigue*, ISBN 978-0-309-21696-8, July 6, 2011 (Response to P.L. 111-216, Sec. 212).

progress to date and will continue to monitor its efforts to meet remaining Act requirements.

This concludes my statement. I would be happy to address any questions from the Chairman or Members of the Subcommittee at this time.

EXHIBIT. STATUS OF KEY AIRLINE SAFETY ACT REQUIREMENTS

Section	Initiative	Milestone	Deadline	Milestone Status
202	NTSB Recommendations Report	Report	Annual	Met, On-Target
203	FAA Pilot Records Database	Database Development	10/30/2010	Met
		Report	2/1/2012	Missed & Overdue
204	Air Carrier Safety & Pilot Training ARC	ARC Report	7/31/2011	Met
		ARC Report	7/31/2012	On-Target
205	FAA Inspector Staffing	Start OIG Review	5/1/2011	Met
206	Mentoring, Development, and Leadership	NPRM	8/1/2011	Missed & Overdue
		Final Rule	8/1/2013	To Be Determined
207	Crew Pairing and CRM	Study	8/1/2011	Completed Late – 8/26/2011
208	NTSB Training Recommendations	ARC Formation	11/29/2010	Met
		NPRM	8/1/2011	Met
		ARC report	11/30/2011	Completed Late – 3/7/2012
		Final Rule	8/1/2013	To Be Determined
209	FAA Rulemaking on Training	ARC Formation	9/30/2010	Completed Late – 11/16/2010
		ARC Report	8/1/2011	Completed Late – 9/23/2011
		Final Rule	10/1/2011	Missed & Overdue
210	Code Share Ticket Disclosure	Amend 49 U.S.C. § 41712	N/A	Met
211	FAA Safety Inspections	Perform one per year	Annual	Met
212	Fatigue & Commuting	NPRM	2/1/2011	Met
		Final Rule	8/1/2011	Completed Late – 1/4/2012
		Risk Management Plans	11/1/2010	Met
		Start Study	9/30/2010	Met
		Preliminary Findings	1/30/2011	Met
		Report	6/30/2011	Met
213	Voluntary Safety Programs	Report	1/28/2011	Completed Late – 3/16/2011
214	ASAP & FOQA Implementation	Plans Issued	1/28/2011	Completed Late – 4/14/2011
		Plans Implemented	8/1/2011	FOQA Portion Overdue
215	Safety Management Systems	NPRM	11/1/2010	Met
		Final Rule	8/1/2012	On-Target
216	Screening & Qualifications	NPRM	1/28/2011	Completed Late - 2/29/2012
		Final Rule	8/1/2012	To Be Determined
		ATP	8/1/2013	To Be Determined
217	ATP Certification	Final Rule	8/1/2013	On-Target

Source: OIG analysis of FAA-reported data.