ATOS Question and Answers

1. What does it mean if an inspector answers an ATOS DCT question with a "No?"
Depending on the nature of the question and the observation, a "No" response will fall into one of three categories:

- **"No" answers that don't require any action on the part of the certificate holder.** In this category, a single "no" answer may represent a risk that is being managed at an acceptable level. Another example may be a "No" answer related to a safety attribute that is, in and by itself, not significant for approval or acceptance.
- **"No" answers that require certificate holders to take corrective action**. In this category, the observation usually involves a previously approved or accepted program that no longer meets the intent of a regulation or standard. This may occur if a program was altered, or guidance material was revised, or the program shouldn't have been approved or accepted in the first place. ATOS tools can help the FAA inspector describe the system deficiency by referring to the safety attributes and explaining how the deficiency ultimately relates to the regulatory requirements.
- This type of "no" answer may indicate increased risk. The risk should be eliminated or mitigated to an acceptable level. If not, principle inspectors may limit, withdraw, or amend operating approvals and authorizations.
- **"No" answers tied to regulatory requirements.** In this category, the issues associated with a "no" answer may require an enforcement investigation. (The question may include Specific Regulatory Requirements (SRRs) that are an indicator of regulatory implications.)

2. What is the purpose of the Job Task Items (JTIs) in the ATOS Data Collection Tools (DCTs)?

- Some DCT questions are supplemented by JTIs. JTIs contain additional explanatory information that aviation safety inspectors (ASI) can use to help verify the adequacy of written policies, procedures, instructions, and other documentation. ASIs are not required to answer each JTI question.

3. How do inspectors use policy and guidance material during ATOS inspections?

- Data Collection Tools (DCT) are used to capture details of an assessment and to provide a means for aviation safety inspectors (ASI) to determine regulatory compliance. Inspectors perform assessments using DCTs before the initial approval or acceptance of a certificate holder's system or program, and on a recurring schedule to ensure that the initial basis for approval or acceptance is still valid. When an ASI makes a determination about compliance, he/she considers several factors, including whether or not the system or program meets the intent of the regulations, policy, and/or guidance.
- ASIs are required to use the applicable FAA policy and guidance (orders, notices, and advisory circulars) during the evaluation of a certificate holder's program or system. Guidance material may include language that refers to regulations or identifies requirements. Guidance material may also describe an acceptable means, but not necessarily the only means for demonstrating that procedures comply with applicable regulations and meet the intended level of safety.
- Some of the ATOS DCTs include questions about guidance by asking the question:

"Do procedures address the intent of the guidance contained in _____?" By asking if the procedures met the intent, the question is asking if the goal was met. ("Intent" is a goal, or a target.) The purpose of the assessment is to determine if the certificate holder's procedures produced the same level of safety that was the "intended goal" of the applicable requirements. If it did, then the "intent" was met.

- FAA orders direct the activities of ASI. Certificate holders are not required to follow FAA orders.