The National Academies of
SCIENCES • ENGINEERING • MEDICINE

TRANSPORTATION RESEARCH BOARD

An Integrated Approach to Managing Regulatory Compliance

Tuesday, July 25, 2017
2:00pm to 3:30pm ET

Purpose

Discuss ACRP Report 156: Guidebook for Managing Compliance with Federal Regulations: An Integrated Approach.

Learning Objectives

At the end of this webinar, you will be able to:

- Understand the value of and process associated with developing and implementing a CMS
- Understand how to use the RCM Tool to identify applicable federal regulations, generate educational Quick Reference Guides that provide essential need-to-know information on the regulations, and output compliance Master Schedules that show the upcoming compliance due dates

ACRP is an Industry-Driven Program

- Managed by TRB and sponsored by the Federal Aviation Administration (FAA).
- Seeks out the latest issues facing the airport industry.
- Conducts research to find solutions.
- Publishes and disseminates research results through free publications and webinars.

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Opportunities to Get Involved!

- ACRP's Champion program is designed to help early- to mid-career, young professionals grow and excel within the airport industry.
- Airport industry executives sponsor promising young professionals within their organizations to become ACRP Champions.
- Visit ACRP's website to learn more.

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Upcoming ACRP Webinars

August 10th

Financially Responsible Procurement Processes for Airports

September 12th

Use and Potential Impacts of AFFF Containing Per- and Polyfluoroalkyl Substances (PFASs)

September 14th

Understanding Stormwater Management Requirements for Airports

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Additional ACRP Publications Available on this Topic

Report 90: The Impact of Regulatory Compliance Costs on Small Airports

Legal Research Digest 7: Airport Governance and Ownership

Legal Research Digest 17: State and Federal Regulations That May Affect Initiatives to Reduce Airports' GHG Emissions

Legal Research Digest 23: A Guide for Compliance with Grant Agreement Obligations to Provide Reasonable Access to an AIP-Funded Public Use General Aviation Airport

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Today's Speakers

Jeff Kohlman and David Benner

Aviation Management Consulting Group

Presenting ACRP Report 156

Guidebook for Managing Compliance with Federal Regulations: An Integrated Approach

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ACRP Report 156: A Guidebook for Managing Compliance with Federal Regulations: An Integrated Approach

Aviation Management Consulting Group

Jeff A. Kohlman, Managing Principal
David Benner, Managing Consultant

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Team Members

Aviation Management Consulting Group (AMCG)

Bennett Aviation Consulting

ADP Airport Consulting

Leading Edge Strategies

2G Environmental

EA Engineering, Science, and Technology

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Aviation Management Consulting Group
Services

- Provide a wide range of aviation management consulting services to…
  - Airports
  - Fixed Base Operators (FBOs)
  - Specialized Aviation Service Operators (SASOs)
  - Others having an interest in the General Aviation segment of the industry

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Aviation Management Consulting Group
Services

- Airports
  - Strategic business planning/plans
  - Operational, managerial, and financial assessments
  - Market assessments and feasibility studies
  - Primary Management and Compliance Documents
  - Airport Sponsor Assurances and regulatory compliance
  - Rent and fee studies (as well as appraisals)
  - Lease, use, and operating agreements (including TTF)
  - RFI/RFQ/RFP development, evaluation, and selection
  - Valuations, acquisitions, divestiture, and due diligence
  - Land use, site planning, and facility programming

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Jeff Kohlman
Principal Investigator

- Founding principal of AMCG
- Bachelor in Aviation Business Administration from Embry-Riddle Aeronautical University
- Instrument rated private pilot and aircraft owner

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David Benner
Researcher

- MBA in Aviation from Embry-Riddle Aeronautical University
- Commercial pilot with instrument and multi-engine ratings
- Certified Flight Instructor
- Certified Member (CM) of American Association of Airport Executives

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ACRP Oversight Panel

Joshua D Abramson, C.M., Easterwood Airport
Megan M. Atkins, Columbia Metropolitan Airport
Sarah J. Demory, City of Boise
David J. Full, Reynolds, Smith, and Hills
Stephen M. Quilty, SMQ Airport Services
Paul James Eubanks, Airports Council International-NA Liaison
Christine Gerencher, TRB Liaison
Marci A. Greenberger, ACRP Senior Program Officer

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Webinar Outline

- Historical Issue
- Problem Statement
- Purpose
- Introduction and Research Plan
- Compliance Management System (CMS)
- RCM Tool Instructions
- RCM Tool Implementation

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Historical Issue

- Compliance with regulations at federally obligated airports accomplished within each functional area
  - Little to no collaboration with other functional areas
  - Compliance accomplished in a silo
- Independent pursuit of compliance can lead to duplication of effort and redundancy
- Results are inefficient and not cost-effective

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Problem Statement

- Airports required to comply with many regulations
  - Varying federal agencies (e.g., FAA, TSA, DOT, etc.)
  - Varying applicable regulations (e.g., 14 CFR Part 139)
  - Varying required elements (e.g., inspection, training, etc.)
  - Varying time periods (annually, triggering event, etc.)
- Can result in plans and compliance requirements implemented in silos and duplication of effort
- No guidance for airports to integrate plans, policies, and procedures with a more consistent approach for implementation and more efficient use of limited resources

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Purpose

- Provides reasons for, value of, and best practices associated with a Compliance Management System (CMS)
- Provides guidance on managing compliance with federal regulations pertaining to planning, development, operation and management of federally obligated airports
- Regulation Compliance Management (RCM) Tool provides index of applicable compliance requirements
- RCM Tool designed to:
  - Track compliance
  - Allow addition of state and local regulations/requirements
  - Update federal regulations/requirements

Helps management and staff work together to ensure compliance in an efficient manner

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Introduction and Research Plan
Design

- Designed to help airport management and staff:
  - Identify U.S. statutes, regulations, executive orders, and OMB circulars that affect aviation/airside infrastructure, facilities, and activities of federally obligated airports
  - Provide methods and techniques to integrate resources, plans, and procedures for managing compliance with applicable federal regulations
  - Assist with tracking and managing compliance with applicable federal regulations

Statutes are laws enacted by Congress. Statutes with continuing effect are generally codified in the United States Code (USC).

Regulations are the rules issued by the executive branch departments and agencies of the federal government and codified in the Code of Federal Regulations (CFR).

Executive Orders are directives of the President of the United States to officers and agencies of the executive branch for management of agency operations, and have the full force of law.

OMB Circulars are instructions, information, and/or policies adopted by OMB (an executive branch office) for executive branch departments and agencies.

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Introduction and Research Plan

Research Plan

- Comprehensive literature review of industry and non-industry CMSs and related resources
- Identification of applicable federal regulations (U.S. statutes, regulations, executive orders, and OMB circulars)
- Interviews with airports and/or airport sponsors on the systems and/or resources developed, implemented, and referenced by management and staff to track and manage compliance

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Introduction and Research Plan
Research Results

- Literature Review
  - Limited number of industry/non-industry CMSs and tools
  - Majority of existing tools focused on safety, security, environmental, 14 CFR Part 139, and Assurances
- Applicable federal regulations
  - More than 60 primary and 339 secondary regulations
  - 17 primary and 21 secondary statues, executive orders, and OMB circulars
- Interviews
  - Most airports do not have a CMS or federal RCM tool
  - Non-compliance addressed after inspection

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Introduction and Research Plan
Applicable Federal Regulations

- 17 federal departments, agencies, and offices

CBP USDA DOD DHS HUD

DOI DOJ DOL DOT

EPA FAA FCC GSA ICE

OSHA OMB TSA

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Compliance Management System (CMS)

Definition and Focus Elements

- Definition
  - Comprehensive system consisting of a policy; management and oversight plan; goals, objectives, and action plans; and tools and resources
- Focus elements
  - Reduce and manage risk
  - Ensure and improve health and safety of all employees and users of the airport
  - Protect the environment
  - Improve the financial well-being of the airport

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Compliance Management System (CMS)

Reason for a CMS

- Risks of non-compliance are significant
- Compliance is mandatory
  - Airport Sponsor Assurance #1 – “comply with all applicable Federal laws, regulations, executive orders, policies, guidelines, and requirements as they relate to the application, acceptance and use of Federal funds.”

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Compliance Management System (CMS)
Value of a CMS

- As a planning tool

- Also as a management and communications tool
- Resolves age-old inefficient silo-effect approach
- Lowers cost of compliance

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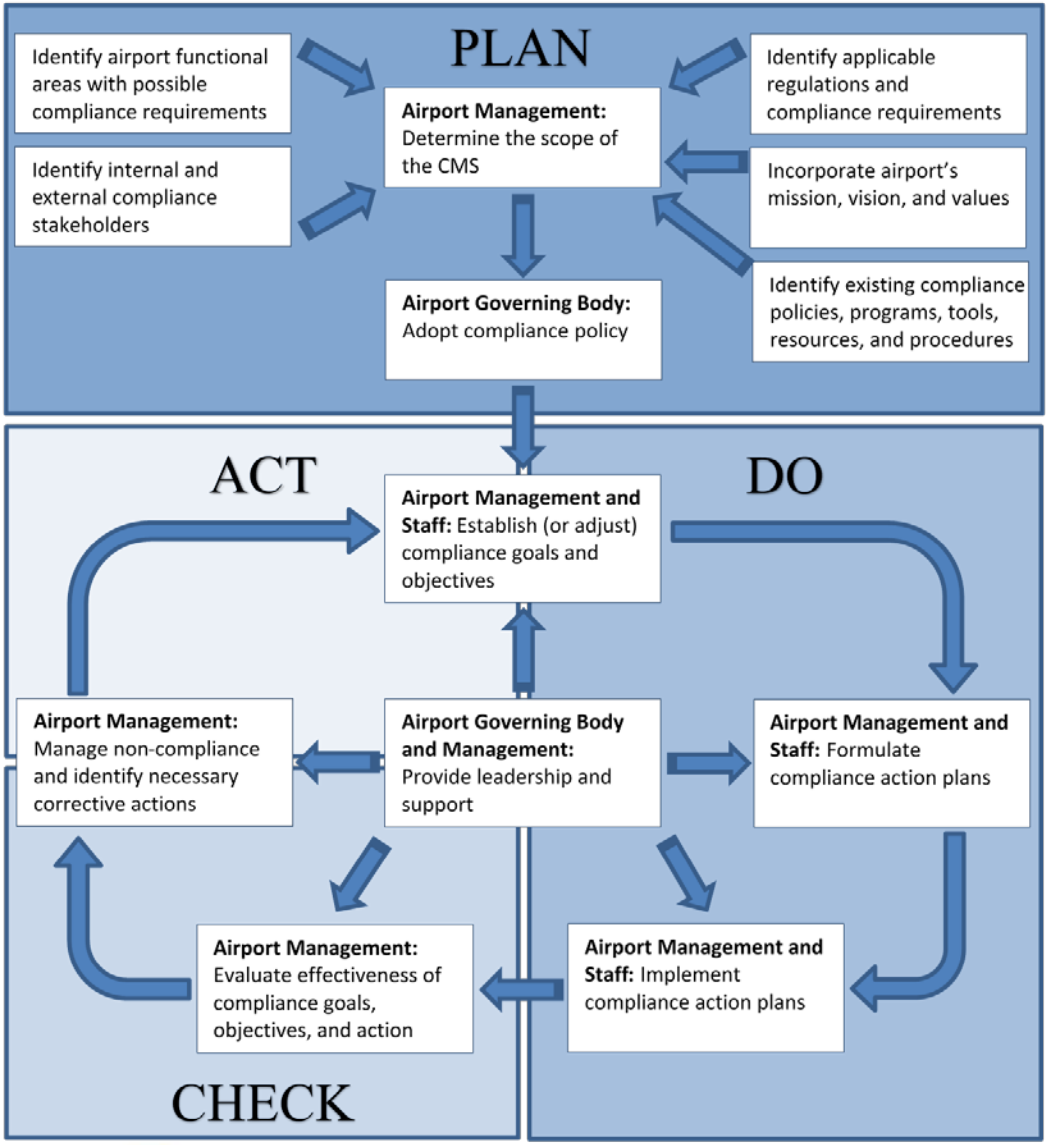
Development and Implementation



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Compliance Management System (CMS)

Elements of a CMS

- Policy
  - Reason, value, and clear expectations
- Management and Oversight Plan
  - Formal plan with designated CMS compliance manager
- Goals, Objectives, and Action Plans
  - Similar to those of an airport business plan (Report 77)
- Compliance Management Tools and Resources
  - RCM Took, Quick Reference Guides, and Master Schedules

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RCM Tool Instructions
Design Overview

- Designed to help airport management and staff with:
  - Identifying applicable federal regulations
  - Answer frequently asked questions
  - Provide supplemental resources
  - Identify additional compliance guidance
  - Generate educational Quick Reference Guides
  - Output compliance Master Schedules

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RCM Tool Instructions
Design Benefits

- RCM Tool design provides:
  - Identification of associated compliance requirements and associated frequencies
  - Identification of commonalities among the compliance requirements
  - Identification of opportunities for inherent synergies
  - Identification of compliance impacts to functional areas
  - Addition and modification of federal, state, or local regulations as well as airport specific information
  - Creation of filtering capabilities

Flexibility ensures RCM Tool remains specific and relevant

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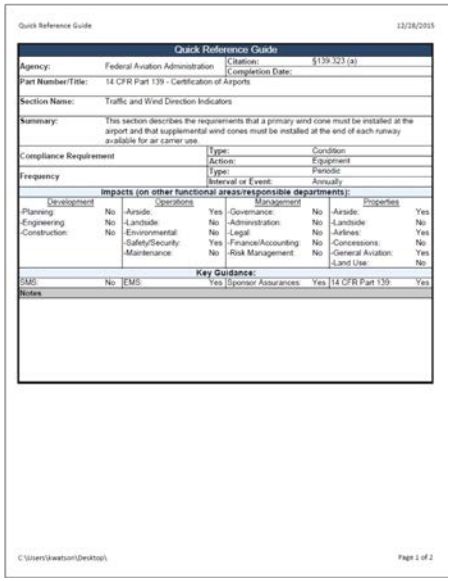
RCM Tool Instructions

Education Quick Reference Guides

- Provides essential need-to-know information that can be consulted in the field based on RCM Tool
  - Brief summary of the regulation subject matter
  - Frequently asked questions
  - Identification of other associated regulations and resources



Quick Reference Guide 12/28/2015

Quick Reference Guide

Agency:	Federal Aviation Administration	Citation:	§139.323 (a)
Part Number/Title:	14 CFR Part 139 - Certification of Airports	Completion Date:	
Section Name:	Traffic and Wind Direction Indicators		
Summary:	This section describes the requirements that a primary wind cone must be installed at the airport and that supplemental wind cones must be installed at the end of each runway available for air carrier use.		
Compliance Requirement		Type:	Condition
		Action:	Equipment
Frequency		Type:	Periodic
		Interval or Event:	Annually

Impacts (on other functional areas/responsible departments):

Development		Operations		Management		Properties	
-Planning:	No	-Airside:	Yes	-Governance:	No	-Airside:	Yes
-Engineering:	No	-Landside:	No	-Administration:	No	-Landside:	No
-Construction:	No	-Environmental:	No	-Legal:	No	-Airlines:	Yes
		-Safety/Security:	Yes	-Finance/Accounting:	No	-Concessions:	No
		-Maintenance:	No	-Risk Management:	No	-General Aviation:	Yes
						-Land Use:	No

Key Guidance:

SMS:	No	EMS:	Yes	Sponsor Assurances:	Yes
14 CFR Part 139:	Yes				

Notes

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Quick Reference Guide 12/28/2015

Quick Reference Guide

Agency:	Federal Aviation Administration	Citation:	§139.323 (a)
Part Number/Title:	14 CFR Part 139 - Certification of Airports	Completion Date:	
Section Name:	Traffic and Wind Direction Indicators		

Frequently Asked Questions:

When is it required to have a segmented circle installed with a wind cone?	For each runway with a right hand traffic pattern and for airports serving any air carrier operation.
N/A	N/A
N/A	N/A

References

Other Regulation(s)
Airport Sponsor Assurances
14 CFR Part 121
FAA Order 5280.5C Airport Certification Program Handbook
Other Agency Resources
FAA Order 5190.6B FAA Airport Compliance Manual
AC 150/5345-27E Specifications for Wind Cone Assemblies
N/A
Other Resources
AC 150/5200-18C Airport Safety Self-Inspection
N/A
N/A

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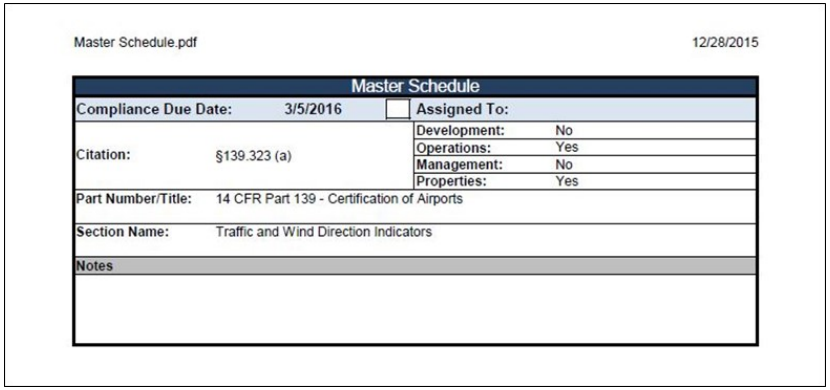
RCM Tool Instructions
Compliance Master Schedules

- Regulations with a specific compliance due date based on RCM Tool
  - Visual representation of upcoming compliance due dates based on filters
  - Organized in a linear and sequential manner
  - Identification of individuals responsible for compliance



Master Schedule.pdf 12/28/2015

Master Schedule

Compliance Due Date:	**3/5/2016**	**Assigned To:**	
Citation:	§139.323 (a)	**Development:**	No
		Operations:	Yes
		Management:	No
		Properties:	Yes
Part Number/Title:	14 CFR Part 139 - Certification of Airports		
Section Name:	Traffic and Wind Direction Indicators		
Notes			

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RCM Tool Instructions
Airport Functional Areas

- RCM Tool identifies:
  - Impacts to common airport functional areas
  - Identification of key guidance elements

Development	Operations	Management	Properties	Key Guidance
Planning	Airside	Governance	Airside	Safety Mgmt System (SMS)
Engineering	Landside	Administration	Landside	Emergency Mgmt System (EMS)
Construction	Environmental	Legal	Airlines	Sponsor Assurances
	Safety/Security	Finance/Accounting	Concessions	14 CFR Part 139
	Maintenance	Risk Management	General Aviation	
			Land Use	

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RCM Tool Instructions

RCM Tool Overview

- Approximately 440 primary and secondary federal regulations
- RCM Tool consists of 5 tabs
  - Home
  - Regulations
  - Master Schedule
  - Manage Regulations
  - Lists

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RCM Tool Instructions
Home Tab Overview

- Provides additional instructions to explain process
- Ensures differentiation between airports based on three major factors:
  - 14 CFR Part 139 (Certification of Airports
  - 29 CFR Part 1910 (Occupational Safety and Health Standards)
  - 49 CFR Part 1542 (Airport Security)
- Ability to filter regulations by specific user filter criteria

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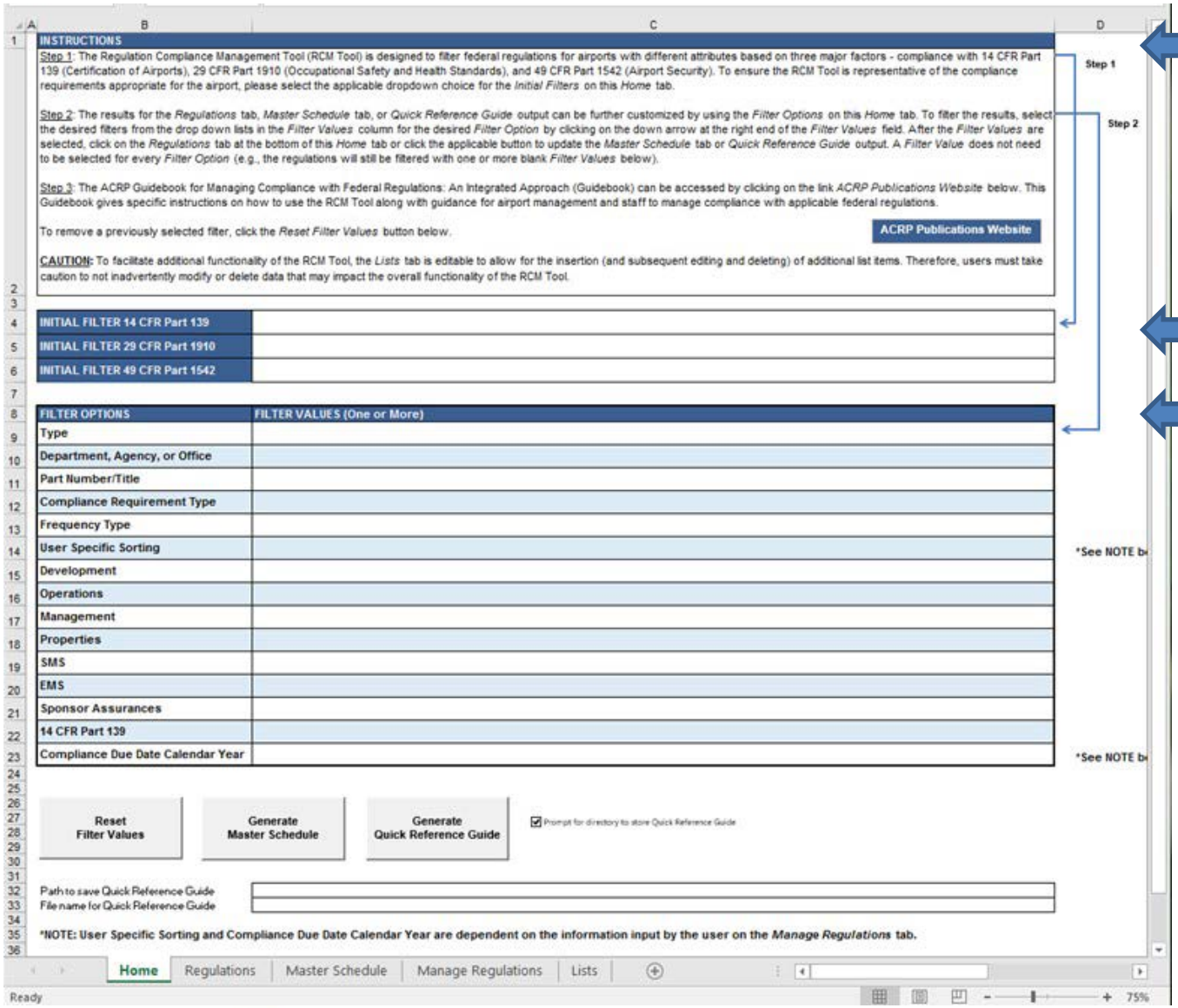
Home Tab – Overview



INSTRUCTIONS

Step 1: The Regulation Compliance Management Tool (RCM Tool) is designed to filter federal regulations for airports with different attributes based on three major factors - compliance with 14 CFR Part 139 (Certification of Airports), 29 CFR Part 1910 (Occupational Safety and Health Standards), and 49 CFR Part 1542 (Airport Security). To ensure the RCM Tool is representative of the compliance requirements appropriate for the airport, please select the applicable dropdown choice for the *Initial Filters* on this *Home* tab.

Step 2: The results for the *Regulations* tab, *Master Schedule* tab, or *Quick Reference Guide* output can be further customized by using the *Filter Options* on this *Home* tab. To filter the results, select the desired filters from the drop down lists in the *Filter Values* column for the desired *Filter Option* by clicking on the down arrow at the right end of the *Filter Values* field. After the *Filter Values* are selected, click on the *Regulations* tab at the bottom of this *Home* tab or click the applicable button to update the *Master Schedule* tab or *Quick Reference Guide* output. A *Filter Value* does not need to be selected for every *Filter Option* (e.g., the regulations will still be filtered with one or more blank *Filter Values* below).

Step 3: The ACRP Guidebook for Managing Compliance with Federal Regulations: An Integrated Approach (Guidebook) can be accessed by clicking on the link *ACRP Publications Website* below. This Guidebook gives specific instructions on how to use the RCM Tool along with guidance for airport management and staff to manage compliance with applicable federal regulations.

To remove a previously selected filter, click the *Reset Filter Values* button below.

ACRP Publications Website

CAUTION: To facilitate additional functionality of the RCM Tool, the *Lists* tab is editable to allow for the insertion (and subsequent editing and deleting) of additional list items. Therefore, users must take caution to not inadvertently modify or delete data that may impact the overall functionality of the RCM Tool.

Step 1

Step 2

INITIAL FILTER 14 CFR Part 139	
INITIAL FILTER 29 CFR Part 1910	
INITIAL FILTER 49 CFR Part 1542	

FILTER OPTIONS	FILTER VALUES (One or More)
Type	
Department, Agency, or Office	
Part Number/Title	
Compliance Requirement Type	
Frequency Type	
User Specific Sorting	
Development	
Operations	
Management	
Properties	
SMS	
EMS	
Sponsor Assurances	
14 CFR Part 139	
Compliance Due Date Calendar Year	

*See NOTE b

*See NOTE b

Reset Filter Values

Generate Master Schedule

Generate Quick Reference Guide

Prompt for directory to store Quick Reference Guide

Path to save Quick Reference Guide

File name for Quick Reference Guide

*NOTE: User Specific Sorting and Compliance Due Date Calendar Year are dependent on the information input by the user on the *Manage Regulations* tab.

Home | Regulations | Master Schedule | Manage Regulations | Lists

Ready

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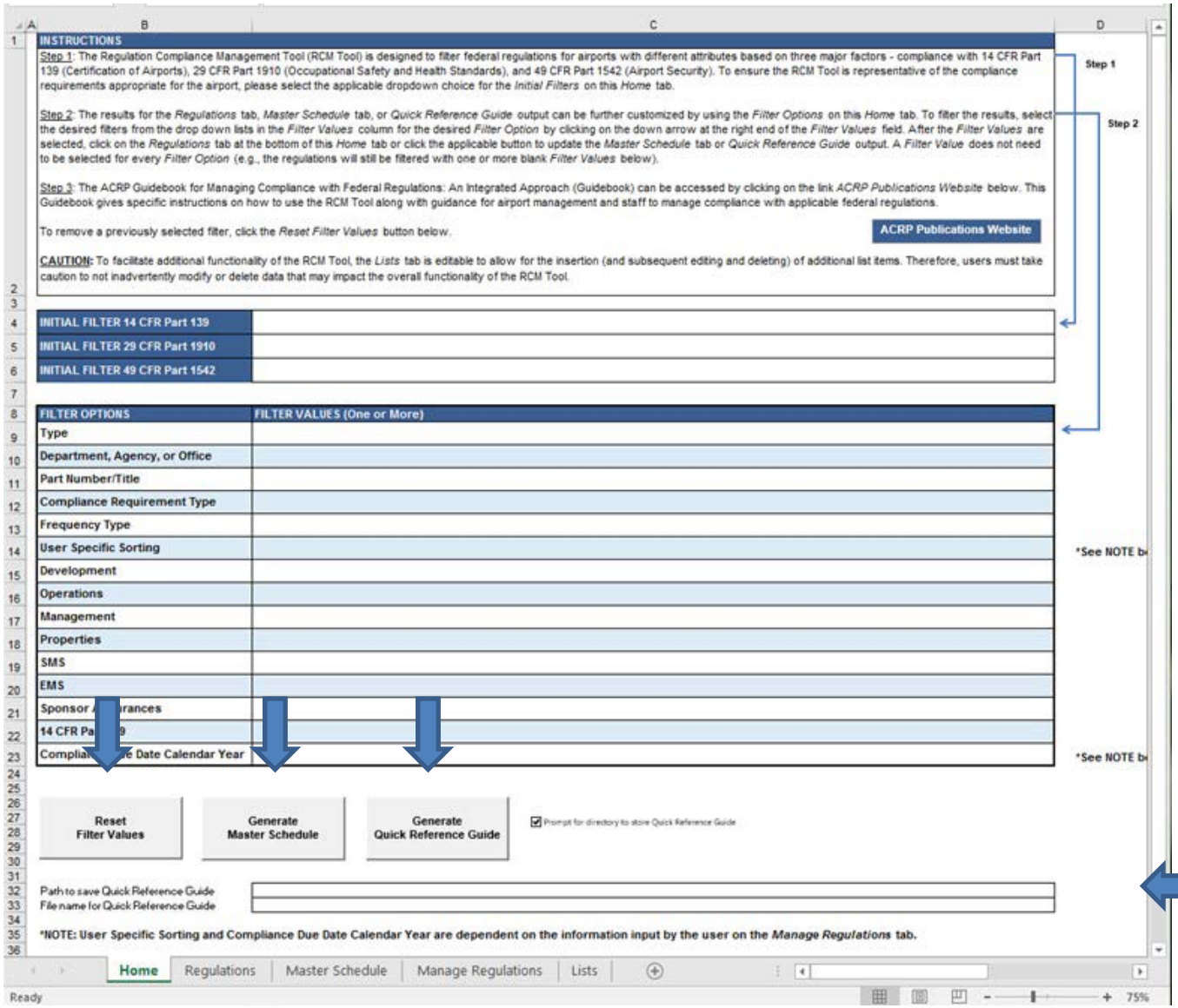
Home Tab – Buttons and Saving



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Development	
Operations	
Management	
Properties	
SMS	
EMS	
Sponsor A[illegible]rances	
14 CFR Pa[illegible]9	
Compli[illegible]e Date Calendar Year	

*See NOTE b

*See NOTE b

Reset Filter Values

Generate Master Schedule

Generate Quick Reference Guide

Prompt for directory to store Quick Reference Guide

Path to save Quick Reference Guide

File name for Quick Reference Guide

*NOTE: User Specific Sorting and Compliance Due Date Calendar Year are dependent on the information input by the user on the *Manage Regulations* tab.

Home | Regulations | Master Schedule | Manage Regulations | Lists

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Regulations Tab – Column Headings

	A	B	C	D	E	F	G	H
1	Type	Department, Agency, or Office	Part Number/Title	Citation	Section Name	Summary	Compliance Requirement Type	Action
2	Federal	DA	7 CFR Part 1792 - Compliance With Other Federal Statutes, Regulations, and Executive Orders	§1792.104 (a)	Seismic Acknowledgments	This section describes that borrowers or grant recipients must provide Rural Utilities Services (RUS) a written acknowledgment from a registered engineer responsible for the building design stating that seismic provisions pursuant to part 1792.103 will be used in the design of the building.	Document	Report
3	Federal	DA	7 CFR Part 799 - Environmental Quality and Related Environmental Concerns - Compliance With The National Environmental Policy Act	§799.7 (a)	Early Involvement in Private and State and Local Activities Requiring Federal Approval	This section describes the NEPA regulation requiring agencies to provide early involvement in actions, which when planned by other non-Federal entities, require some form of Federal involvement.	Document	Report
4	Federal	DHS	44 CFR Part 9 - Flood Plain Management and Protection of Wetlands	§9.15 (a) (b)	Planning Programs Affecting Land Use	This section describes that the Federal agency shall take floodplain management into account when evaluating any water and land use plans. No plan may be approved unless it reflects consideration of flood hazards, floodplain management, wetland protection, and prescribes planning procedures to implement	Document	Manual
5	Federal	DHS	44 CFR Part 9 - Flood Plain Management and Protection of Wetlands	§9.2	Policy	This section describes the policies, procedures and responsibilities that each agency shall take to minimize the destruction, loss or degradation of wetlands, and preserve the natural beneficial values of wetlands.	Document	Public
6	Federal	DHS	Exec. Order 12699	§12699	Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction	This section describes that in the design of a federally assisted building, the borrowers and grant recipients must utilize the seismic provisions of the most recent edition of those standards and practices.	Document	Report
7	Federal	DOD	32 CFR Part 644 - Real Estate Handbook	§644.111 -121	Acquisition by Condemnation Proceedings	This section describes the procedures of the COE relating to the acquisition of real estate and interests by condemnation proceedings.	Document	Manual
8	Federal	DOD	32 CFR Part 644 - Real Estate Handbook	§644.21 (a)	General	This section describes the procedures of the COE relating to real estate planning and project authorization for the acquisition of land and interests for military projects and other Federal agencies as required.	Document	Manual
9	Federal	DOD	32 CFR Part 644 - Real Estate Handbook	§644.423 (a-c)	Airport Development	This section describes that once the Secretary of Transportation determines that any land owned or controlled by the United States is reasonably necessary for an airport development project, he shall file a request with the agency having control of the land that the property be conveyed to the public agency sponsoring the project.	Document	Manual

Home | Regulations | Master Schedule | Manage Regulations | Lists

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Regulations Tab – Functional Areas

	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK
1	Development	Planning	Engineering	Construction	Operations	Airside	Landside	Environmental	Safety/Security	Maintenance	Management	Governance	Administration	Legal	Finance/Accounting	Risk Management	Properties	Airside	Landside	Airlines	Concessions	General Aviation	Land Use	Key Guidance
2	Yes	Yes	Yes	No	No	No	No	No	No	No	Yes	No	Yes	No	No	No	No	No	No	No	No	No	No	Yes
3	Yes	Yes	No	No	Yes	No	No	Yes	No	No	Yes	No	Yes	Yes	No	No	Yes	No	No	No	No	No	Yes	Yes
4	Yes	Yes	No	No	Yes	No	No	Yes	No	No	Yes	No	Yes	Yes	No	No	Yes	No	No	No	No	No	Yes	Yes
5	Yes	Yes	No	No	Yes	No	No	Yes	No	No	Yes	No	Yes	Yes	No	No	Yes	No	No	No	No	No	Yes	Yes
6	Yes	Yes	Yes	Yes	No	No	No	No	No	No	Yes	No	Yes	No	No	No	No	No	No	No	No	No	No	Yes
7	Yes	Yes	No	No	Yes	No	No	Yes	No	No	Yes	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	Yes
8	Yes	Yes	No	No	Yes	No	No	Yes	No	No	Yes	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	Yes
9	Yes	Yes	No	No	No	No	No	No	No	No	Yes	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	Yes

Home | Regulations | Master Schedule | Manage Regulations | Lists

Ready 75%

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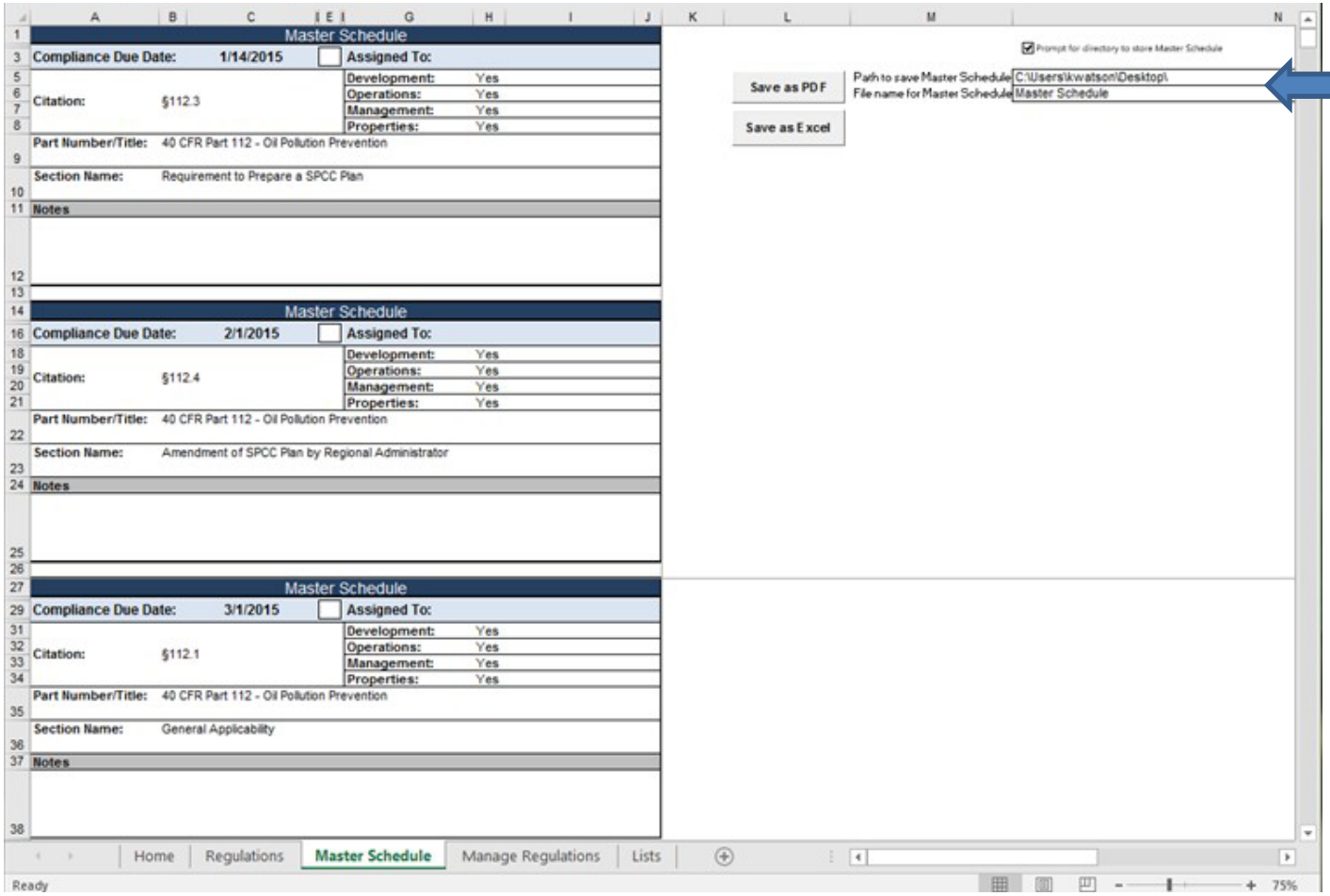
Master Schedule Tab – Updating



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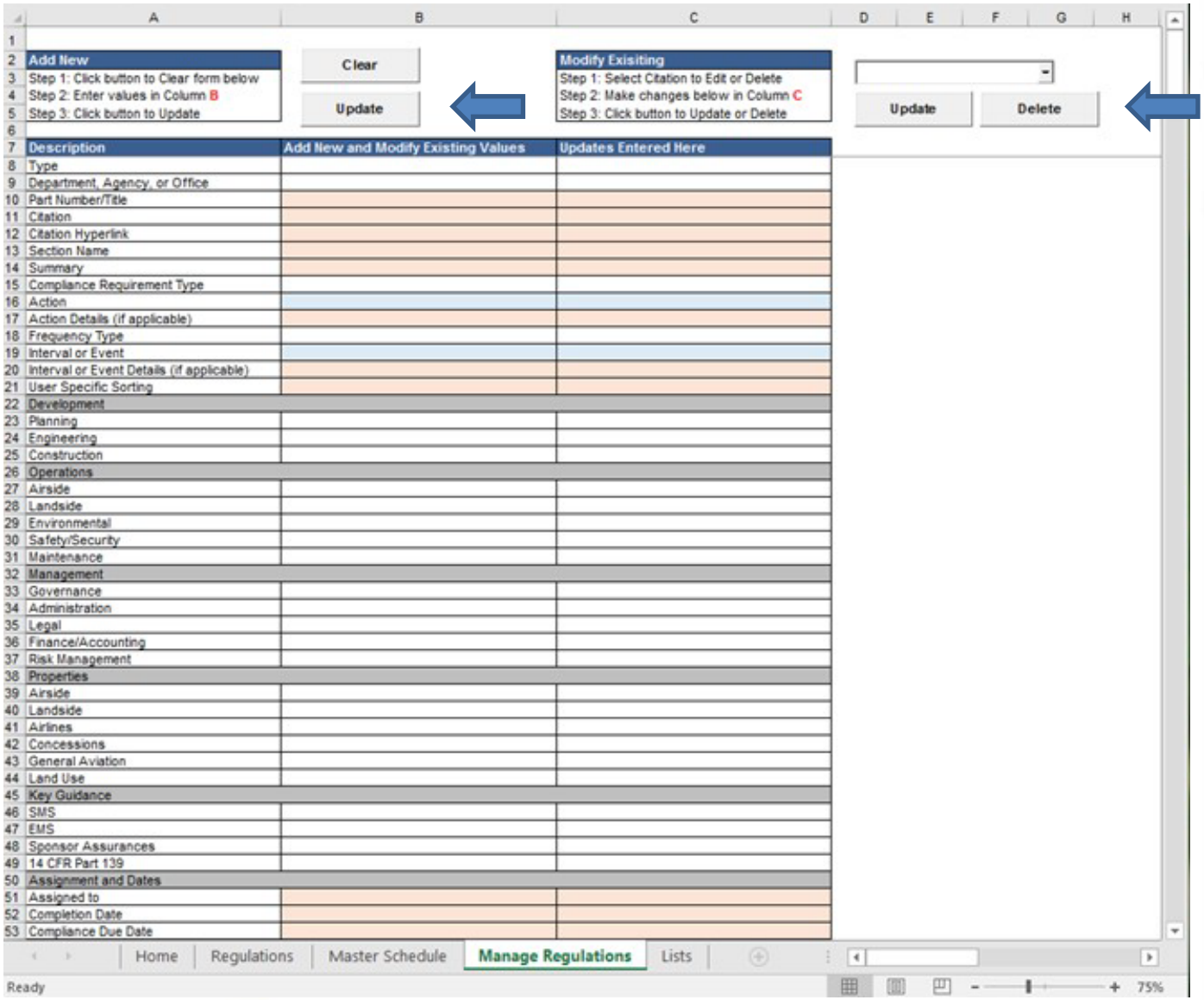
Manage Regulations Tab – Add or Modify



Add New		Modify Exisiting
Step 1: Click button to Clear form below	Clear	Step 1: Select Citation to Edit or Delete
Step 2: Enter values in Column B		Step 2: Make changes below in Column C
Step 3: Click button to Update	Update	Step 3: Click button to Update or Delete

Update | Delete

Description	Add New and Modify Existing Values	Updates Entered Here
Type		
Department, Agency, or Office		
Part Number/Title		
Citation		
Citation Hyperlink		
Section Name		
Summary		
Compliance Requirement Type		
Action		
Action Details (if applicable)		
Frequency Type		
Interval or Event		
Interval or Event Details (if applicable)		
User Specific Sorting		
Development		
Planning		
Engineering		
Construction		
Operations		
Airside		
Landside		
Environmental		
Safety/Security		
Maintenance		
Management		
Governance		
Administration		
Legal		
Finance/Accounting		
Risk Management		
Properties		
Airside		
Landside		
Airlines		
Concessions		
General Aviation		
Land Use		
Key Guidance		
SMS		
EMS		
Sponsor Assurances		
14 CFR Part 139		
Assignment and Dates		
Assigned to		
Completion Date		
Compliance Due Date		

Home | Regulations | Master Schedule | **Manage Regulations** | Lists

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Manage Regulations Tab – Dependencies

Type	Department, Agency, or Office
Federal	DA
State	DHS
Local	DOD
	DOE
	DOI
	DOJ
	DOL
	DOT
	EPA
	FAA
	FCC
	FPM
	HUD
	OMB
	OPM
	OSHA
	TSA
	U.S.C.

Compliance Requirement Type	Action
Document	Manual
	Plan
	Report
	Agreement
	Public
	License/Permit
Review	Inspection
	Audit
	Surveillance
	Observation
	Testing
	Sampling
Exercise	Training
	Drill
	Simulation
Notification	NOTAM
	FAA
	Public
	Staff
	Agreement
	Air Carriers
	Permit
Condition	Facility
	Vehicle
	Equipment
	Staffing
Other	Other (specify)

Frequency Type	Interval or Event
Continuously	N/A
Periodic	Daily
	Weekly
	Monthly
	Quarterly
	Semi-annually
	Annually
	Biannually
	Triannually
	Other (specify)
Trigger	Event
	Other (specify)
	N/A

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Lists Tab – Modify

Type	Department, Agency, or Office	Compliance Requirement Type	Action: Document	Action: Review	Action: Exercise	Action: Notification	Action: Condition	Action: Other	Frequency Type	Interval or Event: Continuously	Interval or Event: Periodic	Interval or Event: Trigger
Federal	DA	Document	Manual	Inspection	Training	NOTAM	Facility	Other (specify)	Continuously	N/A	Daily	Event
State	DHS	Review	Plan	Audit	Drill	FAA	Vehicle		Periodic		Weekly	Other (specify)
Local	DOD	Exercise	Report	Surveillance	Simulation	Public	Equipment		Trigger		Monthly	N/A
	DOE	Notification	Agreement	Observation		Staff	Staff				Quarterly	
	DOI	Condition	Public	Testing		Agreement					Semi-annually	
	DOJ	Staff	License/Permit	Sampling		Air Carriers					Annually	
	DOL	Other				Permit					Biannually	
	DOT										Triannually	
	EPA										Other (specify)	
	FAA											
	FCC											
	FPM											
	HUD											
	OMB											
	OPM											
	OSHA											
	TSA											
	U.S.C.											

Refresh dropdowns to reflect updates to this tab

Home | Regulations | Master Schedule | Manage Regulations | Lists

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RCM Tool Implementation
Benefits

- Implementation of the RCM Tool leads to:
  - Sharing of vital information and essential knowledge
  - Fostering collaboration and innovation
  - Improvement of efficiency and productivity across all functional areas of the airport

Knowledge is not power.

Implementation of knowledge is power.

Unknown

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RCM Tool Implementation
Limitations

- The RCM Tool, by itself, is not a CMS
- RCM Tool does not establish:
  - Compliance policy
  - Compliance management and oversight plan
  - Compliance goals, objectives, and action plans
- RCM Tool contains information and features to help track and manage compliance with federal (and state and local) regulations

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RCM Tool Implementation
Implementation Approach

- Implementation of the RCM Tool should answer the following questions:
  - Who will be responsible for managing and using?
  - What are the airport functional areas and who is the responsible party for compliance in each?
  - What regulations will be tracked and managed?
  - Who, what, when, where, why, and how was compliance last accomplished?
  - What are the methods and techniques to integrate the RCM Tool into the regulation compliance efforts at the airport?

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RCM Tool Implementation
RCM Tool Manager

- Individual designated to oversee compliance efforts
- Oversee the use and implementation of RCM Tool
  - Integrate use of RCM Tool into CMS action plans
  - Assign RCM Tool user
  - Coordinate with airport functional areas (training, identification of regulations, and collection of resources)
  - Coordinate distribution of Quick Reference Guides and Master Schedules
  - Implement Plan, Do, Check Act process

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RCM Tool Implementation
RCM Tool User

- Individual responsible for learning
  - Full functionality of RCM Tool and managing content
  - Generating Quick Reference Guides and Master Schedules
- Specific responsibilities include:
  - Deleting existing non-applicable federal regulations
  - Add new applicable federal regulations and additional information
  - Identify impacts to functional areas
  - Monitor changes to tracked regulations
  - Update compliance completion dates and due dates

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RCM Tool Implementation
Past Compliance Actions

- Incorporate past compliance actions into the RCM Tool
  - Who – is responsible
  - What – is the compliance requirement?
  - When – was the last time compliance was accomplished and when is the next due date (if applicable)?
  - Where – is the impact (which functional area)
  - How – was compliance accomplished

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RCM Tool Implementation
Integration of RCM Tool

- Integration of RCM Tool into CMS allows:
  - Tracking and management of individual regulations
  - Where compliance team members of multiple functional areas can be involved in the compliance steps of specific regulations
  - Where compliance with multiple regulations can be accomplished with completion of a common compliance requirement

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RCM Tool Implementation
Multiple Regulations

- RCM Tool manager should distribute Quick Reference Guides and Master Schedules
- Provides opportunity for functional area compliance members to coordinate compliance activities

Impacts (on other functional areas/responsible departments):							
Development		Operations		Management		Properties	
-Planning:	No	-Airside:	Yes	-Governance:	No	-Airside:	Yes
-Engineering:	No	-Landside:	No	-Administration:	No	-Landside:	No
-Construction:	No	-Environmental:	No	-Legal:	No	-Airlines:	Yes
		-Safety/Security:	Yes	-Finance/Accounting:	No	-Concessions:	No
		-Maintenance:	No	-Risk Management:	No	-General Aviation:	Yes
						-Land Use:	No

Master Schedule			
Compliance Due Date:	3/5/2016	☐	Assigned To:
Citation:	§139.323 (a)		Development: No Operations: Yes Management: No Properties: Yes

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RCM Tool Implementation
Compliance Scenarios - Environmental

- Spill Prevention Control and Countermeasures (SPCC)
  - Determine if facility and/or tenants must comply
  - Identify which airport functional areas involved and who is responsible for the compliance activity
- Example: Small GA Airport
  - Limited airport staff
  - Airport operates multiple fuel tanks
  - One FBO with a fuel farm and two refueling trucks
- RCM Tool solution:
  - Identifies need and number of SPCC Plans
  - Allows scheduling for inspections, trainings, and testing

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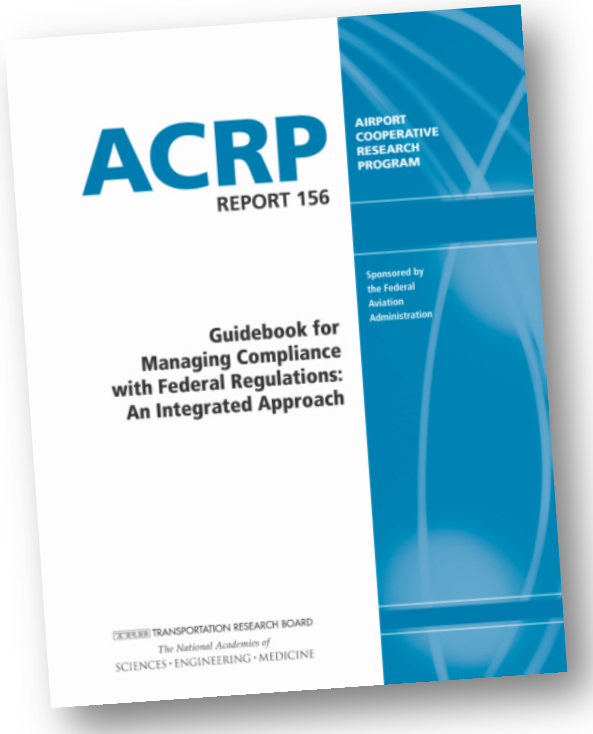
For additional information:



ACRP Report 156

A Guidebook for the Managing Compliance with Federal Regulations: An Integrated Approach

- Jeff Kohlman
  - jkohlman@aviationmanagement.com

http://www.trb.org/Publications/Blurbs/174389.aspx

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Today's Participants

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- David Benner, *Aviation Management Consulting Group, Inc.,* dbenner@aviationmanagement.com

Panelists Presentations

http://onlinepubs.trb.org/onlinepubs/webinars/170725.pdf

After the webinar, you will receive a follow-up email containing a link to the recording

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- Prepare a proposal to conduct research.
- Get involved in TRB's Aviation Group of committees.
- Take part in the Champion or Ambassador Programs.

For more information:
http://www.trb.org/acrp/acrp.aspx