

WYVERN Ltd | FAA ASAP Client Guide



# FAA Aviation Safety Action Program (ASAP)

Client Implementation and Operations Guide

Prepared for WYVERN clients

[www.wyvernlimited.com](http://www.wyvernlimited.com)

Version 1.0 | February 13, 2026

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### Disclaimer and scope

This guide is a WYVERN-developed client aid that summarizes and operationalizes Federal Aviation Administration (FAA) guidance for establishing and operating an Aviation Safety Action Program (ASAP). It is not an FAA-approved document, and it does not replace your company policies, FAA regulations, or the provisions of your FAA-approved ASAP Memorandum of Understanding (MOU). For program-specific questions, coordinate with your local FAA Flight Standards office and the signatories to your ASAP MOU.

### How to use this guide

Use this document to:

- Explain ASAP concepts to employees and managers in plain language.
- Set up reporting, review, and corrective action processes consistent with FAA guidance.
- Provide ready-to-use templates (report fields, ERC agenda, quarterly trend brief).
- Support your Safety Management System (SMS) hazard identification and risk management processes.

### Source document

Primary reference: FAA Advisory Circular (AC) 120-66C, Aviation Safety Action Program, dated March 31, 2020.

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### Overview

This guide is structured into the following sections.

1. ASAP overview and safety culture
  2. Key concepts and definitions
  3. Roles and responsibilities (employees, ERC, ASAP manager, FAA)
  4. Building your ASAP (MOU, reporting channels, database, training)
  5. Report life cycle (submission to closure)
  6. What to include in an ASAP report (WYVERN recommended fields)
  7. Worked example: maintenance step omitted during a repair
  8. Quarterly trend analysis and senior management reporting
  9. Integration with SMS and related voluntary programs
- Appendices (checklists and templates)

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## 1. ASAP overview and safety culture

An Aviation Safety Action Program (ASAP) is a voluntary safety reporting program that enables employees to report safety information that may be critical to identifying precursors to accidents. The program encourages open reporting so that safety issues are resolved through corrective action rather than punishment or discipline.

### 1.1 What ASAP is designed to do

- Capture safety information that might otherwise remain unreported.
- Identify hazards, unsafe conditions, and precursors before they lead to an incident or accident.
- Analyze reports to determine contributing factors and systemic issues.
- Implement corrective actions and monitor effectiveness over time.

### 1.2 What ASAP is not

- A replacement for required regulatory reporting (e.g., accident/incident reporting).
- A mechanism to avoid accountability for reckless or intentional behavior.
- A disciplinary tool. ASAP information is intended to support safety improvements.

### 1.3 Safety culture expectations

An effective ASAP depends on trust. Employees must believe that the organization and the FAA will use accepted reports to improve safety, not to punish. Leaders should communicate the program purpose, protect confidentiality, and visibly act on trends and systemic issues.

## 2. Key concepts and definitions

Key terms used throughout this guide are summarized below (see FAA AC 120-66C Appendix A for the full set of definitions).

| Term                                | Plain-language meaning  |
|-------------------------------------|---|
| <b>Event Review Committee (ERC)</b> | A group representing the FAA, the company, and (if applicable) the employee labor group that reviews reports, determines acceptance/exclusion, and recommends corrective actions. |

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|                                       |  |
|---------------------------------------|--|
| <b>ASAP Manager</b>                   | The program administrator who receives, tracks, analyzes, and responds to reports and supports the ERC process.  |
| <b>Corrective action</b>              | A safety-related action determined necessary by the ERC to address an issue revealed by a report (training, mentoring, procedure change, etc.).                                    |
| <b>Acceptance and exclusion</b>       | Reports are generally accepted unless an exclusion criterion applies (e.g., reckless or intentional conduct, the 'Big Five', outside scope of employment, repeated noncompliance). |
| <b>Big Five</b>                       | Possible criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification.   |
| <b>Sole-source vs non-sole-source</b> | A report is sole-source when all evidence is predicated on the ASAP report; it is non-sole-source when independent evidence exists outside the report.                             |

**2.1 Enforcement-related incentive in plain language**

If an employee submits a report that is accepted into the ASAP (and is not later excluded), the FAA will not use enforcement action to address the apparent violation described in the report. Reports may be excluded and referred for investigation when exclusion criteria apply.

**3. Roles and responsibilities**

An ASAP is a partnership governed by an MOU. The program works best when each participant understands their role, decision authority, and confidentiality responsibilities.

**3.1 Event Review Committee (ERC)**

The ERC is typically comprised of:

- A management representative from the eligible entity (company).
- A representative from the employee group or labor association (if applicable).
- A specifically qualified FAA inspector from the appropriate Flight Standards office.

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Core ERC responsibilities include:

- Review and analyze ASAP reports.
- Determine whether reports meet any criteria for exclusion.
- Investigate events (including interviews when appropriate).
- Identify safety issues, propose solutions, and recommend corrective actions.
- Review the ASAP database at least annually to assess whether corrective actions have been effective.

### 3.2 FAA participation and attendance

FAA participation in the ERC is essential, but FAA attendance at every ERC meeting may be optional depending on the types of reports being considered. Reports associated with criminal activity, substance abuse, controlled substances, alcohol, intentional falsification, reckless conduct, or medical certification/qualification issues require FAA attendance. For other reports, the FAA ERC member may determine that attendance is not necessary, provided appropriate records and minutes are maintained.

### 3.3 ASAP Manager

The ASAP manager (company representative or third-party facilitator, as applicable) typically:

- Receives, records, tracks, analyzes, and responds to ASAP reports.
- Maintains the ASAP database and facilitates ERC access.
- Prepares ERC agendas and distributes reports in advance (with name-redacted versions as needed).
- Tracks corrective actions to completion and documents closure.
- Provides feedback to submitters and communicates program results and trends to company management.

### 3.4 Company leadership

- Provide resources (time, tools, personnel) to operate the program effectively.
- Reinforce nonpunitive intent and protect confidentiality.
- Remove barriers to reporting (fear of retaliation, unclear procedures, lack of feedback).
- Use trend data to prioritize systemic fixes and support SMS risk management.

### 3.5 WYVERN support role (optional)

WYVERN can support clients by helping design practical ASAP procedures, developing report taxonomies, training ERC members and employees, and building quarterly trend

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reporting that integrates with SMS. The signatories to the ASAP MOU retain decision authority for report acceptance/exclusion and corrective actions.

### 4. Building your ASAP

The FAA approves ASAPs on a case-by-case basis. Use the steps below as a practical implementation roadmap aligned with AC 120-66C.

#### 4.1 Implementation roadmap

| Step  | What to do  |
|---|---|
| <b>1. Engage the FAA</b>                                | Contact your local Flight Standards office to discuss eligibility, scope, and FAA capacity to oversee the program.  |
| <b>2. Define scope and participants</b>                 | Decide which employee groups are covered (e.g., maintenance, flight operations, dispatch, cabin, ramp). Confirm whether contractors will be covered and ensure contracts require compliance with the MOU if included. |
| <b>3. Draft the MOU using the FAA template</b>          | Use the FAA MOU template (Appendix C) and avoid nonconforming changes. Identify signatories and alternates.   |
| <b>4. Establish the ERC and appoint an ASAP manager</b> | Select empowered representatives who can make decisions in the best interest of safety. Define meeting cadence and quorum expectations.   |
| <b>5. Set up reporting channels and database</b>        | Implement secure electronic submission, tracking, categorization, and retention. Plan for de-identification and controlled access.  |
| <b>6. Develop an ERC policy and procedures manual</b>   | Document your ERC process, taxonomies, risk matrix, decision flow, corrective action options, and rules of conduct.   |
| <b>7. Train employees and managers</b>                  | Provide written guidance at least 2 weeks before go-live; include ASAP in initial and recurrent training.   |

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| <p><b>8. Integrate with SMS</b></p>     | <p>Define how accepted reports feed hazard identification, risk assessment, and safety assurance processes (while protecting confidentiality).</p> |
| <p><b>9. Launch and communicate</b></p> | <p>Go live with clear instructions, sample reports, and feedback loops.</p>  |
| <p><b>10. Review and improve</b></p>    | <p>Perform ongoing reviews, annual database reviews, and periodic (2-year) program reviews by signatories.</p>                                     |

### 4.2 Data protection and confidentiality

Certain voluntarily provided safety information may be protected from public disclosure under 49 U.S.C. 40123 and 14 CFR part 193. Your ASAP procedures should define who can access reports, how reports are de-identified for trend analysis, and how information is shared with employees and leadership while protecting confidentiality.

### 4.3 Recordkeeping and retention

ASAP recordkeeping should be sufficient to administer and evaluate the program. FAA guidance encourages an electronic database for submission, categorization, risk analysis, and trending, and recommends retaining safety-related information long enough to evaluate corrective action effectiveness, but not less than 2 years.

### 4.4 Communicating high-profile events

When a report involves potentially controversial issues or high-profile safety-related events, the ERC should communicate in a timely manner with management for the parties to the MOU, while protecting confidential details.

## 5. Report life cycle (submission to closure)

This section describes a practical, repeatable workflow for handling reports from submission through closure.

### 5.1 Intake and acknowledgement

- Employee submits an ASAP report via the approved channel (web form, secure email, or third-party facilitator portal).

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- ASAP manager logs the report, assigns a unique ID, and acknowledges receipt to the reporter.
- If the report is disseminated within the organization before ERC review, include the statutory disclaimer that it has not yet been reviewed and may later be found ineligible.

### 5.2 Initial screening

- Confirm the event is within the scope of employment and within the program's coverage.
- Check for immediate safety concerns that require urgent mitigation (before the next ERC meeting).
- Identify if other employees are implicated and determine whether they should be invited to submit their own report.

### 5.3 Acceptance and exclusion considerations

Reports are generally accepted unless excluded. Key exclusion categories include:

- Reckless conduct (gross disregard or deliberate indifference to safety).
- Intentional conduct (knowing noncompliance).
- The Big Five: criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification.
- Events occurring outside the scope of employment.
- Repeated noncompliance by the same individual involving the same or similar noncompliance due to a common root cause previously addressed.

Timeliness is still relevant, but the ERC has discretion to consider acceptance based on what is in the best interest of safety. Timeliness considerations do not apply to sole-source reports.

### 5.4 ERC review and consensus

The ERC's goal is to reach consensus on whether to accept a report and what corrective action(s) are appropriate. Consensus means the voluntary agreement of all voting representatives. If consensus cannot be achieved on a report involving an apparent violation or medical qualification issue, the FAA ERC representative determines acceptance or rejection.

### 5.5 Investigation and corrective action

- The ERC may conduct interviews and gather additional information.

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- Corrective actions may include training, mentoring, counseling, procedure updates, checklist or job card redesign, or other risk controls.
- Corrective actions should be documented and tracked to completion in the ASAP database.
- If a reporter fails to complete required corrective action for an apparent violation in a manner acceptable to the ERC, the report may be excluded and referred to the FAA.
- Corrective actions associated with ASAP should be tracked in the ASAP system, but official training records and personnel files should not reflect corrective actions associated with the ASAP.

### 5.6 Use of report information (discipline and enforcement)

Except as provided by the program’s exclusion criteria and FAA policy (e.g., the Big Five), ASAP reports are not intended to be used to initiate or support company discipline or FAA enforcement action. The company may still take action based on information obtained independently of the ASAP report.

### 5.7 Closure and feedback

Accepted reports are closed after the ERC determines that corrective action (if any) has been satisfactorily completed. The submitter should receive individual feedback on the final disposition, and the organization should publish de-identified lessons learned and trend information.

### 5.8 Reopening a report

A closed report may be reopened if new evidence later establishes that the report should have been excluded from the program. The ERC should not close a report until investigations are complete.

## 6. What to include in an ASAP report

A high-quality report helps the ERC understand what happened, why it happened, what risks existed, and what mitigation is appropriate. The fields below are a practical template you can adopt in your reporting system.

| Recommended field           | What to capture                                     |
|-----------------------------|---|
| <b>Reporter information</b> | Name/employee ID, contact method for follow-up.     |
| <b>Event date/time</b>      | When the event occurred and when it was discovered. |

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|                                |   |
|--------------------------------|---|
| <b>Location</b>                | Station/hangar, line location, or facility.   |
| <b>Aircraft/asset</b>          | Aircraft tail number/registration, work order or job card number, component serial number if relevant.              |
| <b>Work context</b>            | Shift, staffing level, time pressure, environmental factors, tooling, manuals used.                                 |
| <b>Description of event</b>    | Facts only. What work was being performed, what step was missed/incorrect, how it was detected.                     |
| <b>Immediate actions taken</b> | How safety was restored (work stopped, inspection performed, part reinstalled, re-tested).                          |
| <b>Potential consequences</b>  | What could have happened if not detected (leak, system failure, dispatch with noncompliance).                       |
| <b>Contributing factors</b>    | Distraction, documentation ambiguity, fatigue, handover, training gaps, tooling availability.                       |
| <b>Suggested mitigations</b>   | Ideas for preventing recurrence   |
| <b>Other evidence</b>          | Any photos, log extracts, task cards, or independent reports; indicate if you believe the event is non-sole-source. |

6.1 Writing tips for employees

- Be factual and specific; avoid blame and speculation.
- Write the sequence of events (what you did, what you noticed, what you did next).
- Include what made the task harder than usual (interruptions, unclear wording, access issues).
- Submit as soon as practical after recognizing the safety issue.

## 7. Worked example: maintenance step omitted during a repair

The example below shows how a maintenance-related ASAP report might be written when a mechanic forgets a required step in a repair per the FAA-approved maintenance program. This is an illustrative example; adapt details to your operation and your MOU.

### 7.1 Scenario summary

During a scheduled overnight maintenance event, an A&P mechanic completed a component replacement in accordance with an approved maintenance task card. After signing off the task, the mechanic realized that a required functional check step on the task card had been inadvertently skipped. The mechanic immediately notified the lead, placed the aircraft in a safe status, completed the missed functional check, and submitted an ASAP report.

### 7.2 Example ASAP report submission (sample content)

|                              |  |
|------------------------------|--|
| <b>Report title</b>          | <b>Missed functional check step after hydraulic component replacement</b>  |
| <b>Date/time of event</b>    | 2025-11-12 02:15 local (task sign-off); missed step discovered at 02:35  |
| <b>Location</b>              | Main maintenance hangar - Bay 3  |
| <b>Aircraft</b>              | N123WY, Work Order WO-45721, Job Card JC-29-610-04   |
| <b>Task being performed</b>  | Replacement of hydraulic system pressure switch per approved task card JC-29-610-04  |
| <b>What happened (facts)</b> | I replaced the pressure switch and completed the installation steps on the task card. I signed the job card after completing the installation and leak check. About 20 minutes later, while reviewing the task card during cleanup, I realized I had not performed the required operational/functional check listed in Step 12 ('Energize system and verify switch indication within limits'). |

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|---|---|
| <b>How it was detected</b>                                | Self-detected during task card review immediately after the work was completed.   |
| <b>Immediate actions taken</b>                            | I notified the lead mechanic and QA, opened the job card, and placed the aircraft in a no-dispatch status until verification was complete. We performed the missed functional check and confirmed indications were within limits. A second mechanic verified the completed step and QA closed the task. |
| <b>Potential outcome if not detected</b>                  | Aircraft could have been released without confirming correct indication, increasing the risk of dispatch with an undetected installation or component issue.  |
| <b>Contributing factors (what made it easier to miss)</b> | I was interrupted twice during the task for unrelated troubleshooting questions. The functional check step is located on the second page of the task card and is separated from the installation steps. Shift end time pressure contributed to me focusing on closing the job card.                     |
| <b>Suggested mitigations</b>                              | Move functional check steps directly after the installation steps on the task card, or add a bold 'DO NOT SIGN OFF UNTIL FUNCTIONAL CHECK COMPLETE' cue. Reinforce in recurrent training: review the entire card before sign-off and use a stop-point before close-out.                                 |
| <b>Attachments</b>  | Photo of task card Step 12 and completed functional check record; lead/QA notes.  |

### 7.3 How the ERC might review this report

The ERC would typically evaluate the report against acceptance and exclusion criteria, for example:

- Scope: The event occurred during work performed within the scope of employment.

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- Intent/recklessness: The missed step appears inadvertent (not intentional) and not reckless; immediate mitigation actions were taken.
- Big Five: No indicators of criminal activity, substance abuse, alcohol, controlled substances, or intentional falsification.
- Timeliness: Report submitted promptly after discovery; acceptance supports hazard identification.
- Systemic factors: Task card design and interruptions may be contributing factors; consider systemic corrective action in addition to individual feedback.

If accepted, the ERC could close the report after agreed corrective actions are completed (for example, coaching on sign-off discipline, human factors refresher, and a task card revision request).

## 8. Quarterly trend analysis and senior management reporting

Quarterly trend analysis turns individual reports into actionable, risk-based insights. FAA guidance emphasizes maintaining an audit trail of safety enhancements and keeping company upper management informed about program results.

### 8.1 Objectives of quarterly reporting

- Demonstrate safety enhancements achieved through ASAP (e.g., mitigations implemented, training delivered, procedures improved).
- Identify adverse trends early (recurring event types, repeat contributors, hotspots by station/shift).
- Measure corrective action effectiveness (did recurrence decrease after the fix?).
- Provide senior management with risk-based priorities, resourcing needs, and decisions required.

### 8.2 Recommended quarterly analysis workflow

| Step                                   | Details   |
|--|---|
| <b>1. Extract and de-identify data</b> | Export accepted report data from the ASAP database. Remove names and any directly identifying information before broad sharing. |
| <b>2. Normalize categorization</b>     | Apply consistent event and causal contributor taxonomies. Confirm station/aircraft/type fields are standardized.                |

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| <b>3. Perform basic metrics</b>         | Counts, acceptance rate, time-to-closure, corrective actions open/closed, top categories.                            |
| <b>4. Perform risk-focused analysis</b> | Use a likelihood/severity matrix (consistent with SMS) to identify high-risk trends even when report counts are low. |
| <b>5. Validate with SMEs</b>            | Review candidate trends with maintenance leadership, QA, and human factors SMEs to avoid misinterpretation.          |
| <b>6. Convert to actions</b>            | Summarize recommended mitigations, owners, due dates, and expected risk reduction.                                   |
| <b>7. Brief leadership</b>              | Provide a concise briefing deck and a written quarterly report; record leadership decisions and follow-up actions.   |

### 8.3 Recommended quarterly dashboard metrics

- Total reports submitted (by employee group and station).
- Acceptance vs exclusion rate (with high-level reasons; no personally identifying info).
- Median time from submission to ERC disposition; median time to closure.
- Top 10 event categories and top 10 contributing factors.
- Repeat event themes (e.g., 'procedure step omitted', 'documentation ambiguity').
- Corrective action status: open, due soon, overdue, completed this quarter.
- Effectiveness checks: recurrence rate for events with completed mitigations.
- High-risk items: events with high severity potential even if low frequency.

### 8.4 Quarterly report template for senior management

A practical WYVERN-style quarterly report can follow this structure:

| Section                           | Contents  |
|-----------------------------------|---|
| <b>Executive summary (1 page)</b> | What changed this quarter, key risks, key wins, decisions needed. |

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|--|---|
| <b>Program health</b>                        | Report volume, participation, time-to-review, time-to-close, feedback timeliness. |
| <b>Top trends and hotspots</b>               | Narrative and charts/tables; include risk ranking and confidence level.           |
| <b>Corrective actions</b>                    | What was implemented, what is pending, effectiveness observations.                |
| <b>Systemic issues</b>                       | Procedure/work card design, tooling, staffing, training, communication.           |
| <b>High-profile events</b>                   | De-identified summaries and actions taken (as appropriate).                       |
| <b>SMS interface</b>                         | Hazards entered to SMS, risk assessments completed, safety assurance monitoring.  |
| <b>Recommendations / decisions requested</b> | Resourcing, policy changes, training updates, process changes.                    |
| <b>Appendix</b>                              | De-identified event recaps, taxonomy definitions, detailed data tables.           |

**8.5 Presenting to leadership: practical tips**

- Keep identities out of leadership briefings unless strictly required by the MOU process.
- Focus on systemic improvements and risk controls, not individual mistakes.
- Track leadership decisions and assign accountable owners for follow-up.
- Ensure safety enhancements are communicated back to employees (closing the feedback loop builds reporting trust).

**9. Integration with SMS and related voluntary programs**

The FAA's SMS framework requires a means for employees to communicate safety information to management without fear of reprisal. An ASAP can support this requirement when properly integrated into your SMS processes.

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### 9.1 Practical SMS interface

- Treat accepted ASAP reports as a key hazard identification input.
- Use de-identified data to support Safety Risk Management (SRM) assessments and Safety Assurance (SA) monitoring.
- Ensure corrective actions recommended by the ERC are visible in your SMS action tracking system (without disclosing protected details).
- Use annual and quarterly reviews to validate that mitigations remain effective and are not negated by later changes (manual revisions, checklist updates, training changes).

### 9.2 Relationship to the Voluntary Disclosure Reporting Program (VDRP)

If an ASAP report reveals a possible violation by the company (as opposed to an individual), the FAA may handle that matter under the Voluntary Disclosure Reporting Program (VDRP). In some circumstances, the FAA may accept corrective actions recommended by an ASAP ERC as part of a VDRP comprehensive fix, subject to FAA discretion.

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### Appendix A. ASAP implementation checklist

1. MOU drafted using FAA template and signed by all parties.
2. ERC members and alternates appointed; authority and decision rights documented.
3. ASAP manager assigned; database and reporting tools in place.
4. Procedures manual drafted (decision flow, taxonomies, risk matrix, corrective actions).
5. Confidentiality and data protection controls documented and implemented.
6. Training delivered to employees and managers; written guidance provided prior to go-live.
7. Employee feedback loop established (individual feedback plus de-identified lessons learned).
8. Quarterly trend analysis process defined; leadership reporting cadence scheduled.
9. Annual database review scheduled; 2-year program review plan established.

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### Appendix B. ERC Meeting Agenda Template

Suggested standing agenda items:

1. Opening / confidentiality reminder / attendance
2. Review of prior meeting minutes and action items
3. New reports for disposition (accept/exclude) - triaged by risk
4. Investigations in progress - requests for additional information
5. Corrective action assignments and completion status
6. Systemic issues and trend observations
7. High-profile items (if any) - management communication plan
8. Administrative items (training, database, procedure updates)
9. Close-out / next meeting schedule

## Appendix C. Quarterly Report Template

Use the outline below to produce a consistent one-page summary for senior management. Populate with de-identified, aggregate data.

| Section                                | Prompt  |
|--|---|
| <b>Quarterly snapshot</b>              | Report volume, acceptance rate, time-to-close, participation notes.   |
| <b>Top 3 safety themes</b>             | Brief description, risk ranking, and what changed since last quarter. |
| <b>Key safety enhancements</b>         | Procedures updated, training delivered, tools introduced, etc.        |
| <b>Open high-risk items</b>            | What remains unresolved and why; required decisions or resources.     |
| <b>Corrective action effectiveness</b> | Evidence of improvement or continued recurrence.                      |
| <b>Decisions requested</b>             | Specific asks of leadership (approve resources, policy change, etc.). |

## References

Federal Aviation Administration. Advisory Circular 120-66C, Aviation Safety Action Program. March 31, 2020.