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Federal Aviation
Administration

Advisory Circular

Subject: Voluntary Disclosure Reporting
Program

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Change:

- 1 PURPOSE OF THIS ADVISORY CIRCULAR (AC).** This AC provides information and guidance material that a regulated entity (RE) operating under Title 14 of the Code of Federal Regulations (14 CFR) may use when voluntarily disclosing to the Federal Aviation Administration (FAA) apparent violations of those FAA regulations listed in paragraph 2. The procedures and practices outlined herein may be applied to all applicable REs. The procedures and practices outlined in this AC cannot be applied to persons who are required to report failures, malfunctions, and defects under applicable regulations (e.g., 14 CFR part [21](#), § [21.3](#)). The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, and the document is intended only to provide information to the public regarding existing requirements under the law or agency policies.

Note: The Voluntary Disclosure Reporting Program (VDRP) System can be accessed at <https://vdrp.faa.gov/>. Access requires an active user account.

- 2 AUDIENCE.** The audience for this AC includes all REs with operational authority under 14 CFR parts [21](#), [119](#), [121](#), [125](#), [129](#), [133](#), [135](#), [137](#), [141](#), [142](#), [145](#), [147](#) and, for qualified fractional ownership programs operating under 14 CFR part [91](#) subpart [K](#) (part 91K), those portions of part 91 pertaining directly to the duties and responsibilities of the program manager, as defined in part 91K or management specifications (MSpecs), with the exception of those specified in paragraphs 2.1 through 2.3 below.
 - 2.1 Voluntary Disclosure for Violations of Title 49 of the Code of Federal Regulations (49 CFR) Part 175.** Voluntary disclosure of 49 CFR part [175](#) (hazardous materials (HAZMAT)) violations should be accomplished in accordance with the current edition of AC [121-37](#), Voluntary Disclosure Reporting Program - Hazardous Materials.
 - 2.2 Voluntary Disclosure for Violations of Aircraft Certification Service Regulations Under 14 CFR.** Voluntary disclosure for violations of regulations relating to production approval holders (PAH), design approval holders (DAH), and Organization Designation Authorities (ODA) should be accomplished in accordance with the current edition of AC [00-68](#), Aircraft Certification Service Voluntary Disclosure Reporting Program.
 - 2.3 Voluntary Disclosure of Violations of Anti-Drug and Alcohol Misuse Prevention Program Regulations Under 14 CFR.** Voluntary disclosure for violations of anti-drug and alcohol misuse prevention program regulations should be accomplished in

accordance with the current edition of AC [120-117](#), Voluntary Disclosure Reporting Program for Apparent Violations of the Drug and Alcohol Testing Regulations.

- 3 WHERE YOU CAN FIND THIS AC.** You can find this AC on the FAA's website at https://www.faa.gov/regulations_policies/advisory_circulars and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>.
- 4 WHAT THIS AC CANCELS.** AC 00-58B, Voluntary Disclosure Reporting Program, dated April 29, 2009, is canceled.
- 5 DEFINITIONS.** The following key terms are defined to ensure a standard interpretation and understanding of the FAA's voluntary disclosure policy:
 - 5.1 Comprehensive Fix.** A comprehensive fix is an action, or actions, proposed by the RE and accepted by the principal inspector (PI), to preclude recurrence of the apparent violation that has been voluntarily disclosed under this program. A schedule of the dates and events encompassed by the comprehensive fix will be established by the RE with FAA concurrence. This should include each corrective action, as well as an audit for effectiveness, once all steps have been completed.
 - 5.2 Evidence.** For voluntary disclosure, evidence will generally be in the form of written documentation or reports that support an RE's analysis of the disclosed apparent violation and the resulting elements (corrective actions) of the proposed comprehensive fix. Evidence generally comes from the following four elements:
 1. Documents or manuals reviewed.
 2. Equipment examined.
 3. Activities observed.
 4. Interview data.
 - 5.3 Fractional Ownership Programs.** Fractional ownership programs are defined in part 91K and the associated MSpecs. Participation in the VDRP by a fractional ownership program is limited by the following:
 1. Only program managers authorized in accordance with part 91K and MSpecs may participate in the VDRP.
 2. Voluntary disclosures of apparent violations by a fractional ownership program may only be submitted by the program manager, or an authorized representative.
 3. Voluntary disclosures by fractional ownership programs are limited to apparent violations pertaining directly to the duties and responsibilities of the program manager, as defined in part 91K and the MSpecs.
 - 5.4 Intentional Conduct.** A deliberate act (or failure to act) while knowing that such conduct is contrary to a regulation or statute, or is otherwise prohibited.

- 5.5 Principal Inspector (PI).** Under the VDRP, PI refers to the appropriate Maintenance, Avionics, or Operations PI, or other designated FAA official of the program office responsible for oversight of the area of noncompliance involved in the disclosure.
- 5.6 Reckless Conduct.** An act (or failure to act) demonstrating a gross disregard for or deliberate indifference to safety or a safety standard.
- 5.7 Regulated Entity (RE).** An RE is any certificate holder (CH) or fractional ownership program authorized to submit voluntary disclosures under this VDRP.
- 5.8 Satisfactory Fix.** A satisfactory fix is a comprehensive fix in which all corrective measures have been completed on schedule, have been scrutinized for effectiveness using a self-audit, and are acceptable to the FAA.
- 5.9 Self-Audit.** A self-audit is an internal compliance review to evaluate the effectiveness of changes to systems and/or processes implemented as corrective actions following disclosure of regulatory noncompliance.
- 5.10 Senior Office Manager (SOM).** The SOM is responsible for the review and concurrence with the acceptance and closure of Voluntary Disclosure Reports (VDR) by the PIs within a given office. Although usually a duty performed by the actual manager, this role can be delegated and/or assisted by an alternate SOM (ASOM).
- 5.11 Voluntary Disclosure Report (VDR).** A VDR contains a self-disclosure (SD), which is an input by the RE into the VDRP system that purports to notify the FAA of an apparent violation of 14 CFR. This is initially identified by a Notification ID number; after acceptance it is additionally identified by a VDR number. The format of this number is not indicative of any link or sharing of information with the Enforcement Information System (EIS) but is retained simply for data tracking purposes. The previous link with EIS was severed in 2015 after the implementation of what is now the Compliance Program.
- 6 BACKGROUND.** Civil penalties, under the FAA's Compliance and Enforcement Program, have always been considered a means to promote compliance with the FAA's regulations, not an end in themselves. In addition to the deterrence achieved by the appropriate use of civil penalties, the public interest is also served by positive incentives to promote and achieve compliance. Indeed, the FAA believes that aviation safety is well served by incentives for REs to identify and correct their own instances of noncompliance and to invest more resources in efforts to preclude their reoccurrence. The FAA's policy of forgoing civil penalty actions when one of these entities detects violations, promptly discloses the violations to the FAA, and takes prompt corrective action to ensure that the same or similar violations do not reoccur, is designed to encourage compliance with the FAA's regulations, foster safe operating practices, and promote the development of Internal Evaluation Programs (IEP).

7 DISCUSSION.

- 7.1 IEPs.** REs are encouraged but not required by the FAA to develop IEPs that continually monitor company policies and procedures and ensure that the highest level of safety and security compliance is maintained. They may voluntarily disclose apparent violations of 14 CFR covered by this program in accordance with the procedures in this AC, even though an IEP has not been established. Guidance on IEPs is contained in the current edition of AC [120-59](#), Internal Evaluation Programs.
- 7.2 Appendices.** This AC is divided into the main body, which addresses issues common to all REs using the VDRP system, and two appendices that address application of the VDRP system to differing groups of REs. This separation by appendices is necessary due to differences in the applicable procedures. The groups and their respective appendices are as follows:
1. Appendix [A](#) is applicable to air carriers operating under parts 121 and 135, and repair stations operating under part 145. All entities assigned to Appendix A will use the web-based VDRP application.
 2. Appendix [B](#) is applicable to the remaining REs who are not yet authorized to use the web-based VDRP application but may still participate in the VDRP outside of the web-based VDRP.

8 VOLUNTARY DISCLOSURE POLICY.

- 8.1 Violation Reporting.** The FAA believes that the open reporting of apparent violations and a cooperative approach to solving problems will enhance and promote aviation safety. Although it may not be entirely clear that an actual violation has occurred at the outset, the perception that there is an apparent violation should inspire the RE to share that information with the FAA. If the facts lead to a determination that no violation has occurred, and those facts can be documented, the disclosure is subsequently closed with no action.
- 8.2 Violation Evaluation.** In evaluating whether an apparent violation is covered by this policy, the FAA will ensure that the following five conditions for acceptance are met:
1. The RE has notified the FAA of the apparent violation immediately after detecting it, but no later than 24 hours after detection and before the FAA has learned of it by other means.
 2. The apparent violation was neither reckless nor intentional.
 3. The apparent violation does not indicate a lack, or reasonable question, of qualification of the RE.
 4. Immediate action, satisfactory to the FAA, was taken upon discovery to terminate the conduct that resulted in the apparent violation.
 5. The RE has developed or is developing a comprehensive fix and schedule of implementation satisfactory to the FAA. The comprehensive fix will include a

followup self-audit to ensure that the action taken corrects the noncompliance. This self-audit is in addition to any audits conducted by the FAA.

- 8.2.1** The FAA ordinarily will not accept a VDR if the RE informs the FAA of the apparent violation during, or in anticipation of, an FAA investigation/inspection or in association with an accident or incident.

9 POLICY EXCEPTIONS. Certain circumstances that may present exceptions to the timeliness criteria in paragraph [8.2](#), item [1](#) above are:

- 9.1 Exception: Aviation Safety Action Program (ASAP) Report.** If the FAA has learned of an apparent violation by an RE from an ASAP report (as described in the current edition of AC [120-66](#), Aviation Safety Action Program), the FAA can still accept a voluntary disclosure, even though they have already learned of the violation from the ASAP.
- 9.2 Exception: Joint Audit.** Similarly, if an RE voluntarily agrees to conduct a joint audit (inspection) with the FAA, during which an apparent violation is discovered either by the company or FAA members of the audit (inspection) team, the FAA may accept a voluntary disclosure submitted by the company, even though the FAA has already learned of the apparent violation during the joint audit (inspection).

Note: For further guidance on a joint evaluation in accordance with the FAA Certificate Holder Evaluation Process (CHEP), refer to FAA Order [8900.1](#), Volume 10, Chapter 8, Section 1, Safety Assurance System: Certificate Holder Evaluation Process.

- 10 REPEAT VIOLATIONS.** If a repeated violation occurs, notwithstanding the fact that a prior comprehensive fix was satisfactorily completed and followed, the procedures outlined in this AC may apply to the disclosure of the repeated violation. Upon consideration of the facts and circumstances surrounding the repeat violation, the FAA will determine on a case-by-case basis whether a repeat violation will be covered under this policy. REs conduct a Root Cause Analysis (RCA) to evaluate, in detail, the systemic issues and circumstances surrounding each apparent violation. In accordance with Public Law (PL) 112-95, Sec. 344 (dated February 14, 2012), the FAA will confirm that a violation with the same root causes has not been previously discovered by an inspector or self-disclosed. This is particularly important when citing recurring violations of a common regulation. Depending upon the specific circumstances associated with the event, citations of a common regulation may not necessarily be indicative of a common systemic failure. The FAA will notify the operator if its history of repeated violations with a similar root cause will result in nonacceptance of future VDRP submissions pertaining to the same issue.
- 11 INVESTIGATIONS AND USE OF VDRs.** Under the FAA's governing statute, regulations, and agency policy, the FAA investigates statutory and regulatory noncompliance and takes appropriate action in response to noncompliance.

- 11.1 Accepted Reports.** The FAA takes no action against an RE that submits a report that is accepted (and not subsequently rejected). Such reports are closed with an FAA response by email from the VDRP automation to the submitter after the FAA determines to its satisfaction that the submitter has accomplished all elements of the comprehensive fix, including the RE's self-audit. For REs not authorized to use the web-based VDRP application, closure will be accomplished in accordance with Appendix [B](#), paragraph [B.8](#), item 1.
- 11.2 Rejected Reports.** If the report does not meet the criteria of paragraph [8.2](#) above, and otherwise does not comply with the provisions of this AC, the FAA will reject the report. The FAA will investigate the noncompliance identified in the rejected report. The FAA may use the entire content of the rejected report as evidence in any FAA investigation and FAA action (except for reports that the FAA rejects based on its determination that no violation occurred).
- 12 REOPENING A CASE.** If, following FAA closure of the VDR, the same or similar violations are discovered to have occurred prior to submission of the associated VDR, the FAA does not reopen the case unless it determines that the RE failed to comply with all the elements of the comprehensive fix as agreed upon by the FAA and the RE.
- 13 DISPUTE RESOLUTION.** When disputes occur regarding the acceptance of a proposed comprehensive fix, or a modification thereto, the PI and the RE may request that the issue be resolved at the next higher level of management within the FAA. This procedure will provide for an independent assessment of the areas in disagreement.
- 14 SEPARATE ACTIONS AGAINST AIRMEN OR OTHER INDIVIDUAL AGENTS.**
- 14.1 Conditions for Meeting VDRP Policy.** The voluntary disclosure policy applies to individual airmen or other agents of an employing RE only when all the following occur:
- 14.1.1** The apparent violation involves a deficiency of the employing entity's practices or procedures that causes the employing RE to be responsible for a covered violation of an FAA regulation.
- 14.1.2** The airman or other agent of the employing entity, while acting on behalf of the employing entity, violates the FAA's regulations in a manner that is neither intentional nor reckless, and as a direct result of a deficiency of the employing entity that causes the employing entity to be in violation of the regulations. (The voluntary disclosure policy does not apply to the airman or other agent when their apparent violation is the result of actions unrelated to the employing entity's deficiency.)
- 14.1.3** The airman or other agent immediately makes the report of their apparent violation to the employing entity.
- 14.1.4** The employing RE immediately notifies the FAA of both the airman or other agent's apparent violation and the apparent deficiency in its practice or procedures.

14.2 If All Conditions Are Met. When all the above conditions are met, a compliance action or administrative action is taken for the individual in accordance with the current edition of FAA Order [2150.3](#), FAA Compliance and Enforcement Program, and Order [8900.1](#), Volume 14, Compliance and Enforcement.

14.3 If All Conditions Are Not Met. If all the above conditions are not met, the PI will review all the facts associated with the case and determine what action is appropriate for individual airmen or other agents of the employing entity.

Note: This provision does not apply to matters concerning qualifications to hold an airman certificate.

14.4 ASAP Report. For apparent violations by REs when a voluntary disclosure is made based on information in an ASAP report, this paragraph applies. In such cases, the FAA may accept all or part, or even enhance, the corrective action recommended by an ASAP event review committee (ERC) for an accepted ASAP report as the comprehensive fix for the voluntary disclosure. This is acceptable when both of the following conditions apply, even when an apparent employee qualification or competency issue is involved:

1. The FAA determines that the violation is due entirely to the actions of the employee(s) and not to a systemic or procedural deficiency of the company; and
2. The employee completes the corrective action to the satisfaction of the FAA.

15 PROTECTION OF VDRP INFORMATION FROM PUBLIC DISCLOSURE UNDER 14 CFR PART [193](#). Records submitted to the FAA for review pursuant to this VDRP, including information submitted using the web-based VDRP application, are protected from release to the public in accordance with the provisions of part 193, the Federal Register Notice [81 FR 64085](#) (dated September 19, 2016), and FAA Order [8000.89](#), Designation of Voluntary Disclosure Reporting Program (VDRP) Information as Protected from Public Disclosure under 14 CFR Part 193.

Note: Information submitted by the RE concerning the content of a VDRP submission must be clearly labeled as follows to be eligible for protection under this designation: “WARNING: The Information in this Document is Protected from Disclosure under 49 U.S.C. 40123 and 14 CFR part 193.” If the information is submitted electronically, the warning notice must be appropriately embedded in the electronic submission in a fashion that ensures the visibility of the warning to any viewer.

16 AC FEEDBACK FORM. For your convenience, the AC Feedback Form is the last page of this AC. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this AC on the Feedback Form.



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APPENDIX A. VOLUNTARY DISCLOSURE REPORTING PROGRAM (VDRP) FOR REGULATED ENTITIES (RE)

- A.1 Applicability.** This appendix applies to REs operating under Title 14 of the Code of Federal Regulations (14 CFR) parts [121](#), [135](#), and [145](#), and to their designated representatives. These REs are authorized to use the web-based VDRP application.
- A.2 Access to the Web-Based VDRP Application.** The FAA has implemented Multi-Factor Authentication (MFA) for the VDRP to provide the next-level layer of security. Access to the web-based application is obtained via the following means:
- A.2.1 RE Representatives.** Users named by an RE to represent the company on voluntary disclosure issues will use the MFA User Guide at <https://vdrp.faa.gov/> for instructions on registering for MFA. To access the VDRP application, the representative will need to be authorized for access by their principal inspector (PI). Contact the Help Desk at 1-844-FAA-MyIT (322-6948) or helpdesk@faa.gov for additional information. Management officials specified in 14 CFR part [119](#), § [119.65](#) or § [119.69](#) are automatically added to the web-based VDRP application through the Web-based Operations Safety System (WebOPSS) when properly listed within the certificate's Operations Specification (OpSpec) A006, Management Personnel.
- A.3 The Six Stages of the VDRP.** The web-based VDRP application employs a six-stage process. Responsibility for each such stage is assigned to either the RE or the FAA, as described below. Except as specified in this advisory circular (AC), the voluntary disclosure policy applies when notification of an apparent violation is made to the FAA by the RE immediately, but no later than 24 hours, after the apparent violation has been discovered, and generally before the FAA learns of the apparent violation by some other means.
- Note:** The web-based VDRP application allows the uploading of documents (e.g., photos, text documents, and letters) by the RE in all stages and uploading by the FAA in Stages II, III, IV, V, and VI, to enable the inclusion of any documents that may be appropriate to support submissions.
- A.3.1 RE Submissions.** REs authorized to use the web-based VDRP application are listed at <https://vdrp.faa.gov>.
- A.3.2 Disclosure Notification.** Initial notification of a disclosure to the FAA will normally be made via the web-based VDRP application, unless extenuating circumstances prevent initial notification using that means, or if previous arrangements have been made with the appropriate PI to use alternate means.
- A.3.3 Web-Based VDRP Application Provisions.** The web-based VDRP application contains provisions for indicating that the notification process was initiated via another medium. When acceptable to the PI, the RE may submit initial notice of a voluntary disclosure orally, via a written hardcopy, or electronically, provided the RE enters the initial notification data via the web-based VDRP application (normally within 72 hours of the original notification). Compliance with the 10-business-day or 30-calendar-day guidance

for submission of the written report, as described in Stage III below, will be based on the date of the FAA response in Stage II, regardless of the submission means or medium.

A.4 Stage I: Initial Notification. The RE notifies the FAA of an apparent violation by contacting the appropriate PI. This notification automatically occurs when the RE submits the disclosure via the web-based VDRP application, as all PIs for that certificate are notified when an RE submits the disclosure through such means. However, if the RE submits the initial notification via alternative media, the RE should submit the disclosure directly to the appropriate PI. The timeliness criteria for a Voluntary Disclosure Report (VDR) are described in paragraph [8.2](#), item 1 and paragraph [9](#) of this AC. The FAA retains sole discretion in determining whether a voluntary disclosure received later than 24 hours after discovery of the violation will be accepted. The RE should therefore not delay notification for any reason, and address the following items:

- A.4.1 Brief Description of the Apparent Violation.** A brief description of the apparent violation, including an estimate of the duration of time that it remained undetected, as well as how and when it was discovered.
- A.4.2 Verification of Cease of Noncompliance.** Verification that noncompliance ceased after it was identified.
- A.4.3 Brief Description of Immediate Action.** A brief description of the immediate action taken after the apparent violation was identified, the immediate action taken to terminate the conduct that resulted in the apparent violation, and the person responsible for taking the immediate action.
- A.4.4 Verification of Evaluation.** Verification that an evaluation is underway to determine:
1. If there are any systemic problems, and
 2. The corrective steps necessary to prevent the apparent violation from reoccurring. (Please note the corrective steps in the “Further Clarification of Above” box on the “Verify” tab of the Initial Disclosure.)
- A.4.5 Identification of Responsible Person.** Identification of the person responsible for preparing the comprehensive fix.
- A.4.6 Acknowledgment of a Written Report.** Acknowledgment that a written report meeting the criteria under paragraph [A.6](#) will be provided to the PI within 10 business days. If a proposed comprehensive fix is not fully developed within 10 business days, the RE should provide at least an overview of its comprehensive fix plans in a preliminary written report submitted within 10 business days. In any event, a complete written report should be submitted within 30 calendar days from the date of FAA acceptance in the Initial Notification Response.

A.4.7 Initial Notification Submission by Management Officials. The initial notification of a voluntary disclosure is submitted by one of the management officials specified in § 119.65 or § 119.69, as appropriate, or in accordance with paragraph A.4.8 below.

Note: This is not applicable to part 145 repair stations.

A.4.8 Initial Notification Submission by Authorized Employees. The initial notification may be submitted by an employee authorized by the certificate holder (CH) to accomplish initial notification, provided that the employee includes a letter signed by one of the management officials specified in § 119.65 or § 119.69, as appropriate. This is not applicable to part 145 repair stations. That letter should stipulate that:

1. The corporate official is aware of this disclosure,
2. The RE took immediate action to cease the violation, and
3. The RE has developed or is developing a proposed comprehensive fix for FAA consideration to prevent future recurrences of the violation.

A.5 **Stage II: Initial Notification Response.** The PI will review the web-based submission from the RE and respond in a timely fashion through the web-based VDRP application. If the original submission from the RE was made via an alternative medium (e.g., by telephone), the PI may respond via an alternative means.

A.5.1 PI Review. The PI's review of the disclosure will confirm that the submission contains the following:

1. The RE has notified the FAA of the apparent violation immediately after detecting it, but no later than 24 hours after detection and before the FAA has learned of it by other means.
2. The apparent violation was neither reckless nor intentional.
3. The apparent violation does not indicate a lack, or reasonable question, of the RE's qualification.
4. Immediate action, satisfactory to the FAA, was taken upon discovery to terminate the conduct that resulted in the apparent violation.
5. The RE has developed, or is developing, a comprehensive fix and schedule of implementation satisfactory to the FAA. The comprehensive fix includes a followup self-audit as the final corrective action to ensure that the actions taken correct the noncompliance. This self-audit is in addition to any audits conducted by the FAA.
6. The initial notification of a voluntary disclosure was submitted by one of the management officials specified in § 119.65 or § 119.69, as appropriate; or the initial notification was submitted by an employee authorized by the CH to accomplish initial notification and includes a letter that meets the requirements set forth in paragraph A.4.8. This is not applicable to part 145 repair stations.

A.5.2 PI Completion of the Review. Once the PI completes the review of the voluntary disclosure submission, they decide to accept the disclosure, return it for editing, or reject it.

1. **Acceptance.** If the PI accepts the disclosure, the PI completes the required Stage II entries in the web-based VDRP application and submits their input. Upon submission by the PI, the VDRP system will alert the senior office manager (SOM), via email, that the file is awaiting their review.
2. **Return for Edit.** If the PI finds the disclosure does not contain sufficient information to accept the disclosure, they have the option of returning the disclosure to the RE for editing. Upon the PI selecting the “send back” button, the VDRP system notifies the RE of the determination via email and returns the case to Stage I, pending resubmission by the RE.
3. **Rejection/Invalid.** If the PI finds the disclosure does not meet the requirements for acceptance, or if no violation occurred, the PI selects “No” in response to the question, “Is this a valid self-disclosure?” Following the PI’s response, the RE is notified by email that the disclosure does not meet the requirements for acceptance. The invalid disclosure does not advance and is not assigned a VDR number.

A.5.3 SOM Review. The SOM will review the PI’s determination to accept the voluntary disclosure. The SOM will review the PI’s determination within 10 business days.

1. If the SOM concurs with the PI’s acceptance determination and selects “Submit,” Stage II is concluded and the record will advance to Stage III, which triggers automated email notification to the RE of the acceptance. It also triggers the VDRP system to automatically assign a VDR number to the report.
2. If the SOM nonconcurrs with the PI’s acceptance determination, the case will be referred back to the PI for reconsideration. The case will not advance to Stage III until the SOM concurs with the PI’s determination.

A.6 Stage III: Written Report.

A.6.1 Written Report. The written report will normally be submitted by the RE to the PI, via the web-based VDRP application, within 10 business days following the date of the FAA’s completion of the Initial Notification Response. This report will contain a detailed description of the proposed comprehensive fix, outlining the planned corrective actions, the responsibilities for implementing those corrective actions, a schedule for completion of each action, and a self-audit. If a proposed comprehensive fix is not fully developed within 10 business days following the FAA’s acceptance in the Initial Notification Response, the RE should provide a complete written report within 30 calendar days following the date of the FAA’s acceptance in the Initial Notification Response. The PI has complete discretion, subject to coordination with the SOM, to make the final determination as to what submissions are to be considered timely and complete.

A.6.2 Required Input. The web-based VDRP application requires the input of the following information in the written report stage:

1. “General” Tab: RE information, identifying responsible personnel for the following activities: immediate action, discovery of the alleged violation, filing the report, and monitoring the fix implementation.
2. “Description” Tab: A listing of the alleged regulations violated, including the time and date it was discovered, the location of discovery, the date the alleged violation occurred, the duration of time it remained undetected, and the name and contact information of the RE representative who discovered the alleged violation.
3. “Summary” Tab: A detailed summary of the alleged violation and completion of a risk matrix to aid in evaluating the significance of the event.
4. “Action” Tab: A description of immediate action taken, including the date of immediate action and the RE representative responsible for it.
5. “Root Cause” Tab: Identification of up to five root causes of the alleged violation, summary of analysis, the reason why the violation was neither reckless nor intentional, and evidence of the apparent violation.
6. “Comp. Fix” Tab: A detailed description of the RE’s proposed comprehensive fix, including beginning and end dates of the fix and the RE representative responsible for the comprehensive fix and the self-audit.
7. “Equipment” Tab: A detailed description of equipment involved in the alleged violation, if any.
8. “Submit” Tab: Upload any file attachments that support the self-disclosure and confirm that the written report is complete. If the written report is not complete, provide an explanation of why. The RE representative responsible for monitoring the implementation of the comprehensive fix will be listed in this tab.

A.7 Stage IV: Written Report Review. The FAA works with the RE to ensure that the RE has identified any root causes and systemic issues that led to the apparent violation. In this stage, the PI completes a risk assessment matrix to aid in evaluating the significance of the event and the proposed comprehensive fix. This collaboration helps to ensure that the corrective actions contained in the comprehensive fix are acceptable to the FAA. The PI can refer the written report back to the RE for changes, additions, enhancements, and corrections. The system will maintain a record of each subsequent version of the written report. This process will continue until the PI is satisfied and willing to complete Stage IV.

Note: If the investigation of the apparent violation results in the FAA’s determination that no violation has occurred, the FAA rescinds the file and provides an explanation in the comment box provided. When submitted, the FAA receives a warning that submitting this action (rescinding the file) will close the case. If the inspector confirms the rescission, the case is closed in the VDRP system on that date. The FAA is able to reopen a closed VDR within 10 calendar days if additional information is received after the rescission.

A.8 Stage V: Implementation of a Comprehensive Fix and FAA Surveillance.

- A.8.1** Implementation Period. During the implementation period, the FAA and the RE will continue to collaborate, communicate, and cooperate in order to ensure the completion of each of the corrective actions as well as the self-audit. The FAA may provide guidance to the RE in correcting any identified systemic problems. Changes will be made to the proposed comprehensive fix when the need is identified. Upon determining that the initial implementation of the proposed comprehensive fix is satisfactory, the PI may advance the VDR to Stage VI.
- A.8.2** Corrective Actions. The FAA monitors the implementation of the corrective actions. Throughout the implementation period, the FAA assesses the RE's corrective actions and its top management's awareness of these actions. Upon determining that the initial implementation of the proposed comprehensive fix is satisfactory, the PI may advance the VDR to Stage VI. If during this period the FAA determines that the RE failed to take corrective action, the VDR may be rejected and appropriate FAA action initiated.
- A.8.3** Self-Audit. The RE completes the self-audit and documents its completion as the last and final corrective action.

A.9 Stage VI: Inspector Signoff.

- A.9.1** Stage VI Completion. If all elements of the comprehensive fix have been satisfactorily accomplished by the RE, including the RE's self-audit, the PI will submit the required entries in the web-based VDRP application for Stage VI completion.
- A.9.2** Stage VI Submission. At the conclusion of the implementation period, the PI and the SOM will make a final assessment. Consultation with specialists, legal counsel, or other FAA personnel may be included as part of this process when deemed appropriate.
1. If the SOM concurs with the PI's determination, Stage VI is concluded upon submission of the SOM's concurrence.
 2. If the SOM does not concur with the PI's determination, the SOM will offer any comments in the text area provided for that purpose. The SOM will then select the "Return" button. Upon selection of the "Return" button, the case will be referred to the PI for reconsideration of the SOM's comments. The case will not advance out of Stage VI until it is resubmitted by the PI and the SOM submits their concurrence. Written acknowledgment of VDR closure is sent via email through the automation. No other letters are generated.

**APPENDIX B. VOLUNTARY DISCLOSURE REPORTING PROGRAM (VDRP) FOR
REGULATED ENTITIES (RE) NOT AUTHORIZED TO USE THE WEB-BASED
VDRP APPLICATION**

B.1 Applicability. All REs and their designated representatives *not* authorized to use the VDRP web-based system will use the guidance contained in this appendix for submission of voluntary disclosures. A list of authorized users of the web-based system may be found on the VDRP home page at <https://vdrp.faa.gov>.

B.2 Stage I: Initial Notification. The RE notifies the FAA of an apparent violation by contacting the appropriate principal inspector (PI). The timeliness criteria for Voluntary Disclosure Reports (VDR) are described in paragraph [8.2](#), item 1 of this advisory circular (AC). The FAA retains sole discretion in determining whether a voluntary disclosure received later than 24 hours after discovery of the violation will be accepted. The RE should therefore not delay notification for any reason, and should address the following items with the PI:

1. A brief description of the apparent violation, including an estimate of the duration of time that it remained undetected, as well as how and when it was discovered.
2. Verification that noncompliance ceased after it was identified.
3. A brief description of the immediate action taken after the apparent violation was identified, the immediate action taken to terminate the conduct that resulted in the apparent violation, and the person responsible for taking the immediate action.
4. Verification that an evaluation is underway to determine:
 - If there are any systemic problems.
 - The corrective steps necessary to prevent the apparent violation from recurring.
5. Identification of the person responsible for preparing the comprehensive fix.
6. Acknowledgment that a detailed written report will be provided to the PI within 10 business days after initial notification by the RE. If a proposed comprehensive fix is not fully developed within 10 business days, the RE should provide at least an overview of its comprehensive fix plans in a preliminary written report submitted within 10 business days. In any event, a complete written report should be submitted within 30 calendar days after initial notification.

B.3 Stage II: Initial Notification Response. The PI responds with a written acknowledgment of the RE's initial notification. This acknowledgment includes the request for a written report and is sent in lieu of a letter of investigation, provided the written report is completed in accordance with the VDRP set forth in this AC. The PI's review of the disclosure confirms that the submission meets the following requirements:

B.3.1 The FAA Was Notified. The RE has notified the FAA of the apparent violation immediately, but no later than 24 hours after detecting it, generally before the FAA has learned of it by other means.

- B.3.2** Reckless/Intentional. The apparent violation was neither reckless nor intentional.
- B.3.3** The Violation Does Not Affect RE Qualification. The apparent violation does not indicate a lack, or reasonable question, of qualification of the RE.
- B.3.4** Immediate Action Was Taken. Immediate action, satisfactory to the FAA, was taken upon discovery to terminate the conduct that resulted in the apparent violation.
- B.3.5** The RE Has or Is Developing a Scheduled Comprehensive Fix. The RE has developed, or is developing, a comprehensive fix and implementation schedule satisfactory to the FAA. The comprehensive fix includes a followup self-audit to ensure that the action taken corrects the noncompliance. This self-audit is in addition to any audits conducted by the FAA.
- B.3.5.1** **PI Acceptance**. If the PI elects to accept the disclosure, the inspector notifies the senior office manager (SOM) that the file is awaiting their review.
1. Return for Edit. If the PI finds that the disclosure does not contain sufficient information to accept the disclosure, they will return the disclosure to the RE for editing.
 2. Rejection/Invalid. If the PI finds that the disclosure does not meet the requirements for acceptance, or it has been determined that no violation occurred, the PI does not advance the VDR. The RE is notified of that determination.
- B.3.5.2** **SOM Review**. The SOM will review the PI's determination to accept the voluntary disclosure.
1. If the SOM indicates concurrence with the PI's acceptance determination, the PI is notified by the SOM. The PI will use a code that complies with their office's protocols in order to identify each VDRP file for tracking purposes.
 2. If the SOM indicates nonconcurrence with the PI's acceptance determination, the case will be referred back to the PI for reconsideration. The case will not advance to Stage III until the SOM concurs with the PI's determination.
- B.4** **Stage III: Written Report**. The RE should provide the written report to the PI within 10 business days after the completion of Stage II. This report will contain a detailed description of the proposed comprehensive fix, outlining the planned corrective steps, the responsibilities for implementing those corrective steps, and a time schedule for completion of the fix and the completion of a self-audit. If a proposed comprehensive fix is not fully developed within 10 business days, the RE submits at least an overview of its comprehensive fix plans in a preliminary written report submitted within 10 business days after the completion of Stage II. In any event, the RE provides a complete written report containing a detailed description of the comprehensive fix within

30 calendar days after the completion of Stage II. In summary, the written report should include the following information:

1. A list of the specific FAA regulations that may have been violated.
2. A description of the apparent violation, including the duration of time it remained undetected, as well as how and when it was detected.
3. A description of the immediate action taken to terminate the conduct that resulted in the apparent violation, including when it was taken, and who was responsible for taking the action.
4. An explanation that shows the apparent violation was neither reckless nor intentional.
5. Evidence that demonstrates the apparent violation and the RE's analysis of that evidence.
6. A detailed description of the proposed comprehensive fix, outlining the planned corrective steps, the responsibilities for implementing those corrective steps, and a time schedule for completion of the fix.
7. Identification of the company official responsible for monitoring the implementation and completion of the comprehensive fix and self-audit.

B.5 Sample Written Report Format. Figure [B-1](#), Sample Written Report Format, is only a suggested format to be followed when preparing the written report that will be submitted to the FAA. While an RE should include at least all the elements specified below, the RE can modify the structure of the written report to fit its needs.

Figure B-1. Sample Written Report Format

WARNING: The Information in this Document is Protected from Disclosure under 49 U.S.C. 40123 and 14 CFR part 193.

A. General.

- 1) Date.
- 2) Certificate type or equivalent.
- 3) Pertinent RE number or equivalent.
4. Company name.
- 5) Company address.
- 6) Company official filing report:
 - Name,
 - Position,
 - Telephone number, and
 - Email address.

B. Description of Apparent Violation.

- 1) Applicable 14 CFR part(s).
- 2) Date the apparent violation was discovered.
- 3) Location of discovery.
- 4) Company official who discovered the apparent violation:
 - Name,
 - Position,
 - Telephone number, and
 - Email address.
- 5) Date and time of initial notification to the FAA.
- 6) Name of FAA official notified (PI).

C. Company Official Responsible for Immediate Action:

- 1) Name,
- 2) Position,
- 3) Telephone number, and
- 4) Email address.

D. Duration of Time the Apparent Violation Remained Undetected (Hours, Cycles, or Days).

E. Summary of Apparent Violation. The summary should be a brief statement that describes the nature of the apparent violation and identifies the specific aircraft, engines, appliances, facilities, checkpoint, gate, cargo, and/or individuals associated with the apparent violation.

F. Immediate Action.

- 1) When immediate action was taken.
- 2) Description of immediate action. This description should outline the immediate steps that were taken to cease the violation.
- 3) Company official responsible for immediate action:
 - Name,
 - Position,
 - Telephone number, and
 - Email address.

G. Analysis.

- 1) Summary of evidence. This summary should describe the scope of the apparent violation and explain how it was detected. In addition, conclusions reached regarding possible or probable systemic deficiencies (i.e., who, what, when, why, and how the noncompliance occurred) should be described.
- 2) Reasons why the apparent violation was neither reckless nor intentional.
- 3) Supporting documentation. The evidence associated with the apparent violation should be attached. This evidence should include a statement regarding how the RE determined the extent of the apparent violation.

H. Comprehensive Proposal. The proposed long-term corrective steps to be taken by the RE to preclude recurrence of the apparent violation should be listed in this section. Each corrective step should identify the individual or department responsible for implementing and completing the corrective step as well as the time allotted for completion of each corrective step. This proposal should include a self-audit by the RE. Examples of types of questions or issues that a comprehensive fix proposal should address are as follows:

- 1) Whether the apparent violation involves equipment, facilities, or individuals beyond those addressed in the initial notification and for which immediate action was taken.
- 2) Whether procedural or organizational changes are necessary.
- 3) How will it be determined whether any procedural or organizational changes are effective.
- 4) What procedures will be developed to ensure that the affected area is periodically reviewed in the future so that concerns can be identified before a violation occurs.
- 5) Who will be responsible for performing periodic reviews and the self-audit.
- 6) To whom in the RE's organization the results of those periodic reviews will be reported, and how they will be documented.

I. Responsibility for Monitoring Implementation of the Comprehensive Fix.

- 1) Name.
- 2) Position.
- 3) Telephone number.
- 4) Email address.

J. FAA Acceptance (To Be Completed by the FAA).

- 1) Name.
- 2) Position (PI).
- 3) Date.
- 4) Office.

B.6 Stage IV: Written Report Review by the FAA. The FAA works with the RE to ensure that the RE has identified any root causes and systemic issues that led to the apparent violation. This collaboration helps to ensure that the corrective actions contained in the comprehensive fix are acceptable to the FAA.

Note: If investigation of the apparent violation results in the determination that no violation has occurred, the VDR may be closed by the FAA rescinding the file and providing a written response to the RE.

B.7 Stage V: Implementation of a Comprehensive Fix and FAA Surveillance.

B.7.1 Continued FAA and RE Cooperation. During the implementation period, the FAA and the RE should continue to work together. The FAA may advise and assist the RE in correcting any identified systemic problems. Changes will be made to the proposed comprehensive fix when the need is identified.

B.7.2 The FAA's Monitoring of Corrective Step Implementation. The FAA monitors the implementation of the corrective steps. Throughout the implementation period, the FAA assesses the RE's corrective efforts and its top management's awareness of these efforts. If, during this period, the FAA determines that the steps taken by the RE are not those documented in the comprehensive fix and acceptable corrective action by the RE is not forthcoming, appropriate legal enforcement action may be initiated.

B.7.3 RE Self-Audit Following Completion. Following completion of the agreed-upon corrective action(s), the RE conducts a self-audit to ensure that the action taken remedies the problem that gave rise to the apparent violation.

B.8 Stage VI: Inspector Signoff. At the conclusion of the surveillance stage, the PI and the SOM will make a final assessment. Consultation with legal counsel or other FAA personnel may be accomplished when deemed appropriate by the PI or the SOM.

1. If all elements of the comprehensive fix have been satisfactorily accomplished, including the RE's self-audit, the PI will notify the SOM. If the SOM concurs with the PI's determination, Stage VI is concluded upon submission of the manager's concurrence and FAA written acknowledgment by the FAA to the RE that the VDR has been closed.
2. If the SOM does not concur with the PI's determination, the SOM will notify the PI and provide comments. The SOM will then return the case to the PI for reconsideration of whatever comments were provided. The case will not advance out of Stage VI until it is resubmitted by the PI and the SOM provides their concurrence.
3. The case remains subject to reopening in the event that the agreed-upon actions, outlined in the comprehensive fix, are not completed to the satisfaction of the FAA.

Advisory Circular Feedback Form

If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by contacting the Air Transportation Division at 9-AFS-200-Correspondence@faa.gov or the Flight Standards Directives Management Officer at 9-AWA-AFB-120-Directives@faa.gov.

Subject: AC 00-58C, Voluntary Disclosure Reporting Program

Date: _____

Please check all appropriate line items:

An error (procedural or typographical) has been noted in paragraph _____
on page _____.

Recommend paragraph _____ on page _____ be changed as follows:

In a future change to this AC, please cover the following subject:
(Briefly describe what you want added.)

Other comments:

I would like to discuss the above. Please contact me.

Submitted by: _____

Date: _____