



FAA

Report AV2025038
July 28, 2025

FAA Has Not Resolved Persistent Issues With SkyWest's Maintenance Practices



Highlights

Federal Aviation Administration (FAA)
AV2025038 | July 28, 2025

FAA Has Not Resolved Persistent Issues With SkyWest's Maintenance Practices

Self-Initiated

Our Objective(s)

To assess FAA's oversight of SkyWest Airlines' maintenance practices. Specifically, we evaluated FAA's actions to address SkyWest's maintenance noncompliance and violations.

Why This Audit?

Aviation safety is FAA's priority for the 2.9 million passengers that take 45,000 flights a day in the National Airspace System. In prior audits, we found weaknesses in FAA's oversight of maintenance at other airlines. We initiated this audit as part of our ongoing work reviewing FAA's oversight of air carrier maintenance programs.

What We Found

FAA's oversight of SkyWest's maintenance practices does not fully comply with Agency guidance.

- FAA's Certificate Management Office (CMO) has not resolved issues with SkyWest's remote return to service maintenance practices for over 4 years.
- The CMO also does not always adhere to FAA guidance when addressing SkyWest's noncompliance; CMO leaders are directing inspectors to use a method not included in FAA guidance to achieve compliance.
- Delays in the CMO's access to SkyWest's data, CMO leadership and staff turnover, and ineffective communication have also slowed the resolution of SkyWest's noncompliance.
- CMO inspectors do not always identify recurring noncompliance; CMO leaders may not be using the most effective tools to address repetitive noncompliance with more comprehensive solutions.
- FAA's Safety Assurance System database surveillance documentation options do not fully align with FAA guidance.



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Recommendations to improve FAA's oversight of SkyWest Airlines' maintenance. (p. 20)

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Memorandum

Date: July 28, 2025

Subject: ACTION: FAA Has Not Resolved Persistent Issues With SkyWest's Maintenance Practices | Report No. AV2025038

From: Nelda Z. Smith 
Assistant Inspector General for Aviation Audits

To: Federal Aviation Administrator

Aviation safety is the Federal Aviation Administration's (FAA) top priority as over 2.9 million passengers embark on more than 45,000 flights per day in the National Airspace System (NAS). In prior audits, we uncovered weaknesses in FAA's oversight of maintenance at Allegiant Air, American Airlines, and Southwest Airlines. Accordingly, we initiated this audit as part of our ongoing work reviewing FAA's oversight of air carrier maintenance programs. Our objective was to assess FAA's oversight of SkyWest Airlines' maintenance practices. Specifically, we evaluated FAA's actions to address SkyWest's maintenance noncompliances and violations.

We conducted this audit in accordance with generally accepted Government auditing standards. Exhibit A details our scope and methodology. Exhibit B lists the organizations we visited or contacted, and Exhibit C lists the acronyms used in this report.

We appreciate the courtesies and cooperation of Department of Transportation (DOT) representatives during this audit. If you have any questions concerning this report, please contact me or Tina Nysted, Program Director.

cc: The Secretary
DOT Audit Liaison, M-1
FAA Audit Liaison, AAE-001

Background

FAA Certificate Management Offices (CMOs) specialize in the certification, surveillance, and inspection of major air carriers and Part 142 training centers.¹ CMOs oversee and evaluate program effectiveness for each air carrier. Within the CMO, FAA safety inspectors issue certificates, monitor compliance, investigate noncompliance, administer sanctions, and focus on a certificate holder's organization and process management. To document an air carrier's ability to maintain safe operations and correct deficiencies, Aviation Safety Inspectors (ASIs) enter their surveillance and oversight findings in a risk-based oversight system, called the Safety Assurance System (SAS).²

FAA's approach to compliance stresses a collaborative problem-solving approach, including engagement, root-cause analysis, transparency, and information exchange. The Agency's goal is to achieve the airlines' rapid compliance with regulations, eliminate safety risks, and foster permanent change using FAA's Compliance Program.³ According to FAA, this approach allows it to identify safety issues that underlie deviations from standards and correct them as effectively, quickly, and efficiently as possible. FAA's Compliance Program relies on an open and transparent exchange of information that requires mutual cooperation and trust that can be challenging to achieve in a traditional, enforcement-focused regulatory model.

FAA guidance provides inspectors with various tools to resolve airlines' compliance issues. The most commonly used is the Compliance Action.⁴ For complex or systemic hazards, FAA can initiate a Risk Management Process (RMP)⁵ or form a System Analysis Team (SAT)⁶ to document, track, and mitigate hazards identified through Compliance Actions.

¹ Title 14 of the Code of Federal Regulations (CFR) Part 142 defines "training center" as a center that provides training, testing, and checking under contracts or other arrangements with airmen.

² SAS is FAA's oversight tool for performance of certifications, surveillance, and Continued Operational Safety.

³ Information on FAA's Compliance Program is available at www.faa.gov/about/initiatives/cp.

⁴ A Compliance Action is FAA's non-enforcement method for correction of airlines' unintentional deviations or noncompliance that arise from factors such as flawed systems and procedures, simple mistakes, lack of understanding, or diminished skills. A Compliance Action is not a legal adjudication and does not constitute a finding of violation and is used if the airman/organization/noncertificated person is willing and able to comply with regulatory standards.

⁵ According to FAA Order 8900.1, a Risk Management Process (RMP) is an action designed to ensure hazards are identified, documented, eliminated, or mitigated. More specifically the RMP is used to document, track, and evaluate the status of existing hazards and their associated risks.

⁶ According to FAA Order 8900.1, a System Analysis Team (SAT) is convened to develop action plans to assist FAA in determining the root cause of systemic problems and ensure certificate holders manage their risks.

We have previously issued three reports⁷ that captured a myriad of issues at each FAA oversight office we reviewed. In January 2022, we subsequently issued a capstone report on common themes identified through these reviews. For this audit, we evaluated whether previously identified oversight issues were present at the SkyWest CMO and whether previous recommendations that have been implemented have been effective.

SkyWest Airlines

SkyWest Airlines is currently the Nation's largest regional airline⁸ and operates all its flights under long-term, fixed-fee agreements between airlines—known as code-share agreements—as United Express for United Airlines, Delta Connection for Delta Air Lines, American Eagle for American Airlines, or Alaska Airlines for Alaska SkyWest.⁹ As of December 2024, SkyWest had 492 aircraft in scheduled service or under contract.¹⁰ SkyWest has 11 hubs and operates 12 maintenance bases in the United States. See figure 1 for information on SkyWest Airlines' size compared to the largest domestic commercial airlines.

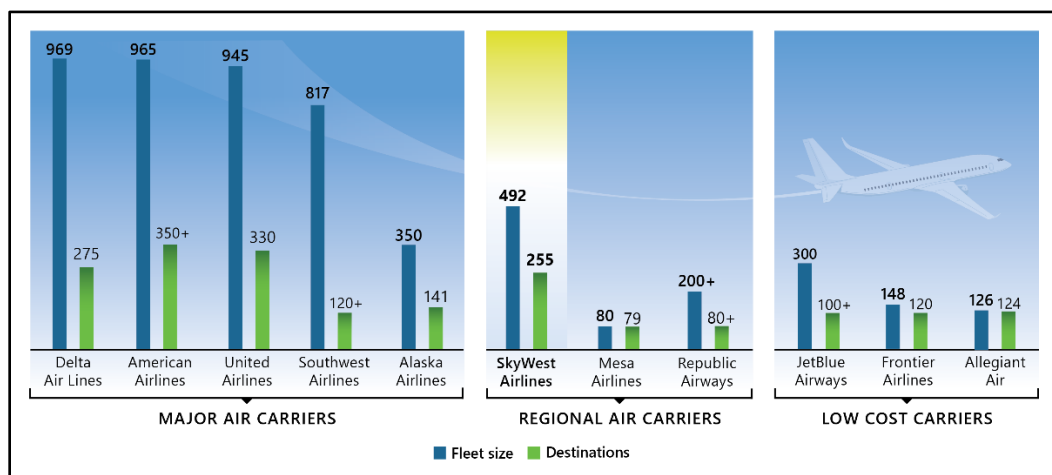
⁷ *FAA Needs To Improve Its Oversight To Address Maintenance Issues Impacting Safety at Allegiant Air* (OIG Report No. AV2020013), December 17, 2019; *FAA Lacks Effective Oversight Controls To Determine Whether American Airlines Appropriately Identifies, Assesses, and Mitigates Aircraft Maintenance Risks* (OIG Report No. AV2022004), October 20, 2021; *FAA Has Not Effectively Overseen Southwest Airlines' Systems for Managing Safety Risks* (OIG Report No. AV2020019), February 11, 2020. Our audit reports are available on our website, www.oig.dot.gov.

⁸ There is no formal definition of "regional airline." For the purposes of this report, we define regional airline as a Federal Aviation Regulations (FAR) Part 121 carrier that operates aircraft of 99 seats or fewer for a larger or mainline carrier. Regional airlines such as SkyWest typically operate smaller aircraft on shorter routes than major and low-cost carriers.

⁹ During 2024, SkyWest offered approximately 2,190 daily departures, approximately 890 of which were as United Express, 700 as Delta Connection, 380 as American Eagle, and 220 as Alaska Airlines.

¹⁰ As of the end of 2024, SkyWest's commercial fleet consisted of 262 E175 regional jet aircraft, 36 CRJ900 regional jet aircraft, 119 CRJ700/CRJ550 regional jet aircraft and 75 CRJ200 regional jet aircraft.

Figure 1. Comparison of Airline Relative Size and Complexity

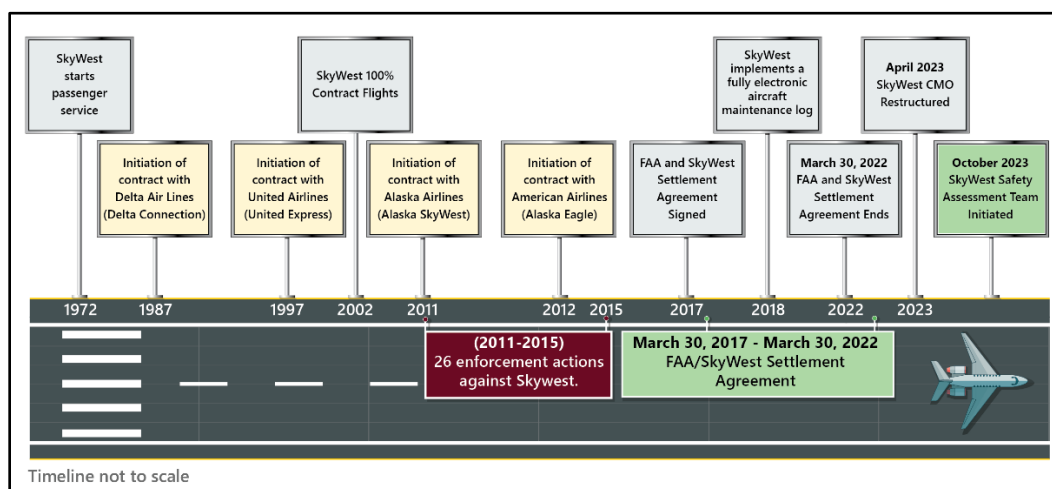


Source: OIG Analysis of FAA and Airline Data as of 2024

SkyWest flies to 255 destinations, 22 of which have maintenance capabilities—known as hubs, line stations, or maintenance bases—with SkyWest mechanics available to rectify maintenance issues. The remaining 233 locations rely on contractors or SkyWest mechanics traveling to the location to perform maintenance.

See figure 2 for an outline of significant events in SkyWest’s history.

Figure 2. SkyWest’s Timeline

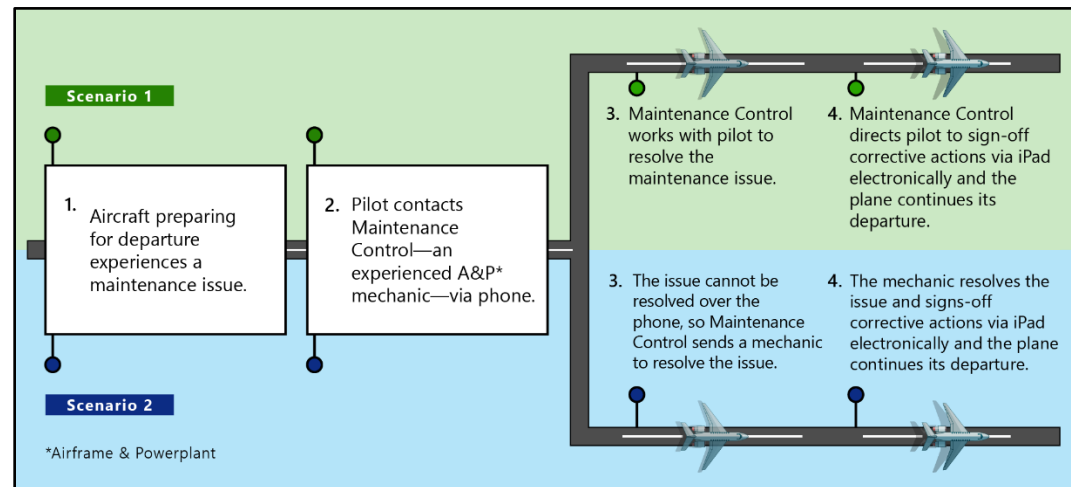


Source: OIG Analysis of SkyWest Airlines Data

Between 2011 and 2015, FAA initiated 26 enforcement actions against the company, which are referred to later in this report.

In 2018, SkyWest introduced an electronic aircraft maintenance logbook (eAML) into its operations. The eAML allows remote return to service maintenance for each aircraft that experiences a maintenance issue. Before introduction of the eAML, paper logbooks were used. The eAML provides a digital process with automated checks and verification signatures. Centrally located maintenance controllers at SkyWest headquarters in Utah oversee SkyWest mechanics or contract mechanics performing maintenance at the aircraft's location. See figure 3 for more details on eAML's remote return to service.

Figure 3. How Remote Return to Service Maintenance Works



Source: OIG Analysis of SkyWest Data

While FAA inspectors reviewed physical aircraft logbooks under the previous system, eAMLs require Agency inspectors to access carriers' record keeping systems or request copies of records from the air carriers.

FAA's SkyWest CMO

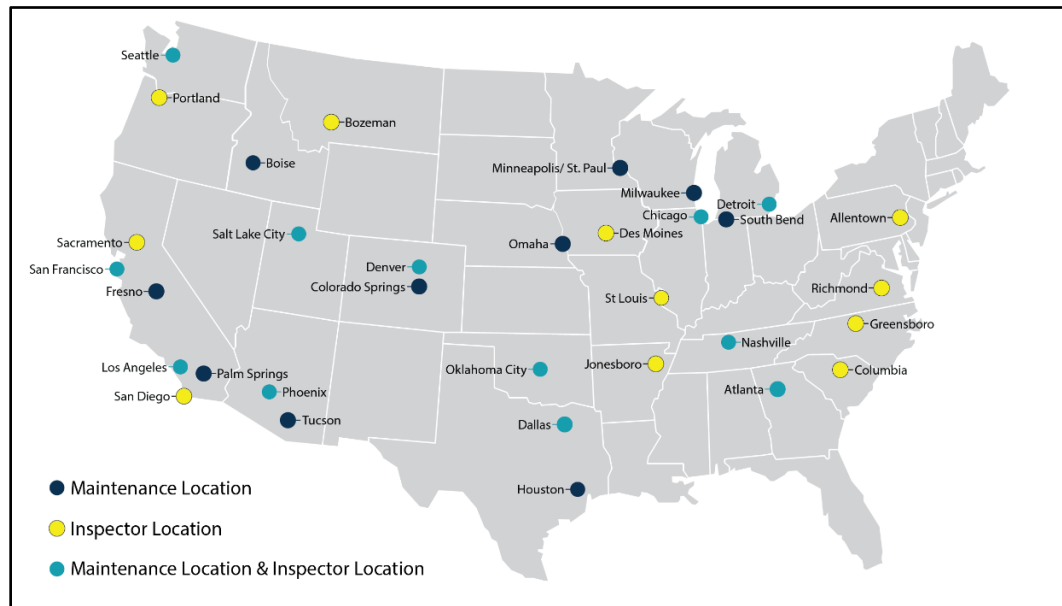
FAA's SkyWest CMO is located in Salt Lake City, UT. As of June 2024, the office had 71 authorized positions—10 managers and supervisory inspectors, and 61 inspectors and support personnel. In 2017, FAA Flight Standards reorganized its structure from a geographic-based organization to a function-based organization. The reorganization grouped all Part 121¹¹ air carriers into the Office of Air Carrier Safety Assurance (ACSA) which is comprised of 5 Divisions and 21 CMOs. The FAA CMO that oversees SkyWest Airlines is grouped with other CMOs

¹¹ FAA grants authority to air carriers certified under the Code of Federal Regulations (C.F.R.) Part 119 to operate scheduled air service as regulated by C.F.R. Part 121, Operating Requirements. Air carriers authorized to operate under a FAA Part 121 certificate are generally large, U.S.-based airlines, regional air carriers, such as SkyWest, and all cargo operators.

that oversee United Airlines, Endeavor Air, Sun Country Airlines, Alaska Airlines, Horizon Air and other smaller air carriers. This restructuring also allowed inspectors to reside closer to SkyWest maintenance facilities around the country rather than at one central location in Utah. Further restructuring of the SkyWest CMO in 2023 added three Supervisory Principal Inspector (SPI) positions in the office, similar to other large CMOs.

Over half of the SkyWest CMO's staff work remotely (away from the CMO's headquarters) where they travel to observe and inspect SkyWest operations and maintenance. According to CMO leadership officials, hiring inspectors at locations near SkyWest facilities has facilitated hiring, provided flexibility for inspectors to travel to cities where SkyWest conducts significant operations, and made a positive impact on inspector recruitment and retention. See figure 4 for inspectors' locations in relation to SkyWest's maintenance bases.

Figure 4. SkyWest's Maintenance Bases Compared to FAA's Inspector Locations



Source: OIG Analysis of SkyWest Airlines and FAA Data

FAA's Oversight of SkyWest's Maintenance Practices Does Not Fully Comply With Agency Guidance

While the Agency has implemented a risk-based approach to improve its inspections of airlines, key gaps in oversight persist in a number of areas. First, FAA's CMO has not fully resolved issues with SkyWest's remote return to service maintenance practices. Additionally, CMO management's directions to inspectors on how to address and document SkyWest's noncompliances do not consistently comply with Agency guidance. Furthermore, Principal Inspectors (PIs) have not consistently identified and required SkyWest Airlines to address repetitive noncompliance with more comprehensive solutions. Finally, FAA's SAS database surveillance documentation options do not fully align with FAA guidance.

The CMO Has Not Resolved SkyWest Noncompliance Issues for Over 4 Years

The CMO has allowed noncompliance issues in SkyWest's use of remote return to service maintenance to persist without resolution for over 4 years. Additionally, data access issues and SkyWest's delayed responsiveness to CMO data requests have hampered inspector compliance efforts. Further, CMO staff turnover, loss of institutional knowledge, and ineffective communications have hindered safety collaboration between FAA's CMO and SkyWest Airlines.

The CMO Has Not Addressed Problems Impeding Its Ability to Assess Systemic Risks

Safety inspectors at the FAA's SkyWest CMO have been unable to fully resolve issues pertaining to remote return to service maintenance practices for more than 4 years. For example, CMO inspectors found that SkyWest was inappropriately deferring maintenance for minimum equipment list¹² (MEL) items, dispatching aircraft for flights without required inspections, and using pilots to perform maintenance tasks not approved in SkyWest's maintenance manuals.

Since 2021, the CMO has been working to resolve 32 issues involving remote return to service, 19 of which resulted in Compliance Actions. At the time of our analysis, the CMO had resolved 26 of the 32 issues using Compliance Actions and other tools, while 6 issues remained in progress. At least 9 of these 32 issues involved aircraft MEL issues. Despite the resolutions, however, noncompliance persisted with SkyWest's remote return to service maintenance practices. These problems indicate that the CMO's efforts to ensure that SkyWest resolved identified noncompliances were not effective. Furthermore, based on our analysis, the recurrence of issues with remote return to service maintenance suggests that the problem should have been identified and addressed as a systemic hazard. According to FAA guidance, systemic hazards are those that indicate defects in the design of the carrier's processes, patterns of repeated noncompliance with procedures, or significant changes in the operating environment. Controlling or eliminating systemic hazards requires modifications to the system's design.

¹² An MEL is an operator-specific, FAA-approved document that includes a list of items that may be inoperative during a flight. An MEL constitutes an approved change in the aircraft type design. Any changes to the MEL document must be FAA-approved.

When an inspector identifies a systemic hazard, FAA guidance¹³ provides a process flow of steps that inspectors should follow. However, because several different inspectors were identifying similar issues with remote return to service maintenance and did not link the Compliance Actions, the CMO did not initiate a systemic risk review until 2 years after the issues were found.

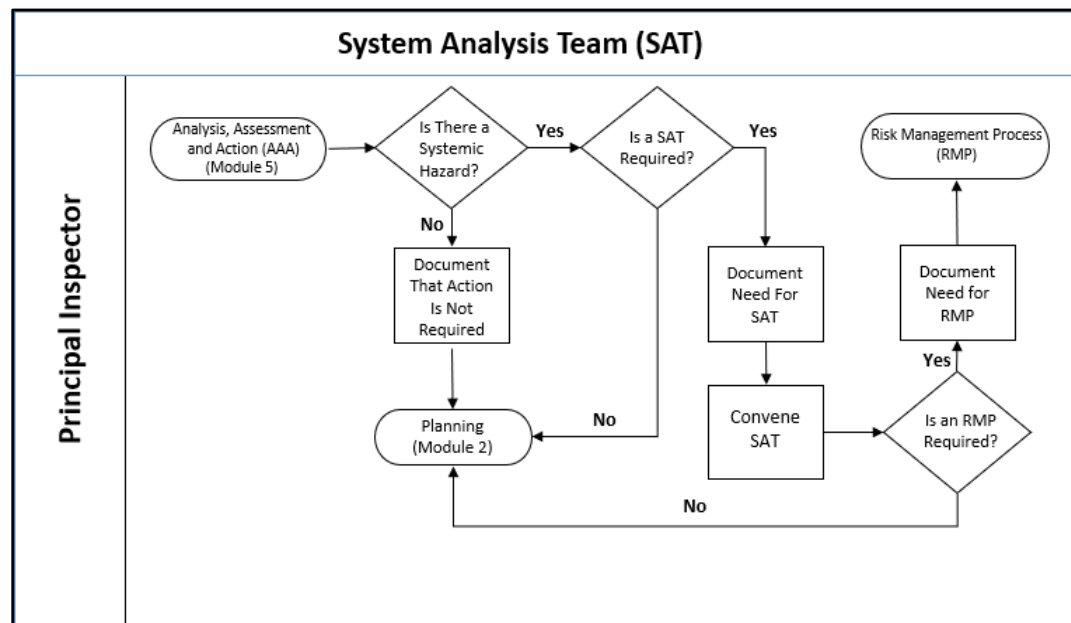
Further, while inspectors eventually recognized the linkages among the Compliance Actions in March 2023 and initiated a Risk Management Process (RMP) to address the remote maintenance issues, CMO management decided to initiate a System Analysis Team (SAT) in October 2023 to work more collaboratively with the carrier rather than working through the issues with the RMP alone. As a result, FAA inspectors became frustrated that their RMP efforts were being delayed and concerned that the airline's remote maintenance practices could contribute to an accident. These inspectors argued that the SAT merely prolonged the process and delayed resolution of previously identified issues—issues that have persisted for well over a year under the SAT process and over 2 years under the RMP process.

According to FAA guidance, the RMP is designed to ensure that hazards are identified, documented, eliminated, or mitigated. Additionally, the RMP tracks and evaluates the status of existing hazards and their associated risks. The RMP can be initiated on its own or in conjunction with other action plans to manage risk. When a systemic hazard is identified, FAA guidance¹⁴ directs the principal inspector to determine if a SAT is required (see figure 5 for details on the SAT process).

¹³ FAA Order 8900.1, Vol. 10, Ch. 7, Sec. 3.

¹⁴ FAA Order 8900.1, Vol. 10, Ch. 7, Sec. 3.

Figure 5. The SAT Process



Source: FAA Order 8900.1

FAA uses SATs to determine the root cause of systemic hazards and develop action plans, using an RMP, to help ensure the carrier is managing their risks. The process encourages participants to provide feedback on any actions taken as part of the information sharing process.

Identifying systemic risks can impact FAA's ability to help bring the air carrier into compliance as rapidly as possible. Our analysis identified several examples that indicated that the SkyWest CMO was aware of systemic hazards related to remote return to service maintenance that were handled individually through various compliance program actions before recognizing the condition needed to be treated in accordance with systemic hazard procedures. For example:

- In March 2020, an accident in Plattsburgh, NY, revealed that pilots were performing unauthorized maintenance procedures that they may not have been trained to perform. In 2021, CMO inspectors conducted a design assessment that showed that SkyWest had changed its manual to allow pilots to perform maintenance on the aircraft and sign for it in the aircraft logbook in violation of regulations.¹⁵

¹⁵ According to 14 C.F.R. § 121.709, a certificated mechanic or repairman must sign an entry into the logbook/records or airworthiness release following maintenance before the carrier operates the aircraft. The mechanic must certify, in part, that the work performed was done in accordance with the manuals and that, as far as the work performed is concerned, the aircraft is in condition for safe operation.

- In late 2020, CMO inspectors issued a Compliance Action related to CAT II Instrument and Landing System equipment maintenance that was not completed in accordance with FAA regulations. As a result, 1 aircraft was operated in an unairworthy condition for 12 flights.
- In December 2022, SkyWest introduced Maintenance Form M-361 as a control to ensure that authorized pilot-in-command remote return to service actions complied with regulations. However, in September 2023, CMO inspectors found that maintenance controllers who oversee and authorize remote maintenance actions were misusing the remote return to service program to defer certain maintenance tasks to a later time or skipped steps in the maintenance checklists to clear aircraft faults. CMO inspectors determined that even after the M-361 form was in use, SkyWest continued to allow pilots to complete maintenance they were not authorized to perform. As a result, in September 2023, the CMO wrote a Compliance Action letter to SkyWest, listing several instances in which SkyWest improperly used the MEL.
- Also in 2023, remote return to service maintenance actions may have resulted in flights that did not meet FAA safety or airworthiness requirements. For example, one CMO inspector noted that an aircraft was released for flight without an operational altimeter as required. In a second example, an inspector found that a maintenance controller had improperly deferred¹⁶ a fuel fault advisory message which is not deferrable.

The CMO Has Encountered Delays in Access to SkyWest's Data

FAA regulations¹⁷ require air carriers to make their records available to FAA at any time to complete inspections. However, SkyWest CMO inspectors rely on a request for information (RFI) process to obtain air carrier safety data. FAA's current agreement with SkyWest for data access requires the carrier to provide requested documentation within 10 business days of receipt of the CMO's RFI. Additionally, FAA Compliance and Enforcement Program guidance¹⁸ states that air carriers must provide their records to the Agency and identifies the consequences for those who deny air carrier data access to FAA. While air carriers are moving toward using digital data to document operations and maintenance functions, FAA's guidance does not address inspector access to air carrier

¹⁶ In aviation maintenance, deferring a task means postponing the repair or replacement of a non-essential item or system that doesn't impede safe operations. This allows for flexibility in managing maintenance, as some issues can be addressed later without compromising safety.

¹⁷ 14 C.F.R. § 119.59, Conducting tests and inspections.

¹⁸ FAA Order 2150.3C, *FAA Compliance and Enforcement Program*.

electronic/digital data. During our review, 10 of 19 CMO inspectors we interviewed expressed concerns with timely access to SkyWest's maintenance data that they needed to complete accurate inspections and resolve identified safety violations. According to inspectors we interviewed, the CMO cannot access SkyWest's digital records without SkyWest's approval and must submit RFIs each time access to data is needed. This additional time to request and respond to information requests has resulted in delays with inspectors' compliance efforts.

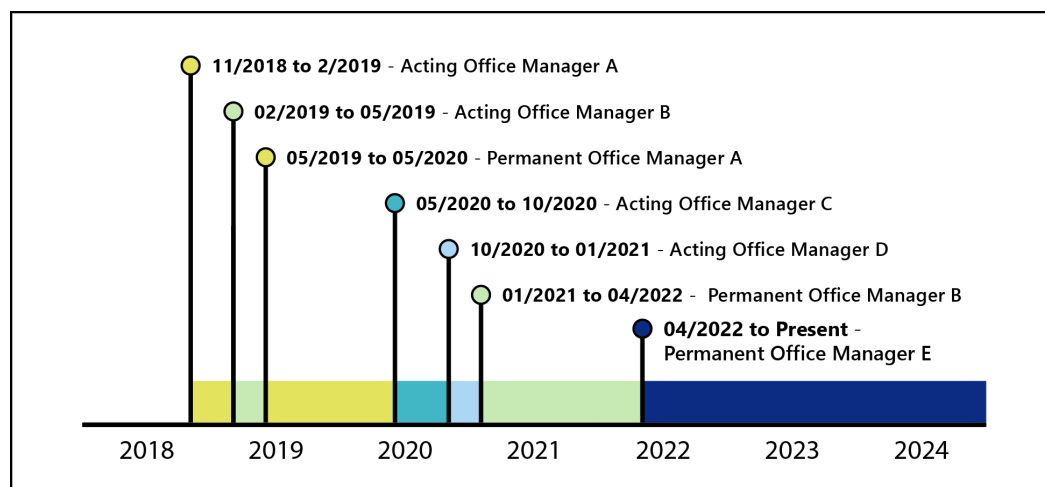
According to CMO inspectors, the data access issue has persisted since 2022. In March 2017, SkyWest entered into a 5-year Settlement Agreement with FAA to resolve 26 enforcement actions that the CMO had initiated. In return for the settlement of those enforcement actions, SkyWest agreed to provide CMO inspectors with an enhanced level of access to software systems that inspectors could use during their SkyWest oversight. More specifically, the agreement provided inspectors with access to SkyWest's maintenance control tracking system known as SkyTrack. At the conclusion of the 5-year settlement period in 2022, however, the enhanced data access was terminated and CMO inspectors had to rely on the RFI process. During the period of our review, we found that SkyWest Airlines missed the deadline for 325 of the CMO's 1,299 requests (25 percent) by more than 10 days, thus delaying FAA's resolution of the carrier's noncompliance.

During our audit, the current CMO Manager was working on a data sharing agreement with SkyWest that would have alleviated the data access delays. However, toward the conclusion of our audit work, the manager informed us that he has since abandoned this effort and will continue using the RFI process. This decision will likely frustrate inspectors who have expressed concerns with the RFI process and timely access to data. We determined that SkyWest Airlines took an average of 12 days to return requested information to FAA. While 72 percent of the data requests were completed on time, some requests experienced delays ranging between 60 to nearly 120 days. Continuing to allow RFI delays hinders inspectors' abilities to ensure the carrier complies with regulations.

CMO Staff Turnover, Loss of Institutional Knowledge, and Ineffective Communications Have Contributed to Delays in Resolution of Noncompliances

CMO leadership turnover, changes in organizational structure, and hiring of new inspectors with limited knowledge of FAA and SkyWest's operations have contributed to deficiencies in how the CMO has addressed SkyWest's compliance issues. FAA does not have a formal process that ensures consistent internal communication and Compliance Action processing during periods of key personnel turnover. Between 2018 and 2022, the CMO Manager changed seven times. See figure 6 for details. FAA added three new SPIs to align the SkyWest CMO with similarly-sized CMOs for other airlines.

Figure 6. Changes in Managers at FAA's SkyWest CMO



Source: OIG Analysis of FAA CMO Data

Of the 70 inspector positions authorized in the SkyWest CMO during the same period, FAA has filled 16 since the beginning of 2020 and 7 remained vacant. CMO leadership told us that these new hires came onboard with no prior FAA experience, though they did have a background in aviation. During our meetings with SkyWest leadership, they surmised that this lack of experience may have contributed to misunderstandings of systemic risks associated with SkyWest's introduction of the remote return to service maintenance process. Furthermore, the inspector assigned as the CMO focal point for SkyWest's implementation of the remote maintenance process transferred out of the office and the departure may have left the remaining inspectors with limited understanding of important aspects of the eAML system design and surveillance needs.

Changes in CMO management have also led to inconsistent and sometimes contentious communications between FAA and SkyWest. FAA's Compliance Program stresses a collaborative approach to problem-solving—such as engagement, root-cause analysis, transparency, and information exchange—in which the goal is to enhance the safety-related performance of both individuals and organizations. The program encourages an open and transparent exchange of information that requires mutual cooperation and trust. However, in July 2022, the CMO miscommunicated FAA headquarters policy interpretations responding to SkyWest regulatory questions by selectively providing responses to their questions that aligned with the CMO's perspective and did not forward those interpretations that agreed with the air carrier's positions.

Furthermore, in October 2023, SkyWest Airlines informed FAA that 13 of its aircraft had exceeded corrosion inspection timeframes required by an FAA airworthiness directive. The 13 aircraft should have been immediately grounded

until the airline completed and documented the corrosion inspections.¹⁹ However, the Supervisory Principal Maintenance Inspector did not require the aircraft to be grounded until two days later on October 4, 2023, after an FAA inspector found flaws in the data that SkyWest had provided and objected to allowing the carrier to continue to operate the aircraft without the necessary inspections being verified as completed and documented correctly. The CMO then subsequently issued a Compliance Action letter to SkyWest, creating confusion and mistrust at the carrier because it believed it had been transparent with the CMO.

Lastly, inspectors we interviewed also described instances of different approaches among CMO managers for achieving carrier compliance. One inspector alleged that a previous manager favored addressing oversight findings verbally rather than through formal letters to foster a better relationship with SkyWest. Another inspector stated that the CMO's current management team supports sending formal letters to gain compliance. In general, the inspectors we interviewed expressed that these changes in management philosophy caused contention within the CMO, complicated both internal and external communications, and negatively affected the CMO's relationship with SkyWest.

When Addressing and Documenting Noncompliances, the CMO Does Not Always Adhere to Agency Guidance

Supervisory Principal Inspectors at the SkyWest CMO are directing inspectors to downgrade identified noncompliance issues from Compliance Actions to General Correspondence letters in contravention to FAA's guidance. Furthermore, PIs are not consistently identifying recurring noncompliance or requiring SkyWest Airlines to address repetitive noncompliances with more comprehensive solutions. Finally, the documentation options in SAS—FAA's oversight tool for documenting and tracking of surveillance findings—do not fully align with FAA guidance.

CMO Leaders Direct Inspectors To Use a Method Not Included in FAA Guidance To Achieve Compliance

CMO supervisors are using a method for SkyWest noncompliance resolution that is not included in FAA guidance. FAA guidance²⁰ calls for inspectors to use the

¹⁹ Airworthiness Directives are legally enforceable regulations issued by the FAA in accordance with 14 C.F.R. Part 39 to correct an unsafe condition in a product. Part 39 defines a product as an aircraft engine, propeller, or appliance. Compliance with Airworthiness Directives is mandatory to ensure continued airworthiness.

²⁰ FAA Order 8900.1, Vol. 14, Ch. 1, Sec. 2.

Compliance Action Decision Process to determine what actions they should take when they identify carrier noncompliance—Compliance Action (CA), Administrative Action, or Enforcement Action. However, management officials at the SkyWest CMO have also directed ASIs to use a tool known as a General Correspondence letter that are not included in FAA’s guidance. We found that inspectors and supervisors disagree on the use of General Correspondence letters in instances when a Compliance Action letter is more appropriate based on FAA guidance. The CMO Manager emphasized that General Correspondence letters are used for nonconformance²¹ issues and Compliance Actions letters are used to address noncompliance²² issues. However, we found an instance in which the CMO used a General Correspondence letter was used to address a noncompliance involving a mechanic performing the duties of a supervisor and inspector simultaneously. Furthermore, it is unclear whether PIs are appropriately categorizing General Correspondence letters in SAS. The use of General Correspondence letters may result in an inability to track these actions. See figure 7 for details on the different compliance tools, included in FAA guidance, that CMO inspectors use to bring an air carrier into compliance when issues are found.

²¹ FAA Order 8000.72 defines nonconformance as a non-fulfillment of an organization’s requirements, policies, and procedures, as well as requirements of safety risk controls developed by the organization.

²² FAA Order 8000.72 defines noncompliance as conduct that is contrary to a statute, regulation, or order issued under a statute or regulation.

Figure 7. FAA Oversight Actions

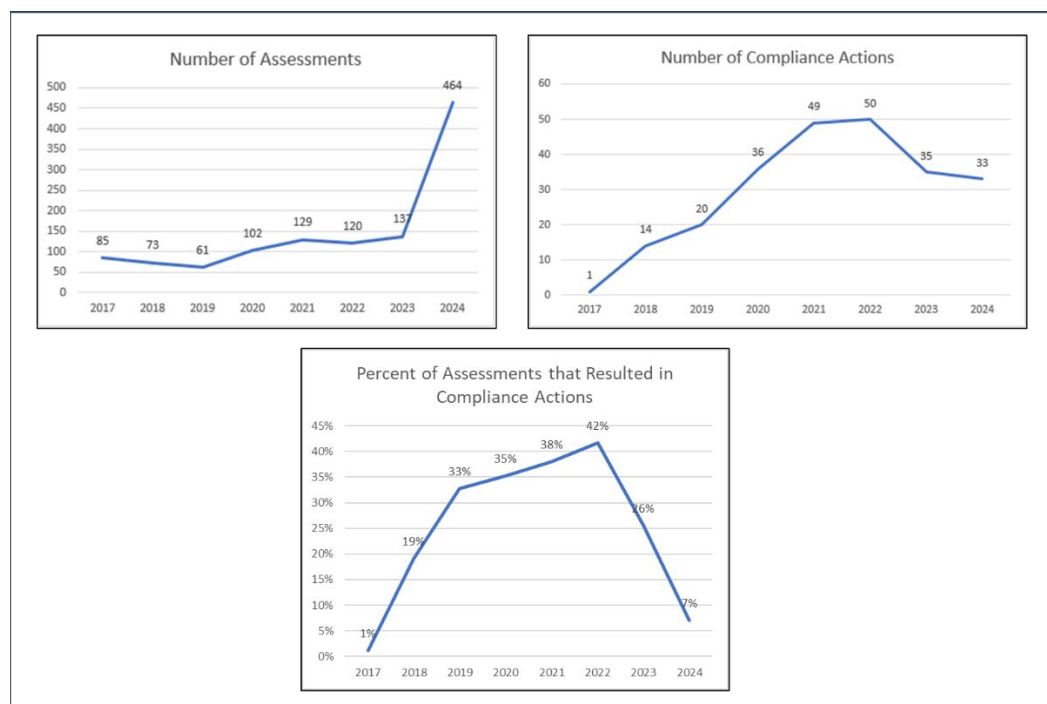
<div> <div>High</div> <div>↑</div> <div>Severity</div> <div>↓</div> <div>Low</div> </div>	Action	Example
	Enforcement Investigative Report	Civil Penalty (Fine) Certificate Revocation
	Administrative Actions	Warning Notice Letter of Correction
	Compliance Action	Compliance Action Letter On the Spot Correction Counseling/Education
	Other Actions	Hazard Letter Safety Assurance Letter

Source: OIG Analysis of FAA Oversight Guidance

According to CMO inspectors, supervisors have directed inspectors to forward Compliance Actions to SkyWest as General Correspondence letters. For example, in August 2024, a CMO inspector determined that a SkyWest mechanic had performed duties of both a SkyWest supervisor and inspector simultaneously, contradicting SkyWest’s General Maintenance Manual. The CMO inspector drafted a Compliance Action letter for regulatory noncompliance that a SPI subsequently directed be sent to SkyWest as a General Correspondence letter. While we are aware of other instances where this occurred, the magnitude of this issue is unclear because FAA has no way to track this decision-making process in its inspection database.

In our review of inspection records, we found that the number of surveillance inspections that have resulted in Compliance Actions has decreased even though the number of inspections has increased (see figure 8). Our assessment is that this trend may underscore inspectors’ concerns over leadership’s lack of support for issuing Compliance Actions.

Figure 8. Comparison of SkyWest CMO Assessments and Initiated Compliance Actions



Source: OIG Analysis of FAA Safety Assurance System and Safety Performance Analysis System database on SkyWest surveillance and outcomes

FAA developed its Compliance Program to promptly resolve noncompliance using Compliance Actions, Administrative Actions, or Enforcement Actions. Use of General Correspondence letters is not explained in FAA Order 8900.1²³ nor the Consistent Communication through Correspondence (CCtC) process. We found that the CMO is using this type of correspondence locally under their SkyWest CMO Formal Correspondence Protocols to supplement CCtC guidance for non-regulatory/statutory communications.

ACSA guidance on CCtC states that the process is meant to bring consistency to ACSA so that all Part 121 carriers receive similar correspondence from FAA. Inspectors informed us that because SkyWest officials view Compliance Actions as pejorative, CMO managers have directed inspectors to send General Correspondence letters rather than Compliance Actions as part of regular correspondence with the air carrier. While General Correspondence letters may require a response from the air carrier similar to Compliance Actions, they are not

²³ FAA Order 8900.1 establishes the Dynamic Regulatory System (DRS) as the repository of all Flight Standards policy and guidance concerning aviation safety inspector job tasks. DRS is the Flight Standards system of record for all Flight Standards policy and guidance.

identified as a formal tool in FAA's Compliance Program and are not captured effectively in FAA's inspection database. As a result, inspectors' ability to identify, track, and assess recurring noncompliance is impeded.

CMO Inspectors Do Not Consistently Identify Recurring Noncompliance

FAA inspectors are initiating Compliance Actions for similar issues without consistently identifying and applying broader corrective actions for these recurring issues. According to FAA guidance,²⁴ inspectors should conduct historical reviews to identify recurring issues to help measure the effectiveness of the Agency's Compliance Program. However, when FAA inspectors do not consistently analyze historical data to identify repeat noncompliance, they miss opportunities to implement broader resolutions, which may allow issues to reoccur. As a result, our analysis indicates that SkyWest CMO managers may not be implementing the Compliance Program as intended.

FAA's implementation of our previous recommendation regarding repetitive noncompliances has improved root cause analysis documentation. However, our review of 55 closed Compliance Action records from between 2019 and 2024 found that several of the listed noncompliances and corresponding root causes were reoccurrences. The most frequent maintenance noncompliances were attributed to SkyWest's lack of oversight of maintenance providers and failure to follow procedures, as identified in 25 of the 55 cases (45 percent) we reviewed. Further review revealed that FAA had identified and linked 12 of the 25 cases, but a dozen repetitive noncompliance issues occurred before FAA took more comprehensive action. The other recurring issues that we identified were handled individually. As such, reoccurring noncompliances at SkyWest indicate that SkyWest CMO inspectors are not promptly identifying repeated issues as being systemic in nature and do not address them using effective corrective actions. As a result, FAA cannot be reasonably assured that corrective actions will address identified systemic noncompliance issues.

²⁴ FAA Order 8900.1, Vol. 14, Ch. 1, Sec. 2.

FAA’s Inspection Database Does Not Allow Inspectors To Document All Actions They Can Take To Address Noncompliance

FAA’s inspection database—known as the Safety Assurance System (SAS)—does not provide a standard way for safety inspectors to document all of their oversight efforts and associated documentation required to keep airlines in compliance with Federal safety regulations. FAA guidance on SAS policy and procedures²⁵ outlines several action options inspectors can use to notify air carriers of issues and findings, including Compliance Action Letters, Hazard Letters, or Safety Assurance Letters. However, SAS does not provide a specific location to store Hazard Letters or Safety Assurance Letters to distinguish them from Compliance Action Letters. As a result, important inspection records may be stored in different locations, making it difficult to analyze both historical and current inspection records for tracking repetitive or systemic hazards. See figure 9 below for details on the lack of documentation options for Safety Assurance and Hazard Letters in FAA’s SAS database.

Figure 9. SAS Action Options for Assessment Determination

The screenshot shows a web form titled "Add Action(s)". It contains a list of actions with checkboxes and dropdown menus. The actions are: "Adjust Priority/Resource Order of SPA" (with a "Select System/Subsystem" dropdown), "Add Element PA (EPA)" (with a "Select Element" dropdown), "Add Element DA (EDA)" (with a "Select Element" dropdown), "Add Custom DCT" (with a blue "Add Custom DCT" button), "Notify Certificate Holder", "* Initiate 2150.3 ()", "Amend OpSpecs", "Convene a SAT", "Request National Level Hazard Analysis", "Initiate RMP", "* Compliance Action", and "Other" (with a text input field labeled "If Other, enter text.").

Source: FAA SAS Database

²⁵ FAA Order 8900.1, Vol. 10, Ch. 6, Sec. 2.

Inspectors use Compliance Action Letters and Hazard Letters primarily to communicate regulatory and nonregulatory issues, while they use Safety Assurance letters primarily to summarize quarterly surveillance results. Air carriers analyze these letters to find solutions to problems and send corrective actions to FAA for review. FAA uses its SAS database to store and track these letters until the identified problem is resolved. However, our analysis found that the SkyWest CMO Principal Operations Inspector stores Safety Assurance letters under the Compliance Action, Other, or Notify Certificate Holder options while the Principal Maintenance Inspector uses the Other or Notify Certificate Holder options. As a result, these inspection findings are stored in different locations, making analyses of both historical and current inspection records difficult for tracking reoccurring and systemic hazards.

Conclusion

FAA's oversight of America's largest airlines is a complex endeavor that requires inspectors across the Nation working together with air carriers to resolve safety problems before they result in accidents. This requires a careful balance of using the right tools to gain rapid compliance while maintaining professional relationships with air carriers. While the Agency has implemented a risk-based approach to improve its inspections of airlines and is working to achieve prompt compliance with regulations, key gaps in FAA's application of the Compliance Program persist. FAA should leverage lessons learned from oversight of SkyWest Airlines' introduction of new technology and our past audits to improve oversight of all air carriers in the NAS. Without these steps, FAA will continue to face challenges addressing safety risks, which could undermine the safety and reliability of the NAS.

Recommendations

To improve the Federal Aviation Administration's (FAA) future oversight of SkyWest maintenance programs, we recommend that the Federal Aviation Administrator:

1. Provide training or formal instruction to managers and inspectors on how to identify and resolve systemic hazards.
2. Establish clear procedures on how Certificate Management Offices should address significant delays in obtaining air carrier data, including defining an escalation process.

3. Provide formal guidance to Certificate Management Offices to aid in consistent internal communication and Compliance Action processing during periods of key personnel turnover.
4. Reinforce a structured resolution process within the Compliance Action framework that includes documented escalation procedures, mediation steps, and clear criteria for resolving inspector disagreements to ensure consistency and improve adherence to FAA policy.
5. Clarify within inspector guidance the proper use of General Correspondence letters to ensure they are not used in place of Compliance Action letters.
6. Reinforce through inspector training the process for identification of repeat findings and the comprehensive resolution of these findings.
7. Update guidance and provide training for Principal Inspectors on the proper categorization of actions used to address inspector findings in Safety Assurance System.

Agency Comments and OIG Response

We provided FAA with our draft report on May 27, 2025. On July 10, 2025, we received FAA's response, which is included as an appendix to this report. FAA concurred with recommendation 1 and recommendations 3 through 7 and provided appropriate planned actions and completion dates. FAA partially concurred with recommendation 2, stating that a uniform procedure for all CMOs would be impractical. However, the Agency agreed that clear procedures are important and stated that each CMO will review its existing procedures and revise them as needed by June 2026. FAA's proposed alternative actions meet the intent of recommendation 2. Therefore, we consider all seven recommendations resolved but open pending completion of planned actions.

Actions Required

We consider recommendations 1 through 7 resolved but open pending completion of planned actions.

Exhibit A. Scope and Methodology

This performance audit was conducted between September 2023 and May 2025. We conducted this audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

To conduct our work, we gathered information on the FAA Compliance Program, FAA inspector training, and surveillance documentation programs. We analyzed FAA surveillance data on SkyWest maintenance documentation generated between 2017 and 2024. We also visited SkyWest's headquarters in St. George, UT, to interview and gather information on the airlines' maintenance programs and gathered official correspondence between FAA and the carrier. We interviewed program and management officials at FAA and inspectors at the FAA CMO responsible for oversight of the carrier.

Exhibit B. Organizations Visited or Contacted

FAA Headquarters

Safety Analysis and Promotion Division (AFS-900)

Aviation Safety Organization (AVS), Office of Accident Investigation & Prevention (AVP), Management Services Branch (AVP-410)

Air Transportation Division, AFS-200

Regulatory Standards Division (AMA-200), FAA Academy (AMA-1)

Flight Standards Service, Office of Air Carrier Safety Assurance, Air Carrier Division D (AFC-400)

FAA Field Offices

SkyWest Certificate Management Office (CMO)

Airline Locations and Repair Facilities

SkyWest Corporate Headquarters

SkyWest Nashville Maintenance Base

Embraer Aircraft Maintenance Services (Nashville)

Exhibit C. List of Acronyms

ACSA	Air Carrier Safety Assurance
ASI	Aviation Safety Inspector
CCtC	Consistent Communication through Correspondence
C.F.R.	Code of Federal Regulations
CMO	Certificate Management Office
DOT	Department of Transportation
DRS	Dynamic Regulatory System
eAML	electronic aircraft maintenance logbook
FAA	Federal Aviation Administration
MEL	Minimum Equipment List
NAS	National Airspace System
OIG	Office of Inspector General
PI	Principal Inspector
RFI	request for information
RMP	Risk Management Process
SAS	Safety Assurance System
SAT	System Analysis Team
SPI	Supervisory Principal Inspector

Exhibit D. Major Contributors to This Report

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CHELSEA ARLANTICO	ASSOCIATE COUNSEL

Appendix. Agency Comments



**Federal Aviation
Administration**

July 10, 2025

To: Nelda Z. Smith
Assistant Inspector General for Aviation Audits

From: Robert C. McMillan, Director (AAE-1)
Office of Audit and Evaluation

Subject: FAA Management Response to OIG Draft Report: *FAA Has Not Resolved Persistent Issues With SkyWest's Maintenance Practices* (Project Number 23A3009A000)

ROBERT CALINTENO Digitally signed by ROBERT
MCMILLAN
CALINTENO MCMILLAN
Date: 2025.07.10 14:56:14 -0400

The Federal Aviation Administration (FAA) is steadfast in its commitment to ensuring the safety of the National Airspace System (NAS) through comprehensive oversight of all Part 121 air carriers, including SkyWest Airlines. The FAA remains fully committed to ensuring compliance and transparency in all oversight activities and uses every available tool to uphold safety standards and meet regulatory obligations. As part of the FAA's oversight of SkyWest's remote return-to-service maintenance operations, the FAA launched a System Analysis Team and initiated a comprehensive Risk Management Process in 2023 to evaluate systemic risks more holistically, strengthen collaboration with SkyWest, and enhance overall accountability. Examples that underscore the FAA's unwavering commitment to safety, oversight, and organizational reliability include the following:

- The FAA's robust Safety Assurance System, specifically designed to maintain operational consistency and oversight, even during periods of personnel transition.
- Implementation of rigorous, well-established processes to ensure that all corrective actions taken by certificate holders are not only thoroughly assessed and documented but also verified for long-term effectiveness. This structured approach includes identifying patterns of recurring noncompliance and conducting targeted follow-up evaluations to ensure that corrective measures address root causes. By emphasizing root-cause analysis and sustained resolution, the FAA reinforces its commitment to a proactive, data-driven oversight model that prioritizes continuous safety improvement and regulatory integrity.

Upon review of OIG's draft report, the FAA concurs with six of the seven recommendations (1 and 3-7) and has initiated plans to implement these recommendations by July 2026. For recommendation 2, FAA partially concurs to establish clear procedures on how Certificate Management Offices (CMOs) should address significant delays in obtaining air carrier data, including defining an escalation process. The FAA agrees that clear procedures are important. However, CMOs differ in how they interact with operators, making a uniform procedure impractical. Given the complexities, a standardized process could disrupt effective local practices and limit the flexibility needed to address the varied contexts of FAA data requests. Instead of mandating a uniform approach, each CMO will review its existing procedures for requesting and escalating information requests. CMOs will revise procedures as needed and ensure they are clearly communicated to staff by June 2026. Recognizing that delays in operator record submissions can hinder safety assessments, Safety Assurance Managers will address this issue in upcoming meetings with air carrier management to set mutual expectations. These discussions and related workforce communications will be completed by July 2026.

For any questions or additional information, please contact me at Robert.C.McMillan@faa.gov.

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