

COMPLIANCE COMMITTEE SANCTIONING GUIDELINES

Rule or Statutory Violations	1 ST OFFENSE	2 ND OFFENSE	3 RD OR SUBSEQUENT OFFENSE
		\$0-\$10,000	\$10,001-\$50,000

*Remedial training and technical assistance may be an option in lieu of above fines

*Fees and/or costs, including court costs and interest fees, may also be assessed against violating state

*For serious, blatant or repeated violations, suspension and termination of membership could be imposed

Factors to consider in determining appropriate sanction within range	
Whether the violation resulted in serious physical injury or death	
The state's relevant disciplinary history	
Whether the state accepted responsibility for and acknowledged the violation prior to detection and intervention	
Whether the state voluntarily employed subsequent corrective measures, prior to detection or intervention to revise general and/or specific procedures to avoid recurrence of violation.	
Whether the state was cooperative with ICAOS in its examination and/or investigation of the underlying misconduct.	
Whether the state engaged in the violation over an extended period of time.	
Whether the state engaged in numerous acts and/or a pattern of misconduct.	
Whether the state's violation was the result of an intentional act.	