

SUMMARY:

ARG/US Audit Recommendations Report: Safety Program

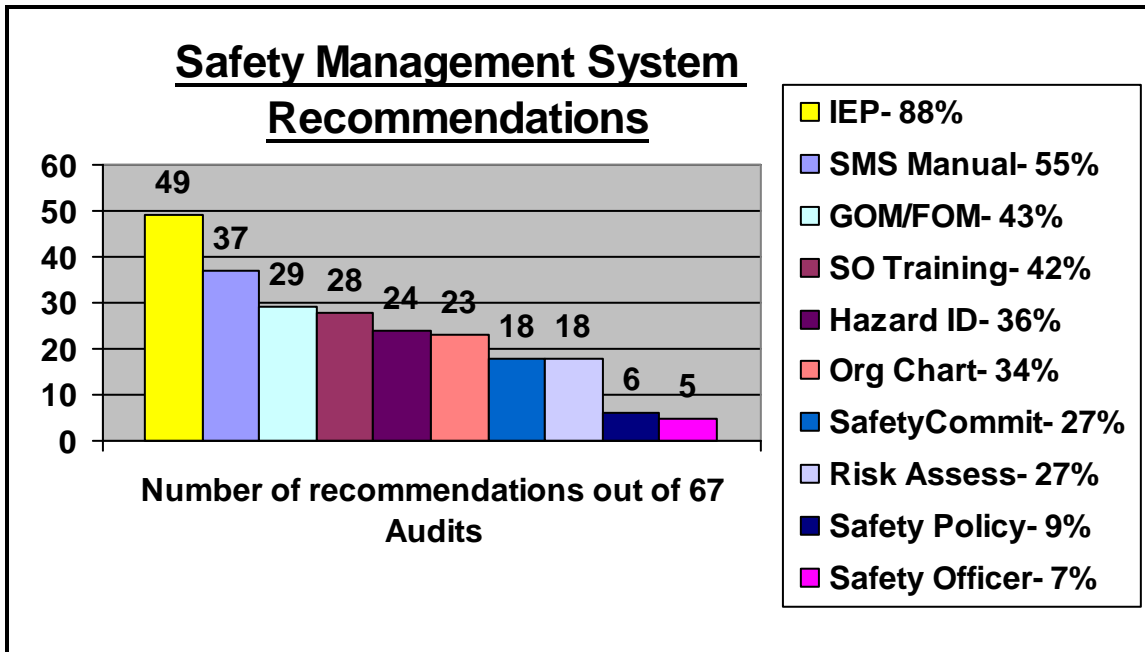
Each year ARG/US audits a vast amount of operators from Part 91 and Part 135 flight departments. All aspects of the flight department's organization are reviewed, to include the safety program. The following report is a summary of the safety program audit results compared to the ARG/US Part 91 or ARG/US Platinum standard. These audits follow a "systems" and "process" style, and are not compliance based. The goal each audit is to seek evidence of both industry best practices and the discernable structure of a safety management system (SMS) as outlined in FAA AC120-92. The objective of this report is to highlight common problematic areas found in SMS implementation. This widened aperture will help ASOS subscribers to focus their efforts on common weak areas cited by auditors, and improve their own SMS program. A total of 67 audits completed during a 15-month period from January 1, 2007- March 31, 2008 were examined.

The figures below represent the number and percentage of operators that had deficiencies in a particular area. For example, 25 (37%) of the 67 operators audited had a weakness in the area of family assistance planning under the Emergency Response Program (ERP). Even though the ERP is placed under the umbrella of SMS, the results of this report are separated into SMS elements and the ERP. The ERP is its own distinct component and is of particular value to an operation. The categories presented below represent operators that had findings, or weakness-in, a particular category. The vast majority of the audit findings point to a deficient Internal Evaluation Program (IEP). This program is especially important because it is designed to uncover process or program deficiencies within the operations and maintenance areas before they become factors in an accident or incident. The audits cite a lack of IEP documentation as a consistent finding. For example, you may have a series of IEP checklists; however, who is completing them? When are they being conducted? Are deficiencies and correction actions documented?

Top SMS Recommendation Areas

- **88%- Internal Evaluation Program**
- **58%- On-Scene Accident Qualifications (Bloodborne Pathogens and Personal Protection Equipment Training/ Hepatitis B Inoculation.)**
- **55%- Safety Management System Manual**

Safety Management System



IEP- Internal Evaluation Program- 88%

Sample Audit Recommendation: "Develop an IEP in accordance with FAA AC 120-59A."

Guideline:

- The IEP should contain a documented process for: conducting checklists, identifying and mitigating hazards/deficiencies, completion interval, and employees responsible.

SMS Manual- Safety Management System Manual- 55%

Sample Audit Recommendation: "Develop, publish, and implement an SMS in accordance with FAA AC 120-92 (as a controlled document)."

Guideline: The SMS manual should be:

- A distinct, controlled document;
- Owned and controlled by the Safety Officer;
- Tailored to the organization (i.e. company organizational chart, risk assessment process, IEP process, etc.)

GOM/FOM- General Operations Manual/ Flight Operations Manual- 43%

Sample Audit Recommendation: "Revise the GOM to include the DOS duties and responsibilities."

Guideline: The GOM/FOM should:

- Contain evidence of the existence of a safety program;
- Contain an outline of safety officer/manager responsibilities;
- Not include the entire SMS manual.

SO Training- Safety Officer Training-42%

Sample Audit Recommendation: “Designate and provide the SO with formal SMS training.”

Guideline:

- Formal annual training is best practice.
- Training subjects may include: accident investigation, safety management system fundamentals.
- Training options: online, three-day or week-long course, college course, seminar.

Hazard ID- Hazard Identification and Tracking- 36%

Sample Recommendation: “Develop, publish, and implement a safety issue corrective action tracking process.”

Guideline:

- Identify existing and potential hazards through a reporting system;
- Track hazards to prevent reoccurrence;
- Document a process for hazard identification and tracking;
- Communicate to employees that the system is non-punitive;
- Promote the program to increase participation.

Org Chart- Company Organizational Chart- 34%

Sample Recommendation: “Include the DOS (Director of Safety) on the GOM organization chart and publish the position duties and responsibilities in the GOM.”

Guideline: The Safety Officer’s position should:

- Be clearly defined in order for the SMS to function properly;
- Have a direct reporting line to the company VP/President.
- This does not imply the Safety Officer should routinely report to the VP/President.

SafetyCommit- Safety Committee- 27%

Sample Recommendation: “Require the safety committee to meet quarterly, publish an agenda, assign action items to individuals with suspense and track to completion.”

Guideline:

- Document the process and meeting discussions;
- Produce an effective schedule;
- Best practice is to conduct meetings quarterly;
- Discuss topics such as IEP findings, Hazard Report mitigations, risk assessment, etc.

Risk Assess- Risk Assessment- 27%

Sample Recommendation: “The safety program does not contain a risk assessment/analysis program.”

Guideline:

- May be performed any time it is determined there is an elevated level of risk;
- Usually accomplished when there is a change in the mission, operating environment, procedures, etc.;
- May result in a change in company policy or a new procedure;

- Document the process in the SMS manual.

Safety Policy- Safety Policy Statement- 9%

Sample Recommendation: “Senior management should publish a safety policy for its flight department.”

Guideline:

- A safety policy statement signed by the CEO or President will help establish a positive safety culture.
- Policy statement should be reflected in the GOM/FOM and SMS manual.
- Policy statements should be reviewed and updated periodically.

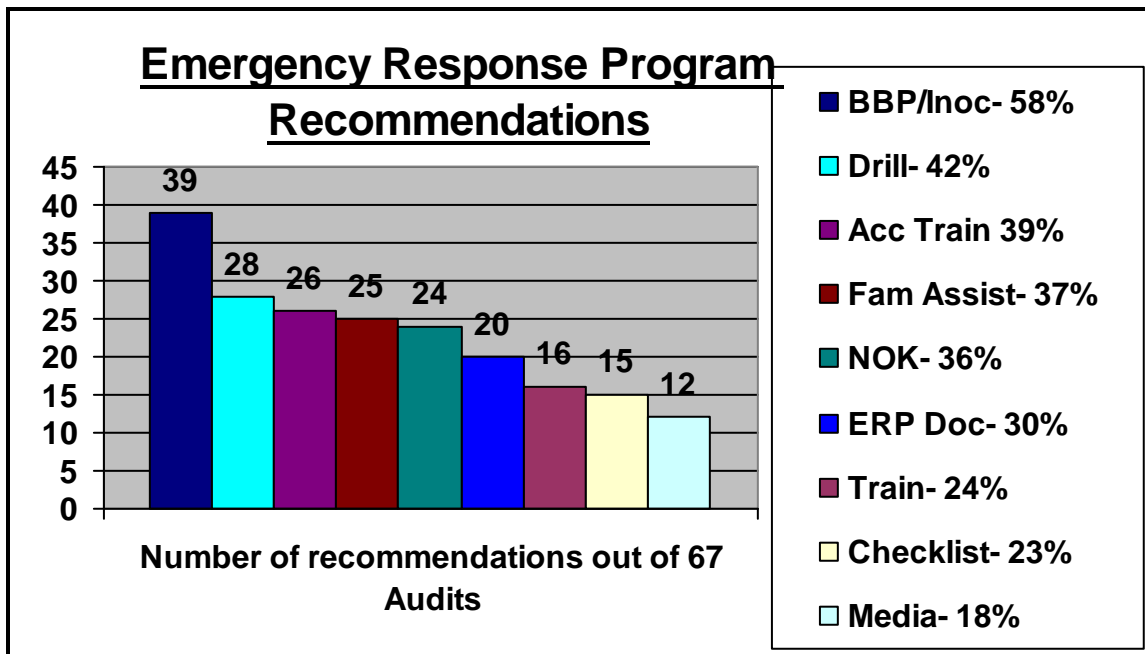
Safety Officer- 7%

Sample Recommendation: “President should consider appointing an individual to the Safety Officer or Director of Safety position that is not a senior management individual.”

Guideline:

- Designate an individual (typically a line pilot) to manage the SMS program;
- It should not be a member of management if possible;
- It is important that the individual appointed actually wants to be the Safety Officer.

Emergency Response Program



BBP/Inoc- Bloodborne pathogens and personal protection equipment training. Hepetitus B inoculation offered. -58%

Sample Recommendation: "All Go-Team members should be trained in bloodborne pathogen hazards and biohazard suit utilization. On-site responders should be offered the Hepatitis "B" inoculation."

Guideline: The individual(s) designated to go on-scene to the accident must:

- Receive bloodborne pathogens and personal protective equipment training.
- Be offered the hepatitis B inoculation.
- In the case of an employee who refuses the inoculation, a signed, written statement must be available. Without these items, on-scene access to an accident will likely not be granted.

Drill- ERP Drill- 42%

Sample Recommendation: "Company X should complete its scheduled ERP exercise and document the results. Any experienced defects should be discussed and remedied."

Guideline:

- An ERP drill must be accomplished to verify the ERP is working properly;
- Conduct a drill at least annually;
- Include all personnel that have assigned responsibilities;
- Remember to inform everyone the scenario is a drill.

Acc Train- Accident Investigation Training- 39%

Sample Recommendation: "On-site responders should receive training regarding the NTSB party participation and investigative processes."

Guideline:

- Designated on-scene responders should have formal training in at least the NTSB party process and/or accident investigation.
- The NTSB Accident Investigation Orientation for Aviation Professionals course is one of many available.

Fam Assist- Family Assistance Planning- 37%

Sample Recommendation: "Revise the ERP to contain specific information on who will perform family assistance functions and how they will be trained."

Guideline:

- A formal process must be discussed and outlined in the ERP manual.
- If someone is not trained to perform family assistance within the company, a few national family assistance providers are available.
- The local Red Cross chapter can help as well.

NOK- Next of kin notification- 36%

Sample Recommendation: "Revise the ERP to contain specific NOK (next of Kin) notification protocols"

Guideline:

- NOK notification is typically accomplished by appropriate personnel such as local law enforcement and/or senior management.
- Family transportation to the accident site should also be considered.

ERP Doc- Emergency Response Plan document poor or not controlled- 30%

Sample Recommendation: "The ERP, with its included checklists, should be treated as a controlled document to preclude inadvertent non-current documents and procedures being referenced during an emergency."

Guideline:

- The Safety Officer must maintain the ability to modify the ERP at any time.
- The ERP either can be a stand-alone document or identified within the SMS manual.
- Every portion of the manual (handouts included) must be current via a revision control process.

Train- ERP employee training- 24%

Sample Recommendation: "Subsequent to training, the ERP should be routinely exercised."

Guideline:

- All employees should be informed of the function and purpose of an ERP.
- Those assigned responsibilities for an emergency response must be trained prior to a drill.

Checklist-No checklists for designated ERP personnel- 23%

Sample Recommendation: "The Emergency Response Plan should include a checklist for key responders delineating their duties and responsibilities."

Guideline:

- Checklists should be readily available and easily identifiable.
- Consider having multiple copies of the ERP checklists in place at areas such as at the individual's home and office (don't abandon revision control).
- Some operators have used business card-sized cards with critical response information for storage in their employee's wallets.

Media- Prepared statement for the media- 18%

Sample Recommendation: "Revise the ERP to include a draft media release."

Guideline:

- A standard media statement should be readily available.
- Statements should be given by designated and/or senior personnel.
- No other statements should be made.
- For inquiries, a name, company, and phone number should be taken and a return call made at the discretion of management.