

Aviation Safety Action Program: Recurrent Training – 2010



MEDALLION FOUNDATION

Purpose

1. Improve Aviation Safety

- Increase the understanding of program design and application
- Improve conformance to the Memorandum of Understanding
- Eliminate misconceptions



Pre-Test Debrief



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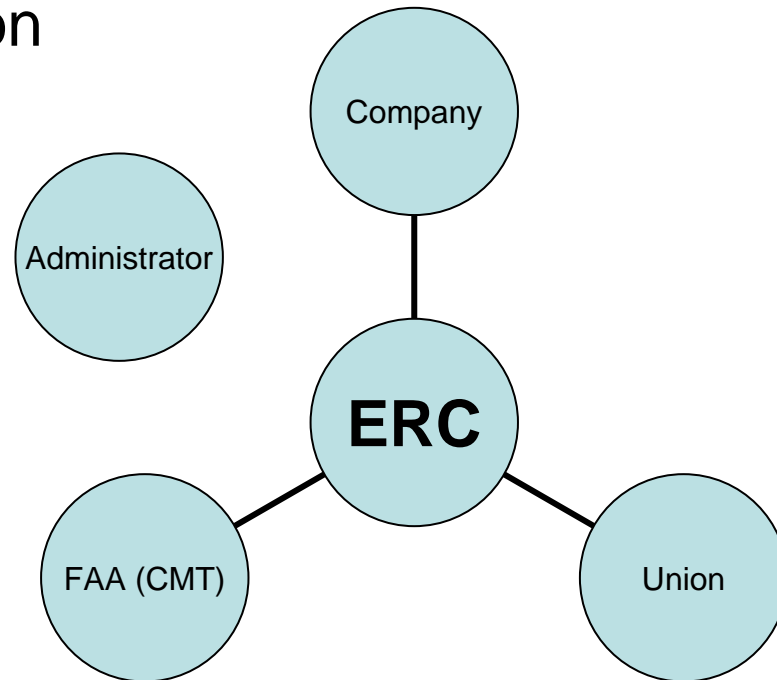
Scope of ASAP

- Threat identification / risk mitigation
- In the “normal” operational regime, identify issues that may impact safety
- Defined by the acceptability criteria of the Memorandum of Understanding



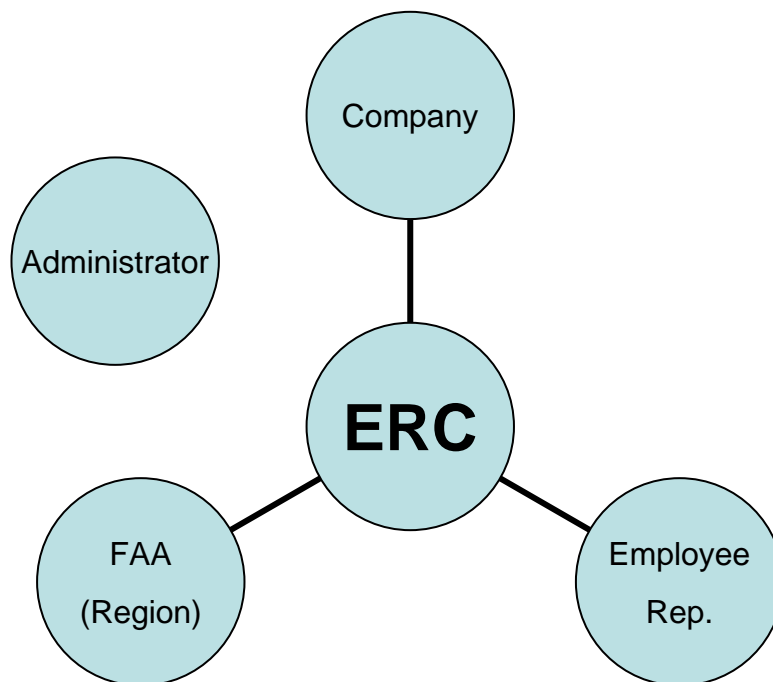
Event Review Committee (ERC) Organization

- Traditional Organization



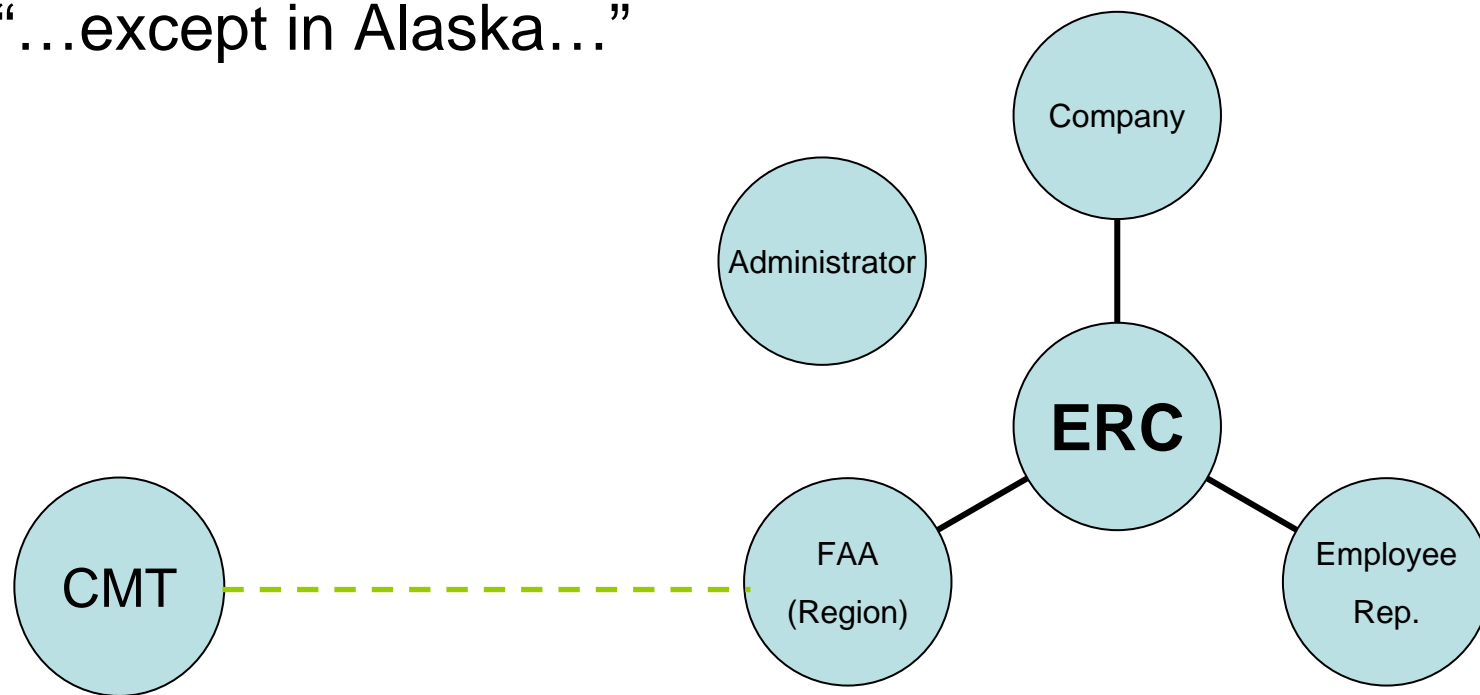
Event Review Committee (ERC) Organization

“...except in Alaska...”



Event Review Committee (ERC) Organization

“...except in Alaska...”



ERC Roles and Expectations

- Air Carrier Management
 - > To represent the certificate holder
- Employee Group
 - > To represent the interests of reporting employees
- FAA
 - > To represent the interests of the flying public and statutory responsibilities
 - > FAA members bound by MOU and existing policy guidance



Coordination with ERC

- Initial Stages: Non-Sole Source Report
 - > Field office will be conducting independent, related investigation
 - Based on standard information channels, NOT the ASAP report
 - > Investigator will be made aware of acceptance/exclusion of a related ASAP report
 - Impacts processing of investigation



Coordination with ERC

- Initial Stages: All Reports
 - > CMT Principals notified
 - > Input of CMT is solicited
 - Support for report analysis
 - Corrective action development



Coordination with ERC

- Closing Stages
 - > CMT notified of outcome
 - ERC Decision
 - Corrective Action
 - CMT validates corrective action implementation through surveillance



Participation in ERC

- Voting Members
 - > Only those trained and identified by the MOU will have voting rights
- Non-voting Members
 - > Technical representatives
 - > Following report acceptance, may contribute to corrective action development
- ERC deliberations are “need to know”

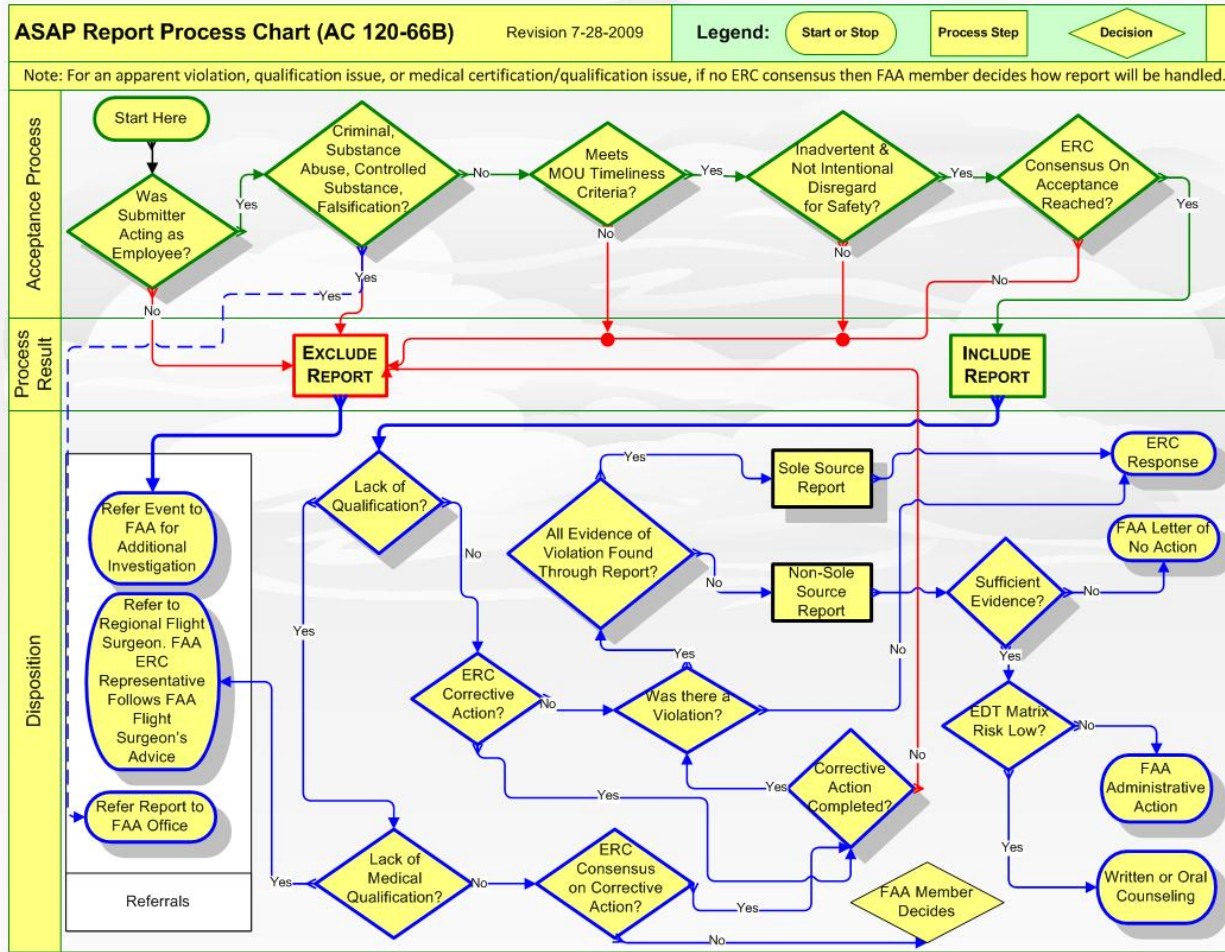


Event Review Committee (ERC) Members

- Administrator (non-voting)
 - > Kent Adams, Medallion Foundation
 - > Michelle Fabry, Medallion Foundation
- FAA ERC Representative
 - > Michael Crudden (Operations)
 - > Jim Tupper (Airworthiness)
- Company Representative
- Employee Representative



ERC Process



Acceptability Criteria

1. Was the submitter acting as an employee?
2. Criminal Activity, Substance Abuse, Alcohol, Controlled Substance, or Falsification not involved?
3. Meets MOU timeliness criteria?
4. Inadvertent and not an intentional disregard for safety?
5. ERC consensus on acceptance reached?



Timeliness Criteria

- Sole Source Report
 - > Not applicable
- Non-sole Source Report
 - > 24 hours following duty cycle
 - Hotline call or fax report “stops the clock” temporarily
 - Electronic report must be submitted within three calendar days



“intentional disregard for safety”

FAA Order 2150.3B: Compliance and Enforcement

- *“the act or failure to act was a substantial deviation from the degree of care, judgment, and responsibility normally expected of a person holding that certificate with that type, quality, and level of experience, knowledge, and proficiency.”*



“intentional disregard for safety”

- Operations
 - > Compressor Stall / Preflight Action by FO
- Maintenance
 - > Unapproved Lubricant

Reference: Advisory Circular 120-66B, Aviation Safety Action Program



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Excluded Reports

- Events are referred to the FAA field office (FSDO/CMO) for investigation
 - > Report remains de-identified
- No ASAP report or information from an ASAP report can be used by the FAA for enforcement purposes



Report De-identification

- ASAP is confidential, non anonymous
 1. Acceptability
 - When additional information is needed, submitter may be contacted by ERC. All interaction with ERC is an extension of the ASAP report
 2. Corrective Action Development
 3. Corrective Action Implementation



Sole Source / Non-Sole Source

- Sole Source
 - > **ALL** evidence of a violation about the event was predicated on an ASAP report(s)
- Non-Sole Source
 - > Information received outside of ASAP
 - For FAA
 - For Company

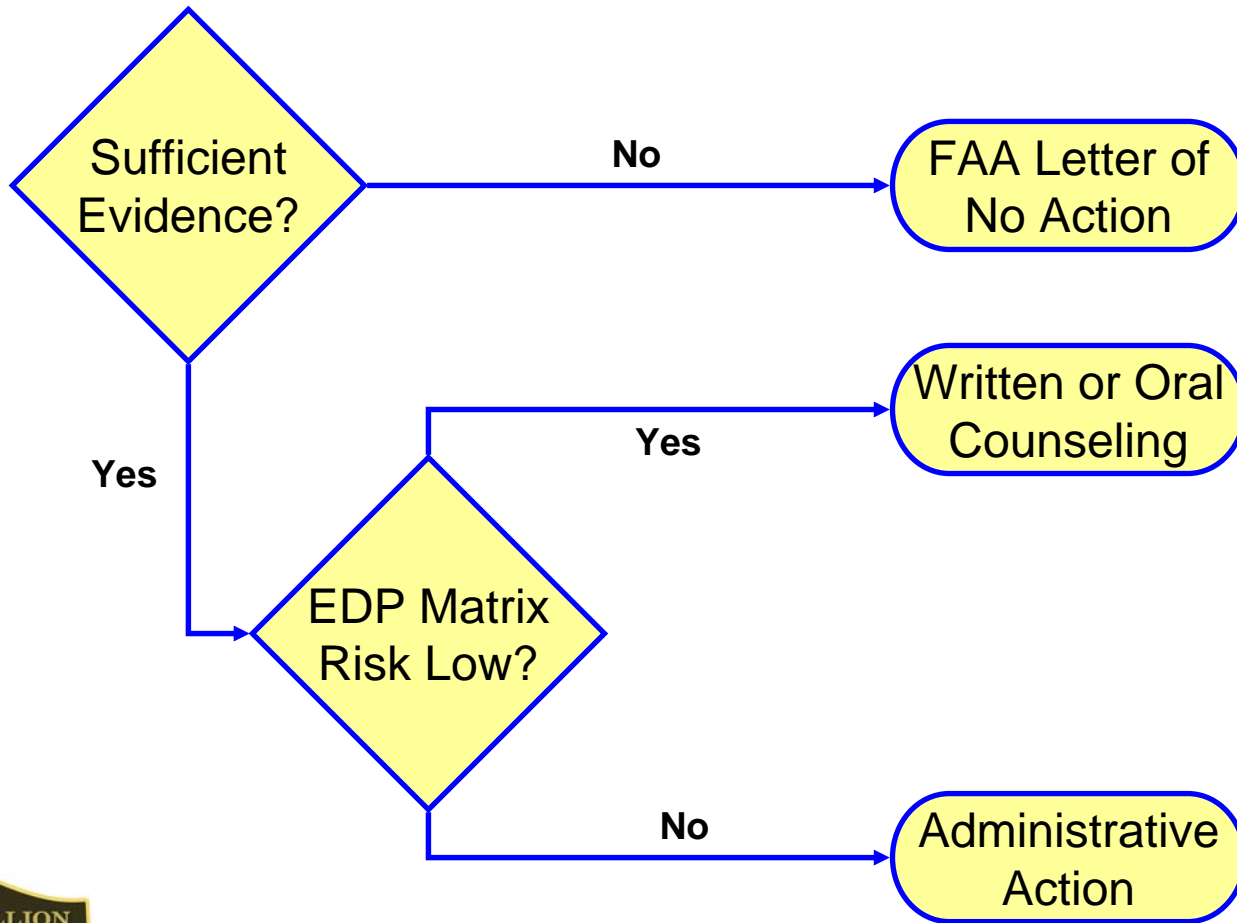


Enforcement-Related Incentive

- Relevant to non-sole source reports
- Limits FAA enforcement to informal or, at most, administrative action
 - > Informal Action (Written or Oral Counseling)
 - > Administrative Action
 - Letter of Correction
 - Warning Letter



Enforcement-Related Incentive



Administrative Action

- Warning Letter
 - > Not an adjudication, or finding of violation
 - > Expunged from records after 2 years
 - > Not subject to Pilot Records Improvement Act disclosure

Reference: FAA Order 2150.3B, Compliance and Enforcement Program



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Re-examination

- Not enforcement action
- Not punitive in nature
- May be necessary, in circumstances where a report may indicate a question of qualification



Company Disciplinary Action

- For a sole source report, prohibited by MOU
- Assumes all information was received through ASAP report(s)
- Policy does not preclude company taking action outside of the ERC for events that were known or would otherwise have been discovered



Corrective Action

- Collaborative effort among ERC members and their resources
- Targeted at root causes
- May involve action at multiple levels (company, individual airmen, FAA action)
- Corrective Action is *any* action determined by the ERC to be necessary



Corrective Action

- Corrective action is not necessarily appropriate for every report accepted into the program
- Some reports are accepted and monitored for emerging trends
- Developing corrective action for the sake of corrective action has a deterrent effect



Program Data

- Used with the company
- Use by the FAA
 - > ASIAS Data Analysis through ASRS
 - > Local Report Dissemination
 - > Surveillance Planning
- Sharing of program information



Evolving Medallion ASAP

- Modifications to policies and protocols
- Steering Committee



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References

Memorandum of Understanding, Revision 2. Medallion Participating Carriers. July 2007.

Aviation Safety Action Program. (AC 120-66B). Federal Aviation Administration. Washington, D.C.: November 2002.

Aviation Safety Action Program. (FAA Order 8900.1). Federal Aviation Administration. Washington D.C.: November 2007.

Compliance and Enforcement Handbook. (FAA Order 2150.3B). Federal Aviation Administration. Washington, D.C.: October 2007.

ASAP Policy and Guidance. AFS-230, Voluntary Safety Programs.

