

# DEPARTMENT OF THE INTERIOR DEPARTMENTAL MANUAL

Aviation Management

Part 352 Aviation Safety

Chapter 1 Aviation Safety Program

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Chapter 1 Aviation Safety Program

352 DM 1.1

**1.1 Purpose.** This chapter establishes policy for implementation of the aviation safety program within the Department of the Interior (DOI). The primary objective is the elimination of unnecessary or unacceptable risks associated with the use of aircraft in support of Interior programs.

**1.2 Authority.** Federal law requires the head of each agency to develop and support activities designed to reduce employee injuries and damage to property, encourage safe practices, and eliminate hazards in the workplace. (See 5 USC 7902; Sections 6 and 19 of P.L. 91-596, Occupational Safety and Health Act of 1970, as amended; 29 USC 651, et. seq., 29 CFR 1960; and Executive Order 12196.) This program is established by the Director, Office of Aircraft Services (OAS) in accordance with provisions of Departmental Manual 112 DM 12, 485 DM 1 and 350 DM 1.

### **1.3 Aviation Safety Program Structure.**

**A. Policy.** Aviation safety and aircraft mishap prevention in DOI is based on the philosophy that all aircraft mishaps can be prevented and that mishap prevention is an inherent function of management. Bureau directors are ultimately responsible for the management of aviation resources and the implementation of an effective aircraft mishap prevention program. Supervisors and managers at all levels are responsible for the safety of aviation operations under their control. Within this policy are the practical requirements to provide safe working conditions, prevent injuries to employees, and protect property from damage. Application of approved practices is a fundamental responsibility of managers and supervisors and represents an area in which performance and accountability must be emphasized.

**B. Program Development.** Each DOI organization involved in aviation operations shall establish an aviation safety program. Policy directives issued by each bureau shall be consistent with the provisions of 350-354 DM series manuals and OAS OPMs.

**1.4 Program Elements.** The following six elements are minimally essential to all bureau aviation safety programs.

- A. Aviation Safety Program Responsibilities.
- B. Aircraft Mishap Prevention Program.
- C. Aviation Review Program.

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- D. Aviation Safety Awards Program.
- E. Aircraft Mishap Investigation.
- F. Aviation Safety Education and Training.

**1.5 Staffing and Training.**

**A. Staffing.**

(1) Bureau directors shall provide adequate staffing and training of personnel necessary to ensure an effective aircraft mishap prevention program. These positions may be classified as full-time equivalent or collateral duty based on bureau management assessment of needs.

(2) The following minimum standards apply in the development of a bureau aviation safety program:

(a) An Aviation Manager shall be designated to administer the bureau aviation program at the national level. This individual will be thoroughly knowledgeable regarding bureau aviation activities and will meet minimum training requirements specified in the Aviation User Training Program.

(b) An Aviation Safety Manager shall be designated to administer the bureau aviation safety program at the national level. While it is desirable that this individual hold a Federal Aviation Administration (FAA) Commercial Airman Certificate, pilot certification is not mandatory. However, the individual shall be trained in the aviation safety management subjects listed below. If not trained in these subjects, the individual shall attend formal course(s) of instruction in concepts and methods necessary to establish and maintain a national level aviation safety program within 12 months of appointment. Minimum training includes professional institution instruction in:

- (i) Aircraft mishap prevention concepts and methods
- (ii) Aviation safety program structure and organization
- (iii) Management skills
- (iv) Aviation psychology/human factors
- (v) Biomedical aspects of aviation safety
- (vi) Aviation safety program evaluations
- (vii) Motivating management
- (viii) Managing a part-time safety office
- (ix) Legal aspects of aviation safety
- (x) Risk analysis and management

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(3) The education and training requirements specified for the positions identified above are minimums, regardless of classification of the position as full-time or collateral duty.

(4) Bureaus with an aviation program exceeding 20,000 flying hours annually are strongly encouraged to establish a full-time position for the Aviation Safety Manager.

**B. Education and Training.** The education and training of Interior personnel at all organizational levels is the responsibility of management. The minimum level of education and training specified in the 350-354 DM series and 485 DM series shall be provided to appropriate bureau personnel.

## **1.6 Aviation Safety Program Responsibilities**

**A. Director, Office of Aircraft Services.** The Director shall:

(1) Develop Departmental policy statements regarding aviation management for documentation in the Departmental Manual by the A/S-PMB which include:

(a) Standards for pilots and aircraft utilized in conducting DOI aviation activities.

(b) Aviation safety and aircraft mishap prevention functions.

(c) Maintenance standards and inspection procedures.

(d) Identification of operational considerations for mishap prevention efforts.

(2) Assist bureaus in developing and implementing aviation safety and aircraft mishap prevention programs.

(3) Establish and maintain a positive Departmental aviation safety program.

(4) Advise and support bureau aviation safety personnel.

(5) Administer the DOI Aviation Safety Awards Program.

(6) Review Departmental and bureau aviation operational publications when requested.

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352 DM 1.6A(7)

(7) Identify, develop, coordinate and conduct essential aviation safety, aviation management, and aircraft mishap prevention education training.

(8) Provide technical assistance to OAS Aviation Safety Management personnel in conducting evaluations.

(9) Keep the Office of the Secretary informed on the status of the Interior Aviation Safety Program.

(10) Monitor DOI airspace needs and coordinate Departmental responses to proposed airspace actions which would affect bureau programs and functions.

(11) Develop specific Departmental guidance and procedures for effecting airspace restrictions under Federal Aviation Regulations.

(12) Facilitate the Interior Aircraft Mishap Review Board process and forward all Board recommendations to appropriate action offices.

(13) Establish evaluation criteria for and provide leadership in the conduct of aviation program management and aviation safety program management evaluations within the Department.

(14) Other responsibilities as specified in 112 DM 12, the 350-354 DM series and OPMs.

**B. OAS Aviation Safety Manager.** The Manager shall:

(1) Be responsible for the investigation of all NTSB reportable aircraft mishaps occurring within DOI aviation operations.

(2) Develop and coordinate Interior aircraft mishap prevention seminars.

(3) Provide technical advice to DOI bureaus on aviation safety issues.

(4) Disseminate aviation safety information to bureaus.

(5) Maintain liaison with Department and bureau aviation safety personnel regarding the Interior aviation safety program.

(6) Manage the Aviation Mishap Information System (AMIS).

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(7) Evaluate and appraise the effectiveness of the existing aviation and aviation safety programs within DOI and recommend changes or controls.

(8) Assess compliance with established Departmental aviation management and aviation safety policies, concepts, and objectives.

**C. Bureau Directors.** Bureau directors are responsible for the implementation of an aviation safety program within their organizations. They shall:

(1) Publish an aviation management plan to implement Departmental aviation policies established in Parts 350-354 of the Departmental Manual, appropriate OAS Operational Procedures Memoranda, and other guidelines.

(2) Furnish current bureau aviation management plan and aviation manuals, standards, policy statements and directives regarding their aviation program, including aviation safety information to the OAS Director.

(3) Identify and provide resources for the education and training of personnel as required in the Aviation User Training Program and 485 DM.

(4) Integrate the six program elements identified in paragraph 1.4 into all bureau aviation safety programs.

(5) Ensure application of all Departmental and bureau aviation safety policies.

(6) Designate a senior management official to serve as the bureau representative to the Interior Aviation Board of Directors.

(7) Designate a bureau Aviation Manager.

(8) Designate a bureau Aviation Safety Manager.

(9) Assign a representative to serve as liaison with OAS for all NTSB reportable mishaps.

(10) Promote active participation in the Aviation Mishap Information System (AMIS).

(11) Encourage attendance at aircraft mishap prevention seminars.

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352 DM 1.6C(12)

(12) Monitor bureau airspace needs and coordinate bureau responses to proposed airspace actions.

(13) Ensure bureau participation at Interior Aircraft Mishap Review Boards.

#### D. Bureau Management shall:

(1) Develop bureau specific procedures for implementing aviation management policy.

(2) Provide guidance to bureau units in implementing Departmental aviation management and aviation safety management program requirements.

(3) Identify and provide appropriate resources for the education and training of staff, line managers, and field personnel as outlined in the Aviation user Training Program.

(4) Serve as a focal point for aviation matters within the bureau.

(5) Coordinate bureau policy regarding procedures relating to aviation.

(6) Develop bureau specific aviation safety and aircraft mishap prevention programs.

(7) Manage the bureau responsibilities of the Interior Aviation Mishap Information System (AMIS).

(8) Encourage attendance of bureau personnel at aviation safety management education and training courses/workshops/seminars.

(9) Disseminate aircraft mishap prevention information to the appropriate levels of the organization.

(10) Support the Interior aircraft mishap prevention effort by maintaining liaison with the OAS Aviation Safety Manager for aircraft mishap prevention purposes.

(11) Develop and coordinate bureau aviation safety and aircraft mishap prevention meetings, conferences, workshops or seminars.

(12) Be a focal point for all bureau aviation safety program activities.

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**1.7 Program Promotion.** Resources shall be made available for education and training as specified in the Aviation User Training Program. Attendance at aviation user, management, and aviation safety management training sessions, as well as aviation safety seminars and formal educational institutions, shall be encouraged.

**1.8 Aircraft Mishap Notification, Investigation and Reporting.** The DOI notification, classification, investigation, and documentation of NTSB reportable aircraft mishaps involving DOI aviation activities will be accomplished in accordance with the procedures established in 352 DM 6, Aircraft Mishap Notification, Investigation and Reporting. Investigations are conducted for the purpose of aircraft mishap prevention only and do not satisfy the requirements of 451 DM 1 or 485 DM 5. Provisions and procedures for aircraft mishap investigations are established under the authority granted in 112 DM 12. These reports are not a substitute for other DOI safety management reports (see 485 DM 5).

**1.9 Aircraft Mishap Prevention Plan.** Each bureau is encouraged to have a formal written Aircraft Mishap Prevention Plan consistent with Departmental policy. It should outline personnel responsibilities; and provide implementation guidelines, goals, and methods utilized to monitor the success of the program. Safety requirements set by the Department shall not be waived. Should a deviation of an established safety procedure or directive occur, the individual(s) involved shall furnish the bureau Aviation Safety Manager with a complete report of the circumstances as soon as possible after the event. Bureau directors are encouraged to have their Aviation Manager develop policies and procedures to incorporate the critical elements listed below into all levels of bureau aviation activity.

A. **Risk Assessment.** Risk assessment is the subjective analysis of physical hazards and operational procedures to arrive at a GO/NO-GO decision. Risk assessments support informed GO/NO-GO decisions which are the responsibility of line management. The pilot retains final authority for a NO-GO decision when safe operation of the aircraft is a factor.

B. **Education and Training.** Bureau directors are responsible for assuring that all employees involved in the use or control of aviation resources receive an appropriate level of aviation safety training. The education and training listed is the minimum for promoting aircraft mishap prevention awareness and developing operational and aviation management skills. Identification,

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development and presentation by bureaus of additional training needs unique to specific programs shall be accomplished as required. To avoid duplication of effort, the OAS Director shall be informed of training program development of these specific programs.

C. ~~Project Planning~~. Aviation operations shall be planned with necessary consideration given to mishap prevention. Flights shall be conducted as planned and in accordance with Departmental policy and procedures. Deviations from the approved mission profile will not be conducted except for safety of flight considerations. Project planning shall include as a minimum:

- (1) Flight routes/areas and altitudes.
- (2) Risk assessment.
- (3) Hazard identification (e.g. weather, takeoff or landing weights, landing areas, wire hazard, etc.).
- (4) Management approval for special use activities.

D. ~~Wire Strike Prevention~~.

(1) ~~Flight Environment Considerations~~. Bureau projects often dictate that flights be conducted in close proximity to the ground where wires are prevalent.

(2) ~~Risk Assessments/Hazard Maps~~. To reduce wire strike potential, it is critical that a risk assessment be conducted prior to all low-level flights. A low-level flight hazard map shall be constructed for the local operational area. All preplanned low-level flights require a thorough map reconnaissance of the route to be flown.

E. ~~Operational Environment Considerations~~. Environmental conditions are those conditions over which there is no human control. Forecast or known environmental conditions are not mishap cause factors. For example, structural damage caused by flying into forecast severe turbulence is NOT a mishap causal factor. A pilot's decision to fly into forecast or known severe turbulence is a cause factor. Cause factors are normally under human control and can be eliminated. Managers must be aware that their actions may encourage pilots to operate beyond existing capability. Pilots must be ever cognizant of environmental conditions in which they are expected to operate safely and are the final authority relative to a GO/NO-GO decision based upon environmental and safety considerations.

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F. ~~Aviation Life Support Equipment (ALSE).~~ Project leaders shall ensure appropriate and adequate ALSE, including personal protective equipment (PPE), is aboard the aircraft or being worn by the individual, based upon Departmental requirements, guidelines, project needs, and individual state statute requirements. Detailed information is contained in the ALSE Handbook.

G. ~~Flight Following.~~ As a potential lifesaving condition, each bureau should include a flight following requirement in the aircraft mishap prevention plan. This plan should specify the method or procedure to be used which will accommodate communications from mission personnel (or the pilot) to the flight-following facility at predetermined intervals. Additional information concerning flight following is contained in 351 DM 1.

H. ~~Weight and Balance.~~ It is imperative that proper consideration and planning be given to the aircraft weight and balance computation and subsequent loading. The actual weight of personnel and/or cargo must be considered relative to environmental and aircraft performance capabilities. This will be accomplished for each takeoff and landing for all aircraft. The formality for the documentation of this effort will be determined by the bureau conducting the operations.

I. ~~Airspace Coordination.~~ Airspace planning and coordination are becoming more important as the limited airspace is becoming more congested. All users of the airspace system need to be aware of special-use airspace and what restrictions apply to the use of that airspace. Coordination with other airspace users such as the military, is an important safety issue. Airspace coordination is an important part of mission planning.

## **1.10 Aviation Mishap Information System (AMIS).**

A. ~~AMIS Program.~~ The Aviation Mishap Information System is an electronic data (files) storage based system encompassing all aspects of aviation mishap reporting within DOI. Categories of reports include aircraft mishaps, aviation hazards, aircraft maintenance deficiencies, and airspace intrusions. The system uses the SAFECOM (Form OAS-34) to report any condition, observance, act, maintenance problem, or circumstance which has potential to cause an aviation-related mishap. Submitting a SAFECOM is not a substitute for "on-the-spot" correction(s) to a safety concern, rather it is a tool used in the documentation, tracking, and follow-up corrective action(s) related to a safety issue. Additional information is contained in the "Aviation Mishap Notification, Investigation and Reporting Handbook." The AMIS report does not replace the requirement for initiating a DI-134, "Report of Accident/Incident," as required in 485 DM 5.

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B. ~~Program Promotion.~~ The AMIS Program shall be promoted by all levels of management. The SAFECOM form shall be made readily available to pilots, passengers, dispatchers, CORs, maintenance personnel, project leaders, managers and others in positions to affect aviation safety. Prompt replies to the originator (if a name and telephone number/address are provided), timely action to correct problems, and discussion of filed SAFECOMs at local level meetings encourage program participation and active reporting.

## 1.11 Aviation Safety and Aircraft Mishap Information Dissemination.

### A. Responsibilities.

(1) ~~Office of Aircraft Services.~~ The OAS Aviation Safety Office shall ensure all SAFECOMs are stored in the electronic database and access is provided to bureau aviation management personnel. Appropriate action shall be taken on identified Department-level aviation safety concerns.

(2) ~~Bureau.~~ The responsibility for regularly reviewing the database and taking appropriate action rests with the bureaus. Bureau Aviation Safety Managers are encouraged to provide feedback to SAFECOM submitters and to solve aviation safety problems at the lowest level possible. Department level problems should be forwarded to the OAS Aviation Safety Manager.

### B. Publications. The OAS Aviation Safety Office publishes the following:

(1) ~~Safety Alert.~~ The "Safety Alert" is red-bordered and will be utilized to disseminate information of a significant nature regarding aviation safety within the Department. The three areas addressed are operations, maintenance, or publications. These "Safety Alerts" will be published on an unscheduled basis.

(2) ~~Aircraft Mishap Prevention Bulletin.~~ The "Aircraft Mishap Prevention Bulletin" is green-bordered and will be utilized to disseminate information of a general nature regarding aircraft mishap prevention concepts, methods, procedures and efforts. Bulletins will be published on an unscheduled basis as pertinent information/subject materials become available.

(3) ~~Aviation Safety Review.~~ An annual review of aircraft mishaps, associated statistical data, and trend analysis will be published and distributed following the mishap reporting year.

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(4) ~~Aircraft Mishap Video~~. A video will be produced which provides a synopsis of the previous year's aircraft mishaps. This video is produced for mishap prevention purposes only. The video contains representative aircraft mishaps and relative information. Information contained in the video cannot be relied upon as a viable source of information for use in employee grievance procedures, litigation, or as an official response to a Freedom of Information Act (FOIA) request.

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