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Aviation Safety Action Program Policy & Procedures Manual

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Revision: 2

06 January 2022

Serial Number: _____

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Record of Revisions

Manual Serial Number: _____

Insert all revisions immediately.

Record a brief description of the revision, effective date and the initials of the person inserting the revision.

Revision	Description of Change	Revision Effective Date	Revision Inserted By
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1	Support for multiple ASAP programs within the OmniSMS web application; Addition of number of regulatory violations to the ASAP Quarterly Report.	25 August 2020	PMS
2	Added acronyms to section 1 Clarified distinction between ERC corrective actions (for reporters) and ERC systemic recommendations (for process owners)	06 January 2022	PMS
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ASAP Policy & Procedures Manual

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ASAP Policy & Procedures Manual

1. General Information

1.1 OVERVIEW

(A) Your Company's Aviation Safety Action Program (ASAP) has been developed in accordance with FAA **Advisory Circular AC 120-66C** and FAA **Order 8900.1 Vol 11, Ch.2 Voluntary Safety Programs**.

(B) Additional sources of reference include the document: **Lessons Learned and Best Practices for ERC Members** (as referenced in Appendix C of AC 120-66C), and **Best Practices for Event Review Committees** (as sponsored by FAA's Voluntary Safety Programs Branch AFS-230 and published by American Institutes for Research).

1.1.2 ASAP PURPOSE

(A) The ASAP is based on a safety partnership that includes members of YCO management, FAA Inspectors, and (identify 3rd party contractors, facilitator or labor groups here if applicable).

(B) The ASAP's purpose is to encourage employee reports of errors and events that may involve an employee's (or a named contractor employee's) possible noncompliance with Federal Aviation Regulations. To do this, enforcement-related incentives have been designed into the program.

(C) ASAP reports provide safety information that helps YCO managers and Federal Aviation Administration (FAA) regulators identify potential precursors to accidents. Identifying these precursors is essential to further reducing the already low accident rate.

(D) The elements of the ASAP are set forth in a Memorandum of Understanding (MOU) between the FAA, YCO management, and (edit to include 3rd party contractor, facilitator and/or labor group here if applicable).

1.1.3 APPLICABILITY

(A) Your Company, the FAA and (contractor, facilitator, and labor group parties as applicable) have entered into the ASAP voluntarily, and contractual arrangements are in place with the contractors listed herein. Contractual arrangements specify that each contractor and its employees shall abide by the terms of the applicable ASAP MOU, and by the decisions of the YCO Event Review Committee (ERC). Applicable Memorandums of Understanding also stipulate that such contractual arrangements are in place.

(B) Your Company's ASAP Memorandum(s) of Understanding cover(s) the following employee groups:

(1) Pilots;

(2) Maintenance Technicians; *EDIT LIST PER YOUR MOUs*.

(3) Ramp staff;

(4) Contractor employees of (Name of contractor(s) as they appear in the MOU(s)).

1.1.4 PROGRAM PARTICIPATION

(A) This Aviation Safety Action Program is a continuing program. It is reviewed every 2 years to ensure objectives are met. Reviews are conducted by all signatories to the MOU. In addition, the Flight Standards Service (FS) conducts random sampling.

(B) Any party to the MOU may withdraw at any time and for any reason.

1.1.5 ASAP MANAGER AND ERC CONTACTS

(A) **Pilot Group.** The following personnel currently serve as ERC members for the Pilot Group:

ASAP Manager:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
Alternate:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
ERC Mgmnt, Rep:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
(Alternate):	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
ERC Employee Rep:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
(Alternate):	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
ERC FAA Rep:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
(Alternate):	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:

(B) **Mx Tech Group.** The following personnel currently serve as ERC members for the Mx Tech Group:

ASAP Manager:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
Alternate:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
ERC Mgmnt, Rep:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
(Alternate):	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
ERC Employee Rep:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
(Alternate):	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
ERC FAA Rep:	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:
(Alternate):	First Name	Last Name	Tel. (xxx) – XXX-XXXX Email:

Add or remove groups / members as needed by your organization.

NOTE:
Multiple ASAP programs, ASAP employee groups and ERC members within each group are added / updated in OmniSMS by administrators under **Configuration > System Configuration > Reporting tab > ASAP panel**.

1.1.6 USE OF THIS MANUAL

(A) Your Company has developed and maintains this **ASAP Policy & Procedures Manual** (PPM) for use by designated employee groups, the ASAP manager, and members of the YCO Event Review Committee. It includes the necessary policies, processes and procedures for ASAP program administration, including:

(1) ASAP report submission;

(2) Roles and responsibilities of stakeholders;

(3) ERC decision-making;

(4) Data analysis and sharing.

(5) ASAP recordkeeping;

(6) Development of ASAP training courses.

NOTE:
Your Company controls and periodically revises this document, but it is not accepted nor approved by YCO's Certificate Management Team.
(per Randy McDonald, FAA ASAP Program Manager – remove this reference).

1.1.7 SMS INTEGRATION

Interface– SMS Manual Section 6: Confidential Reporting System

(A) This program is fully integrated with Your Company's confidential reporting system under the SMS. The SMS reporting interface allows certain reports to be designated as ASAP submissions. Safety risk management (SRM), safety assurance (SA), and Event Review Committee (ERC) processes are then applied and documented within the OmniSMS web application.

(B) ASAP submissions validate the reporter and capture the date and time of report submission. ASAP reports are name-redacted for initial ERC review within OmniSMS. A special FAA ERC Representative user account in OmniSMS is provided to FAA ERC representatives for direct access to ASAP reports.

(C) ASAP / SMS integration allows YCO managers and ERC members to quickly see trends from multiple sources of data, and identify contributing and causal factors related to both ASAP regulatory violations and company policy / procedure violations. Through investigation and analysis, managers further determine if such violations are unintentional, routine, or exceptional in nature.

(D) Once causal factors are properly identified, the ERC can decide on appropriate corrective action for the individual. The ERC may also recommend corrective actions to address any identified systemic issues, and ERC members can readily see if existing risk controls are ineffective, or if additional controls are needed. All ERC decisions, actions and recommendations are recorded in YCO's OmniSMS web application.

(E) For systemic issues, implementation of ERC recommendations by YCO process owners results in continuous improvement of Your Company's operational, safety, and quality assurance processes.

1.2 DEFINITIONS

Interfaces – SMS Manual § 0.8.1 Terminology, § 6.6 VDRP

1.2.1 TERMINOLOGY

(A) The following key terms and phrases are defined to ensure standard interpretation of the ASAP guidance contained herein. Refer to **paragraph 0.8 Definitions** of the SMS Manual for additional terminology and acronyms used throughout the YCO safety management system.

Acceptance: The terms "accept(s)," "accepted," and "acceptance," and references to ASAP reports that meet "acceptance criteria," refer to such reports that are accepted as valid reports under the presumption in the FAA Reauthorization Act of 2018 and that the ERC, after review, determined should not be excluded.

Administrative action: Under FAA's Compliance and Enforcement Program, administrative action is a means for disposing of violations or alleged violations that do not warrant the use of enforcement sanctions. The two types of administrative action are a warning notice and a letter of correction. *NOTE: FAA no longer processes administrative actions for accepted ASAP reports, and they are no longer required for Voluntary Disclosure Reporting Program (VDRP) disclosures.*

ASAP facilitator: A third party who provides personnel, expertise, and/or time in order to design, implement, manage, or maintain an eligible entity's ASAP.

ASAP manager: The company representative serving as the focal point for program administration, whose duties include but are not limited to: recording / acknowledging receipt of reports, identifying all ASAP submissions as ASAP reports, designating those ASAP submission reports that are accepted by the ERC as 'accepted' in the OmniSMS application, providing information about, and responding to, inquiries concerning the status of ASAP reports, and coordinating and tracking the company's implementation of corrective action recommendations of the ERC.

"Big Five": Reports associated with criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification.

Certificate-Holding District Office (CHDO): The Flight Standards District Office (FSDO) or Certificate Management Office (CMO) having overall responsibility for all FAA reporting requirements, technical administration requirements, and regulatory oversight of a certificate holder.

Consensus of the Event Review Committee (ERC): Under an ASAP, consensus of the ERC means the voluntary agreement of all representatives of the ERC to each decision required by the MOU.

Corrective action: For the purposes of ASAP, corrective action refers to any safety-related action determined necessary by the ERC based upon a review, investigation, and analysis of the reports submitted under the ASAP. Corrective action can be recommended by the ERC for any safety concern identified in an accepted ASAP Report, regardless of whether or not it involves an individual's qualification issue. Corrective action may involve joint or individual action by the parties to the MOU. *NOTE: ERC-recommended corrective actions may include 1) corrective actions directed to an ASAP reporter (such as remedial training); and 2) corrective actions directed to the company in order to prevent recurrence and improve organizational processes.*

Covered under the Program / Qualified for inclusion / Included in ASAP: For the purposes of ASAP, these terms all have the same meaning. They mean that the enforcement-related incentives and other provisions of the ASAP apply to the employee who submitted the report, and that the report is (or will be) accepted.

Enforcement-related incentive: The assurance that no enforcement action will be used to address certain apparent violations of the regulations. This incentive applies only to ERC-accepted reports.

Event Review Committee (ERC): A group comprised of a representative from each party to YCO's ASAP MOU (excluding contractors, who must abide by the decisions of the ERC). The ERC includes a YCO management representative, an employee representative (who may be from a labor association if applicable), and a specifically qualified FAA inspector assigned from YCO's Certificate Management Office (CMO).

'Gross disregard for safety' is evidenced by behavior when an individual 1) deviates 2) from established risk controls (which include regulations and company policies / procedures) AND the most credible outcome or consequence of such deviation is risk-assessed as **Unacceptable / Red / High**. *NOTE: Using either Event Risk (ER) classification or the Risk Assessment (RA) matrix within OmniSMS, risk is assessed using one or more **credible outcomes**; NOT 'worst-case scenarios'.*

Intentional conduct: An act (or failure to act) while knowing that such conduct is contrary to a statutory or regulatory requirement.

Intentional falsification: A false statement in reference to a material fact made with knowledge of the falsity. It does not include mistakes, inadvertent omissions or errors.

Memorandum of Understanding (MOU): Refers to the written agreement between two or more parties setting forth the purposes for, and terms of, an ASAP. A standard MOU template is available from the FAA at http://www.faa.gov/about/initiatives/asap.

Non-sole-source report: The ERC considers a report to be non-sole-source when evidence of the event is not discovered by, or otherwise predicated on, the ASAP report.

Party/Parties: Refers to Your Company, the FAA, and any other person or entity (e.g., labor union or other industry or government entity) that is a participant in the program.

Person: An individual, firm, partnership, corporation, company, association, joint stock association, or government entity. It includes a trustee, receiver, assignee, or similar representative of any of them.

Policy & Procedures Manual: This manual, which includes policies, ASAP / ERC processes, and procedures.

Reckless conduct: An act (or failure to act) demonstrating a gross disregard for, or deliberate indifference to, safety or a safety standard. *See **Gross disregard for safety.** NOTE: An intentional deviation from an established risk control with the intent to reduce risk (i.e., emergency or abnormal situations) does not constitute "reckless conduct."*

Risk controls: Steps taken to eliminate hazards or to mitigate their effects by reducing the severity and/or likelihood of risk associated with those hazards (e.g., regulations, standards, and policies). *NOTE: Within OmniSMS, risk controls are distinguished from corrective actions. See **paragraph 2.3.6 Safety Risk Control** of the SMS Manual for more information.*

Safety management system (SMS): The formal, top-down business approach to managing safety risk, which includes a systemic approach to managing safety, including the necessary organizational structures, accountabilities, policies, and procedures.

Safety-related report: Refers to a written or online report of any event that involves an operational or maintenance issue related to aviation safety reported through the YCO ASAP.

Sole-source report: An ASAP report is considered sole-source when the only evidence of the event is the report itself. It is possible to have more than one sole-source report for the same event. For the purpose of any additional action taken by the company outside of ASAP, Your Company considers a report to be sole-source when all evidence of the event known to YCO is discovered by or otherwise predicated on the ASAP disclosure. Your Company does not use any information obtained through ASAP to initiate or support disciplinary action outside of ASAP, with the exception of those events excluded from ASAP due to the appearance of possible criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification.

Sufficient evidence: Sufficient evidence means evidence gathered by an investigation not caused by, or otherwise predicated on, the individual's safety-related report. There must be sufficient evidence to prove the violation, other than the individual's safety-related report. In order to be considered sufficient evidence under ASAP, the ERC must determine through consensus that the evidence (other than the individual's safety-related report) would likely have resulted in the processing of a FAA enforcement action had the individual's safety-related report not been accepted under ASAP.

Voluntary Disclosure Reporting Program (VDRP): A policy-based program under which Your Company may voluntarily report apparent violations of the regulations and develop a corrective action plan (comprehensive fix) satisfactory to the FAA to preclude violation recurrence. *NOTE: YCO's VDRP is described in **paragraph 6.6 Voluntary Disclosure Reporting Program** of the SMS Manual.*

1.2.2 ACRONYMS

(A) The following acronyms are used within this ASAP PPM:

AC – Advisory Circular
ASAP – Aviation Safety Action Program
ASRS – Aviation Safety Reporting System
CAP – Corrective Action Plan
CMT – Certificate Management Team
EDP – Electronic Data Processing
EIG – Event Investigation Guide
ER – Event Risk (classification)
ERC – Event Review Committee
IAW – In Accordance With
IEP – Internal Evaluation Program
KPI – Key Performance Indicator
MOU – Memorandum of Understanding
Mx – Maintenance
NCF – Nonconformity
PPM – Policy & Procedures Manual
RA – Risk Analysis
RCA – Root Cause Analysis
SA - Safety Assurance
SKPI - Safety Key Performance Indicator
SMS - Safety Management System
SRM - Safety Risk Management
VDRP - Voluntary Disclosure Reporting Program

1.3 GENERAL POLICIES

1.3.1 ASAP FACILITATION

(A) YCO utilizes the OmniSMS web application reporting interface to collect and analyze ASAP safety reports, and to integrate ASAP reporting with the YCO safety management system. The OmniSMS web application provides a central data repository for all sources of SMS data including ASAP reports, and supports ERC processes as developed by Your Company.

(B) In accordance with AC 120-66C paragraph 25, OmniSMS is not a third-party facilitator of this ASAP, nor is the program administered under the purview of OmniSMS.

1.3.2 NON-PUNITIVE REPORTING

Interfaces – SMS Manual Section 6, EIG § 2.1.1 Non-punitive Reporting Policy

(A) Your Company strongly desires to learn from all incidents, occurrences and errors made, in order to improve our systems and enhance safety. YCO therefore maintains a non-punitive reporting policy to promote and encourage the uninhibited open and honest sharing of information.

(B) If errors involve a violation of regulations, YCO management will make every effort to protect employees involved from certificate action and civil penalties by assisting with ASAP and ASRS reports, and by developing voluntary disclosures to FAA that emphasize organizational deficiencies rather than individual blame. This course of action protects both the company and the individuals involved in the violation.

NOTE:
Your Company's **Non-punitive Reporting Policy Statement**
as signed by YCO's accountable executive is located under
the POLICY tab of the OmniSMS web application.

1.3.3 ASAP REPORT ACCEPTANCE

(A) **Program coverage.** This ASAP applies to all covered employees of Your Company, and only to events that occur while acting as an employee. The memorandum of understanding (MOU) between Your Company and the FAA identifies covered employee groups. It is located in the OmniSMS document library.

(B) **Report exclusions.** Submitting an ASAP report may help you avoid enforcement action in the event you inadvertently violate a regulation. However, your report will NOT be accepted into ASAP by the Event Review Committee (ERC) when the event involves any of the following: criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification. Also, your actions must not appear to involve an intentional disregard for safety or reckless conduct.

(C) **Report classification.** ASAP reports are classified as either sole-source or non-sole source. A sole-source report means your report is the only evidence that an event has occurred. A non-sole source report means that information is obtained from a source (other than your report) to prove that a violation has occurred.

(D) **Timeliness.** To help assure enforcement protection, it's important that you submit your ASAP report in a timely manner. To assure the most favorable ERC decision regarding report acceptance, submit your report:

(1) Within 24 hours after the end of the last flight of your duty period (for pilots), or the end of your duty shift (for personnel other than pilots), excepting extraordinary circumstances; (or)

(2) Within 24 hours of having become aware of possible non-compliance with regulations (e.g., by learning of the noncompliance through ATC, FAA, or after being notified by a YCO manager or ERC member that you may have violated a regulation).

(E) **Event Review Committee review.** The ERC reviews and analyzes ASAP reports submitted. Their first task is to decide whether to accept your report. The ERC identifies actual or potential safety problems, and proposes corrective actions:

(1) To the individual who submitted the report; and

(2) In some cases to YCO management for improvements to processes and procedures.

(F) **Submitter corrective action.** ERC corrective action(s) which apply to an individual who has submitted an ASAP report must be completed. Failure to do so is grounds for a previously accepted ASAP report to be excluded, and enforcement actions may ensue.

(G) **Company corrective action.** ERC corrective action(s) which apply to Your Company are recommendations, and YCO may choose not to implement them. This will not impact acceptance of the submitter's ASAP report. However, if YCO has submitted a related voluntary disclosure and ERC recommendations are part of the disclosure's comprehensive fix, the disclosure may be rejected and enforcement actions may ensue if a corrective action is not implemented.

1.3.4 ASRS REPORTING

Interface – SMS Manual § 6.2.5 Aviation Safety Reporting System

(A) Employees may wish to submit an ASRS report in association with their ASAP report to further protect them from enforcement action. However, protection under this program is limited for repeated disclosures by the same individual within the last 5 years.

(B) An ASRS report can be submitted simultaneously with an ASAP report from within the OmniSMS web application.

(C) The ASRS reporting program is described in YCO's **SMS Manual paragraph 6.2.5**.

NOTE:
Learn more about ASRS at
https://asrs.arc.nasa.gov/overview/summary.html

1.3.5 ASAP REPORTS THAT REVEAL COMPANY VIOLATIONS

(A) When an ASAP report reveals an apparent violation for which Your Company also desires enforcement protection (in addition to the reporter) under the Voluntary Disclosure Reporting Program, the appropriate YCO 119 manager should review the report with the ASAP manager and analyze the apparent violation.

(B) This evaluation should consider the following, in order to determine VDRP eligibility:

(1) Has FAA become aware of the violation by any means outside of YCO? If so, enforcement protection may not be provided by the self-disclosure.

(2) Was the apparent violation inadvertent, and not a blatant disregard for the regulations?

(3) If the violation has been on-going, has **immediate action** been taken to terminate the violating conduct or operation (such as grounding a pilot after discovery of an expired medical, or immediately removing an aircraft from service that has been discovered to have overflown an inspection)?

(4) Has the responsible department manager or process owner begun developing a comprehensive fix (referred to as a corrective action plan in OmniSMS) to prevent recurrence?

(C) Based on this evaluation, if a YCO 119 manager decides to submit a VDRP disclosure in conjunction with an ASAP report, the report's corrective action plan (CAP) should include:

(1) ERC corrective actions for the reporter;

(2) ERC recommended corrective actions for the company (if accepted by YCO process owners);

(3) The company's comprehensive fix as agreed to in the VDRP.

NOTE:
Refer to the **SMS Manual paragraph 6.6 Voluntary Disclosure Reporting Program** for a description of the VDRP process and procedures for submitting a self-disclosure under VDRP.

1.3.6 MANAGEMENT'S USE OF VDRP

(A) The Voluntary Disclosure Reporting Program (VDRP) as described in YCO's **SMS Manual paragraph 6.6** is utilized by YCO 119 managers to voluntarily disclose regulatory violations to FAA.

(B) VDRP is similar to ASAP in that it provides enforcement protection, but this protection is for Your Company. A voluntary disclosure may not provide adequate enforcement protection for employees.

(C) Since most regulatory violations occur as a result of the actions or inactions of employees, it's important for YCO department managers to consider employees who might be affected whenever a voluntary disclosure is submitted to FAA.

(D) It is therefore YCO company policy that whenever a YCO 119 manager notifies FAA of a voluntary disclosure, that manager shall also notify, or cause to be notified, all personnel who may be affected, and:

(1) Encourage each affected employee to submit an ASAP report;

(2) Recommend that each affected employee also submit an ASRS report, in case the employee's ASAP report is not accepted by the ERC.

1.3.7 ERC DISCRETION

(A) YCO management officials (other than designated ERC representatives) should not be voting members of the ERC and should refrain from influencing any ERC decisions.

(B) YCO management should not preempt any ERC representative's decision-making discretion for an event reported under the ASAP. If management does not permit ERC representatives to exercise this discretion, the capacity of the ERC to achieve consensus will be undermined and the program will ultimately fail.

1.3.8 HIGH-PROFILE EVENTS

(A) YCO's confidential reporting system (see **SMS Manual Section 6**) allows employees to submit safety reports which involve potentially controversial issues and high-profile safety-related events.

(B) When such reports are designated as ASAP submissions, ERC management representatives should communicate in a timely manner with parties to the MOU, including FAA and YCO senior management.

(C) The parties should be briefed on the nature of these issues and events, investigation results, ERC decisions, and the disposition of each report.

(D) During such communications, the ERC and YCO managers shall protect confidential details of all reports.

1.3.9 ASAP RESOURCES

(A) The following sources of information are utilized by the ASAP manager, department managers, process owners and ERC representatives during the performance of their duties under the ASAP:

(1) SMS Manual Section 6: Confidential Reporting System (for general hazard / event reporting);

(2) **ASAP Policy & Procedures Manual** (for ASAP reporting and ERC processes);

(3) SMS Manual Section 2: SRM and Section 3: SA (for analysis of data);

(4) **Event Investigation Guide** (for investigation of ASAP reports);

(5) YCO's current Memorandum(s) of Understanding.

(B) For reports of errors or suggestions for improvement to these documents, submit a **Change Request** into YCO's OmniSMS confidential reporting system.

1.3.10 USE OF ASAP INFORMATION

(A) Information from ASAP reports is used to measure YCO's safety performance, SMS performance, ASAP program performance, and as a measure of YCO safety culture.

(B) SMS performance indicators (such as the number of ASAP and non-ASAP reports received per employee group) are also used to measure safety culture within a group, a department, or the organization as a whole.

(C) Violations, events and contributing / causal factors from ASAP reports may impact established safety key performance indicators (SKPIs). When a trend in these events / factors is identified, the information is used to modify existing SKPIs and related performance objectives. Additional, targeted SKPIs may also be created to address the trend.

(D) In order to gain the greatest possible positive benefit from the ASAP, YCO may share ASAP data with external parties (such as other companies and industry safety organizations), as well as create lessons learned for internal or external use.

NOTE:
Your Company shares only name-redacted, de-identified
data in lessons learned and with outside organizations.

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1.4 RECORDKEEPING

1.4.1 ASAP DATA COLLECTION AND RECORDS

(A) The OmniSMS web application is a comprehensive electronic database used for ASAP report submission, data acquisition, event classification, risk analysis, and data trending. All records necessary for the ASAP program's administration and evaluation are stored within the OmniSMS web application.

(B) Records submitted to the FAA for review relating to an ASAP report are protected to the extent allowed by law under applicable exemptions to the Freedom of Information Act.

(C) All records, documents and safety-related information relating to the YCO ASAP are appropriately kept in a manner that ensures compliance with 14 CFR and all applicable law, including the Pilot Records Improvement Act. These records include:

(1) ASAP reports in the OmniSMS web application;

(2) Acceptance / exclusion of ASAP reports;

(3) Investigations and identified safety issues within each ASAP report;

(4) ERC decisions that involve the reporter directly, including:

(a) Corrective actions, recorded as **Individual corrective actions**;

(b) Completion of corrective actions, recorded within each ASAP report;

(5) ERC recommendations that involve systemic issues in YCO processes, including:

(a) Corrective action / risk control recommendations, recorded as **Systemic recommendations**;

(b) Implementation or rejection of ERC-recommended corrective actions and risk controls.

1.4.2 ASAP DATA RETENTION

Interface – SMS Manual § 0.4 SMS Operational Records

(A) In accordance with AC 120-66(C), YCO retains all ASAP data for a sufficient period of time for the ERC to determine whether its recommended corrective actions have been effective, but not less than 2 years.

(B) However, investigations of potential noncompliance with regulatory standards and other safety risk controls (including analyses of such data), are considered safety assurance (SA) process outputs under 14 CFR Part 5 and the SMS Voluntary Program (SMSVP) standard. **Such safety assurance process output records must be retained for 5 years as required by 14 CFR § 5.97(b)**.

(C) Further, if an ASAP report reveals systemic deficiencies in YCO processes, and risk controls are implemented as a result of ERC recommendations, **14 CFR § 5.97(a) requires such safety risk management (SRM) process outputs to be retained for as long as the control remains relevant to YCO operations**.

NOTE:
See **SMS Manual paragraph 0.4 SMS Operational Records** for recordkeeping requirements IAW 14 CFR Part 5 and the SMSVP standard.

1.5 ROLES AND RESPONSIBILITIES

1.5.1 GENERAL

(A) The ASAP requires specific roles to be held by company and FAA personnel. These roles include the ASAP manager, the FAA ERC representative, and other members of the ASAP Event Review Committee (ERC).

(B) For each employee group covered under an MOU, ERC members are assigned the following roles:

(1) ASAP manager;

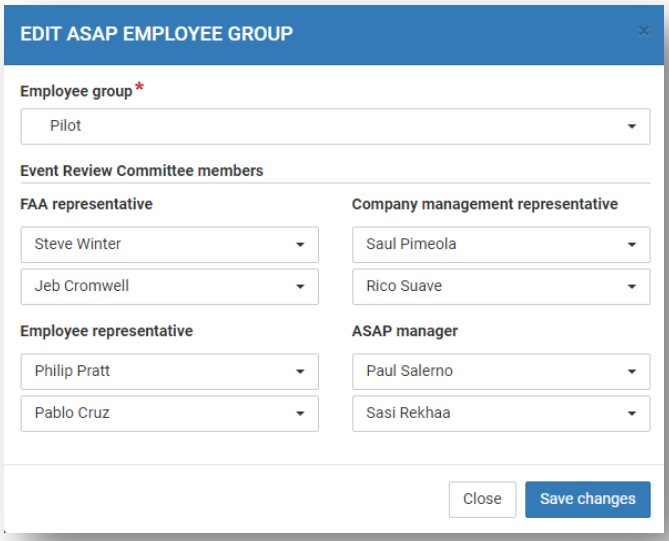
(2) YCO management representative;

(3) Employee representative;

(4) FAA representative.

(C) Within the OmniSMS web application, safety administrators assign these roles and may edit them as the need arises in the ASAP panel under **Configuration > System Configuration > Reporting.**

(D) The system provides for listing alternate ERC members within each role, in the event a primary member is unable to attend an ERC meeting.



1.5.2 ASAP MANAGER

(A) The ASAP manager serves as program administrator. In some cases, the ASAP manager may serve as YCO's management representative to the ERC and may perform both functions.

(B) **Competencies.** The ASAP manager should possess knowledge about each employee group's work processes, standards and methods. If lacking in expert knowledge regarding a specific employee group, the ASAP manager relies on the expert knowledge of other ERC members assigned to the group. The ASAP manager should be familiar with ASAP and ERC processes, other safety programs and system safety principles. The ASAP manager should have the following personal characteristics and skills:

(1) Strong commitment to safety;

(2) Commitment to maintaining confidentiality;

(3) Skill in meeting and teamwork facilitation;

(4) Strong communication skills, interpersonal skills, and working relationship skills;

(5) Be respected by peers, employees, and other ERC members.

(C) **Responsibilities.** The ASAP manager is responsible for administration and accomplishment of the ASAP. The ASAP manager is also responsible for the following duties:

(1) Provide each participating ERC member with written guidance;

(2) Receive and record / track / respond to ASAP reports;

(3) Perform an initial assessment and risk analysis on all ASAP reports received;

(4) Analyze reports to identify events and their related contributing / causal factors;

(5) Manage the OmniSMS database to facilitate ERC member access and prepare meeting agendas;

(6) Provide access to complete reports (excepting name redactions of reporter and crew) to ERC members for review prior to meeting;

(7) Document ERC recommendations for ASAP reports, and convey such ERC recommendations to appropriate YCO department managers for consideration;

(8) Record and track the implementation of corrective action(s) and risk controls, including follow-ups to assure proper implementation of all actions / controls;

(9) Annotate when an ERC process status is closed without an FAA ERC member in attendance

(10) Record repeated instances of noncompliance with 14 CFR and inform ERC members if the same individual is involved in multiple violations;

(11) Identify repeated events (systemic issues) and bring such trends to the attention of YCO management and FAA ERC members;

(12) Provide employees who submit reports with their individual report status, including the final disposition of each report;

(13) Coordinate with the ERC to publish pertinent lessons learned and trend analyses from submitted and processed reports which have been analyzed in accordance with YCO procedures;

(14) Provide feedback to all stakeholders regarding lessons learned from the ASAP program;

(15) Provide the YCO Certificate Management Team (CMT) with ASAP quarterly reports on safety enhancements.

(16) Conduct an annual review of the OmniSMS ASAP database to determine whether corrective actions have been effective in preventing or reducing the recurrence of safety-related events, and that corrective actions have not been subsequently negated through implementation of other company actions (e.g., manual revisions, checklist modifications, training, etc.);

(17) Keep YCO upper management informed regarding ASAP program results.

(18) Keep all documents and records regarding the ASAP program (see **paragraph 1.4 Recordkeeping**) and making them available to the parties to the MOU at their request.

(19) Coordinate with the ERC to revise / improve processes and procedures for reviewing and analyzing reports as found in the YCO **Event Investigation Guide** and **SMS Manual Section 6**.

1.5.3 EVENT REVIEW COMMITTEE MEMBERS

(A) **Competencies:** ERC members hold important roles and should be well qualified. For each employee group to which an ERC member is assigned, members should possess expert knowledge about the group's work processes, standards and methods. ERC members should also possess knowledge of general system safety principles. ERC members should further have a demonstrated commitment to safety, thereby allowing the ERC to focus on common goals.

(B) In addition to professional qualification, knowledge and background, the following personal characteristics are essential in promoting good teamwork among ERC members, and in the ERC's ability to reach a consensus:

(1) Effective communication skills, both verbal and listening;

(2) Professional maturity and open-mindedness;

(3) Commitment to maintaining confidentiality;

(4) Integrity and belief in the goal of improving safety;

(5) Trust in ASAP / ERC processes and pride in ERC participation;

(6) Freedom from personal, organizational, and regulator biases;

(7) Commitment to full participation in ERC meetings.

(C) **Responsibilities.** Event Review Committee members are jointly and severally responsible for reviewing and analyzing reports submitted under the ASAP for which they will participate as an ERC member. All ERC members are also responsible for the following duties:

(1) Determine whether such reports meet any criteria for exclusion;

(2) Identify actual or potential safety issues from information contained in the reports;

(3) Investigate reported events when designated as a lead investigator or additional investigator in the OmniSMS web application;

(4) Conduct interviews when investigation instructions include a request to interview;

(5) Propose solutions for safety issues identified in reports;

(6) Identify and communicate recommendations for effective corrective actions and risk controls;

(7) Notify the ASAP manager if unable to attend a scheduled ERC meeting for any reason.

1.5.4 YCO MANAGEMENT REPRESENTATIVES

(A) **Additional responsibilities.** In addition to their duties and responsibilities as an ERC member, YCO management representatives are further responsible for the following:

(1) Assist the ASAP manager in conducting an annual review of ASAP reports in the OmniSMS web app.

(2) Identify and report on safety issues within their respective employee groups, including:

(a) Areas of repeated violations;

(b) Trends in contributing and causal factors.

1.5.5 FAA REPRESENTATIVES

(A) **Attendance vs. Participation.** FAA participation in the ERC is essential. YCO's FAA ERC representative should be diligent with respect to his or her participation and promotion of the program.

(B) FAA attendance at ERC meetings is required for ASAP reports associated with:

(1) Criminal activity;

(2) Substance abuse;

(3) Controlled substances;

(4) Alcohol;

(5) Intentional falsification;

"The Big Five"

(6) Regulatory noncompliance;

(7) Reckless conduct;

(8) A medical certification or qualification issue.

(C) However, for reports that are not associated with such conduct, FAA attendance at certain ERC meetings may not be necessary, at the discretion of the FAA ERC member.

(D) **Additional responsibilities**. In addition to their duties and responsibilities as an ERC member, FAA ERC representatives are further responsible for:

(1) Communicating ERC recommendations to outside groups (anyone who is not a party to the MOU);

(2) Maintaining confidentiality during such outside communications.

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1.6 INFORMATION AND TRAINING

(A) Your Company provides each participating ERC member employee and manager with access to this **ASAP Policy & Procedures Manual** no less than 2 weeks before the employee is listed as an ERC member.

(B) All new-hire employees within participating employee groups receive training on the program during initial training.

(C) Each participating employee group receives further instruction concerning the program during regularly scheduled recurrent training, and thereafter in recurrent training on a continuing basis.

1.7 EMPLOYEE FEEDBACK

(A) Your Company provides open and meaningful feedback to employees regarding the operation and results of the ASAP program, including:

(1) Individual corrective actions as determined by the ERC and taken in response to ASAP reports;

(2) Systemic corrective actions and risk controls as recommended to YCO by the ERC;

(3) Identified safety / quality issue(s) and recommendations resulting from ASAP report investigations;

(4) ASAP program performance as revealed by ASAP performance indicators.

(B) This feedback is shared openly and honestly with all stakeholders (e.g., the submitter, other safety-sensitive employees), using de-identified data and maintaining confidentiality. Such feedback keeps the program and its safety benefits visible. It also builds / maintains trust and buy-in to the program.

(C) YCO managers disseminate ASAP feedback using:

(1) Lessons Learned;

(2) Safety Comms / Memos.

NOTE:
Lessons learned and Safety comms / memos are created
in OmniSMS under the main menu: PROMOTION.

2. ASAP Reporting

2.1 PROGRAM DESIGN

2.1.1 INTEGRATED SMS / ASAP REPORTING

(A) Safety reports come in all shapes and sizes – the report could be of a hazard, an irregularity, a minor event or an occurrence – with or without an apparent violation. Employees also sometimes report a violation as a stand-alone event (such as an expired medical certificate or duty time exceedance). Sometimes violations are discovered during event investigation, and involved employees can be given an opportunity to submit an ASAP report on the advice of management.

(B) By integrating ASAP reporting with YCO's confidential reporting system under the SMS, these various use cases are supported by:

(1) Allowing any reported hazard, safety concern or event to be submitted as an ASAP report;

(2) Accepting stand-alone reports of apparent violations;

(3) Associating ASAP reports with previously reported events.

(C) YCO provides a single reporting point for any type of hazard or event, for all employee groups and contractor employees. Integrated ASAP reporting improves both ASAP and SMS processes:

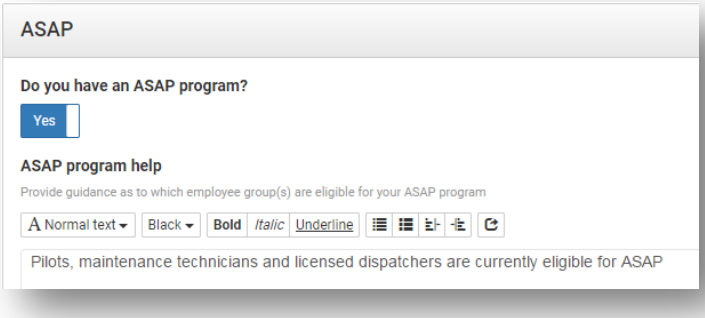
(1) A single ASAP report can include investigations regarding the reported event and the violation, together with branched investigations of other contributing and causal factors associated with the event.

(2) Various types of violations can be monitored and measured using trend analysis and safety key performance indicators (SKPIs). YCO managers can also utilize the OmniSMS hazard register to drill down into regulatory and procedural violations to see related contributing and causal factors.

2.1.2 ACTIVATING THE ASAP FEATURE

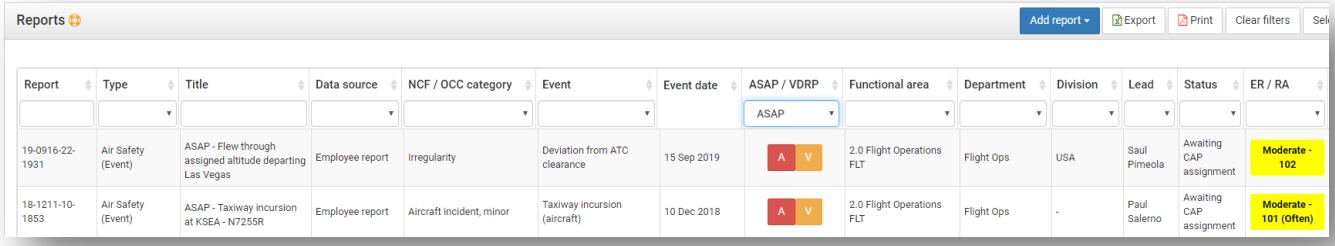
(A) Within OmniSMS, safety administrators access **System Configuration** to activate the ASAP feature and define or modify the employee groups covered by YCO's Memorandum(s) of Understanding with FAA.

(B) A message on the ASAP reporting interface tells employees which groups are currently eligible for ASAP enforcement incentives.



2.1.3 ASAP REPORT ATTRIBUTE

(A) Each ASAP report carries its ASAP attribute throughout the report's lifecycle. From the Report table in OmniSMS, both ASAP reports and voluntary disclosures can be filtered and sorted. Multiple constrained finds permit filtering of ASAP reports by date, functional area, department, status, risk level, etc.



2.2 REPORTING PROCEDURES AND NOTIFICATIONS

2.2.1 ASAP REPORTING INTERFACE

(A) OmniSMS supports anonymous reporting for any type of SMS report, except when the report is submitted as ASAP.

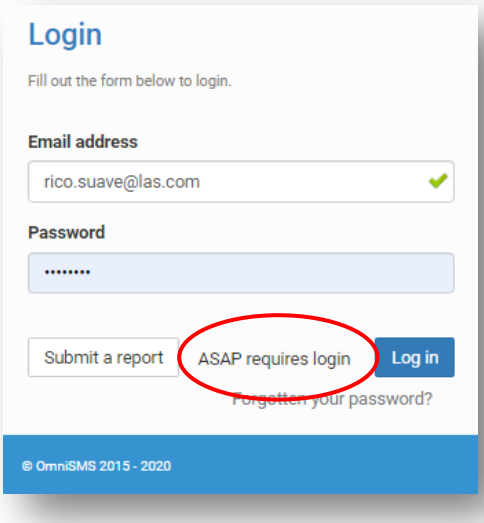
(B) For ASAP, the reporter must have an OmniSMS user account:

(1) To validate the reporter's credentials at the time the ASAP report is submitted;

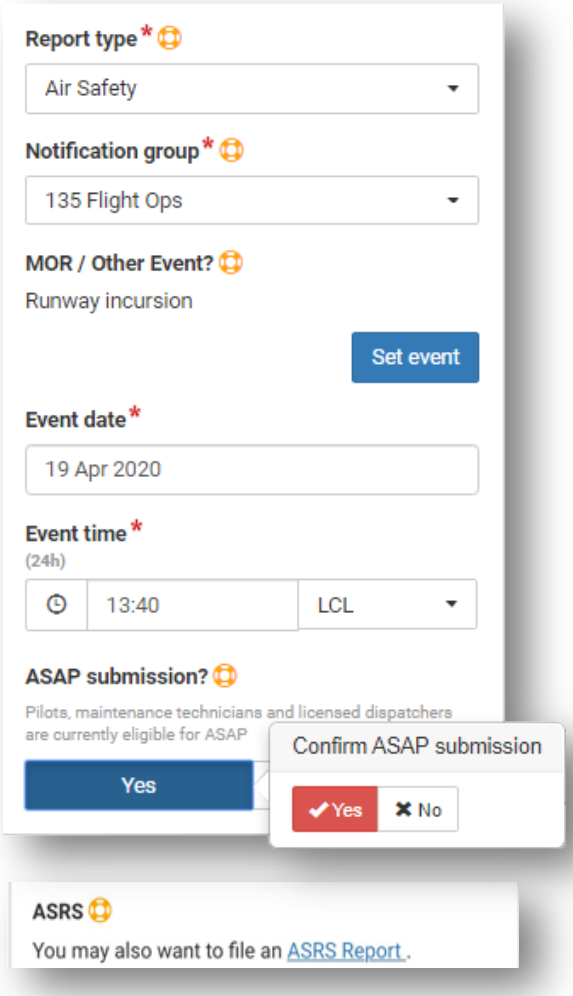
(2) For the ERC to identify instances of the same or similar repeated noncompliance by an individual.

(C) To make an SMS report an ASAP submission, the reporter must enter their login credentials. Upon successful login, the reporter then selects the quick access **REPORT** command from the upper L/H area of the user's dashboard.

(D) An internet connection via Wi-Fi or cellular network is required.



2.2.2 ASAP REPORTING PROCEDURES



(A) **ASAP submission.** On the reporting form, select Hazard, Air Safety, or other type of SMS report.

(B) Select the appropriate notification group to send a report notification email to YCO managers.

(C) Event date and time are required fields for an ASAP submission. You must enter the date and approximate time the event / violation occurred.

(D) Make the SMS report an ASAP submission by selecting **Yes** and confirm your submission.

(E) Liferings provide additional guidance and are editable by safety administrators.

(F) **ASRS reporting.** Click on the link provided to open NASA's ASRS website in a new tab.

(G) Complete the ASAP report's Description and Suggestions panels, but do not submit your ASAP report until the ASRS report is complete.

(H) Then, while keeping both tabs open, copy and paste from your ASAP report into the ASRS report.

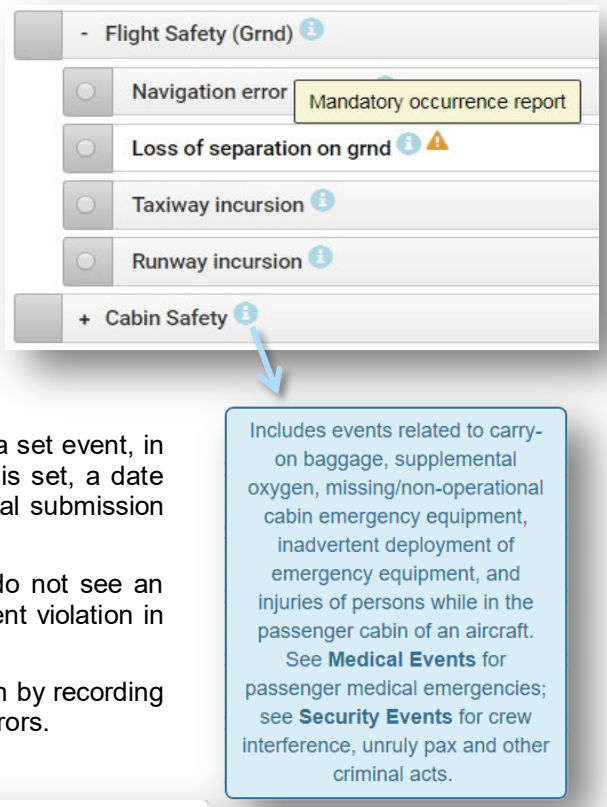
NOTE:
If the reporter saves a copy of their ASRS report as a PDF, it can be uploaded with the ASAP report, or attached under the ASAP report's Docs / Images tab after the ASAP report has been submitted.

.

(I) **Setting an event.** Set an event if the option is provided. ASAP reports may include events which are designated by YCO managers as mandatory occurrence reports (e.g. a TCAS RA or Service Difficulty Report).

(J) MOR events are identified with an MOR icon.

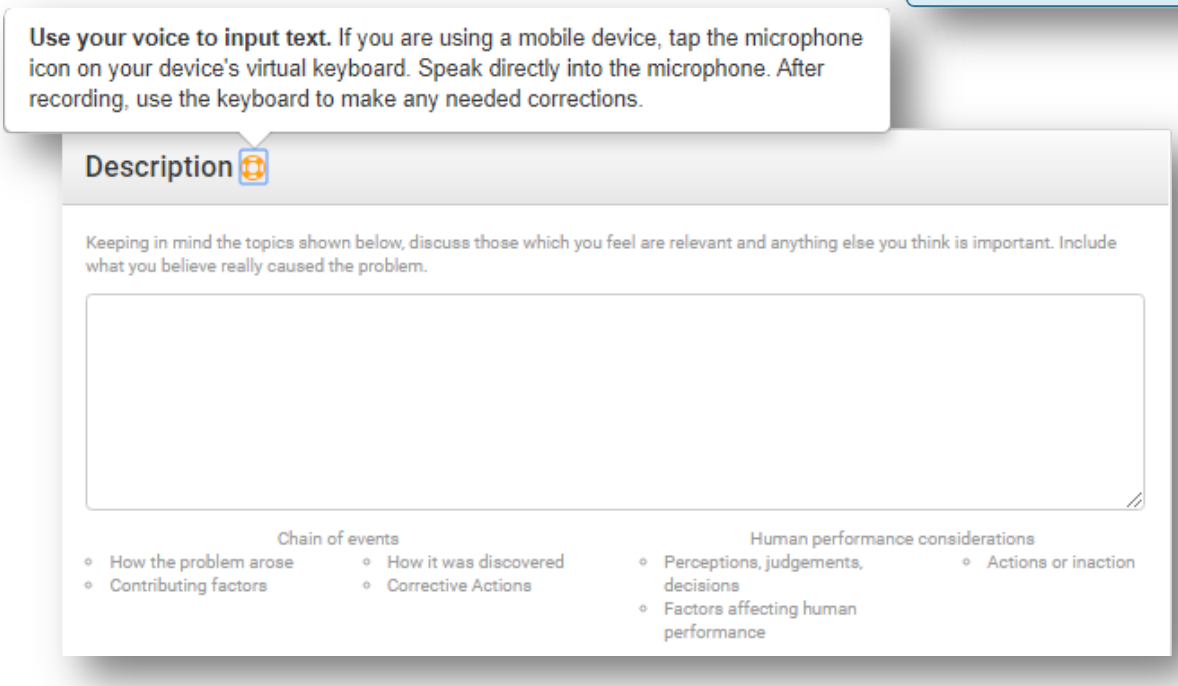
(K) Blue information icons provide event descriptors and definitions. These descriptors help reporters and managers select the event that best describes what happened. If you set the wrong event it can be changed before your report is submitted.



(L) After submission, safety administrators can set an event, change an event that was previously set, or clear a set event, in the *Overview* panel of the submitted report. If an event is set, a date and time must also be provided. In this case your original submission (including the event you set) is retained in the system.

(M) If the option to set an event is not provided, or if you do not see an appropriate event selection, describe the event or apparent violation in the **Description** panel of your report.

(N) Mobile device users can expedite their ASAP submission by recording their voice narrative and then editing the description for errors.



(O) **Description**. Describe the circumstances surrounding the event or violation using the guidance provided in the Description panel. Look for company processes or procedures that are not well designed, or even error-inducing. This may provide some defense and protection for the person(s) involved, by placing the onus of regulatory violation more on a company process, and less on the individual's action or inaction.

(P) **Suggestions for correction.** Provide your thoughts on what can be done to prevent a recurrence, or correct the situation.

(Q) **Upload images / documents.** Images from a mobile device may be uploaded directly with your report, or at any time after the report has been submitted.

(R) **Submit your report.** Select **Submit report** to upload your ASAP report into the system. The date and time of your submission are automatically captured. In addition:

(1) You will receive an email confirmation that your report has been received;

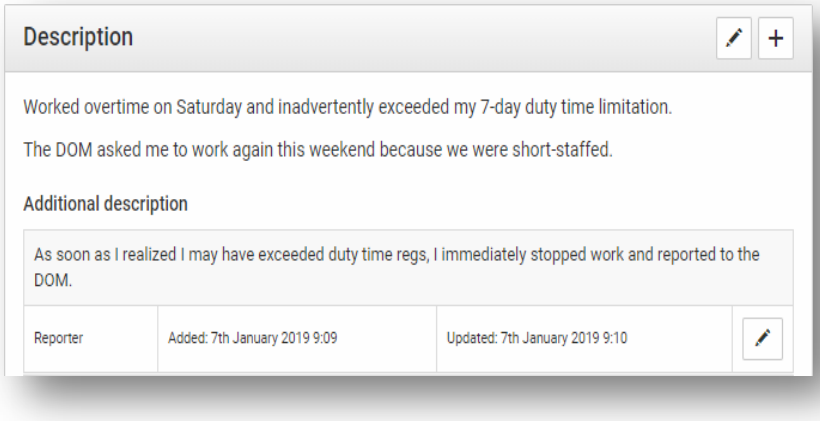
(2) Members of the notification group you selected will receive a notice of report submission that includes your name and contact information. It is important that YCO managers be able to contact you to assess the current situation and take appropriate immediate action if necessary.

2.2.3 REPORTER'S VIEW OF THEIR ASAP SUBMISSION

(A) To view an ASAP submission, employees must login to OmniSMS. When logged in, they have implicit view-only permission to all SMS reports they submit, including their ASAP submissions.

(B) After an ASAP report has been submitted, employees cannot edit their original report. However, a reporter can provide additional narrative description and if desired, add additional suggestions for correction.

(C) When additional descriptions are added, the date and time are captured and the reporter's name is automatically redacted.



Reporter's additional description, de-identified.

2.2.4 MANAGER NOTIFICATIONS

(A) SMS reports designated as ASAP submissions generate a ***report submitted*** email that is sent to the notification group specified by the reporter (e.g., Air Operations, Flight Control, Maintenance, Ground Ops., etc.). These groups are user-defined and populated by department managers. An 'All Reports' group also receives a notification for each ASAP report submitted, regardless of which group the reporter selects.

(B) ASAP report notification emails contain the reporter's name, contact information and the hazard or event description. This is necessary so that notified managers can contact the reporter, assess the situation and determine an immediate course of action.

(C) The reporter also receives a system email acknowledging their ASAP submission.

NOTE:
ASAP reports are treated by YCO managers with the same confidentiality given to other SMS reports. Refer to **SMS Manual paragraph 6.3.7 Non-disclosure** for more information.

2.3 MANAGING ASAP REPORTS

2.3.1 INITIAL REPORT ASSESSMENT

Interface– SMS Manual § 6.3.8 Initial Assessment of SMS Reports Received

(A) The ASAP manager (either individually or together with other appropriate YCO managers) performs a prompt initial assessment of all ASAP reports received, to determine:

(1) If a life-threatening situation exists;

(2) If there is continuing risk of personal injury or damage to Company aircraft or other resources;

(3) If immediate action is necessary to discontinue any apparent non-regulatory behavior or activity. This may include interruption of flights, grounding of personnel / aircraft, or any other action(s) deemed necessary by YCO management.

(4) Refer to **SMS Manual paragraph 6.3.8 Initial Assessment of SMS Reports Received** for additional guidance.

2.3.2 INITIAL RISK ASSESSMENT

(A) Initial risk assessment of ASAP reports may be performed by the Director of Safety (DOS), the ASAP manager, or other appropriate YCO department manager in accordance with **SMS Manual paragraph 6.4 Managing SMS Reports**.

(B) ASAP reports typically involve an ***event*** beyond the violation itself. If the reported event occurs during flight or maintenance operations and could have led to an incident or accident, **Event Risk (ER) classification** should be used as the preferred method of risk assessment. Refer to **SMS Manual paragraph 2.4 Event Risk Classification** for instructions on how to use this method.

(C) If however the reported event is a minor event without accident potential, or simply a violation (such as exceeding duty time, or a lack of qualification) the standard **Risk Assessment (RA) matrix** should be used.

2.3.3 ASAP REPORT OWNERSHIP

(A) The ASAP manager assigns 'ownership' of each ASAP report received at their discretion. The report owner is typically a process owner or YCO department manager. The report owner may also be the ASAP manager or an ERC management representative.

(B) When ownership is assigned, the owner automatically becomes lead investigator for the report.

2.3.4 ERC PROCESS OUTPUTS

(A) The ERC is responsible for producing three (3) distinct process outputs:

(1) **Identified safety issues** are entered by the lead investigator or ASAP manager when the investigation is closed. These identified safety issues then reside in the **Causal factors panel on the CAP tab** of the ASAP parent report, where they can be readily referenced / edited during CAP development.

(2) **Individual corrective actions** for the ASAP report submitter are entered by the ASAP manager in the ERC actions panel on the Ownership tab of the submitter's ASAP report.

(3) **Systemic recommendations** for Your Company are entered by the ASAP manager in the ERC actions panel on the Ownership tab of the ASAP parent report. Such recommendations may include corrective actions and / or risk controls intended to improve YCO processes and reduce the likelihood of a repeated event.

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2.3.5 ASAP REPORT USE CASES

(A) During the unfolding of a minor event or occurrence, regulatory violations can sometimes occur as a result of:

(1) Triggering events (e.g., equipment failures, miscommunications or other errors);

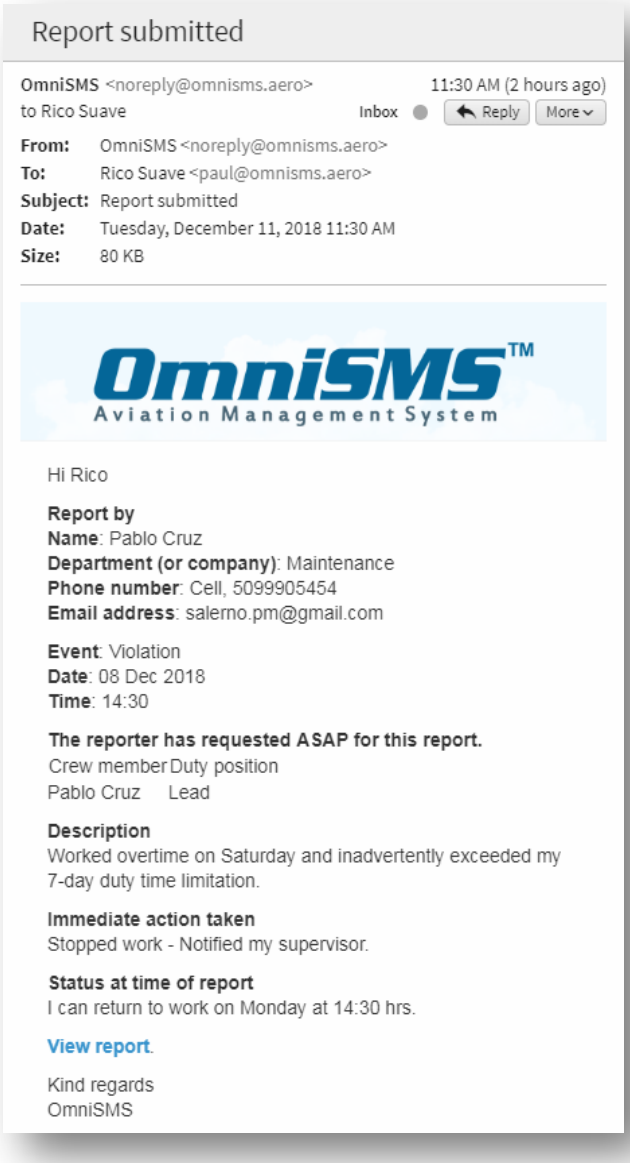
(2) Failed risk controls (e.g., poorly designed processes, lack of SOPs, inadequate guidance or training).

(B) Contributing factors may include additional errors, other human factors and organizational influences. *This is why violations must be analyzed within the context of the reported event.*

(1) **Example 1:** In the email notification displayed at right, the reported event is simply a violation.

(2) **Example 2:** A company PIC misses ATC instructions due (in part) to a malfunctioning VHF comm radio, and taxis onto the wrong taxiway. The PIC reports the event as a taxiway incursion with ASAP submission.

(3) **Example 3:** Upon receipt of the PIC's report and after initial analysis, the Chief Pilot recommends the SIC also submit an ASAP report for the same event. The SIC's ASAP submission is made a 'child' of the taxiway incursion report, and the child report is linked to the PIC's original 'parent' report.


Report submitted

OmniSMS <noreply@omnisms.aero> 11:30 AM (2 hours ago)
to Rico Suave Inbox Reply More

From: OmniSMS <noreply@omnisms.aero>
To: Rico Suave <paul@omnisms.aero>
Subject: Report submitted
Date: Tuesday, December 11, 2018 11:30 AM
Size: 80 KB

OmniSMS™
Aviation Management System

Hi Rico

Report by
Name: Pablo Cruz
Department (or company): Maintenance
Phone number: Cell, 5099905454
Email address: salerno.pm@gmail.com

Event: Violation
Date: 08 Dec 2018
Time: 14:30

The reporter has requested ASAP for this report.
Crew member Duty position
Pablo Cruz Lead

Description
Worked overtime on Saturday and inadvertently exceeded my 7-day duty time limitation.

Immediate action taken
Stopped work - Notified my supervisor.

Status at time of report
I can return to work on Monday at 14:30 hrs.

View report.

Kind regards
OmniSMS

(C) In examples 2 and 3 above:

(1) Evidence regarding the PICs ASAP submission is recorded / attached in the PIC's original report, together with ERC decisions regarding report acceptance and corrective action(s) for the PIC.

(2) Evidence regarding the SIC's ASAP submission is recorded and attached in the SIC's report, together with ERC decisions regarding report acceptance and corrective action(s) for the SIC.

(3) **Risk assessments and investigation(s) are performed only in the original (parent) report**, which may include branched investigations to analyze contributing and causal factors of the taxiway incursion event, the PIC's apparent violation, the SIC's apparent violation, and the VHF comm problem.

(4) A single corrective action plan (CAP) is developed in the PIC's original parent report and completion of corrective actions for both the PIC and SIC are recorded therein.

(5) ERC recommendations regarding any systemic issues discovered are also recorded in the parent report, and implementation of company risk controls and corrective actions are recorded in the parent report's CAP.

(6) The ERC process status for each pilot may be set to **Completed**, even though the reports remain open for completion of corrective actions.

(7) After implementation of all risk controls and corrective actions, the parent report is closed. Any associated child reports close automatically with the parent.

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2.3.6 INVESTIGATION REQUESTS

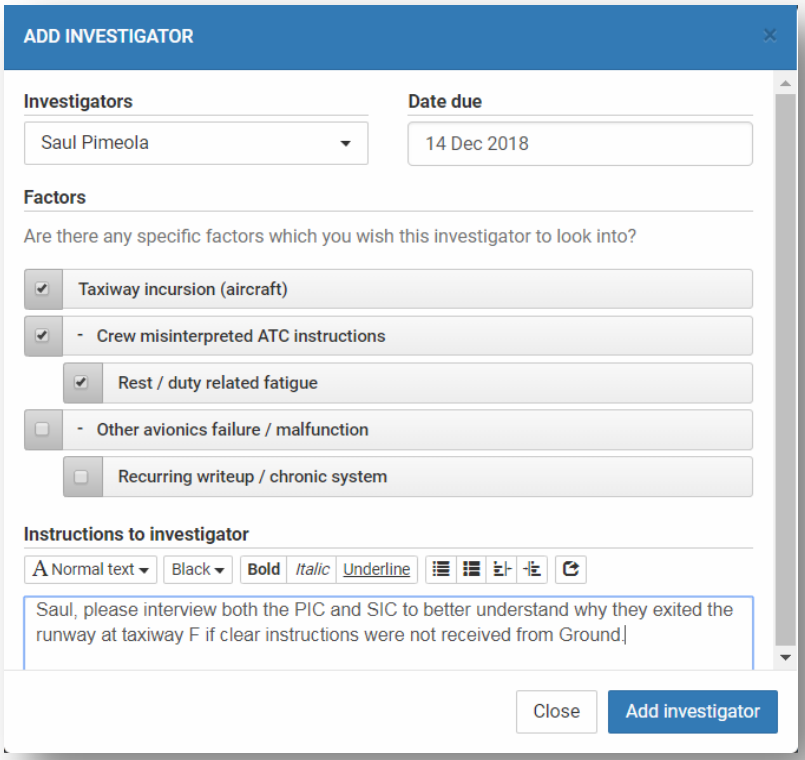
(A) OmniSMS supports **branched investigations**. This allows the report owner or lead investigator to request an investigation of specific contributing factors from appropriate subject matter experts.

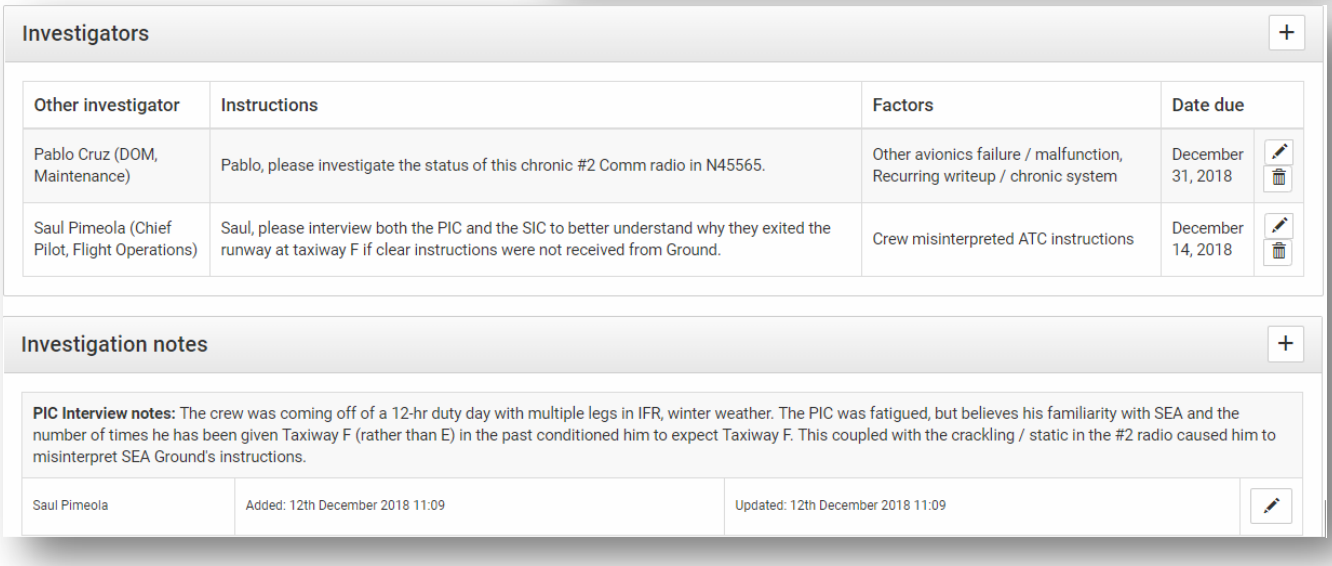
(B) At any time during the life of an ASAP report, ERC members may be asked to investigate the report, and the investigation may include requests to interview reporters. This action request is made on the *Investigation* tab of the report by adding an investigator, checking the specific factor(s) to be investigated, and providing detailed instructions to the investigator.

(C) In **Example 2** above, the Chief Pilot (ERC management representative for the pilot group) may be asked to interview flight crews, and a maintenance manager asked to investigate why the chronic VHF comm radio was not previously repaired.

(D) **Investigation notes** (below) are recorded in a 'forum' format where each investigator enters their own notes and everyone with access to the report can see all notes. Then as the investigation progresses, contributing and causal factors are added to the analysis, and suggestions for correction can be included for each factor.

(E) These notes are available for review during ERC meetings to aid in development of individual corrective actions and company recommendations.





Branched investigations shown with a note displayed in the investigation 'forum' panel.

2.3.7 ROOT CAUSE ANALYSIS

Interface– Event Investigation Guide § 4.5 Root Cause Analysis

(A) ASAP reports are investigated and root cause analysis (RCA) performed in accordance with procedures contained in the YCO **Event Investigation Guide**. This guide is located in the OmniSMS main menu under **ASSURANCE > Event Investigation Guide**.

(B) A simple '5 Why' method of root cause analysis is used for simple, linear events. However, factors identified using the 5 Why method are not captured in the SMS hazard register, and no data relationships are created.

(C) When **advanced root cause analysis** is applied, structured taxonomy terms create data relationships. Using this method, all identified contributing factors populate the hazard register, impact SKPIs, and are associated with functional areas.

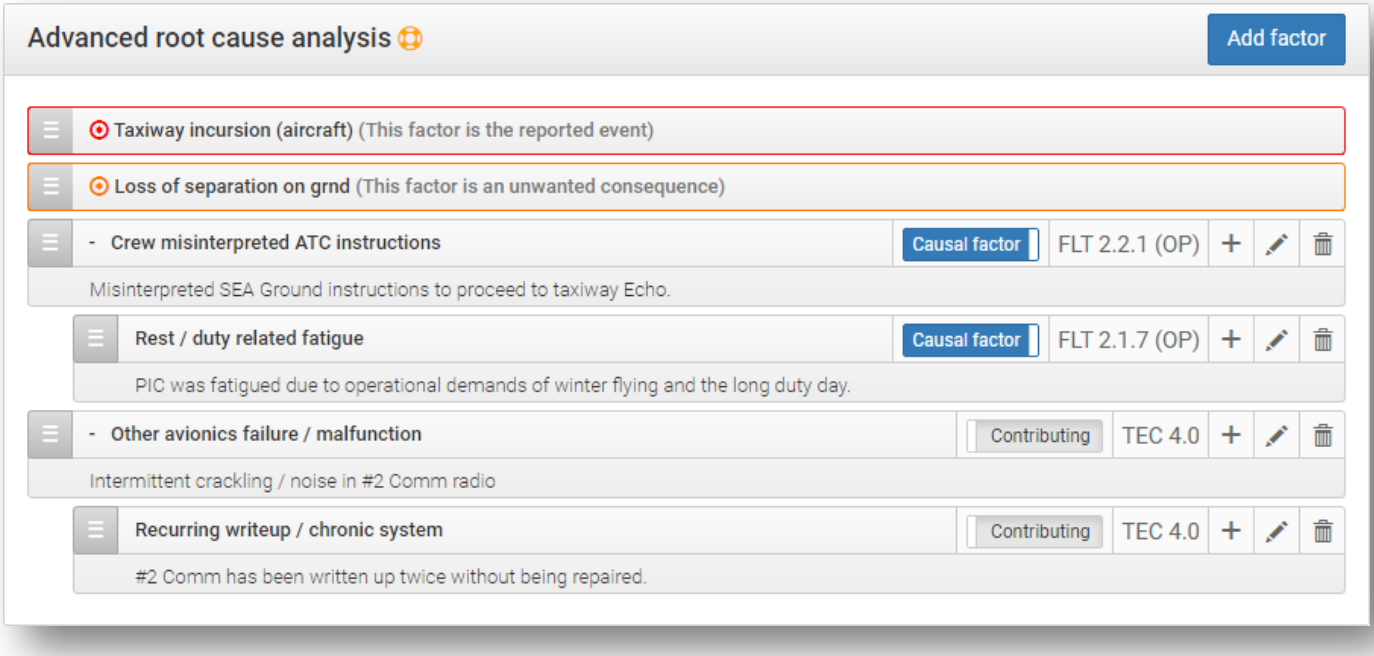
(D) When a contributing factor is made causal, the factor is further associated with the functional area's related process. Risk controls that mitigate these causal factors also then become associated with the process and the department(s) in which they are to be implemented.

(E) By using structured taxonomies of events, hazards, human factors and organizational influences, factors identified through advanced RCA enables:

(1) Event trend analysis;

(2) Safety performance measurements;

(3) Process measurements within departments.

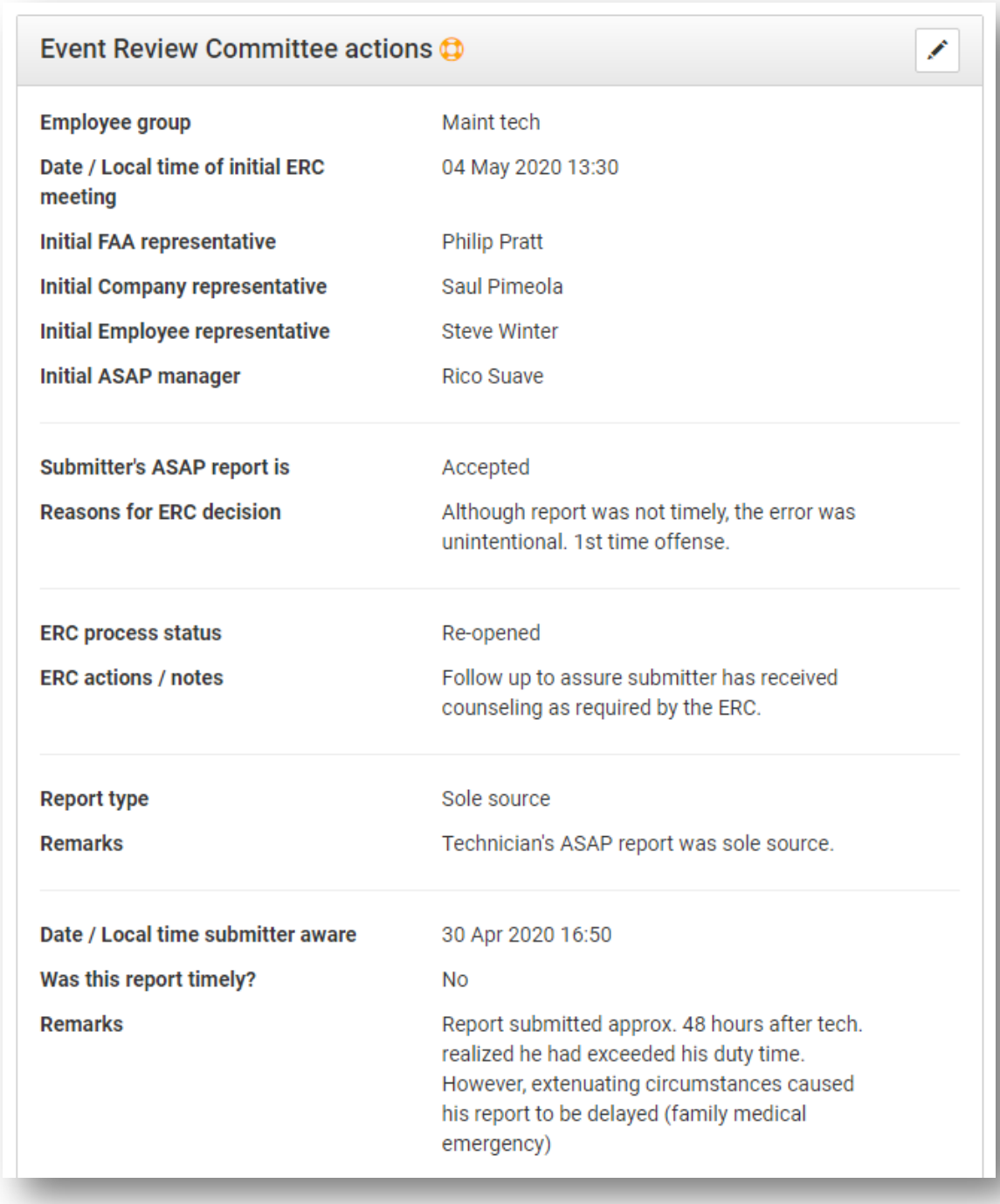


Advanced root cause analysis for a taxiway incursion event reported under ASAP.

2.3.8 VIOLATIONS DISCOVERED DURING INVESTIGATION

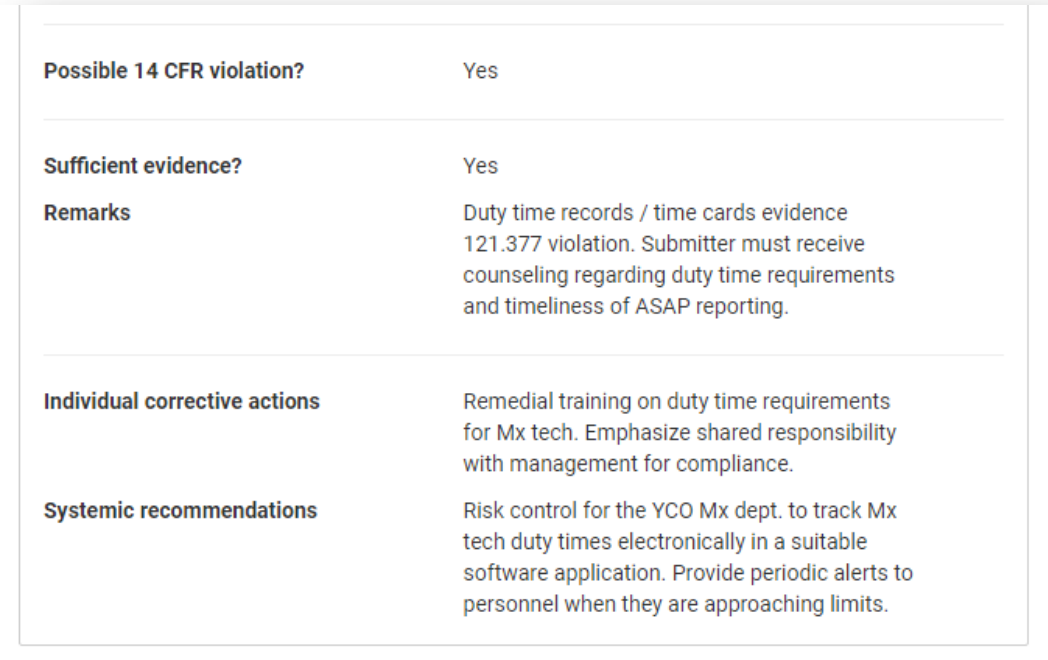
(A) For violations discovered during investigation of a previously submitted SMS report, covered individuals may be given an opportunity to submit an ASAP report, which is then made a "child" of the original "parent" report. The original report could be an audit finding, non-ASAP SMS report, or ASAP submission.

(B) Individuals who submit an ASAP report for a previously reported event will each have a separate child report that is unique to that individual, each with its own *Event Review Committee actions* panel, as shown here.



ERC actions panel on the Ownership tab of a report designated as an ASAP submission

ERC actions panel (continued) on the Ownership tab of an ASAP report.



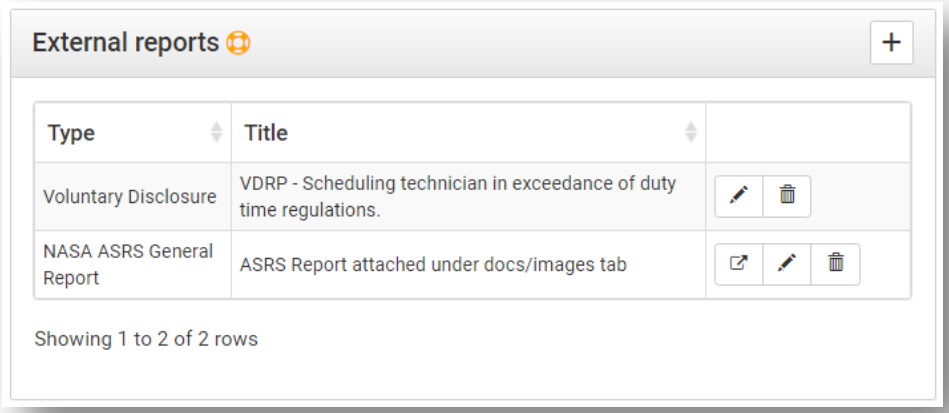
(C) When parent / child report relationships exist:

(1) ERC decisions and actions that pertain to an individual are recorded in the ERC actions panel on the Ownership tab of that individual's ASAP report (parent or child).

(2) ERC recommendations to the company are always recorded in the ERC actions panel on the Ownership tab of the parent report in which the corrective action plan resides.

(3) When an individual submits an ASRS report, it should be recorded in the External reports panel of that individual's ASAP report (parent or child).

(4) If a voluntary disclosure is submitted, the original parent report's corrective action plan (CAP) serves as the VDRP's comprehensive fix, and the VDRP is recorded as an external report on the Ownership tab of the parent report.



External reports panel on the Ownership tab of a report.

3. ERC Process

3.1 PROCESS OVERVIEW

(A) The Event Review Committee (ERC) analyzes new ASAP reports for inclusion into the program, and reviews previous reports which are being investigated, or in which corrective actions are being implemented.

(B) Sometimes the analysis is simple and straight-forward; other times the analysis requires investing significant time and resources and querying multiple sources for information. Thorough investigations are critical for program success because they help ensure that ERC members obtain a complete picture of each event and its true underlying cause(s).

(C) The ERC then decides on appropriate corrective actions (such as remedial training) for the submitter. Failure to complete ERC-directed corrective actions may cause the submitter's report to be subsequently excluded.

(D) The ERC may also recommend corrective actions and risk controls to address systemic issues revealed by an ASAP report and its analysis. When this occurs, the ASAP manager requests action from YCO process owners to develop error-tolerant processes, error-capturing strategies, and effective risk mitigations.

3.2 ERC MEETING PREPARATION

3.2.1 MANAGING THE DISPLAY OF REPORTER AND CREW

(A) ASAP reports are managed in OmniSMS just like other SMS reports, with the exception of how reporter and crew information is displayed. ERC best practices dictate that a reporter's identity not be revealed until the ERC has determined if the reporter's ASAP submission will be accepted.

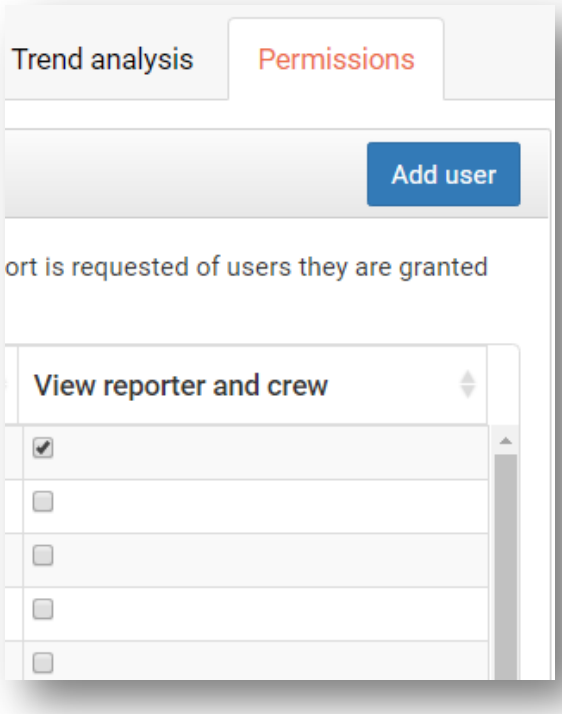
(B) ASAP reports enter OmniSMS with reporter and crew information hidden by default. The reporter's identity is however provided in the email notice sent to the reporter's selected YCO management group. This allows managers to contact the reporter for prompt risk assessment and immediate action if necessary.

(C) From the *Permissions* tab of each report, the ASAP manager or safety administrator can select: 'View reporter and crew' to display this information to other individual managers on a need-to-know basis.

(D) Prior to ERC notification the ASAP manager should check to be sure that all ERC members have their "View reporter and crew" checkbox deselected.

(E) When ERC members are notified of a new ASAP report, all ERC members within the reporter's covered employee group (both primary and alternate) receive the notification email, which includes a link to the report.

(F) Notified ERC members automatically receive view-only permission to the report by default. Edit permission may also be given to individual members by an administrator under the *Permissions* tab.



NOTE:
Edit permission is automatically granted when an ERC member is asked to participate as an investigator.

3.2.2 REDACTING AN ASAP REPORT

(A) The purpose of removing the reporter's name for review prior to an initial ERC meeting is simply to reduce the likelihood that an ERC member's personal knowledge of the reporting individual may bias that ERC member's initial evaluation and decision to accept the report.

(B) Other information regarding the report (such as date of the event, tail number, etc.) should not be removed for initial ERC report review. The FAA ERC representative needs the specifics (other than employee identity) concerning the event (e.g., date, location, etc.) to determine whether the FAA has received independent information outside of the ASAP (e.g., a preliminary pilot deviation (PD) report) concerning the event, and if so, to obtain that information for the ERC. The ERC needs this independent information to determine whether it must request further information from the individual, the operator, or from the FAA in order to determine report acceptability and, if appropriate, corrective action.

3.2.3 NEW ASAP REPORT NOTIFICATION

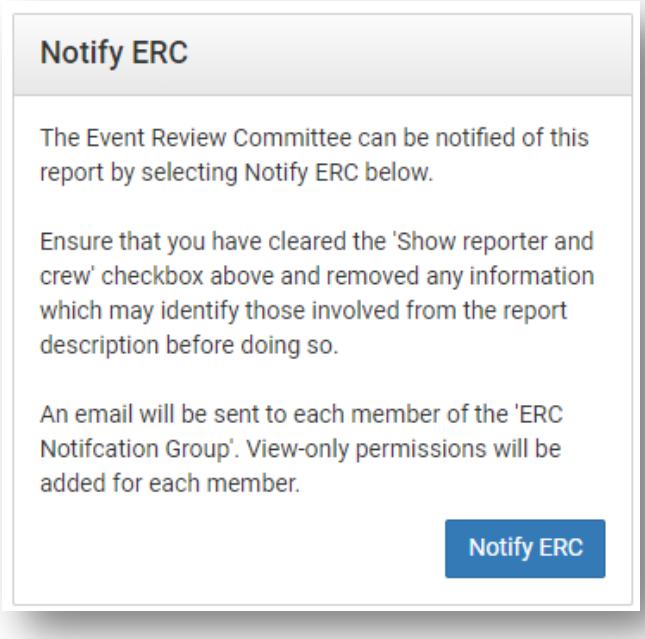
(A) After YCO managers have communicated with the reporter and crew, performed an initial risk assessment and managed the event as necessary, a new ASAP report can be name-redacted in preparation for ERC notification. Redaction should include a review of:

(1) The narrative description and suggestions for correction;

(2) Investigation notes and corrective actions (if any exist);

(3) Docs / Images (if any have been uploaded);

(4) The *Permissions* tab to assure that reporter and crew information is not displayed in the report.



(B) Select 'Notify ERC' on the Permissions tab of the report to notify all ERC members for the reporter's employee group that a new ASAP report is available for review.

(C) If a date and time of the initial ERC meeting has been set, this information will also be included in the email notification.

(D) An important distinction exists between non-FAA ERC members and FAA personnel who are given an **FAA ERC Rep** user role:

(1) Any user, with any role, can be an ERC member; however,

(2) Users with the FAA ERC Rep role have view-only access ONLY to ASAP reports, and *only after they have been notified* using the Notify ERC command.

(E) FAA personnel with an FAA ERC Rep role therefore cannot see an ASAP report when it first enters the system. This important control prevents viewing of ASAP reports until they have been properly redacted.

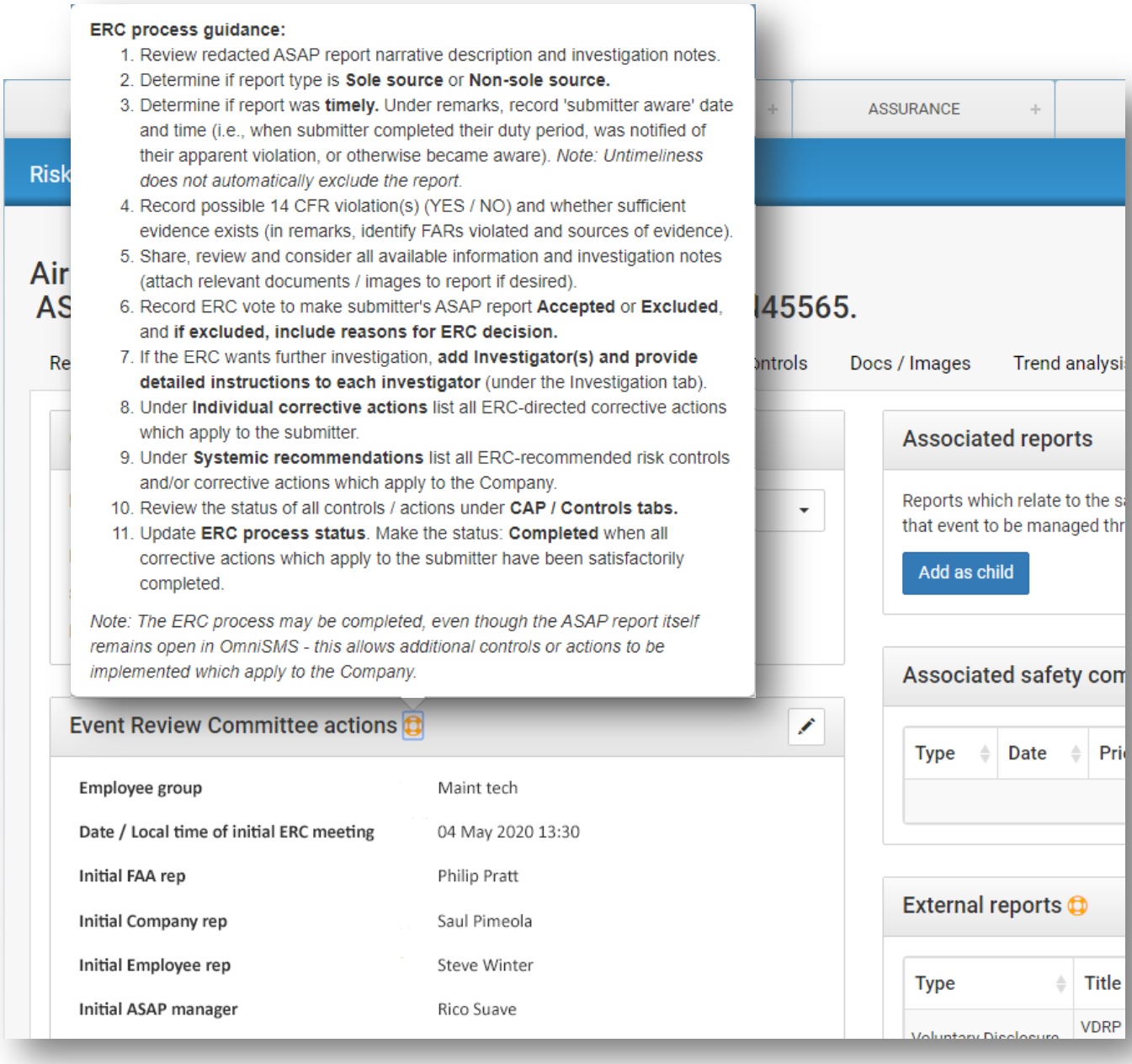
(F) A non-editable, non-redacted copy of the original report is maintained in the system. This preserves the integrity of the reporter's submission and details surrounding the apparent violation.

Uncontrolled copy when printed; confirm current online revision before use.

3.3 ERC INITIAL REPORT REVIEW

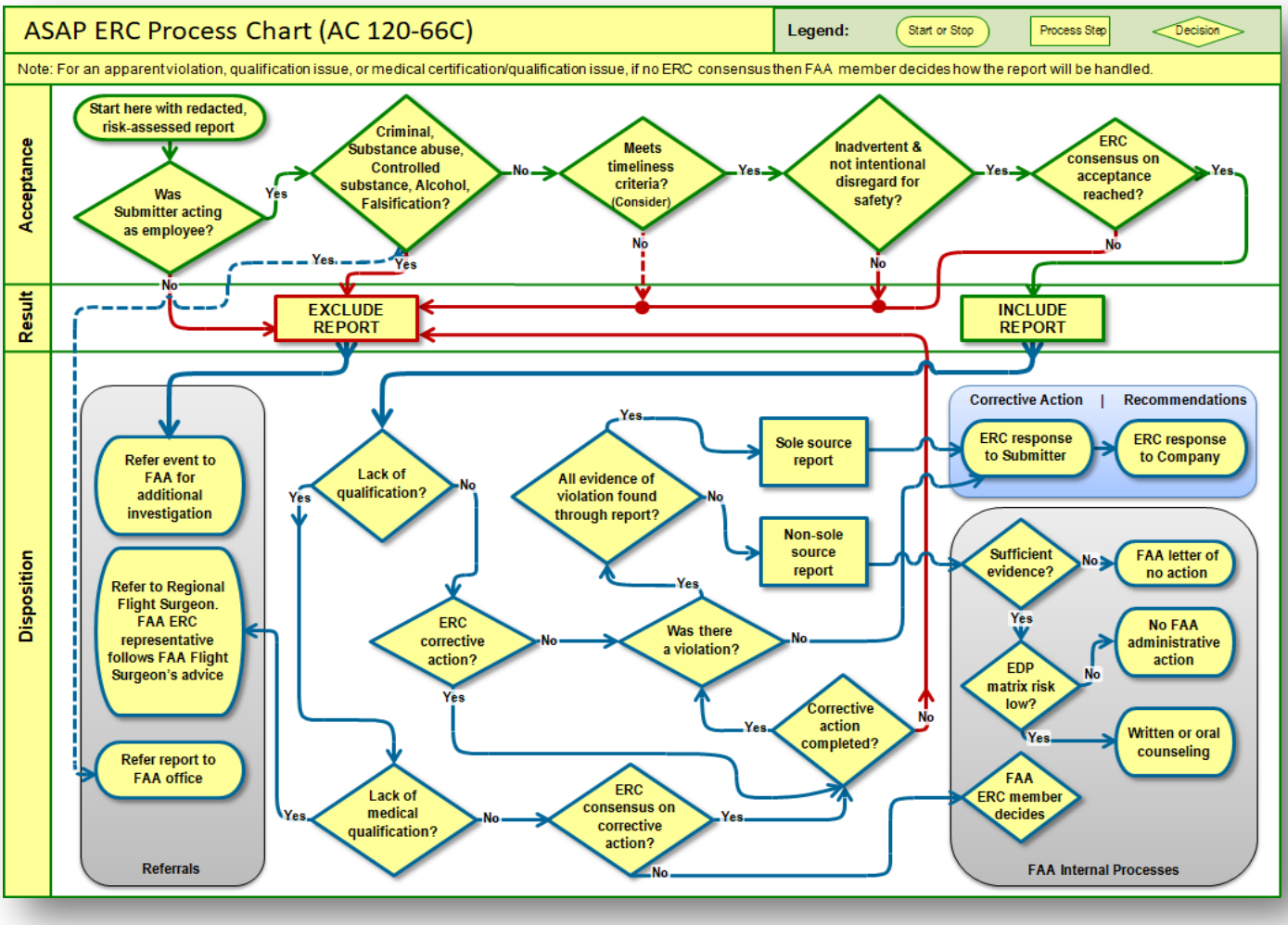
3.3.1 REPORT ACCEPTANCE PROCEDURES

(A) When viewing the Report Ownership tab of an ASAP report, a lifering on the **Event Review Committee actions** panel provides ERC members with process guidance and procedures for ASAP report acceptance.



3.3.2 ASAP ERC PROCESS CHART

(A) The ERC process chart facilitates the ERC's initial report review process by providing a visual flowchart of process steps and decisions that must be made. The chart is accessible within OmniSMS as a menu item under **POLICY / OBJECTIVES > ASAP > ERC Process Chart**.



*From the main menu, select **POLICY / OBJECTIVES > ASAP > ERC Process Chart** to display the chart.*

3.3.3 ERC MEETING NOTIFICATIONS

(A) Prior to each ERC meeting, the ASAP manager provides a list of all ASAP reports that the ERC will review, together with the ERC process status of each report. This advance notice serves two purposes:

(1) ERC members can familiarize themselves with the information in each report and determine if a report can be accepted, if additional investigation is needed;

(2) FAA's ERC member can determine whether his or her attendance at the meeting is necessary (see **paragraph 1.5.5 FAA Representatives**).

(B) For meetings not attended by the FAA ERC member, the ASAP manager provides the FAA ERC member with the minutes from such meetings so that he or she can ensure appropriate safety-based responses.

(C) FAA ASAP policy states that except for the "big five" (reports that involve criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification), the FAA will not use the report, or the content of the report, in any legal enforcement action against a reporting employee, regardless of whether the report is accepted or excluded from ASAP.

NOTE:
If an employee believes that a violation of this FAA ASAP policy has occurred, the matter should be brought to the attention of the FAA ASAP Program Office, AFS-280.

3.4 GUIDELINES FOR REPORT ACCEPTANCE

3.4.1 ACCEPTANCE CRITERIA

(A) The following criteria must be met for a report involving a possible violation to be accepted under the ASAP:

(1) **Timeliness.** If an employee submits a report later than the period stated in the MOU after the occurrence of an event, and provided the report has met all other acceptance criteria, the ERC will review all available information to determine whether it is in the best interest of safety to accept the untimely report. *Timeliness considerations do not apply to reports that are determined to be sole source.* In other words, if an employee's ASAP report is the only source of information regarding the violation, it does not matter when the employee's report is received.

(2) **Reckless conduct.** The ERC must determine through consensus that the apparent regulatory violation did not involve reckless conduct.

(3) **Intent.** The alleged regulatory violation must be inadvertent, and must not appear to involve an intentional disregard for safety. Intentional violation of a rule is permitted only in cases where such violation occurs while pursuing the safest course of action (e.g., captain's use of emergency authority).

(4) **The Big Five.** The reported event must not appear to involve criminal activity, substance abuse, use of controlled substances, use of alcohol, or intentional falsification by the reporting employee.

(5) **Previous possible involvement with The Big Five.** Reports initially excluded due to possible involvement with the Big Five may be readmitted for handling under the ASAP if there is consensus of the ERC that evidence revealed in a subsequent investigation has determined that the employee was not involved in such behavior.

3.4.2 ERC CONSENSUS

(A) For a report to be accepted into ASAP, the ERC must reach a consensus in accordance with **paragraph 3.4.1 Acceptance Criteria** above.

(B) This involves a quorum of the ERC. In other words, the minimum number of ERC members required for the decision must be present, and they must jointly reach a consensus. For official meeting purposes, a quorum exists when all designated ERC representatives or their alternates are present (either in person or in remotely situated communication).

(C) Some reported events may involve matters that are complex or sensitive, or that require the expertise of other industry or FAA personnel. ERC representatives are encouraged to consult with such personnel as needed during the ERC process.

3.4.3 ERC INTERVIEWS OF REPORTING EMPLOYEES

(A) The ERC may elect to interview a reporting employee prior to making an acceptance decision on a report, or at any time prior to ERC process completion, if the ERC determines that the interview is necessary to make an informed decision on the disposition of a report.

(B) The FAA considers information obtained from an employee during an ERC interview to be an extension of the employee's ASAP report itself and therefore subject to all of the same protections that apply to the report itself under FAA ASAP policy. This means that the FAA will not use the content of an interview in any legal enforcement action against a reporting employee if the employee's report is excluded from the program - unless the event involves criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification.

(C) See **paragraph 2.3.6 Investigation Requests** for procedures when requesting an ERC interview of a reporting employee.

3.5 GUIDELINES FOR REPORT EXCLUSION

3.5.1 EXCLUSION CRITERIA

(A) The following types of reports are excluded under the ASAP, with the exception of untimely reporting, which may be a consideration in excluding a report:

(1) **Untimely reporting.** While timeliness is a relevant factor regarding acceptance or exclusion of a report, it is not an absolute requirement. The ERC reviews all information available and determines whether acceptance of the report is in the best interest of safety.

(2) **Intentional conduct.** Reports involving an apparent violation that is not inadvertent or that appear to involve an intentional disregard for safety are excluded. However, if the intentional conduct involves an emergency requiring immediate action and an individual intentionally violates a rule to the extent required to meet that emergency, the report may be accepted. In considering report acceptance, the ERC will evaluate whether such action maybe have been the safest course given the circumstances at the time of the incident. If the deviation was the result of an event outside of the control of the individual or not otherwise evidencing a lack of due diligence (e.g., to address a flight-threatening mechanical malfunction), the ERC may determine that acceptance of the report is appropriate.

(3) **The 'Big Five'**. Reports that appear to involve possible criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification are excluded.

(4) **Outside the scope of employment.** Reports of events that occur when NOT acting as an employee of Your Company are excluded.

(5) **Repeated noncompliance.** The ERC may exclude a report of a repeated act of the same or similar noncompliance by the same individual due to a common root cause that the ERC previously accepted and addressed with individual corrective action under the ASAP.

(6) **Reckless conduct.** Reports of an apparent violation involving reckless conduct are excluded. Reckless conduct is an act (or failure to act) demonstrating a gross disregard for, or deliberate indifference to, safety or a safety standard.

(B) Reckless conduct exists when an individual deviates from established risk controls in gross disregard for safety. Risk controls are established by:

(1) The FAA through regulations (i.e., 14 CFR); and

(2) Company policies and procedures.

(C) Risk controls can therefore be both regulatory and non-regulatory. Established, documented risk controls (such as company policies / procedures, SOPs, etc.) are designed to eliminate hazards or to mitigate their effects by reducing the severity and/or likelihood of harm associated with those hazards. Thus, where an individual knows (through established risk controls) how to eliminate or reduce a risk of harm, but nonetheless acts or fails to act in a manner consistent with the established risk control, then that individual has deviated from the established risk control. **"Reckless conduct" occurs when that deviation is in gross disregard for safety.**

(D) Under YCO's Event Risk (ER) classification matrix or Risk Assessment (RA) matrix, such "gross disregard for safety" is indicated if the individual's conduct could have increased the probability or severity of a credible accident consequence (not a worst-case scenario) to a high level (unacceptable risk).

(E) Intentional deviation from an established risk control with the intent to reduce risk (i.e., emergency or abnormal situations) does not constitute "reckless conduct."

(F) **Failure to Complete Corrective Action.** Reports initially included in an ASAP will be excluded from the program if the employee fails to complete the recommended corrective action in a manner satisfactory to all members of the ERC. In those cases, failure of any individual to complete corrective action for an apparent violation, a qualification issue, or medical certification or qualification issue in a manner acceptable to all members of the ERC may result in the reopening of the case and referral of the matter for appropriate enforcement action.

3.6 POSSIBLE OUTCOMES

3.6.1 ACCEPTED REPORTS

(A) The FAA takes no action against an employee who submits an ASAP report that is accepted (and not subsequently excluded). Such reports are closed with an ERC response to the submitter after the ERC determines to its satisfaction that the submitter has properly completed the corrective action(s) (if any). FAA correspondence outside the ERC is not necessary.

(B) Reports included in ASAP that demonstrate a lack of qualification or raise a question of a lack of qualification will be addressed with appropriate corrective action(s) as recommended by the ERC.

3.6.2 REPORTS EXCLUDED BASED ON THE BIG FIVE

(A) Reports of events that appear to involve possible criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification will be referred to an appropriate FAA office for investigation. The FAA may use such reports for any enforcement purposes, and will refer such reports to law enforcement agencies, if appropriate.

(B) If upon completion of subsequent investigation it is determined that the event did not involve any of the aforementioned activities, then the report will be referred back to the ERC for a determination of acceptability under ASAP. Such reports will be accepted under ASAP provided they otherwise meet the acceptance criteria contained in **paragraph 3.4 Guidelines for Report Acceptance** above.

3.6.3 REPORTS EXCLUDED FOR REASONS OTHER THAN THE BIG FIVE

(A) If the ERC excludes a report for reckless or intentional violation conduct, violations outside the scope of employment, or repeated noncompliance, the FAA ERC representative communicates his or her knowledge of the event to the appropriate FAA office.

(B) FAA may use its knowledge of the event to prompt an independent investigation of the apparent violation(s) and to initiate an FAA action against the employee.

(1) “Knowledge of the event” includes the date, time, location, flight number, aircraft tail number, and related information, as well as the apparent noncompliance disclosed in the ASAP report.

(2) “Independent investigation” means one in which the FAA uses knowledge of the event to conduct the investigation, but does not obtain other information concerning the apparent violation(s) from the ERC or from the ASAP report (except that FAA may obtain information regarding corrective action on a non-sole-source report).

3.6.4 NON-SOLE-SOURCE REPORTS

(A) An ASAP report is considered non-sole-source when FAA evidence of an apparent violation comes from a source that is separate from an employee’s ASAP report (e.g., whistleblower/hotline complaints, reports from air traffic control (ATC) involving airspace deviations, incident reports, and accident reports).

(B) When FAA becomes aware of a potential violation based on evidence separate from an ASAP report, FAA conducts an independent investigation - regardless of whether the associated non-sole-source report was accepted or excluded. If FAA’s independent investigation reveals conduct involving:

(1) Criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification (the Big Five); or

(2) Reckless or intentional violation conduct, violations outside the scope of employment, or repeated noncompliance; then

(C) FAA may pursue enforcement action and the employee’s ASAP report (if previously accepted) may be subsequently excluded by the ERC.

3.6.5 USE OF ASAP REPORTS FOR COMPANY DISCIPLINE

(A) No portion of an employee's ASAP report, including ERC investigation or interview(s) concerning a reported event, shall be used to initiate or support company discipline, unless the reported event involves:

(1) Criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification (the Big Five); or

(2) Reckless or intentional violation conduct, violations outside the scope of employment, or repeated noncompliance.

(B) In such cases Your Company may further utilize information gathered that is separate from the employee's ASAP report to initiate or support company disciplinary actions.

(C) This policy applies regardless of whether the ERC accepts or excludes the report.

3.6.6 REPEATED VIOLATIONS

(A) Reports involving the same or a similar possible noncompliance that were previously addressed with corrective actions under the ASAP will be accepted into the program, provided they otherwise satisfy the acceptance criteria under **paragraph 3.4 Guidelines for Report Acceptance** above.

(B) The ERC will consider on a case-by-case basis the corrective action that is appropriate for such reports, and upon review may determine through consensus that such a report is ineligible for acceptance.

3.6.7 NON-REPORTING EMPLOYEES COVERED UNDER ASAP

(A) If an ASAP report identifies another covered YCO employee in a possible violation, and that employee has not submitted a report, the ERC determines on a case-by-case basis whether to offer the non-reporting employee the opportunity to submit an ASAP report.

(B) If the non-reporting employee submits a report within an acceptable timeframe as established by the ERC, that report is afforded the same consideration under the ASAP as that accorded the report from the original reporting employee, provided the report meets all other ASAP acceptance criteria.

(C) However, if the non-reporting employee fails to submit a report within the timeframe allotted after notification, the possible violation by that employee is referred to the appropriate office within the FAA for additional investigation and action (as appropriate) and for referral to law enforcement authorities, if warranted.

3.6.8 NON-REPORTING EMPLOYEES NOT COVERED UNDER ASAP

(A) If an ASAP report identifies another employee of YCO who is not covered under the ASAP MOU, and the report indicates that employee may have been involved in a possible violation, the ERC determines on a case-by-case basis whether it would be appropriate to offer that employee the opportunity to submit an ASAP report.

(B) If the ERC determines that it is appropriate, the ERC provides that employee with information about the ASAP and invites the employee to submit an ASAP report. If the employee submits an ASAP report within a timeframe acceptable to the ERC, that report is accepted under the ASAP, provided it meets all other ASAP acceptance criteria.

(C) If the employee fails to submit a report within an acceptable timeframe established by the ERC, the FAA ERC member refers the possible violation by that employee to the appropriate office within the FAA for additional investigation and action (as appropriate) and for referral to law enforcement agencies, if warranted.

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3.7 CORRECTIVE ACTIONS

(A) Corrective actions are developed by the ERC in order to address deficiencies discovered during the analysis and investigation of an ASAP report. The ERC may recommend corrective action(s) and/or risk controls for any safety issue identified within an accepted report.

(1) **Individual corrective actions** may consist of training, mentoring, counseling, or other options that the ERC determines are the best course of action regarding the individual who submitted the ASAP report.

(2) **Systemic recommendations** are ERC-recommended corrective actions and risk controls which YCO may choose to implement in order to counter adverse risks and trends. The ERC works with YCO to implement such actions and controls.

3.7.1 INDIVIDUAL CORRECTIVE ACTIONS

(A) Individual corrective actions must be completed for an employee's ASAP report to remain accepted, and for enforcement incentives to remain in place. An employee's ASAP report may be excluded if the employee fails to complete corrective action for an apparent violation, or a medical certification or qualification issue, in a manner acceptable to the ERC. The FAA ERC member then refers the event to an appropriate FAA office for additional investigation and/or FAA action.

(B) Official training records and personnel files should not reflect corrective actions associated with the ASAP (refer to the Pilot Records Improvement Act of 1996 (PRIA) and the current edition of AC 120-68, Pilot Records Improvement Act of 1996). All actions and controls are recorded and retained in the OmniSMS web application.

3.7.2 CORRECTIVE ACTION FOR QUALIFICATION ISSUES

(A) The ERC addresses accepted reports involving competence or qualification of certificate, license, or permit holders with appropriate corrective action, which may include retraining or reexamination.

(B) Reluctance by an individual or failure to adopt methods to remediate noncompliance or instances of repeated noncompliance are handled by FAA in accordance with Order 2150.3 – FAA Compliance and Enforcement Program.

3.7.3 CORRECTIVE ACTION FOR SYSTEMIC ISSUES

(A) An ASAP report investigation may reveal systemic issues. They are recorded as **Identified safety / quality issue(s) and recommendations** in the Causal factors panel on the CAP tab of the report. The ASAP manager brings these systemic issues to the attention of appropriate YCO department managers, and to ERC members during ERC meetings.

(B) The ERC analyzes these issues and provides ERC-recommended corrective actions and risk controls. The ASAP manager records ERC-recommended actions and controls in the report's ERC actions panel under **Systemic recommendations**.

(C) The ASAP manager then presents these recommendations to appropriate YCO department managers for consideration. YCO managers may choose to implement, modify, or decline to implement the ERC's recommendations.

(D) If YCO management chooses to modify, or to not implement an ERC recommendation, the ASAP manager will record the reason for such in the Systemic recommendations area of the ERC actions panel.

NOTE:
Legitimate reasons for declining a recommendation include low risk assessment; cost-prohibitive; ineffective; not sustainable; poor acceptance by the affected employee group; or other legitimate reason as documented.

3.7.4 REOPENING REPORTS BASED ON NEW EVIDENCE

(A) The ERC may be reopened a closed ASAP report and take appropriate action if the ERC (or FAA) later discovers evidence that establishes that the violation should have been excluded from the program.

3.7.5 ENFORCEMENT POLICY

(A) By public law and FAA orders, the FAA is responsible for the proper investigation and disposition of all suspected cases of noncompliance with 14 CFR. The FAA establishes investigative and enforcement jurisdiction and responsibility regarding events reported under Your Company's ASAP program.

(1) The FAA ERC representative from YCO's Certificate Holding District Office (CHDO) is empowered to complete ASAP investigations and is responsible for coordinating all corrective and administrative actions in accordance with current FAA orders.

(2) The determination of whether or not a reported event meets criteria for inclusion into YCO's ASAP will be made in accordance with the applicable orders and through the ERC process. If an event meets the criteria for participation and is accepted into ASAP by the ERC, FAA shall transfer all jurisdiction and responsibility for compliance and enforcement investigations related to the event to the CHDO, even if an enforcement investigation has been previously opened outside of ASAP.

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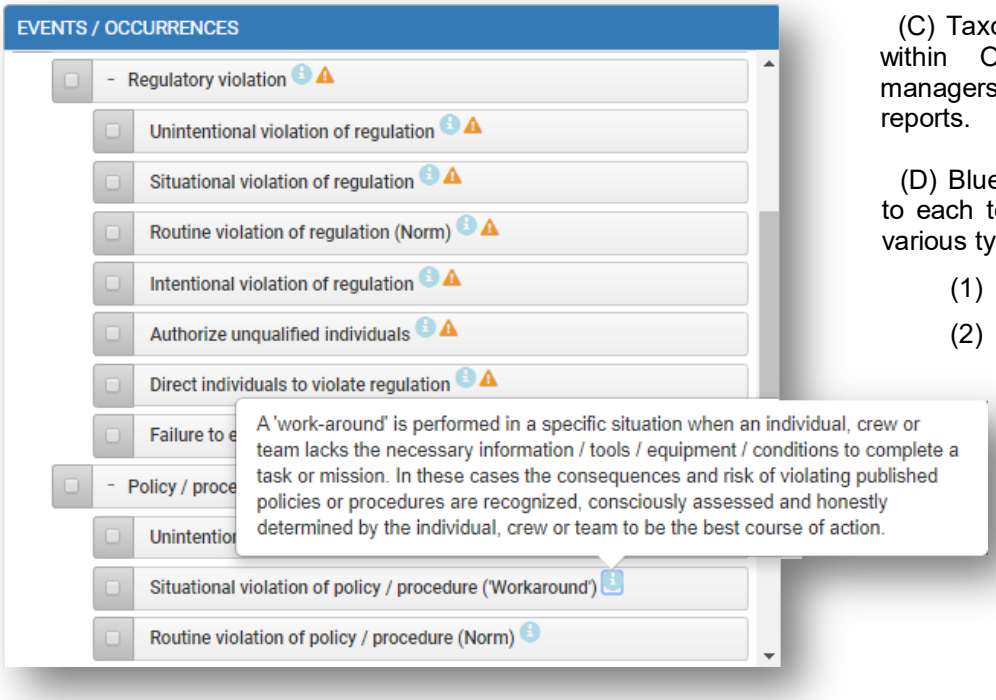
4. Data Analysis

4.1 ANALYZING ASAP SUBMISSIONS

(A) Within OmniSMS, ASAP data can be analyzed separately from other SMS reports. This allows the ASAP manager and Event Review Committee members to monitor and measure ASAP program effectiveness.

(B) An effective ASAP program analyzes the contributing and causal factors of reported events. When these factors include violations, the violations themselves must also be analyzed in order to develop effective corrective action plans (CAPs).



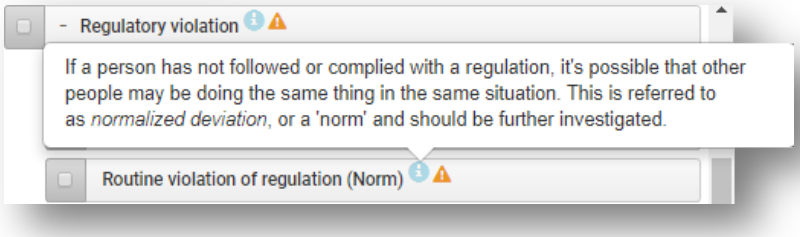
(C) Taxonomy terms are defined within OmniSMS to assist YCO managers in their analysis of ASAP reports.

(D) Blue information icons next to each term provide explanations for various types of:

(1) Regulatory violations; and

(2) Policy / procedure violations.

(E) For example, it may be discovered that a violation is occurring frequently within a covered group, perhaps due to a lack of awareness, gaps in training, or improper written guidance. A thorough investigation would identify these factors, together with suggestions for correction.



(F) A discovery of **normalized deviation** and any other violations identified (both regulatory and procedural) should prompt further investigation into causal factors.

(G) Identifying these factors may cause the ERC to recommend remedial training - not just as a corrective action for the reporter, but as a company recommendation for all employees in the group. Revisions to written guidance and the training program could also be recommended by the ERC as part of the ASAP report's corrective action plan (CAP).

(H) By recording and identifying the causes of various types of regulatory and procedural violations, YCO department managers are able to measure them, create safety key performance indicators (SKPIs) to monitor them, and identify unwanted trends within departments and processes.

4.1.2 RECORDING VIOLATIONS

(A) If an ASAP report has no associated operational event (as in the case of a duty time violation or expired medical certificate) the event is recorded simply as a violation.

(B) If however the reported event involves an operational irregularity, event or other occurrence, both the event and the violation need to be recorded and investigated.

(C) For example, a pilot reports an **Altitude / level deviation** event. In this example, there are actually 2 'events':

(1) An altitude / level deviation; and

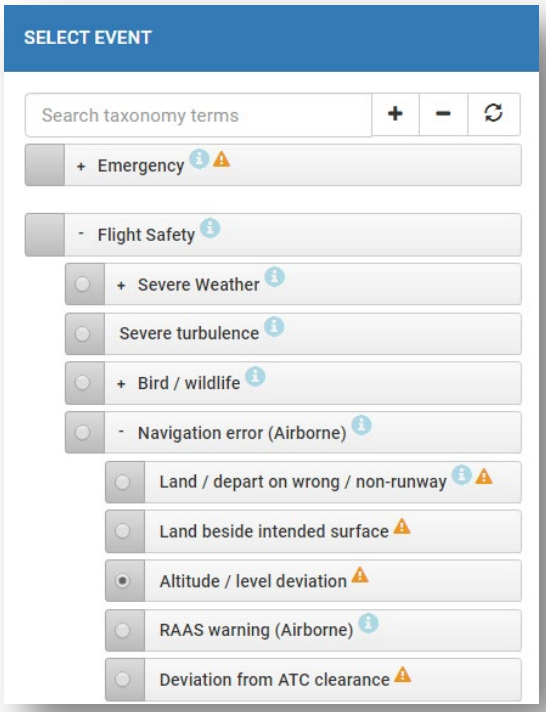
(2) A regulatory violation.

(D) Both events need to be captured during data entry. The ASAP report's event should be set to **Altitude / level deviation**, and the specific type of violation should be determined and entered as a factor using advanced root cause analysis.

(E) Enter the violation as a contributing factor. The factor can then be made causal, since an ERC-recommended corrective action will most likely be created to address the violation.

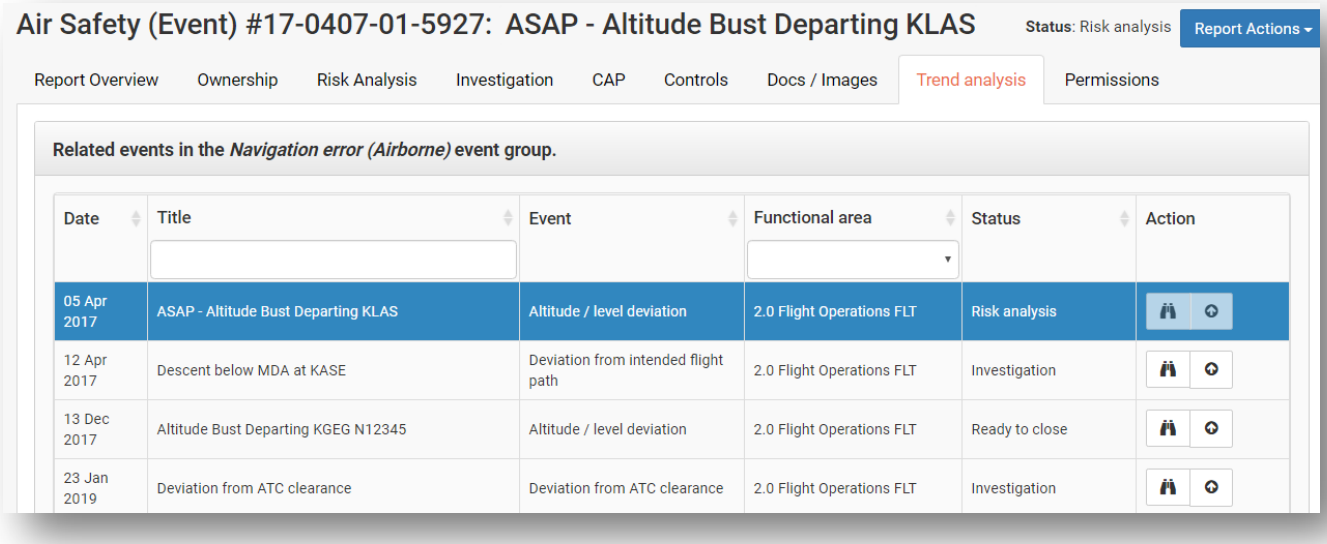
(F) Further investigation may reveal additional contributing factors such as human factors and organizational influences which may have contributed to or caused the violation / event. A contributing factor can be made causal at any time.

(G) For contributing factors, a related functional area must be identified. For contributing factors which are made causal, a related process must be identified. See the YCO **Event Investigation Guide paragraph 2.2.4 Identification of Contributing Factors** for more information.



4.1.3 EVENT TREND ANALYSIS

(A) Note the ***Navigation error (Airborne)* event group** under which the Altitude / level deviation term resides. The ASAP report's *Trend analysis* tab automatically displays all related events within this group.



4.1.4 ASAP PERFORMANCE INDICATORS

(A) When the ASAP feature is activated in OmniSMS, ASAP data can be analyzed using performance indicators. Login and go to **POLICY / OBJECTIVES > Performance Indicators > ASAP** tab.

(B) In the upper R/H area of the ASAP performance indicators panel, select a date range and department to see ASAP data displayed as:

(1) Reports by submission (ASAP vs. non-ASAP)

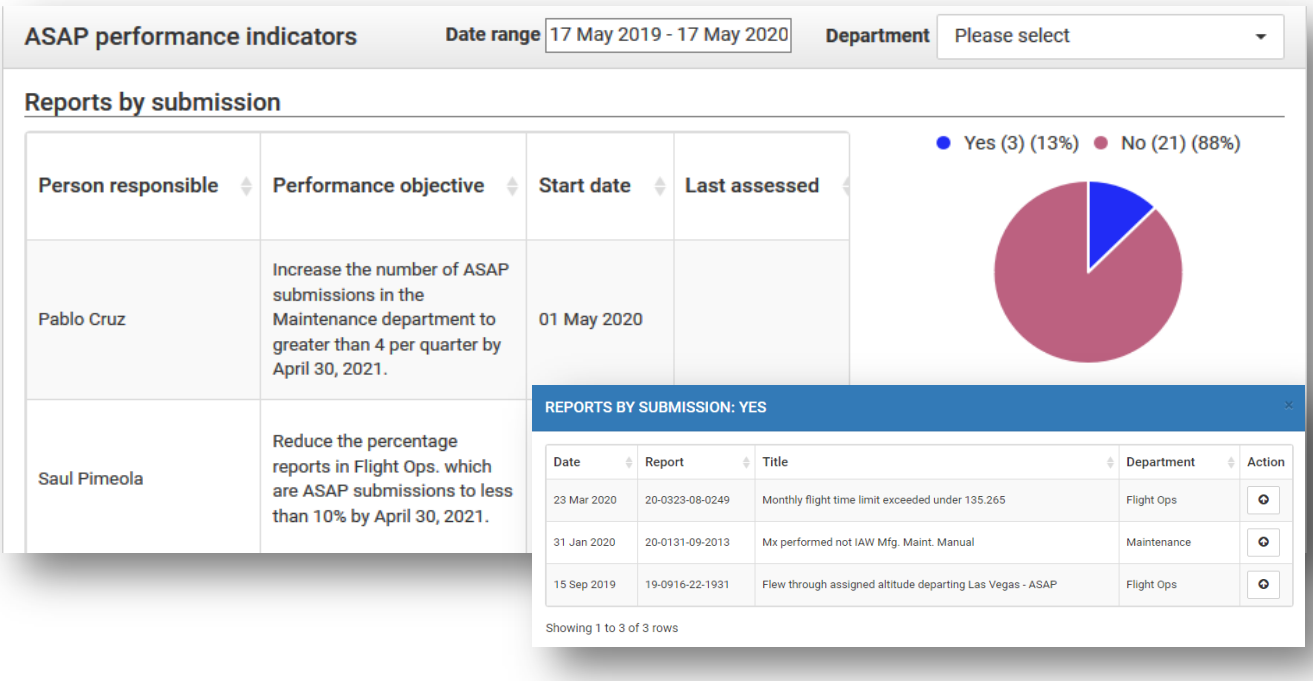
(2) Reports by employee group

(3) Reports by acceptance status (accepted / excluded / to be determined)

(4) Reports by timely submission (timely or untimely)

(5) Controls by type (risk controls vs corrective actions)

(C) Click on any area of a chart to see which ASAP reports have impacted each performance indicator (If no department is selected, the chart will display for all departments).



4.1.5 EXPORTING ASAP DATA FOR ANALYSIS

(A) From the Report table, select a date range (the date range filters for submission date – not event date). Then filter ASAP reports as desired for export to Excel.

(B) The **Export** command produces an Excel spreadsheet of all fields within all reports displayed.

(1) Be sure to **show all rows in the lower L/H area of the Report table**.

(2) Column sorts have no effect on the data exported.

(3) Hiding columns has no effect on the data exported.

(C) Excel data may be further manipulated and statistical analysis tools applied such as Microsoft's Analysis ToolPak or SPC for Excel.

NOTE:
See **SMS Manual Paragraph 3.5.8 Exporting Reports Data** for more information.

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5. Reports & Reviews

5.1 REPORTS

(A) ASAP reports can be viewed and printed in several ways. Within OmniSMS, **Print** commands generate a PDF which can be saved locally or shared via email or file sharing service. PDFs can also be sent to your local printer for paper printing.

(1) Filter and print the **Report table** to show selected ASAP reports within a specified date range;

(2) Print a single **ASAP report**, with or without reporter and crew information;

(3) Create an **ASAP quarterly report** to provide FAA ERC members with ASAP data for their internal use.

5.1.2 REPORT TABLE PDF

(A) From the main menu, select: **RISK MANAGEMENT > Reports > Report Table** to sort, filter and display ASAP data as desired. First filter to display only ASAP reports within your desired date range.

(B) The **Select columns** command displays or hides columns in the Report table which can be filtered and sorted as desired. For example:

(1) Filter by **Functional area / Department / Division** for different views of reports. Multiple constrained finds also permit filtering of a department within a division, a functional area within a division, or a department within a functional area.

(2) Filter by **Event** to see events of the same type, or by **Report status** to see reports in a particular stage of the ASAP report ERC process.

(3) Once a column is hidden, you will not be able to filter, nor can you tell if a filter has already been applied. Therefore a best practice is to **Clear filters**, hide columns you do not want displayed and then filter.

Functional area	Department	Division	Status
2.0 Flight Operations		121A	
2.0 Flight Operations FLT	Fixed Wing Land	121A	Ready to close
2.0 Flight Operations FLT	Flight Ops	121A	Ready to close
2.0 Flight Operations FLT	Charter	121A	Risk analysis

Selected columns, filtered by Functional area and Division.

Reports | Add report | Export | Print | 1 Jan 2019 - 31 Dec 2019 | Clear filters | Select columns

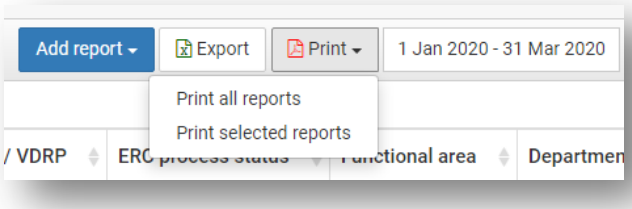
Report	Title	Event	Event date	ASAP / VDRP	ERC process status	Department	ER / RA
				ASAP		Charter	
19-0916-22-1931	Flew through assigned altitude departing Las Vegas - ASAP	TCAS RA (Resolution advisory)	15 Sep 2019	A V	New report	Charter	High - 502
19-0124-10-1635	Altitude Deviation - ASAP	Situational violation of regulation	24 Jan 2019	A	Carry over	Charter	Moderate - 21 (Often)
19-0123-05-5244	Deviation from ATC clearance - ASAP	Deviation from ATC clearance	23 Jan 2019	A	Re-opened	Charter	Low - 5 (Often)

Report table filtered for ASAP / date range / department, and sorted by risk level from high to low.

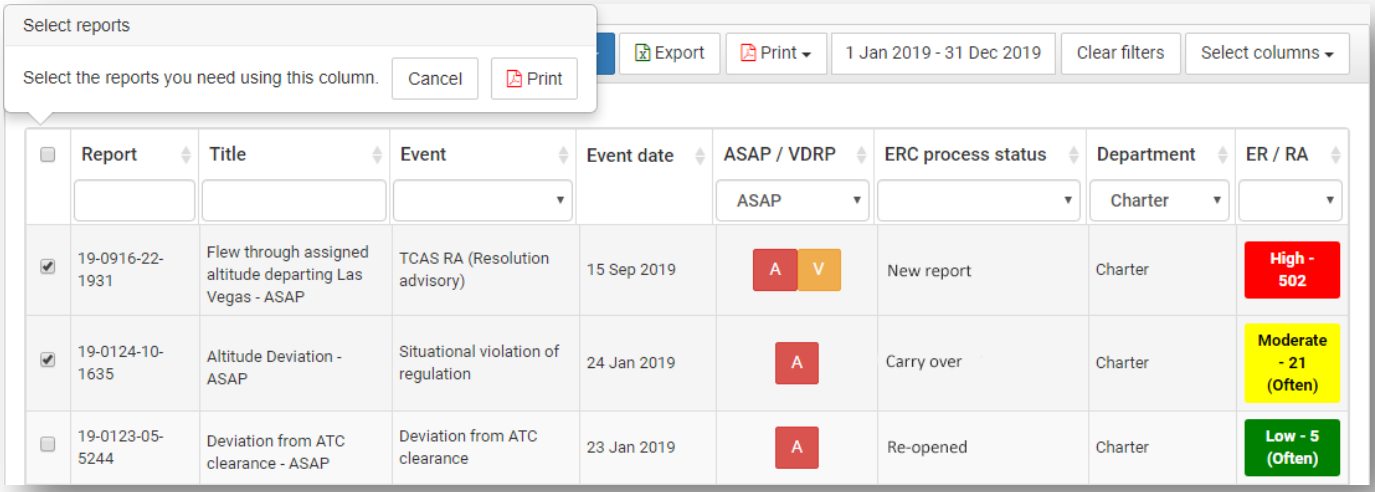
(C) After the Report table has been filtered and sorted, use the Print command to:

(1) Print all reports; (or)

(2) Print selected reports.

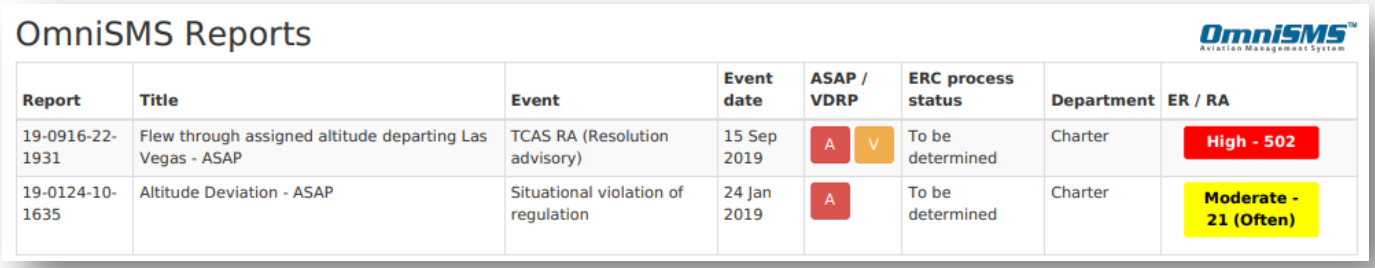


(D) This is useful when preparing for an ERC meeting, to let ERC members know which reports will be reviewed during the meeting. The ERC process status of each report can also be displayed.



Filtered / sorted Report table with two reports selected for print

(E) **Printed Report table.** Displayed here is the same filtered Report table shown above after printing to PDF. PDFs can be saved locally, attached to an email, embedded in the body of an email, or printed on paper.



OmniSMS Reports

Report	Title	Event	Event date	ASAP / VDRP	ERC process status	Department	ER / RA
19-0916-22-1931	Flew through assigned altitude departing Las Vegas - ASAP	TCAS RA (Resolution advisory)	15 Sep 2019	A V	To be determined	Charter	High - 502
19-0124-10-1635	Altitude Deviation - ASAP	Situational violation of regulation	24 Jan 2019	A	To be determined	Charter	Moderate - 21 (Often)

Printed PDF of selected ASAP reports

NOTE:
Make column selections before applying filters. It's possible to filter a column and then hide the filtered column. This can make it difficult to interpret the data.

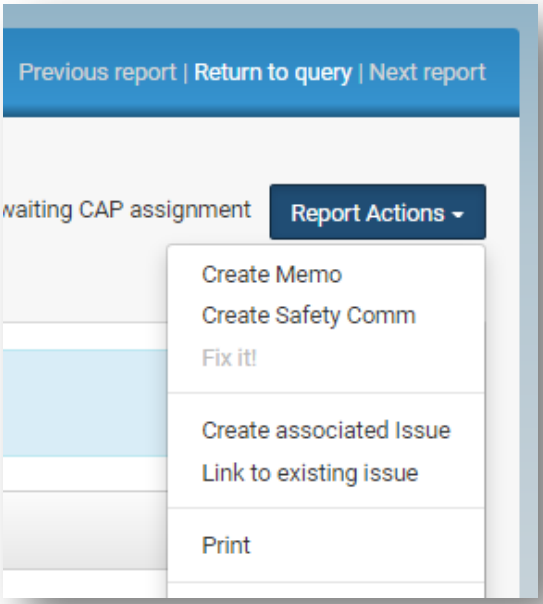
5.1.3 ASAP REPORT PDF

(A) Open an ASAP report from the Report table and select **Report Actions > Print** from the upper R/H corner of the report. This action produces a branded PDF of the entire report. It shows the report in its current status including all data fields, with or without data.

(1) If 'View reporter and crew' is checked next to your name on the report's **Permissions tab**, the reporter and crew will display on the printed report.

(2) If you do not want reporter and crew information on the printed report, uncheck the box next to your name.

(3) If you do not have access to the Permissions tab, ask a safety administrator to either check or uncheck the box for you on the report you want to print. Reference the report using the last 4 digits of the report number. For example, the report shown below can be referenced as report # 5244.



(B) The PDF can be saved locally, attached to an email, embedded in the body of an email, or printed on paper.

(C) If saved to a shared drive (such as Google Docs or Dropbox), a link can be created for electronic distribution to ERC members without the need to attach it to an email.

(D) Depending on how far the report is in its lifecycle, printed reports are typically several pages in length. Printed reports may be useful for ERC members who like to work with paper, or if an electronic device is not readily available for an ERC meeting.

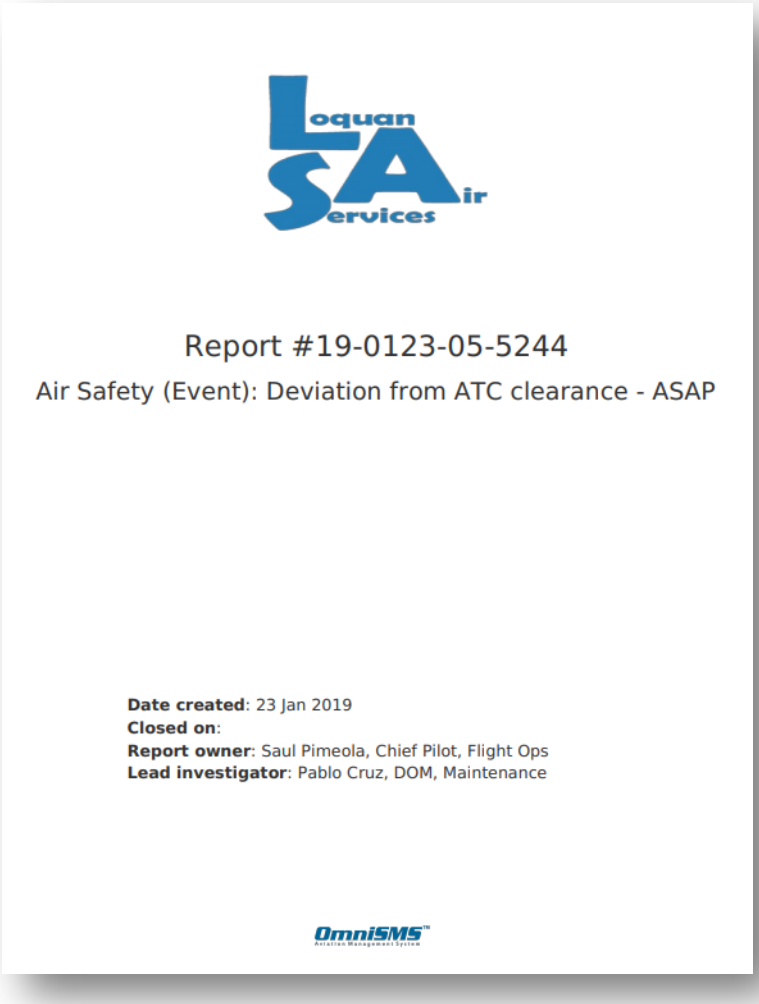
(E) PDF versions of printed reports can be edited using a PDF editor (such as Adobe Acrobat) and de-identified if desired, to send to:

(1) Customers;

(2) Contractors;

(3) ERC members;

(4) Other interested parties.


Loquan SA Air Services

Report #19-0123-05-5244

Air Safety (Event): Deviation from ATC clearance - ASAP

Date created: 23 Jan 2019
Closed on:
Report owner: Saul Pimeola, Chief Pilot, Flight Ops
Lead investigator: Pablo Cruz, DOM, Maintenance

OmniSMS

Example of an ASAP report that has been printed to PDF.

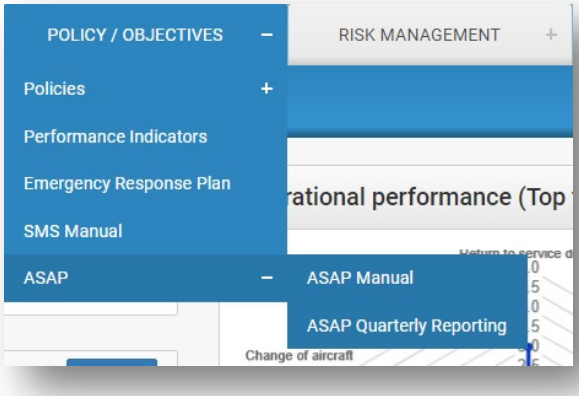
5.1.4 QUARTERLY REPORTS IN WORD

(A) Upon request, the ASAP manager provides YCO's Certificate Management Team (CMT) with an ASAP quarterly report on safety enhancements.

(B) Reports are formatted IAW Order 8900.1 Vol. 11, Ch. 2, Section 1 SAS: Aviation Safety Action Program.

(C) They are generated in MS WORD format for further editing and the CMT office manager's incorporation with other certificate holders' ASAP data.

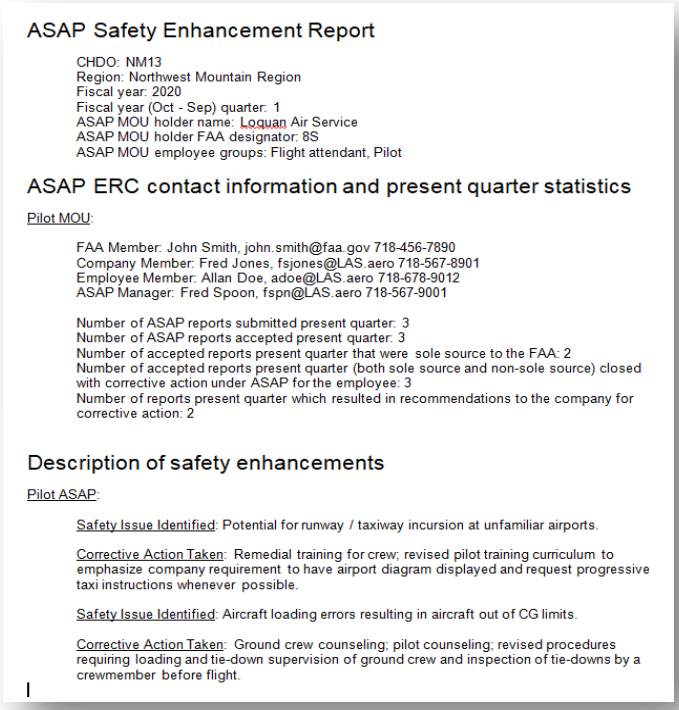
(D) To access the ASAP quarterly report generator, the ASAP manager (or other authorized administrator or department manager) logs in to OmniSMS and selects from the main menu: **POLICY / OBJECTIVES > ASAP > ASAP Quarterly Reporting**.



(E) To generate a quarterly report, first select the desired fiscal year and quarter; then select 'Generate'. A MS WORD document will be created and open automatically in WORD

(F) Before sending the quarterly report to YCO's CMT, the report should be reviewed for accuracy and to ensure that it has been satisfactorily de-identified.

(G) Quarterly reports include regulatory violations from reported events and identified factors.



ASAP Safety Enhancement Report

CHDO: NM13
Region: Northwest Mountain Region
Fiscal year: 2020
Fiscal year (Oct - Sep) quarter: 1
ASAP MOU holder name: Loquan Air Service
ASAP MOU holder FAA designator: 8S
ASAP MOU employee groups: Flight attendant, Pilot

ASAP ERC contact information and present quarter statistics

Pilot MOU:

FAA Member: John Smith, john.smith@faa.gov 718-456-7890
Company Member: Fred Jones, fsjones@LAS.aero 718-567-8901
Employee Member: Allan Doe, adoe@LAS.aero 718-678-9012
ASAP Manager: Fred Spoon, fspn@LAS.aero 718-567-9001

Number of ASAP reports submitted present quarter: 3
Number of ASAP reports accepted present quarter: 3
Number of accepted reports present quarter that were sole source to the FAA: 2
Number of accepted reports present quarter (both sole source and non-sole source) closed with corrective action under ASAP for the employee: 3
Number of reports present quarter which resulted in recommendations to the company for corrective action: 2

Description of safety enhancements

Pilot ASAP:

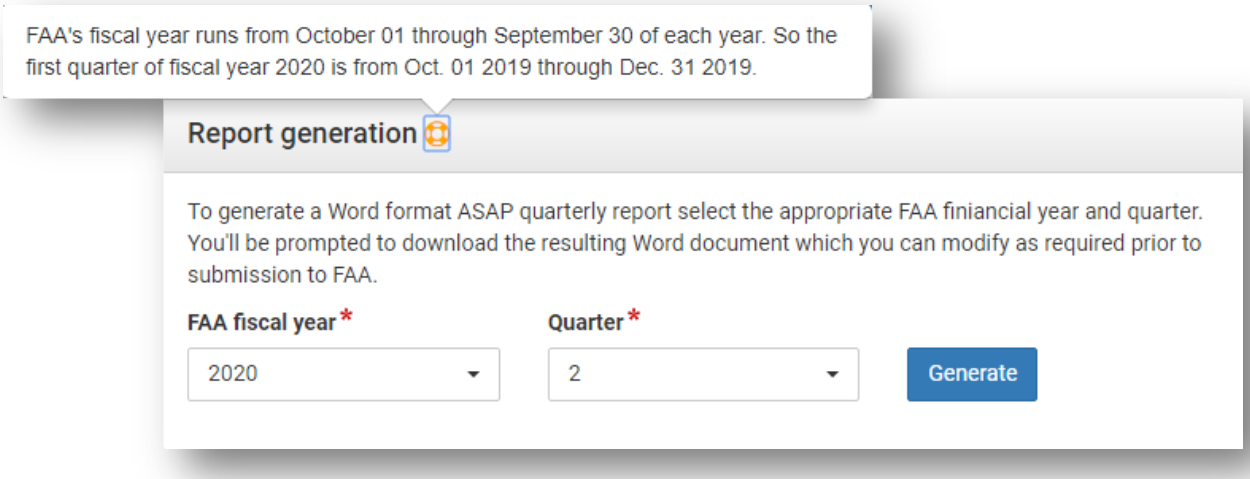
Safety Issue Identified: Potential for runway / taxiway incursion at unfamiliar airports.

Corrective Action Taken: Remedial training for crew; revised pilot training curriculum to emphasize company requirement to have airport diagram displayed and request progressive taxi instructions whenever possible.

Safety Issue Identified: Aircraft loading errors resulting in aircraft out of CG limits.

Corrective Action Taken: Ground crew counseling; pilot counseling; revised procedures requiring loading and tie-down supervision of ground crew and inspection of tie-downs by a crewmember before flight.

Sample ASAP quarterly report in WORD format.



In this example the report would generate for the time period from January 01through March 31, 2020.

5.2 REVIEWS

5.2.1 ASAP SIX MONTH REVIEW

(A) The six-month ASAP review provides an opportunity for the ERC to review ASAP program performance midway between annual reviews. Based on this review, the ERC records progress made towards various performance objectives that have been set. If necessary, performance improvement strategies are applied by the ASAP manager and YCO department managers to improve ASAP performance.

(B) The six-month ASAP review is recorded as an audit in OmniSMS. Under **Assurance > Audits / Evaluations**, select **Add audit** and title the audit: **Six Month ASAP Review**.

(1) Select Audit Standard: **INTERNAL** and Audit Type: **Internal evaluation**;

(2) Select Functional Area / Process: **1.1.2 (OP) Safety Program (Ground and Flight)**;

(3) Select Person Responsible: **ASAP Manager** (by name);

(4) Select **Add audit** to finish audit creation.

(C) Annual ASAP review 'findings' (ERC recommendations) are recorded as opportunities for improvement.

(D) To perform the six-month ASAP review:

(1) Go to **Policy / Objectives > Performance Indicators > ASAP** tab. Select a date range from the last annual review to the current six-month review (this range should be approx. 6 months).

(2) Choose a performance indicator and compare current performance to stated performance objectives. Record the date of the assessment and results.

(3) If the assessment reveals negative progress, or if it is anticipated that an annual performance objective will not be met, create a finding to develop and implement improvement strategies.

(E) In addition to looking at performance objectives, the six-month review focuses on determining whether corrective actions have been effective in preventing or reducing the recurrence of safety-related events. When the review identifies recurring events which are indicative of an adverse safety trend, the ERC will make recommendations for corrective actions.

(1) Go to the **Report table**, set a date range (the last 6 months) and filter for ASAP reports;

(2) Filter for a Department and **sort** the Event column.

(3) Look for recurring or similar events. For each report in which a recurring or similar event appears, go to the report's **Trend analysis** tab for further analysis.

(F) Refer to **Section 4 Data Analysis** for more guidance.

5.2.2 ASAP ANNUAL REVIEW

Interface – IEP § 1.13.8 Review of Violations and Self-disclosures

(A) The ERC conducts an annual review of ASAP reports with emphasis on determining whether corrective actions have been effective in preventing or reducing the recurrence of safety-related events.

(B) Like the six-month review, the annual ASAP review is recorded as an audit in OmniSMS, and findings are used to address identified opportunities for improvement.

(C) If desired, this review may be performed concurrently with YCO's annual management review as required by the SMS. Performing these reviews together helps YCO managers revise safety key performance indicators (SKPIs), some of which may be unrelated to ASAP. When SKPIs are revised, performance objectives and alert levels are also updated.

NOTE:
Refer to the YCO **Internal Evaluation Program** for audit procedures and the disposition of ASAP annual review audit findings.

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