PRISM

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SAFETYWIRE

How to Improve Air Charter Safety: It's All About Culture

(May/June 2022 , Originally published in NBAA Business Aviation Insider)

While the air charter industry is experiencing a business boon during the global COVID-19 recovery, some recent high-profile Part 135 accidents highlight the need for continued – even urgent – enhancements to safety. The reduction in some companies' hiring requirements, along with more turnover than typically seen in the industry, can also create risks, especially with unprecedented demand for charter flights and the industry's desire to maximize revenue generation to offset the initial financial hit of COVID.

The NTSB has called on the FAA to require safety management systems (SMS) for all Part 135 operators, even highlighting SMS for commercial operations in its 10 Most Wanted List for 2021-2022 – and it's no wonder why.

A fully implemented, robust SMS includes many components considered to be keys to safe operations – data sharing, third-party auditing and safety training. Data collection and sharing programs such as the Aviation Safety Action Program (ASAP), Aviation Safety Information Analysis and Sharing (ASIAS), and other initiatives are necessary so the industry can share lessons learned and typically serve in risk management. A third-party safety audit is often used to fulfill part of the safety assurance aspect of SMS. Meanwhile, appropriate training for safety managers is found in the safety promotion component of SMS.

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“NBAA has long encouraged operators to fully implement SMS, properly train safety managers and participate in narrative safety and flight data monitoring safety programs, including ASIAS and ASAP,” said Mark Larsen, NBAA’s director of safety and flight operations.

Implementation of an SMS, successful completion of a third-party safety audit, proper training for safety managers and participation in safety data sharing programs, including the FAA’s ASIAS and ASAP, are all steps to enhance safety in Part 135. But experts say those individual components are not the key ingredient: a healthy safety culture is.

NBAA’s Safety Committee has identified six characteristics of organizational professionalism, which reflects the importance of culture:

- Character
- Culture
- Business Performance and Industry Engagement
- Competency in Vocational Skill
- Conduct and Image
- Continuous Improvement

“A just culture sets the stage for all other safety components,” explained Bryan Burns, president of the Air Charter Safety Foundation (ACSF). “Just culture builds to the SMS, which builds to third-party audits, with data collection through ASAP and even FDM [flight data monitoring] layered in.”

The ACSF aims to reach small to medium operators, providing resources, including a scalable SMS platform and ASAP to help develop safety culture and implement safety programs.

“Safety must be an industry effort,” said Burns. “Collectively, we go farther.”

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“One of the challenges in addressing safety in charter operations is that a lot of the talk about safety has become a sales and marketing tool – somewhat big on superficial claims but short on substance,” said David Rimmer, CEO of AB Aviation Group and the survivor of a major accident himself. “If an operator can point to a third-party audit, an SMS manual on the shelf and an accident/incident-free history, then they are thought to be ‘safe,’ which isn’t necessarily true.”

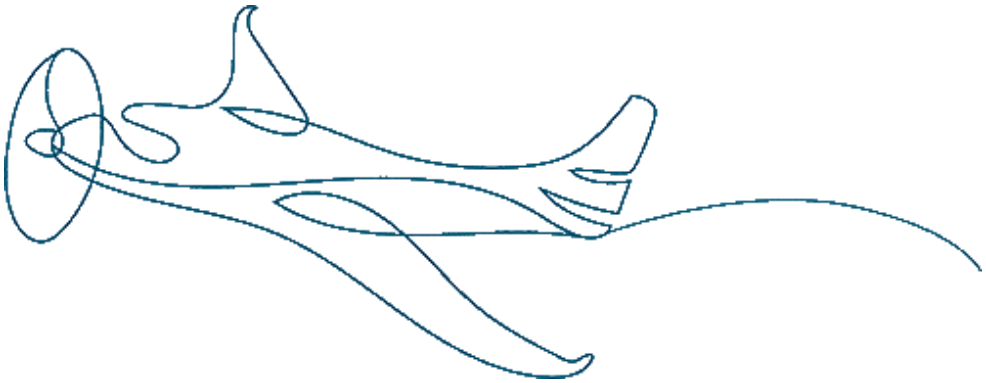
“We should be educating our clients to ask about more than audit status, accident history, aircraft age and refurb dates,” Rimmer added.

So how does an operator show their true safety colors? Consider these questions:

- Does the director of safety have a seat at the decision table?
- Does the director of safety report to senior leadership?
- Are there policies and procedures to insulate pilots from unreasonable or unsafe customer demands?

“We don’t allow a patient or hospital administrator to call a brain surgeon and pressure them into performing surgery when unforeseen circumstances cause the doctor to postpone an operation. Why do we continue to allow passengers or salespeople to pressure pilots?” Rimmer asked.

A safety culture that allows a pilot to make safe decisions is especially important with today’s workforce challenges. A pilot who feels pressured to conduct an unsafe flight has opportunities to work elsewhere.



Michael Klein, a physician and the founder and CEO of OpenAir, a small flight school and charter operator in Gaithersburg, MD, found the “secret sauce” (passion for safety, plus management commitment) to safety culture when he brought on Ben Berman to help him start a Part 135 operation in 2005.

Klein says Berman’s passion for safety drove the organization’s safety efforts, while Berman says the CEO’s commitment to safety sets the tone for the entire organization and is the key to a good safety culture.

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OpenAir believes so strongly that safety starts at the top, key leaders, including Klein, talk with every class of incoming employees so they can share their own perspective on why safety is the top priority at OpenAir.

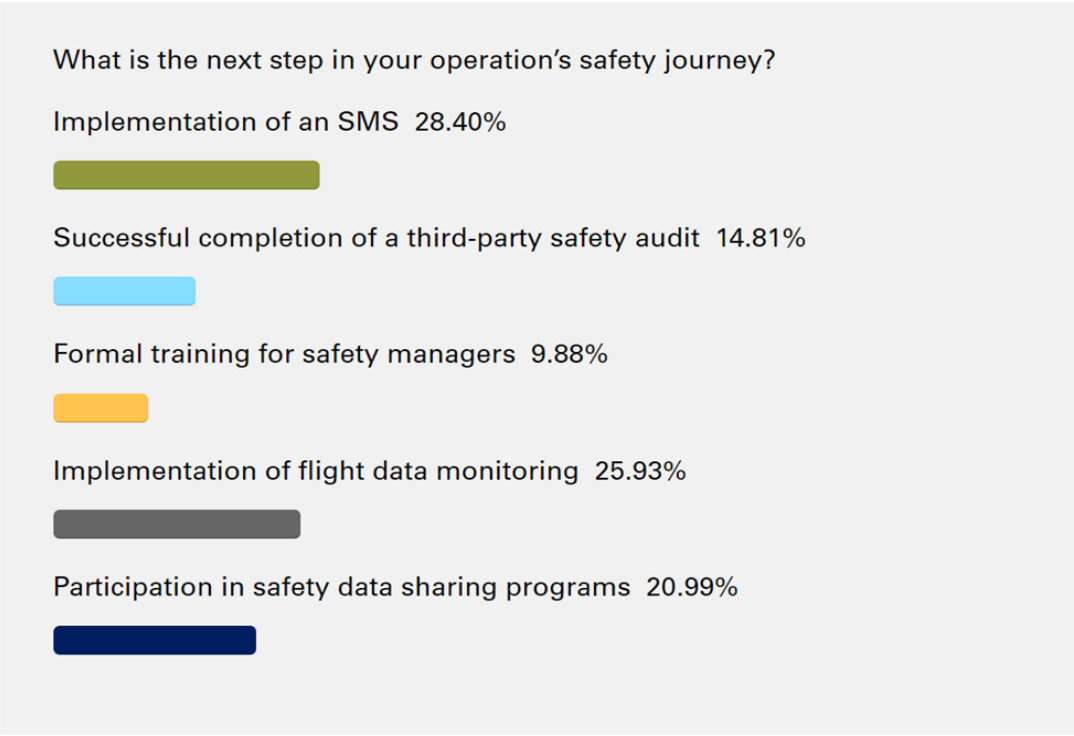
The company has an SMS, scaled for a smaller organization, which Berman calls a “work in progress,” just as any true SMS should be. OpenAir also tries to promote from within – growing students into instructors and then into charter pilots. Klein says this approach enables them to instill the company’s culture early in a pilot’s career.

OpenAir utilizes a structured flight-release process that enables the company to make go/no-go decisions without undue pressure on pilots.

“We have a culture in which people can speak freely. We value an open line of communication between pilots and management,” said Klein.

When an OpenAir pilot cancels a flight for a safety reason, the pilot isn’t berated or pressured to change their mind – they’re thanked for their commitment to keeping passengers and employees safe.

“Safety is earned every day,” said Berman, explaining that each decision a pilot or organization makes is the next step toward either a positive safety culture or a culture of unnecessary risk and acceptable noncompliance.



Safety can sometimes take a backseat, especially while the industry faces soaring demand, ongoing workforce challenges or a desire to recoup losses from early pandemic days. Experts urge industry leaders to instead make safety culture a top priority.

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Rimmer said accident data doesn't lie; without significant commitment from the industry, we'll continue to see an increase in accidents and incidents.

"Now is the time for operators and charter buyers to recommit to a robust safety culture," said Rimmer. "Safety is not defined by a certificate on the wall, a third-party audit, or an SMS on the shelf. We need to come to terms as an industry that we need to do better."

A note from PRISM: The above article mentions some key points that we would like to expand on. PRISM highly encourages and supports involvement in safety data sharing programs, such as the FAA's ASIAS and ASAP, that is why we provide ASIAS and ASAP integrations through the Reporting Program Tracker in PRISM ARMOR. If you participate in either program, you can elect to use PRISM ARMOR to submit your reports directly into ASIAS, or into your ASAP (if you use Air Charter Safety Foundation (ACSF) as a third-party facilitator of your ASAP).

For those interested, PRISM offers a formal three day SMS course for safety managers that also provides safety managers with four (4) credits towards the NBAA Certified Aviation Manager (CAM) Program. Details for this and all of the courses offered are on Page 13 of this SafetyWire, as well as on the ARG/US website.

Did you know that all PRISM Professional subscriptions include a safety culture survey? The survey assesses your operational climate and identifies leading indicators that may be indicative of strengths and weaknesses in your safety culture. For more information on safety cultures, please reach out to the PRISM Team.

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Another Avoidable Helicopter Crash

Bruce Landsberg

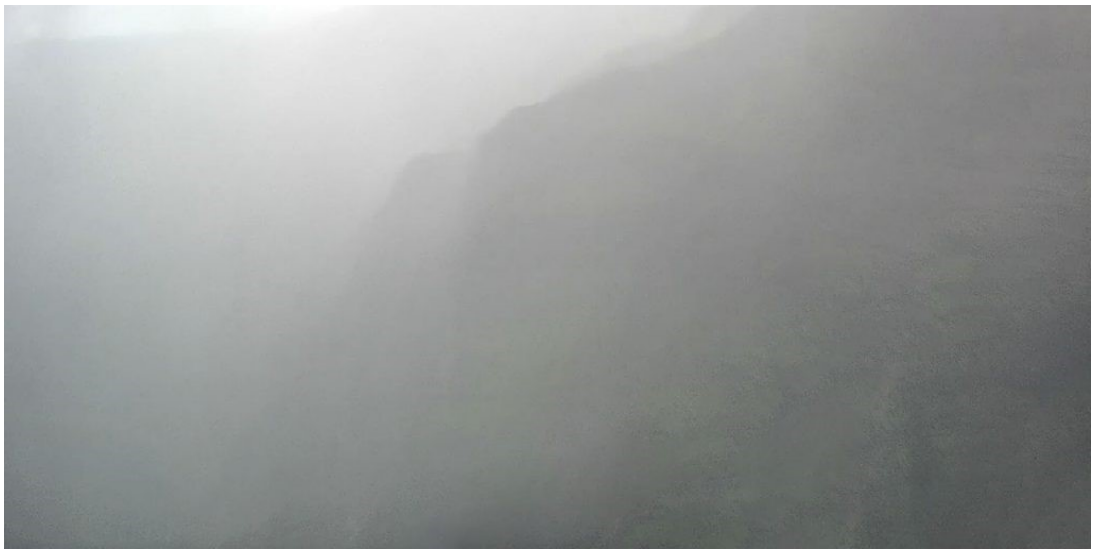
We know how to prevent these types of accidents. So why aren't we doing it?

It was with both sadness and disappointment that the National Transportation Safety Board (NTSB) had to investigate yet another sightseeing aircraft crash, this one in Kekaha, Hawaii, on the island of Kauai, that took place on Dec. 26, 2019. The investigation found that the pilot and his six passengers died after he decided "to continue flight under visual flight rules (VFR) into instrument meteorological conditions (IMC), which resulted in the collision into terrain."

You can read more about this accident in the NTSB accident investigation report, but you really won't find any new or surprising information there. The dangers of continuing VFR flight into IMC conditions, as well as strategies for preventing tragedies of this kind, have been outlined for years. The NTSB has made longstanding recommendations to industry and the FAA that would prevent these types of accidents. Yet, we see the same types of events occur over and over and over.

As Yogi Berra famously quipped, "It's like déjà vu all over again!" However, we at the NTSB feel no satisfaction about being proven right once again. Instead, the NTSB wants the FAA and operators to address the problem and end these types of accidents.

Hawaii tour helicopters often have cameras outside the cockpit to provide souvenirs for customers. While the accident helicopter unfortunately did not, videos from other tour aircraft in the area clearly tell the story—just look at the photo below. The accident pilot wasn't the only one taking unacceptable risks that day. It's obvious that complacency and normalization of deviance exist on the part of several tour companies' management and pilots.



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The image from the video makes clear that what occurred on the day of the accident wasn't inadvertent flight into IMC but deliberate. The commercial incentive to push through the clouds and continue the tour seemed to have outweighed the pilot's duty to conduct the flight safely. Most of the time, luck wins out and everyone survives, and so the practice continues. The harsh truth is that the absence of a crash, even for years, doesn't necessarily mean that things were being done right. Those same risk factors will come together again for the next flight.

The NTSB has asked for in-cockpit image recording for years. Modern technology makes this inexpensive and serves two purposes: crash reconstruction and, more importantly, crash prevention. Videos like these can pave the way for better safety programs and prevent more unnecessary deaths. Yet, I'm not confident that any tour company management saw these videos as an opportunity to step forward and make clear to pilots their commitment to risk management and safe operations. The pushback from pilots and companies about monitoring their own flight -operations and taking nonpunitive corrective action is inexplicable to me, especially if the equipment is already installed.

Helicopters, especially small ones, are notoriously difficult to fly after visual reference is lost. The so-called proficiency checks for emergency escape from inadvertent IMC are ineffective and likely provide a false sense of security. The videos show that the escape mechanism available to most helicopter pilots, the ability to land almost anywhere in deteriorating weather, is often not available in the Waimea Canyon and the northern part of Kauai. The terrain is rugged and covered with trees that make a successful landing improbable.

Again, this is an area where there are known methods of mitigating the risk of spatial disorientation. Simulators or perhaps virtual-reality headgear that could be worn in an actual aircraft present more realistic training. Stability augmentation systems and basic autopilots would also improve the safety of VFR air tour helicopters. Economics is ever the driver of safety decisions for regulators and operators across all modes of transportation. But if you think prevention is expensive, do the math on the real cost of crashes.

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While both the NTSB and FAA proclaim the benefits of a systemic approach to managing safety, the FAA has ignored its own guidance. In an area where rapidly changing weather conditions are well known, real-time weather observations for VFR air tours are essential. Again, cameras provide a relatively inexpensive technology to accomplish that. Likewise, having ADS-B and radio coverage in the area would allow for both collision avoidance and pilot reports that would enhance safety tremendously. An antenna is all that's needed. All these items have been recommended to the FAA for years.

The accident flight was in clear violation of the Hawaii Air Tour Common Procedures Manual (HATCPM), a document published by the FAA's Honolulu Flight Standards District Office (FSDO) that details standard procedures for air tours in that state. Updating the HATCPM and developing cue-based weather training are safety initiatives the FAA has said it would undertake. Despite years of delay, neither has been completed.

Part of a systemic approach to safety is looking at how management failures contributed to the accident chain. During our investigation, the NTSB determined that the tour company's lack of safety management processes contributed to the accident. Going even further up the chain, we identified as a factor the FAA's ineffective monitoring of Hawaii air tour operators.

Change and Improvement

Wayne Ehlke, PRISM Safety Analyst

After 30 years in helicopter maintenance, it still amazes me what this industry is capable of. We take people to see the most incredible sights that could not be seen by any other means. We save lives by transporting people from a crash on the side of the road to the roof of a hospital. We fight fires in remote areas and make pinpoint drops. Many other missions are completed that could not be done by any other vehicle.

The aircraft we operate have changed dramatically over the last 30 years. Navigation, communication, and many other systems have drastically changed. And, the tools and equipment we use to maintain the aircraft have also changed substantially.

I can't tell you how many times I have heard "I have been doing it this way for 30 years and have never had an issue". Occasionally the reason for change is hard to see but most of the time, it's not just change, it is an improvement.

Safety is no different. There are new safety systems and tools available. But we have been doing it this way for 30 years, why do I have to use this new system? If there was ever an area that we should use all the improvements we can and do it better, **safety should be on the top of the list!!!**

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SAFETY MANAGER'S CORNER

AIRPORT COMMENTS

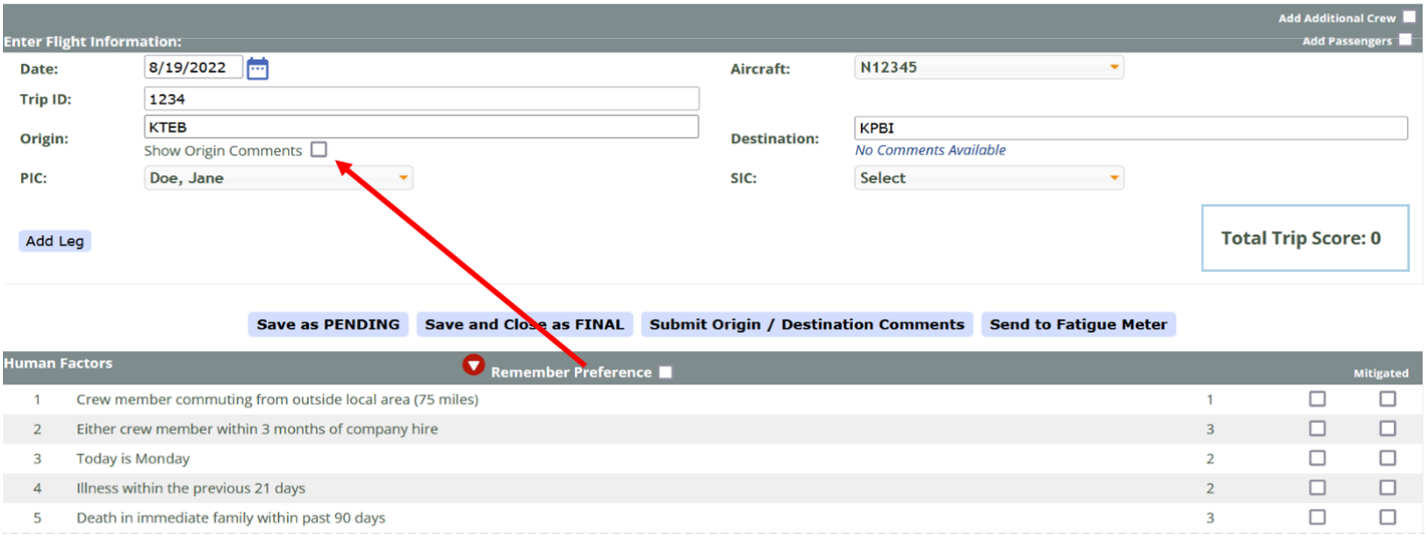
Wouldn't it be nice to have a convenient way to notify flight crews about miscellaneous items at each airfield such as:

- Construction at or near the airport
- Previous issues with the FBO
- Parking issues
- Fuel prices
- Etc.

PRISM's FRAT includes an airport comments feature where flight crews or admin have the ability to add notes/ comments about each airport. Comments can be added directly into a FRAT report or crewmembers can add them after a flight by clicking on the "Click here to submit comments" hyperlink in the email notification that goes to all crew-members when their FRAT is Saved & Closed as Final. The subject line of the email that the crewmembers receive when their FRAT is Saved & Closed as Final will say: Flight Risk Analysis Report – Please Submit Origin/Destination Comments.

If comments exist for an airport, crewmembers will see a small checkbox below the origin and/or destination field in the FRAT that says Show Origin Comments and/or Show Destination Comments as shown below. Flight crews will be able to view all of the comments for that airport by checking the Show Origin/Destination Comments box.

Admin can delete or edit comments from the FRAT homepage under the Manage Comments Quick Link if comments are out of date and are no longer applicable or need to be modified.



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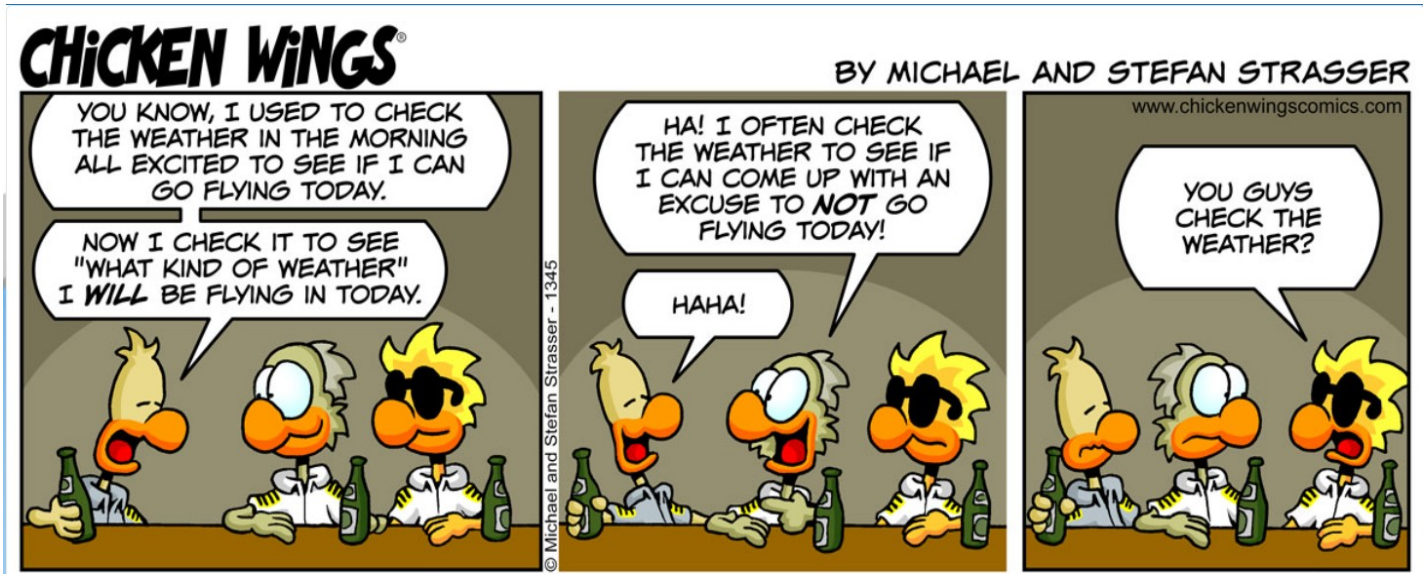
Quote of the Month

"Start by doing what's necessary, then do what's possible; and suddenly you are doing the impossible"

— St. Francis of Assisi

We strive for the impossible in the safety department. A low risk aviation company starts by doing what is necessary to mitigate existing risks. Pretty soon the conversation shifts. It becomes "what can we do?" instead of "what needs to be done?". This subtle change in verbiage is the harbinger of great things. You have decided to move from "necessary" to "possible". Never stop striving, never stop moving the needle, no matter how incrementally; each miniscule movement is a step towards conquering the impossible.



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UPCOMING COURSES

Sept 27 to Sept 29, 2022—PRISM Course
Safety Management System (SMS)
Denver, CO

Oct 3 to Oct 7, 2022—PROS Course
IOSA Auditor Training
Denver, CO

Nov 28 to Dec 2, 2022—PROS Course
Aviation Lead Auditor Training (ALAT)
Denver, CO

Dec 12 to Dec 16, 2022—PROS Course
IOSA Auditor Training
Denver, CO

Go to Upcoming Training Classes to register.