NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

Hageland Safety Manual Excerpts

(18 Pages)

Attachment 13

to the Human Performance Specialist's Factual Report

ANC17MA001

Hageland Safety Manual Excerpts

1.0.1 Air Carrier Contact Information

Hageland Vice President of Safety
Dave Lowell,
████████████████

Ravn Director of Safety Assurance
Adam Ricciardi
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Ravn Manager of Safety Systems
Larissa Jimenez
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Ravn Auditors

Tom Peters
██ ████████████

Safety Program

1.0.3 Safety Program Responsible Manager. The President of Hageland Aviation is responsible for ensuring **that the Safety Program is adequately resourced and managed in a manner to support safe operations** throughout the company. The Hageland Vice President of Safety is the responsible manager for maintaining the safety program at the direction of the President.

1.0.5 Senior Management Commitment

Every employee in the company owns safety. Senior Management, starting with the President, is committed to provide the resources, training, and support required so that all employees can work in an environment that places their safety above all other considerations.

1.0.7 Safety Goals

Hageland Aviation's Safety Program is designed to prevent personal injury and losses resulting from accidents and incidents. The Company has established Safety Goals that are designed to enhance safety through focused performance. These goals are reviewed annually by top management. At any time a goal is achieved, a new Safety Goal will be identified. The primary objectives of our Safety Program are to:

- Motivate safe actions through establishment of a dynamic safety culture;
- Identify hazards to safe operations;
- Communicate safety throughout the Company;
- Provide a safety reporting system that encourages and empowers employees to identify, report, and reduce hazards

1.0.9 Safety Program Principles

Every employee, regardless of position, seniority or age, has a right and is empowered to stop any job for safety concerns and has the responsibility to observe, uncover and report any possible unsafe acts.
- All accidents, injuries and illnesses can be prevented;
- Managers and Supervisors have the responsibility to train and provide oversight to ensure employees always work safely;

- Working safely is a condition of employment,
- Preventing all accidents, injuries and illnesses is good business.

Hageland Aviation's management recognizes:

- Opportunities to improve Safety exist everywhere in the company;
- Safety concerns in one part of the Company will often be similar to concerns in other parts of the Company segments;
- Regulators expect that knowledge regarding issues and solutions relating to safety problems will be dealt with in a consistently high-quality manner throughout the Company's operating segments.

1.0.11 Safety Program Elements

The Company Safety Program consists of the systematic discovery, evaluation and elimination of hazards to all ground and flight operations. It is intended to be preventative in nature. Some of the safety program elements are:

- Safety Policy
- Safety Manual
- Employee Safety Deck
- Safety Education & Training
- Operation Manuals
- Maintenance Manuals
- Ground & Ramp Safety Policies and Procedures
- Hazard Reporting
- Incident & Accident Reporting Program
- Incident & Accident Investigation
- Anti-drug / Alcohol Program
- Safety Award Program
- Safety Committee
- Emergency Response Plan

1.0.13 Safety Awareness and Communications

Communication of safety related information is an important part of the overall safety program. The following elements make up the Safety Awareness and Communications Program:

- Company Safety Manual
- Safety Bulletin Boards
- Safety Bulletins
- Safety Newsletters
- Safety Alerts
- Safety Reporting Program
- Safety Committee
- Safety Meetings

1.0.15 Policies and Procedures

The Company has implemented policies, standards and procedures that highlight the importance of compliance with all Flight and Ground safety requirements. These documents are communicated regularly to all in the Company whose activities could affect compliance.

Hageland Aviation's Safety Policy is applicable system wide.

A copy of the policy is found on all Company bulletin boards and available in every facility of the company.

Clearly written, up-to-date procedures exist at the corporate and facility levels to implement the policies and to assure reasonably consistent safety performance throughout the Company.

2.0.0   Introduction

Accident and incident prevention and the prevention of work-related injuries and illnesses of all employees are of primary importance. Therefore, it is the responsibility of all managers, supervisors and employees to do everything possible to eliminate any unsafe condition or unsafe practice.

Supervisors and managers are responsible for safety training, investigations and safety communication. Senior management is responsible for program creation, evaluation and support.

2.0.3   Responsibility for Safety

Responsibility and accountability exist primarily with each Department Manager and Station Manager within the Company to oversee and ensure compliance with Company policies, procedures and applicable laws.

- Leads, Station Managers, Department Managers and Senior Management must understand that a commitment to safety is their personal responsibility and that it is incumbent upon them to communicate this to their staff.
- Leads, Station Managers and Department Managers, are given adequate resources, technical support and authority to address problems in a timely and appropriate manner. *If adequate resources or technical support are not provided, the Lead, Station Manager, or Department Manager will notify the Director of Safety as soon as practicable.*

Lines of Responsibility and Authority:

- There are clear lines of authority for safety between Mid-Level-Management and the Senior Managers.
- There is a safety structure that establishes a relationship between administration, and the operational levels; that relationship is one of support and tracking.
- Other segments of the Company support the Safety Department.
- The safety organization complements the Company's organization.
- Station Managers and Department Managers understand how to obtain technical support from the Safety Department.

2.0.5   Medallion Foundation Program
Hageland Aviation is an active participant in the Medallion Foundation Star and Shield Program. Managers with responsibility for Medallion stars are:

- Safety – Director of Safety
- Controlled Flight Into Terrain Avoidance – Director of Training
- Operational Control – Chief Pilot
- Maintenance and Ground Service – Director of Maintenance and Director of Stations
- Internal Evaluation Program (IEP) – Director of Safety Assurance

2.0.7   President
- Reports directly to the Board of Directors.
- Has authority and responsibility for administration of the Company in its entirety.
- Promotes and encourages safety in all areas and serves on the Safety Committee.
- Ensures implementation and execution of policies established by the Board of Directors.
- Is responsible to the Board of Directors for high quality conduct of company services.
- Ensures compliance with the rules, laws, and regulations, governing air carriers as   applicable to the Company.
- Coordinates all legal matters, including but not limited to, approval of negotiated contracts and agreements.

2.0.11 Vice President of Safety

- Reports directly to the President.
- Oversees Medallion Star/Shield program
- Develops and oversees implementation of safety programs within the Company.
- Is responsible for process measurement and auditing programs including the Internal Evaluation Program (IEP), and coordinates external audits by customers, FAA, DOD, Medallion Foundation and other entities.
- Promotes safety awareness programs for flight safety, ramp safety, OSHA-related activities and injury and illness prevention.
- Advises managers and supervisors on training requirements for workplace safety and provides information on applicable laws, regulations and Company safety rules and policies.
- Schedules quarterly Safety Committee meetings and chairs the Safety Committee, and advises methods to eliminate safety hazards and improve the accident prevention program.
- Forwards and transmits Safety Reports to the appropriate manager or supervisor responsible for the area affected.
- Ensures annual safety audits are conducted at all Company facilities.
- Investigates all serious or potentially life threatening Safety Reports.
- Investigates all accidents and investigates or directs the investigation of all incidents.

2.0.13 Director of Safety Assurance

- Audits Hageland Medallion Star/Shield program.
- Manages Company process measurement and auditing programs including the Internal Evaluation Program (IEP). Coordinates all external audits by customers, FAA, DOD, Medallion Foundation and other entities.
- Assures the effectiveness of risk controls.
- Assists the VPS with the evaluation of Emergency Response drills or training;
- Has authority to investigate accident or incidents;
- Serve as CASS Board advisory member;
- Participates in Safety Committee meetings;

2.0.15 Manager of Safety Systems

- Exercises overall responsibility and authority in managing and maintaining the Company employee reporting web site (WBAT).
- Manages the Safety Reporting System processes.
- Inputs data and hazards into the Hazard Registry.
- Prepares analysis and trend reports from WBAT as needed.
- Reviews IEP audits, plans, corrective action target dates, and response due dates.
- Prepares weekly reports of WBAT reports submitted.
- Provides training on WBAT System, reporting procedures, and analyst duties.
- Conducts Weekly Risk Assessment Panel (WRAP) meetings.

2.0.17 Auditor

- Conducts facility and program audits at all Company facilities, applicable audit areas, and applicable departments within Operations, Maintenance, and Safety;
- Evaluates Company FAA Approved programs for regulatory compliance, weaknesses, or hazards;
- Evaluates audit evidence for compliance with regulation, policy, procedure, or best practice;

2.0.19 Analyst

The Analyst is a subject matter expert (SME) within their employee group that is appointed by their Department Manager to perform Analyst duties in resolving employee submitted WBAT reports. The Analyst reports directly to their supervisor for their primary job, but functions as an Analyst on behalf of their assigned employee group and the Company. The Analyst duties include, but are not limited to:

- Manages for assigned WBAT reports until all actions associated with that report are completed and closed.
- Performs a risk assessment on the reported event. Coordinates with assigned Report Manager for status updates, target dates, and all corrective actions until complete.
- Coordinates with Safety Department immediately when initial risk assessment is Marginal (3) or greater.

2.0.21 Safety Representative

The Safety Representative reports directly to their Station Manager or Department Manager. Duties of the Safety Representative are in addition to the regular assigned position held by the employee. Duties will be assigned and/or delegated to the Safety Representative by their Manager and may include but are not limited to:

- Works closely with the Safety Department to maintain a high level of safety communication and awareness within the station.
- Assists employees as needed with safety regulation compliance.
- Creates and fosters a positive safety culture at the station.
- Assists the Station Manager with monthly safety meetings by documenting and tracking meeting minutes & monthly attendance sheets, and ensuring effective and relevant topics are covered at each meeting;
- Ensures safety bulletin boards are current and safety communication is posted for at least the minimum required time of 14 days;
- Monitors safety performance at the station, correct any identified hazards, and report those hazards to the Station Manager and Director of Safety as soon as practical.
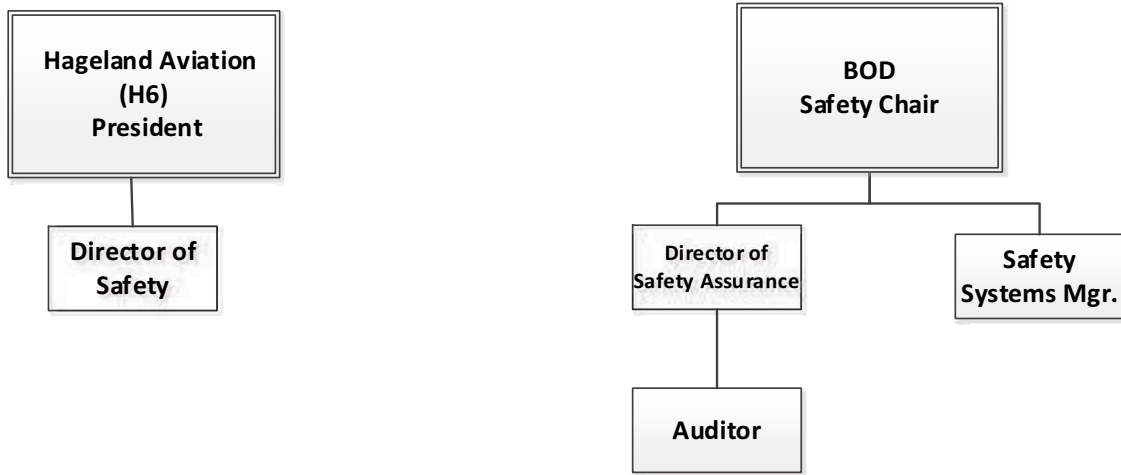
2.0.23 Managers and Supervisors

- Routinely review and communicate Company safety rules and policies to their respective employees;
- Ensure their employees are trained in general and specific safe work practices;
- Ensure their employees are trained in hazards specific to each employee's job assignment and under no circumstance assign an employee a task without sufficient training to accomplish it safely and efficiently.
- Regularly inspects their area of responsibility for hazards.
- Investigate and take corrective action if required, on any employee reports filed by employees in their department, and submit them to the Safety Department.
- Take action on concerns and findings found during annual HSE Audit Reports for their area of responsibility, and return to the Safety Department within the specified time period.
- Observe workers to ensure they follow safe work practices.
- Correct unsafe work conditions promptly.
- Maintain good housekeeping practices at all times.
- (Station Managers) Conduct monthly safety meetings and maintain minutes to ensure all employees under their responsibility are aware of current safety information and Company safety policies. The safety meeting minutes must be forwarded to the Director of Safety for monitoring.

2.0.25 Employees

- Be aware of all job hazards in their work area.
- Attend all required safety meetings.
- Know Company safety rules and policies.
- Participate in safety training.
- Keep an eye on their work area for hazards.
- Take positive steps to avoid unsafe work conditions.
- Correct unsafe conditions promptly.
- Maintain good housekeeping.
- In their area of responsibility, report all hazards, accidents, incidents, or near misses to the Company using www.ravnalaskasafety.com .

2.0.27 Safety Department Authority and Responsibility

This chart depicts the flow of authority and responsibility for administration of processes and procedures associated with the Safety Department.

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  Hageland Aviation                      BOD
       (H6)                          Safety Chair
     President
         |                   _____|_____
  Director of              |                                  |
    Safety            Director of                         Safety
                    Safety Assurance                    Systems Mgr.
                          |
                       Auditor
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3.0.9   Your Actions Matter

You, the employee, are the most important member of the company safety team. Without your commitment to doing your job safely, keeping your fellow employees safe, and immediately fixing and reporting hazardous conditions, there is no safety program. The safety reporting system (WBAT) is a valuable tool that allows us to identify, monitor, and resolve safety issues and concerns.   The Employee Reporting System is not a replacement for communication and initiative. If you can correct an unsafe situation yourself, you should do so. If you need help, tell your supervisor. Always remember to document the situation even if it gets fixed on the spot.

Senior management's intent is to empower employees to fully participate in all matters relating to safety, health and the environment and to comply fully with the applicable legislation concerning informing the workforce.

3.0.11   Implementing and Communicating Safety

Department and Station Managers of groups with at least four employees must ensure that employees have access to a Hageland Aviation Safety Bulletin Board. The Safety Bulletin Board must be located onsite and available in a manner that allows each employee daily access. Bulletin boards must contain:
- The most current copy of the Company Newsletter;
- 3E SDS Hotline Information;
- Copies of the station/departments most recent Safety Meeting Minutes, and;
- A copy of the current Safety Policy;
- Any remaining space on the bulletin board is to be used for safety information only.

All supervisors will be directly and actively involved in the implementation and communication of safety and environmental policy.

Employee Safety Decks. Each employee is issued an Employee Safety Deck. This deck contains the key components of the Safety Program. It is not mandatory for employees to have a safety deck on their persons while in the workplace; it is, however encouraged form each employee to have access to a safety deck in their immediate work area.

3.0.13   Safety Meetings

Safety meetings will be held on a monthly basis for each station or department which has more than four employees in that department. Any necessary information concerning procedures, operational matters or other relevant environmental, health and safety topics shall be communicated to and received from personnel attending these meetings.

Any recommendations arising from these meetings will be recorded and reviewed by company management. Safety meetings will be documented and attendance, topics, notes, or minutes (as appropriate) will be maintained by the department supervisor for a period of 24 months.

The safety meeting minutes and attendance records will be forwarded to the Safety Department each month. Safety Meeting minutes must be posted for at least 14 days (bulletin board/electronic copy) and/or distributed to all employees.

The Safety Department will review all minutes, and identify trends or hazards that should be risk-assessed and elevated to company management. Hazards or trends risk assessed at 3 or higher will be added to the hazard registry, entered into the WBAT system, and processed according to safety reporting system procedures.

The Safety Department will collate and distribute safety meeting minutes to al stations monthly.

3.0.15 Safety Committee

The Safety Committee will meet once per quarter to address safety issues that impact the Company, identified trends, company performance, and high risk issues. The Safety Committee consists of members as listed below. Primary attendees or their designee will attend each meeting; other invited members should attend if their schedule permits. Minutes of the meeting will be documented and maintained by the Presidents Executive Assistant. Results of the meetings will be made available to Department Managers, and relevant safety information will be disseminated to all applicable departments and employees by bulletins, alerts, or memos.

- President
- Vice President of Safety
- Vice President of Operations
- Vice President of Maintenance
- Chief Pilot
- Director of Training
- Director of Flight Standards
- Director of Quality Control
- Director of Stations

3.0.17 Training

All new hire employees must attend Safety Training prior to performing any work-related functions for the Company. Any employee may require additional Job Specific Training that must be conducted prior to performing certain duties and periodically thereafter as required by regulation. Existing Employees must participate in annual Safety Training.

3.0.19 Emergency Response Plan

The Emergency Response Plan (ERP) is an essential element of the Safety Management System. The ERP provides immediate response procedures and should be used to reduce or eliminate the effects of an accident and prevent future accidents. Hageland Aviation's ERP will be reviewed annually by the Safety Department and the Hageland Aviation President.

A table top exercise of the ERP must be conducted on an annual basis.

The ERP outlines procedures to be followed in the event of: an Overdue Aircraft, Accident / Incident, Aircraft Hijacking, Vehicle Accident, Employee or Passenger Death, Serious Injury or Illness, Bomb Threat, Fire, Earthquake, High Winds and Hazardous Substance Spills.

Our first concern in the event of an accident is that proper aid is rendered to those injured and that additional injury be prevented. The "value of life" will be considered above all else.

Our second concern is that additional damage be avoided or reduced in its severity (this includes damage to the Company's public image as well as property of the company and others).

Our third concern is that the root cause of the accident be determined so that measures may be taken to prevent reoccurrence.

3.0.21   Incident Reporting

It is mandatory for employees who are involved in or observe an incident involving Company aircraft, equipment, vehicles or personnel to immediately report that event to their supervisor. An Employee Report must be submitted via the Hageland Employee Reporting System (WBAT) within 24 hours. Failure to report incidents or accidents may lead to disciplinary action against the employee, including employment termination.

All unintentional contact with an aircraft by any other vehicle or equipment is considered to be a reportable incident. This includes all events where no visible damage may be apparent or where only minor cosmetic damage is observed. Whenever such an event occurs, a Company Maintenance Department representative must be contacted immediately and a review of the event must take place prior to the aircraft's next flight. Depending on the severity of the damage, an on-site inspection of the aircraft may be required. Only licensed aircraft mechanics approved by the Company may be involved in determining whether the aircraft remains airworthy or must be grounded for further inspection or repairs. Examples of these events include, but are not limited to; contact from ladders, work platforms, forklifts, belt loaders, and tugs and anytime a power cart is driven away from an aircraft without prior removal of its power cord, and any aircraft contact with wildlife (including birds) or FOD.

Additionally, Reports are required for the following events:

- Employee Injury
- Passenger injury
- Security issues
- Aircraft damage
- Near mid-air
- Equipment damage

- Any event that mandates a report to a regulatory agency
- Aircraft loading issues
- Airfield irregularities
- Process Failure

These mandatory reporting categories may be modified by the Safety Committee based on reporting trends, observed event trends in non-mandatory categories, or identified special interest events.

HAGELAND AIRLINES RISK MATRIX

RISK = FAILURE TO MAINTAIN SAFE, COMPLIANT AND RELIABLE OPERATIONS

	INJURY / ILLNESS	AIRCRAFT, FACILITY OR TERRORISM EVENT	OPERATIONAL COMPLIANCE / PERFORMANCE	DAMAGE, FINES OR LOSS OF REVENUE	CORPORATE IMAGE	ENVIRONMENTAL DAMAGE	EXTREMELY IMPROBABLE ONCE IN 35 YEARS	IMPROBABLE ONCE IN 2-10 YEARS	REMOTE ONCE IN <2 YEARS	OCCASIONAL 2-10 TIMES PER YEAR	FREQUENT 1-3 TIMES PER MONTH	REPETITIVE 4+ TIMES PER YEAR
CATASTROPHIC	MULTIPLE FATALITIES	TOTAL LOSS OF AIRCRAFT OF FACILITY	POTENTIAL THREAT TO OPERATING CERTIFICATE	DAMAGE, FINES OR LOSS OF REVENUE >$5M	POTENTIAL FOR CORPORATE FAILURE, PERMANENT IMPACT ON BUSINESS SYSTEM-WIDE	MASSIVE ENVIRONMENTAL EFFECT	4	4	5	5	5	5
CRITICAL	SINGLE FATALITY OR MULTIPLE OVERNIGHT HOSPITAL ADMISSIONS	NTSB ACCIDENT OR SUBSTANTIAL LOSS OF AFFECTED PROPERTY	REGULATORY POLICY AND/OR PROCEDURE DEVIATION W/ A CRITICAL IMPACT ON SAFETY	DAMAGE, FINES OR LOSS OF REVENUE $1M< ? <$5M	ADVERSE EFFECT ON CORPORATE IMAGE, SIGNIFICANT IMPACT ON A REGION	CRITICAL ENVIRONMENTAL EFFECT	3	3	4	5	5	5
MAJOR	SINGLE OVERNIGHT HOSPITALIZATION	NTSB INCIDENT OR ACCIDENT, PARTIAL LOSS OF A FACILITY OR A CREDIBLE SECURITY THREAT	REGULATORY POLICY AND/OR PROCEDURE DEVIATION W/ MAJOR REDUCTION IN SAFETY MARGIN	DAMAGE, FINES OR LOSS OF REVENUE $100K< ? <$1M	MAJOR EFFECT ON CORPORATE IMAGE, ISOLATED TO A SINGLE LOCATION	CONTAINED EFFECT TO THE ENVIRONMENT	2	2	3	3	4	4
MINOR	MEDICAL TREATMENT BEYOND FIRST AID	NTSB INCIDENT OR MINOR PROPERTY DAMAGE	REGULATORY POLICY AND/OR PROCEDURE DEVIATION W/ MINOR SAFETY IMPLICATION	DAMAGE, FINES OR LOSS OF REVENUE $10K< ? <$100K	MINOR EFFECT ON CORPORATE IMAGE W/ ISOLATED EFFECT THAT IS EASILY REVERSIBLE	MINOR ENVIRONMENTAL EFFECT	1	1	2	2	2	3
NEGLIGIBLE	FIRST AID TREATMENT	NEGLIGIBLE INCIDENT OR DAMAGE W/ EXTREMELY LIMITED EFFECT ON SAFETY	POLICY OR PROCEDURE DEVIATION WITH LIMITED SAFETY IMPLICATION	DAMAGE, FINES OR LOSS OF REVENUE <$10K	NEGLIGIBLE EFFECT ON CORPORATE IMAGE W/ LITTLE TO NO POTENTIAL FOR NEGATIVE IMPACT ON CORVUS AIRLINES BRAND	NEGLIGIBLE ENVIRONMENTAL EFFECT	1	1	1	1	1	2
NO SAFETY IMPLICATION	NO SAFETY IMPLICATION	NO SAFETY IMPLICATION	NO SAFETY IMPLICATION	NO SAFETY IMPLICATION	NO SAFETY IMPLICATION	NO SAFETY IMPLICATION	0	0	0	0	0	0

SEVERITY   LIKELIHOOD

4.0.29 Hageland Aviation Risk Matrix

- Catastrophic (5) – <u>Unacceptable</u>. VP's in areas of risk. Operation is ceased.
- Critical (4) – <u>Unacceptable</u>. VP's and Directors in area of risk until mitigation to level 3.
- Major (3) – Acceptable with mitigation. Directors or above in area of risk.
- Minor (2) – Acceptable. None required.
- Negligible (1) – Acceptable. None required.

- Risk and <u>notification</u> levels are:
  - Extreme Risk (5) – President, CEO and Board of Directors
  - High Risk (4) – President, CEO, VP's, and Directors
  - Medium Risk (3) – VP's Directors, and Managers in impacted area of risk
  - Low Risk (2) – Manager/Supervisor is area of risk
  - Minimal Risk (1) – None

CHAPTER 6
FLIGHT SAFETY

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6.0.0   Purpose

The purpose of the Hageland Aviation flight safety program is to promote safety in all areas of flight operations by providing avenues to identify and communicate flight safety issues to pilots, flight crews, and top management.   The program also provides ongoing flight safety education, safety data aggregation and reporting.

6.0.3   Aviation Safety Reporting

All pilots and flight crew are encouraged to participate in the safety reporting programs available to them. For some specific events, a flight crew member may be required by the company to file a report in the Hageland Aviation Employee Reporting System (WBAT).   Otherwise, use of any of the reporting programs is entirely voluntary.   Benefits to the company and industry are realized through flight crew reporting.   Data from reports is used to develop lessons learned, corrective actions, and identify trends. Some programs also offer some level of immunity from enforcement action by the FAA.   The three Safety Reporting Programs available to Hageland Aviation flight crews are:
- Aviation Safety Action Program (ASAP)
- Aviation Safety Reporting System (ASRS or NASA)
- Hageland Aviation Safety Reporting System (WBAT)
- Safety Hotline

6.0.5   Aviation Safety Action Program

The current Memorandum of understanding can be found in Appendix 1.

HOW TO FILE:

Web: www.medallionsafety.org

Paper: Fax to (907) 743-8051 - you can find a fax report template *here*: http://www.medallionfoundation.org/Reporting.asp

By Phone: (907)743-8050

Time Restrictions:

Sole Source – No limit

Sufficient Evidence – Within 24 hours of when you become aware of the event. If a report is faxed in or phoned in, an electronic submission must be made within 72 hours of the event.

USERNAME/PASSWORD problems contact:

Medallion (907) 743-8050

Hageland Aviation Safety Systems Manager ▮▮▮▮▮▮▮▮▮

Overview. ASAP provides an essential ingredient to the Company's process measurement toolkit to assist in evaluation and evolutionary improvement of all flight operations and maintenance-related procedures and policies. The ASAP program is intended to offer a confidential (but not strictly anonymous) opportunity for employees to report unsafe events, acts or conditions without fear of retribution or disciplinary action from the Company or the FAA. The Company is a participant in the Medallion Foundation's *Aviation Safety Action Program*, also referred to as ASAP. Under ASAP, approved classifications of employees are first trained on the program and are then qualified to submit reports about events that they have been involved in or witnessed that may represent an unsafe action or potential violation of the FAR's. Reporters have the potential to be given immunity from enforcement action against their certificate by the FAA or from internal disciplinary action from the Company.

Who may file a report. Currently pilots, flight attendants, dispatchers and aircraft maintenance technicians within the Company are approved to participate under ASAP; however, they must first be qualified by attending a brief training session where they are provided general instruction on all aspects of ASAP reporting, investigation and problem resolution. When an employee's ASAP training is completed they are given a discreet log-in and password to utilize the ASAP reporting web site (accessed at medallionsafety.org).

Process. ASAP reports are initially sent (via internet or fax) to a Medallion Foundation facilitator for processing and coordination of an investigation. An investigation committee comprised of two representatives from the Company and one representative from the FAA will produce findings and offer

resolutions to minimize a recurrence of the event or condition. The Company and its employees have the obligation of following through with implementation of all prescribed corrective practices within an established timeline.

Once reports are received, they are sanitized by Medallion and forwarded to the Event Review Committee (ERC). The ERC reviews the report, determines if it meets criteria for acceptance, and either accepts or rejects the report.

If a report is accepted, the ERC investigates report, determines root causes and recommends corrective actions. If a report is rejected, Immunity from enforcement action is lost.

Regardless if a report is accepted or rejected, neither the written report nor the content of the written ASAP report will be used to initiate or support any company disciplinary action, or as evidence for any purpose in an FAA enforcement action, unless the event appears to involve criminal activity, substance abuse, controlled substances, alcohol, or intentional falsification. The FAA may conduct an independent investigation of an event disclosed in a report.

6.0.7   NASA Aviation Safety Reporting Systems (ASRS).

NASA ASRS forms can be found in Appendix 2

HOW TO FILE:

No login is required to use the ASRS

Forms in the NASA ARC 277 series have been prepared specifically for intended users (including ARC 277A for air traffic use, 277B for general use including pilots, 277C for flight attendants and 277D for maintenance personnel) and are preaddressed and postage free, or are available online for access and filing electronically.

Web: http://asrs.arc.nasa.gov - From this page you can either chose to file electronically or via paper/mail submission.

Mailing Address:

Aviation Safety Reporting System

P.O. Box 189

Moffett Field, CA 94035-0189

Or, you can simultaneously file an ASRS report when you file an ASAP report www.medallionsafety.org

Overview. NASA ASRS provides for the receipt, analysis, and de-identification of Aviation Safety Reports. In addition, ASRS publishes and distributes periodic reports of findings obtained through the reporting program to the public, the aviation community, and the FAA. Designed and operated by NASA, the NASA ASRS security system ensures the confidentiality and anonymity of the reporter, and other parties as appropriate, involved in a reported occurrence or incident. The FAA will not seek, and NASA will not release or make available to the FAA, any report filed with NASA under the ASRS or any other information that might reveal the identity of any party involved in an occurrence or incident reported under the ASRS. There has been no breach of confidentiality in more than 34 years of the ASRS under NASA management.

The ASRS collects, analyzes, and responds to voluntarily submitted aviation safety incident reports in order to lessen the likelihood of aviation accidents. ASRS data are used to:

- Identify deficiencies and discrepancies in the National Aviation System (NAS) so that these can be remedied by appropriate authorities.
- Support policy formulation and planning for, and improvements to, the NAS.
- Strengthen the foundation of aviation human factors safety research. This is particularly important since it is generally conceded that over two-thirds of all aviation accidents and incidents have their roots in human performance errors.

Who may file a report. This cooperative safety reporting program invites pilots, controllers, Flight Attendants (F/A), maintenance personnel, dispatchers, and other users of the National Airspace System (NAS), or any other person, to report to NASA actual or potential discrepancies and deficiencies involving the safety of aviation operations. The operations covered by the program include departure, en route, approach, and landing operations and procedures; air traffic control (ATC) procedures and equipment;

crew and ATC communications; aircraft cabin operations; aircraft movement on the airport; near midair collisions (NMAC); aircraft maintenance and recordkeeping; and airport conditions or services.

Process. NASA procedures for processing Aviation Safety Reports initially screen the reports for:

- Information concerning criminal offenses, which will be referred promptly to the Department of Justice and the FAA;
- Information concerning accidents, which will be referred promptly to the NTSB and the FAA; and
- Time-critical information that, after de-identification, will be promptly referred to the FAA and other interested parties.

NOTE: Reports discussing criminal activities or accidents are not de-identified prior to their referral to the agencies outlined above.

DE-IDENTIFICATION. All information that might assist in or establish the ID of persons filing ASRS reports and parties named in those reports will be deleted, except for criminal offenses or accidents.
Once reports are de-identified, the reports are matched with multiple reports (if any), then coded and analyzed. After this process, they are included in the ASRS database.

Enforcement Restrictions. The FAA considers the filing of a report with NASA concerning an incident or occurrence involving a violation of 49 U.S.C. subtitle VII or the 14 CFR to be indicative of a constructive attitude. Such an attitude will tend to prevent future violations. Accordingly, although a finding of violation may be made, neither a civil penalty nor certificate suspension will be imposed if:

- The violation was inadvertent and not deliberate;
- The violation did not involve a criminal offense, accident, or action under 49 U.S.C. § 44709, which discloses a lack of qualification or competency, which is wholly excluded from this policy;
- The person has not been found in any prior FAA enforcement action to have committed a violation of 49 U.S.C. subtitle VII, or any regulation promulgated there for a period of 5 years prior to the date of occurrence; and
- The person proves that, within 10 days after the violation, or date when the person became aware or should have been aware of the violation, he or she completed and delivered or mailed a written report of the incident or occurrence to NASA.

Enforcement Action. When determining the type and extent of the enforcement action to take in a particular case, the FAA will consider the following factors:

- Nature of the violation;
- Whether the violation was inadvertent or deliberate;
- The certificate holder's level of experience and responsibility;
- Attitude of the violator;
- The hazard to safety of others, which should have been foreseen;
- Action taken by employer or other government authority;
- Length of time which has elapsed since the violation;
- The certificate holder's use of the certificate;
- The need for special deterrent action in a particular regulatory area or segment of the aviation community; and
- Presence of any factors involving national interest, such as the use of aircraft for criminal purposes.

6.0.9 Hageland Aviation Safety Reporting System (WBAT)

HOW TO FILE:

Web: http://eraalaskasafety.WBAT.org/

At the login screen, Era Employees will select the *Hageland Aviation Safety Login*; Hageland Employees will select the *Hageland Safety Login*.

Username: First initial, last name (all lower case)

Password: Last four of Social Security Number (unless employee changed the password)

Overview. The Hageland Aviation Safety Reporting system is a *confidential* (not anonymous) reporting system that allows employees to report hazards and incidents/accidents for ground and flight operations. There are three types of reports flight crew may file:

Hazard reports: Identify an existing or potential hazard to the conduct of safe operations and report employee injury;

Irregularity reports: Identify equipment/facility damage, actual deviations from established policies or procedures, and report customer injury

Fatigue report: identify operational or personal circumstances leading to crew fatigue.

Further explanation of the WBAT system and processes can be found in section 4, Safety Reporting System.

6.0.11 Anonymous Reporting System (Safety Hotline)

1-800-866-8476

Overview. Hageland Aviation maintains a toll-free number for *anonymous* reporting of any safety issue. This number may be used by employees and customers alike. Reports received through the hotline will be entered into and managed through the WBAT system.

6.0.15 Aviation Safety Education Program.

The Hageland Aviation Safety Education Program supports safety awareness and safety attitudes in all flight crew members through:
- Dissemination of details of relevant company and industry incidents and accidents to all pilots and flight crew members. This will be accomplished by (but not limited to):
- Periodic flight safety newsletters
- Flight safety meetings
- Flight safety training
- Interaction with flight crews
- Observation of crew operations and summaries of trends or topics of note
- Sponsoring aviation safety guest speakers for presentations during initial and recurrent training
- Reporting on aggregate trend data from the WBAT system
- Reporting on successes and failures of implemented corrective actions
- Communicating flight crew inputs regarding system safety issues to top management
- Facilitating crosstalk between certificates on common issues

7.0.0   Auditing and Review

Hageland Departments and Stations are evaluated on a scheduled basis by the Safety Assurance Department's Internal Evaluation Program (IEP). This program is described in the Hageland Safety Assurance Manual. The Internal Evaluation Program will include annual evaluations in the areas of:

- Maintenance
- Inspection
- Flight Operations
- Safety
- Training
- Stations & Facilities

7.0.3   Corrective Actions

It is important to have a clear methodology in place to deal with any deficiencies identified within the system, regardless of the source of the deficiency.

Corrective action items raised as a result of the auditing process will be addressed and rectified within a scheduled time limitation.

The Supervisor or Manager has the responsibility to take any action necessary to safeguard the environment, safety, health and welfare of all persons in or about the workplace.

Where deficiencies requiring emergency corrective action are identified, all Company Managers and

Supervisors are authorized to take all reasonable and practicable actions to secure the safety of personnel or property in jeopardy.

The Company has established guidelines to identify deficiencies and responsibilities for correction of system shortcomings. The system is as follows:

- Policy
- Organization and Documentation
- Verification and Implementation
- Communication
- Monitoring
- Corrective Actions

7.0.5   Safety Risk Assessment

Any employee who identifies the need for a change can initiate a Safety Risk Assessment in WBAT. The VPS will assist with any technical matters regarding the opening/closing or managing of an SRA.

Four triggers that may drive an SRA are:

1. Development of operational procedures
2. Identification of hazards or ineffective risk controls
3. Implementation of new systems
4. Revision to existing systems