

Voluntary safety reports by flight attendants prove to be more valuable than expected.

Speaking Up

BY WAYNE ROSENKRANS

With computer networks ready to pull together diverse safety information, the U.S. Federal Aviation Administration (FAA) during 2008 will keep promoting aviation safety action programs (ASAPs) — including ASAPs for flight attendants — at air carriers and major domestic repair stations. Although introduction of flight attendant versions of this voluntary program is relatively new, benefits from a handful of these ASAPs so far appear to be surpassing the expectations of participants

(Figure 1).¹ The challenge slowing expansion is persuading people to step beyond outmoded safety programs that discipline employees for inadvertent errors.

In a typical ASAP, the air carrier enters a formal partnership with specially trained FAA aviation safety inspectors and the labor organization of a specific employee group. The partners create an event review committee, a non-threatening environment that invites the certificate holder's employees to voluntarily submit written reports that

may prevent accidents. The mission is to identify and address safety issues wherever evidence leads, regardless of violations of federal regulations by the employee or the company.

“Under an ASAP, safety issues are resolved through corrective action rather than through punishment or discipline,” says FAA Advisory Circular 120-66B, *Aviation Safety Action Program (ASAP)*. “The ASAP provides for the collection, analysis and retention of the safety data that is obtained. ASAP safety data, much of which

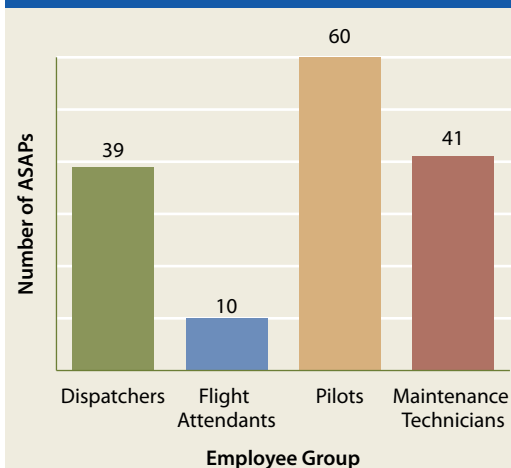
would otherwise be unobtainable, is used to develop corrective actions for identified safety concerns, and to educate the appropriate parties to prevent a reoccurrence of the same type of safety event.”

FAA Order 8900.1, *Flight Standards Information Management System*, reminds aviation safety inspectors that ASAPs enable employees to tell what happened “without fear that the FAA will use reports accepted under the program to take legal enforcement action against them, or that companies will use such information to take disciplinary action.” Historically, the former primarily has been a concern of airline pilots and the latter primarily has been a concern of flight attendants.

To make good on these promises and maintain trust, nearly all details of setting up and conducting an ASAP have been prescribed in FAA guidance documents, although participants can diverge from the template in preparing the required memorandum of understanding. Event review committees must determine by “unanimous consensus” (Figure 2, p. 36)² either that a report is acceptable or it falls under exclusionary exceptions, and learn methods of reviewing ASAP reports and reaching decisions, formulate corrective action and verify its successful completion, and know how the FAA handles exceptional situations such as when the ASAP report is not the sole source of evidence of a regulatory violation.

Committees know when and how to use FAA’s enforcement decision tool and how FAA may conduct an independent investigation of an event disclosed in an ASAP report. They also learn to interpret employee conduct that raises a question of airman competence or qualification, medical certification or other employee competence/qualification issues. The safety risks/threats identified in sole-source reports must be addressed by the committee (see “ASAP Report Insights,” p. 37). A key to the arrangement is that the flight attendant must successfully complete recommended corrective action to be

Employee Groups in U.S. Aviation Safety Action Programs (ASAPs)



Note: These data from December 2007 reflect the 150 ASAPs at 68 U.S. airlines for which the U.S. Federal Aviation Administration has accepted a memorandum of understanding that authorizes an ASAP for a specific employee group.

Source: U.S. Federal Aviation Administration

Figure 1

covered by the program’s protections; otherwise he or she can face a reopening of the case and referral for an FAA investigation.

FAA basically expects ASAP reports involving a possible regulatory violation to be accepted if the flight attendant acted as an employee of the air carrier; the report is submitted in a timely manner, such as within 24 hours after the end of a duty day; the alleged regulatory violation is inadvertent and does not appear to involve an intentional disregard for safety; and the event does not appear to involve FAA’s “big five” exceptions — criminal activity, substance abuse, controlled substances, alcohol or intentional falsification.

Conditional Union Support

Candace Kolander, coordinator, air safety, health and security, Association of Flight Attendants–Communications Workers of America (AFA), said that the union supports ASAPs for flight attendants, but on the condition that reports be sent within 10 days to the U.S. National Aeronautics and Space Administration



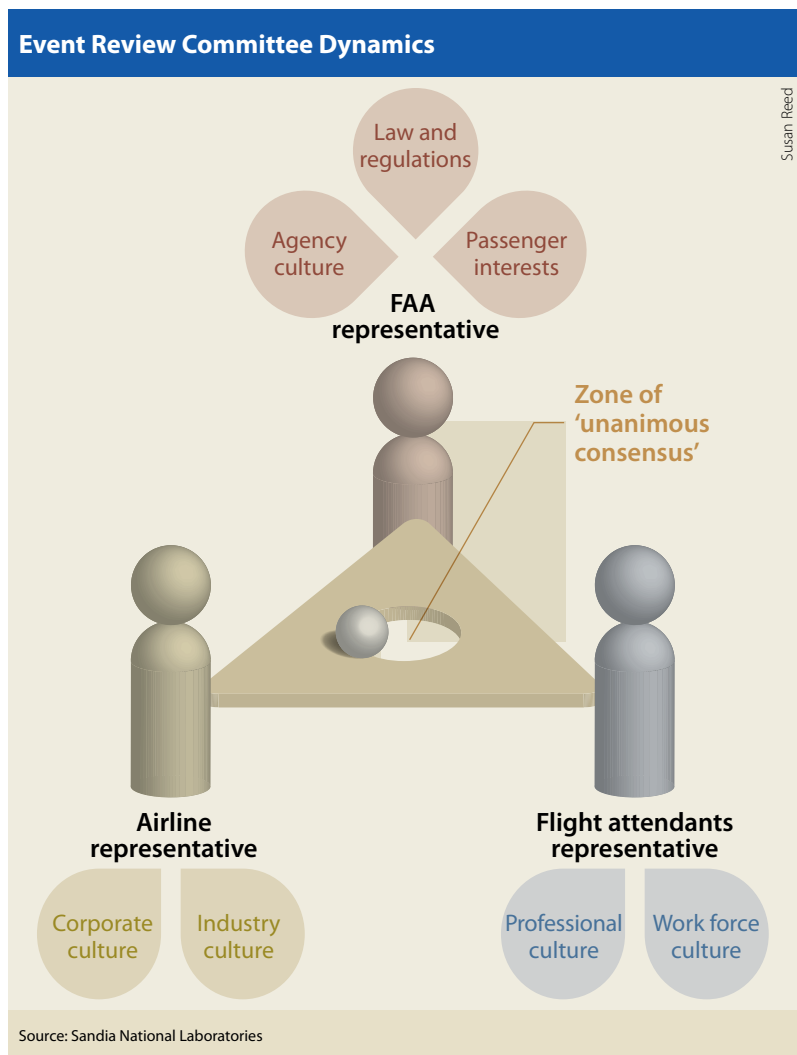


Figure 2

(NASA) Aviation Safety Reporting System (ASRS). This practice typically protects submitters, if an ASAP report proves unacceptable, and reports become beneficial industrywide. Historically, the apparently slight risk of FAA enforcement action against flight attendants may explain the reluctance of some to submit voluntary safety reports. Unlike pilots' risk of airman certificate revocation or suspension, for example, "flight attendants don't have that big question of a violation hanging over their heads all the time," she said.

Flight attendants' feedback to AFA about current ASAPs has been positive. "One of the things they are most excited about is addressing concerns in the cabin," Kolander said. "They want FAA to be given a little 'heads up' about

concerns that they have not necessarily been able to solve at the air carrier level."

Airline Experiences

Valerie Walker and Jack O'Brien, representatives of the United Airlines Onboard Service Safety Action Program implemented in March 2005, said that ASAP for flight attendants enables airlines "to gain objective feedback relating to the effectiveness of training, policies and processes." They said that they found that a critical element of success is for the senior leader of the division to "stand up before his/her leadership team and deliver a message supporting the program."³

Through the ASAP event review committee, the United Airlines Safety Division receives reports from flight attendants, investigates them, provides a weekly update on reports to review, maintains a log of action items, closes out ASAP reports, manages the safety database and interfaces with managers of ASAPs for pilots, dispatchers and maintenance technicians.

At Alaska Airlines, the FAA's template was followed "fairly closely" before the memorandum of understanding was accepted by the FAA in September 2006. Minor changes are expected as this ASAP evolves from a demonstration program to a continuing program in 2008, said Cassandra Bennett-Chaffee, manager, in-flight policy, safety and regulatory compliance.⁴

Reviewing 200 reports from some of the company's 2,700 flight attendants the first year was not difficult, she said, contrary to her expectation. "Right off in the first month, we had four potential violations of the Federal Aviation Regulations [FARs], and I worried that I would spend all my waking hours on this program," Bennett-Chaffee said. "It has become far more manageable because of established patterns. We are looking for trends, we would like to validate whether corrective actions are indeed working."

ASAP protections for submitters encourage event review committee members to be proactive. "To find out about safety-related events, including those that may have required an

ASAP Report Insights

Aviation safety action programs (ASAPs) for flight attendants identified the following issues in 2005–2007. The excerpts from flight attendant reports, selected from the Aviation Safety Reporting System (ASRS) Online Database, reflect a few of these issues but may or may not have originated as ASAP reports:

- **Inadequate procedures, or non-adherence to procedures, were noted when gate agents closed aircraft boarding doors.** One report said, “Once the [Boeing 737-300 overhead] bins filled up, I called to let the [gate] agent know the bins were full. ... When the agent approached the door to the aircraft, I told her not to close the door as we had bags to check. Her response to me was, ‘I don’t want to open the [checked-baggage compartment] at this point; find some space in the middle seats where there is no one sitting.’ ... I again told her not to close the door; she chose to ignore my request and closed the door and pulled the Jetway. We had no choice but to violate U.S. Federal Aviation Regulations, and overload the closet on our aircraft as they were not bringing the Jetway back.”¹
- **Doors were left armed and inadvertent slide deployments occurred or were narrowly averted.** One report said, “When I went to disarm door 2L on this flight, I stood up, faced the door, and instead of immediately disarming, I bent down to check for airstairs being brought up to the door. ... In making my visual sweep of the outside, I stood up and grabbed the wrong handle.”²
- **Improper passenger selection or noncompliance with passenger briefings affected exit row seating.** One report said, “On this [Airbus A320] flight, I was flight attendant no. 2 and my responsibility was to brief the [passengers in] exit rows. Out of my 12 passengers in my exit row there was one gentleman that I was not able to communicate with at all. ... [A cabin supervisor] said that they don’t have to speak English. I told him that I knew that, but I picked up a safety card and showed him where it states that ‘they must be able to understand crewmembers’ verbal instructions.’”³
- **Flight attendants failed to remain at the duty station and fasten their safety belt and shoulder harness during taxi.** One report said, “While [the Boeing 737-800] taxied to the runway, I was literally thrown, right arm first, into the base of the no. 2 jump seat. ... We were taxiing fast and making quick turns as we headed to the runway. ... We should be warned of a quick taxi so flight attendants can take precautions, such as taking a seat and strapping in!”⁴
- **The cabin crew violated the minimum crew requirements during boarding and deplaning.** One report said, “We were three flight attendants and two pilots. ... I immediately mentioned to another flight attendant that I thought we were supposed to have four flight attendants now that we were on Aircraft Y. She kind of shrugged it off. So I went to the purser and asked her. Her explanation was that because we still only had 113 passengers on board there was no problem. ... I got out my flight attendant manual and saw that minimum crew on Aircraft Y was four.”⁵
- **The cabin crew did not follow approved procedures for stowage of in-flight trash.** One report said, “On the front of the [main waste receptacle] door, it states that ‘waste container must be installed.’ ... At 10 minutes prior to departure ... nothing had arrived. I spoke with [the on-board service supervisor] again, who told me to ‘stack things on the floor, and before landing, put the garbage in the bathroom.’ ... I was told that there is nothing else to do.”⁶
- **Galley security — checking/using restraint devices for inserts and carts — required emphasis in training scenarios.** One report said, “[The seat belt sign was on at the time for turbulence and] I had just walked to monitor at the 2R door. ... Very suddenly, the [Boeing 777-300] started to shake violently. ... I saw and heard glass breaking and flying out of the business class galley into the area I was in. Inserts, carts, food, everything that was in the galley was thrown all over the floor and aisle. Shards of broken glass were everywhere. ... The first class galley had broken glass, food, carts, everything in it was on the floor and broken. The passenger in 3D got up to look. He said, ‘This looks like something out of a movie.’ ... No passengers were hurt that I observed.”⁷

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Notes

1. NASA ASRS report no. 697849. March 2006.
2. NASA ASRS report no. 987886. April 2006.
3. NASA ASRS report no. 683532. November 2005.
4. NASA ASRS report no. 700747. June 2006.
5. NASA ASRS report no. 714723. August 2006.
6. NASA ASRS report no. 683549. November 2005.
7. NASA ASRS report no. 705022. July 2006.

employee disciplinary measure in the past, we contact individual flight attendants and encourage them to report,” she said.

The ASAP supplements mandatory cabin safety reports, which flight attendants cannot monitor. In comparison, products of committee meetings twice a month include the quarterly ASAP report to FAA and a monthly ASAP bulletin securely distributed on line to all flight attendants at the airline. “Verbatim deidentified ASAP reports in the monthly bulletin are high value ... the lessons learned have been amazing,” Bennett-Chaffee said. “Some flight attendants say that a policy or procedure was not clear to them until they read somebody else’s report and then they say, ‘I realized why I need to follow the procedure in the manual.’”

Beyond words, ASAP-related actions by the airline have high visibility. “We see flight attendant manual changes and sometimes daily changes in procedures,” she said. Since the ASAP was established, the company’s cabin supervisors also have been reporting improved adherence to written procedures.

Latricia Foulger, director, InFlight, SkyWest Airlines, said that under an FAA-funded collaborative project between the airline and the Universal Technical Resource Services Aviation Consulting Group, flight attendants explain the cause and outcome of the event in their ASAP report. “Sometimes, contact by our event review committee will be for the sole purpose of counseling the flight attendant in proper procedures,” Foulger said. “ASAP reports are selected for publication based on the severity or frequency

of the safety concern. No names are divulged. The committee produces *ASAP Circulars* that are issued to each flight attendant through a bimonthly newsletter as well as posted on a company intranet giving details of the event and the committee’s conclusion and recommended preventive measures.”

American Airlines representatives Shannon Stewart and Penney Pollard told cabin safety professionals that “earning and keeping trust should be a primary goal of the [ASAP] program.” Numerous safety reports generated by an ASAP for flight attendants help validate that “employees trust the process,” they said.⁵

ASRS Magnifies Impact

In 2007, reports received from 68 ASAPs at 32 U.S. airlines surpassed the total ASRS reports received directly from air traffic controllers, dispatchers, flight attendants, maintenance technicians and pilots, said Linda Connell, program director of ASRS at the NASA Ames Research Center (Figure 3). “We are the largest repository of ASAP information,” Connell said. As of December 2007, three airlines with six ASAPs for flight attendants were submitting their reports to ASRS. Data for total intake of reports “absolutely show increasing interest” from flight attendants in voluntary safety reporting (Figure 4), she said.

Connell considers ASRS and ASAPs as complementary, neither a sufficient replacement for the other. A past disadvantage of ASAPs was separation of programs by employee group so that events and concerns became “stove-piped” (segregated) within and among airlines instead of being aggregated, she said. FAA and NASA are addressing this, realizing that some aviation safety specialists prefer ASAP reports because they involve internal investigations, corrective actions and permanent access to a record, protected from public disclosure by federal law, with only the submitter’s name deleted. Underscoring this point, the FAA said, “The value of ASAP for safety enhancement lies in its capacity to retain specific information on individual events,

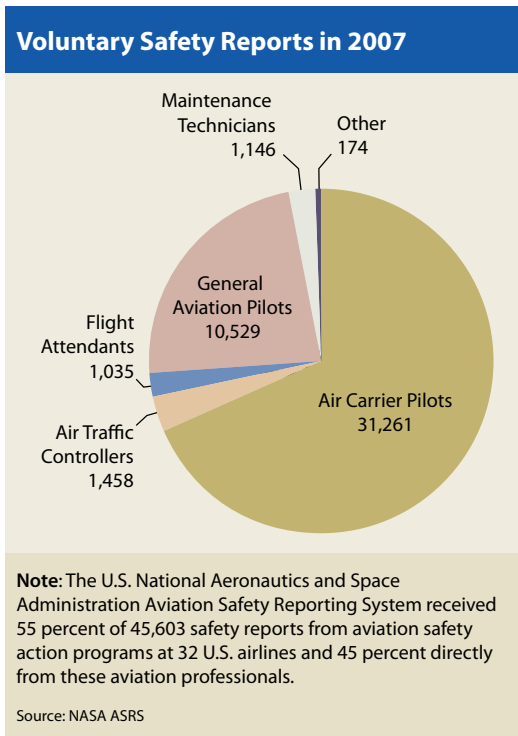


Figure 3

including, for example, specific information on aircraft make, model and series.”⁶

SMS-Ready

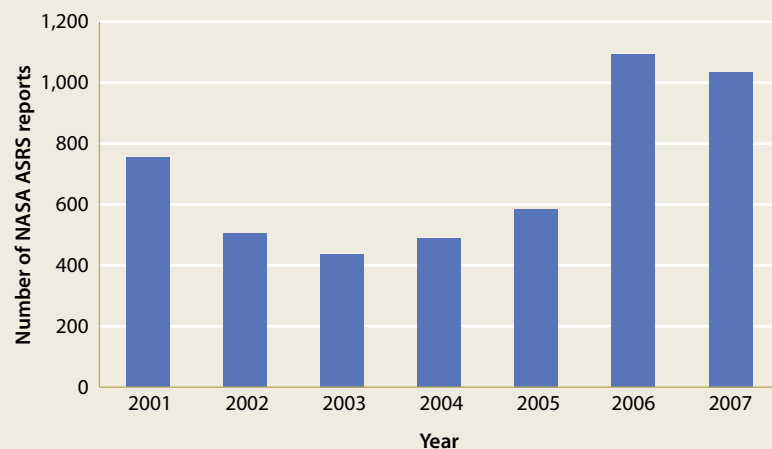
Under the FAA’s Voluntary Aviation Safety Information-Sharing Process, work has been under way since 2004 to develop a “technical process to extract deidentified data from any participating airline flight operations quality assurance [program] or [ASAP], aggregate it through a distributed database and make it accessible to appropriate industry stakeholders for analysis.”⁷ FAA therefore encourages ASAPs to develop data acquisition, event categorization and risk analysis methods that gradually will enable voluntary national sharing of ASAP information from multiple programs, a common taxonomy (classification scheme) tailored to the types of events, and classification of corrective actions for flight attendants and other specific employee groups. In May 2008, the Voluntary Aviation Safety Programs Conference in San Diego will include presentations on how ASAP, ASRS and related programs can be integrated into an airline’s safety management system (SMS) and how voluntary safety information can be shared by airlines and the FAA. ●

For an enhanced version of this story, go to <www.flightsafety.org/asw/feb08/cabin-asap.html>.

Notes

1. As of December 2007, the FAA had accepted 10 memorandums of understanding authorizing ASAPs for flight attendants at Alaska Airlines, Eos Airlines, Horizon Air, PACE Airlines, Pinnacle Airlines, Skyway Airlines, SkyWest Airlines, Swift Air Group, United Airlines and USA3000 Airlines.
2. Ganter, John H.; Dean, Craig D.; Cloer, Bryon K. *Fast Pragmatic Safety Decisions: Analysis of an Event Review Team of the Aviation Safety Action Partnership*. Sandia National Laboratories. Report no. SAND2000-1134. May 2000. Researchers said, “Potential corrective action can be visualized as a steel ball on [a tilt table]. In order for this potential action to be implemented, the ball must pass through a hole at the center: the zone of unanimous consensus. The representatives must cooperate in achieving a reasonably balanced table.”

Flight Attendant Voluntary Safety Reports Increase



NASA = U.S. National Aeronautics and Space Administration; ASRS = Aviation Safety Reporting System

Note: Since 2002, NASA ASRS has received reports from aviation safety action programs (ASAPs) for airline pilots, dispatchers and maintenance technicians in addition to the ASRS reports submitted directly by these employee groups and by air traffic controllers, general aviation pilots and other sources. New ASAPs for flight attendants at 10 airlines, including three that began sending reports to ASRS in 2006-2007, will help the industry and government to monitor cabin safety issues.

Source: NASA ASRS

Figure 4

3. Walker, Valerie; O’Brien, Jack. “Safety Action Program in a Flight Attendant Environment.” In proceedings of the 23rd annual International Aircraft Cabin Safety Symposium. Oklahoma City, Oklahoma, U.S.: Southern California Safety Institute, 2006.
4. Bennett-Chaffee, Cassandra. “Value of the Cabin Crew Aviation Safety Action Program (ASAP) at Alaska Airlines.” Paper and presentation to the Air Transport Association of America. October 2007.
5. Stewart, Shannon; Pollard, Penney. “Cabin ASAP: The International and Non-Labor Perspective.” In proceedings of the 23rd annual International Aircraft Cabin Safety Symposium.
6. FAA. Order 8000.82, *Designation of Aviation Safety Action Program (ASAP) Information As Protected From Public Disclosure Under 14 CFR Part 193*. Sept. 3, 2003.
7. Chidester, Thomas R. *Voluntary Aviation Safety Information-Sharing Process: Preliminary Audit of Distributed FOQA and ASAP Archives Against Industry Statement of Requirements*. FAA Office of Aerospace Medicine. Report DOT/FAA/AM-07/7. April 2007.