

General Instructions for Completion of 1.x Safety Attribute Inspections

The following general instructions provide explanations and guidance for each section of the Version 1.x Safety Attribute Inspection (SAI) data collection tools. SAIs are accomplished by a team of trained and qualified FAA Operations, Airworthiness, Cabin Safety, and/or Dispatch Aviation Safety Inspectors (ASI) assigned to an Air Transportation Oversight System (ATOS) Certificate Management Team (CMT) or a Certification Project Team.

ELEMENT SUMMARY INFORMATION

Purpose of this Element (Certificate Holder responsibility):

Each element should be considered a process that is performed by a Certificate Holder. The “Purpose” statement defines the intent of that process. A Certificate Holder’s process is made up of a series of policies and procedures, which should encompass the six system safety attributes contained in each SAI.

Objective (FAA responsibility):

This defines the scope of the inspection in general terms.

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs): An SRR is a Federal Aviation Regulation that has been refined to its most specific level. SRRs are included with each SAI as a reference for the inspector. The SRRs were used during the development of the SAI data collection tools to help define the function of the element and to develop many of the procedures attribute questions. Some of these regulations pertain to certification and some pertain to surveillance.

Questions that are based upon regulatory requirements have an SRR appended to them. Therefore a “No” answer to such a question may require an enforcement investigation. On the other hand, questions that do not have an SRR appended to them are not regulatory in nature, but are based upon system safety principles. A “No” answer to this type of question, while not a violation, would be an indicator of a risk that may require additional action on the part of the CMT.

Related CFRs & FAA Policy/Guidance:

Related CFRs and FAA Policy/Guidance are included for background information that is necessary to accomplish the inspection. In addition, the inspector should review the related elements that are included in the associated EPI. The purpose of this review is to make the inspector aware of any other elements that may interface with this SAI, which might benefit from a review to ensure that any related procedures do not conflict.

At the time of publication, the guidance material was considered current. If the guidance has been updated since the data collection tool was published, the inspector should read the latest version even if it is not specifically mentioned in the SAI. Subsequent revisions to SAI data collection tools will incorporate updates to this guidance material. However, revisions will not be generated based solely on out-of-date guidance. Even if it is out of date or superseded, the listed guidance may be useful as a starting point in researching current guidance.

General Instructions for Completion of 1.x Safety Attribute Inspections

SAFETY ATTRIBUTE SECTIONS

Objective: Each section begins with a paragraph about the specific objective for that section.

Tasks:

Each attribute section of the data collection tool contains the statement, *“To meet this objective, the inspector will accomplish the following task(s):* and lists one or more tasks that will be completed during the inspection. Each task is made up of various activities. Some of the tasks that may be listed on an SAI are:

1. Review the Specific Regulatory Requirement(s), Related CFR(s) and FAA Policy/Guidance included in the Supplemental Information section of this Data Collection Tool.

A list of the SRRs, related CFRs, and FAA Policy/Guidance documents that are pertinent to the questions of the data collection tool for a given element are provided in the Supplemental Information Section of the SAI. Regulatory and FAA Policy/Guidance references will also appear at the question level.

2. Review the Certificate Holder’s Manual for policies, procedures or instructions and information related to the process to ensure that they contain who, what, when, where and how (as appropriate).

The inspector should review and gain an understanding of the Certificate Holder’s policies and procedures for the element they are inspecting in order to plan their inspection activities. This will usually involve reviewing sections of the appropriate Operations Specifications, training programs or other guidance, as well as the manuals related to the process.

3. Review the interfaces associated with the process that have been identified along with the individual questions in the Procedures Section (1) of this Data Collection Tool.

The inspector reviews the responses to questions in the Procedures Section to identify the interfaces in the process.

4. Identify the person who has overall Responsibility for the process (element).

The inspector needs to understand the Certificate Holder’s system sufficiently to know who is assigned the Responsibility for the quality of each process.

5. Identify the person who has overall authority for the process (element).

The inspector needs to understand the Certificate Holder’s system sufficiently to know who has the Authority to establish or modify each process.

6. Review the duties and responsibilities of the person(s), documented in the Manual System.

General Instructions for Completion of 1.x Safety Attribute Inspections

The inspector needs to understand the Certificate Holder's system sufficiently to know the duties and responsibilities of individuals assigned the Responsibility for, or Authority to change each process.

7. Review the appropriate organizational chart.

The inspector needs to understand the Certificate Holder's organization sufficiently to identify who has the authority and responsibility for certain processes. In any organization there is not always one individual who is in charge. Authority and Responsibility are often disbursed. A person can be an individual, a department, a committee, or a position (such as pilot in command).

Questions:

Each SAI lists a series of questions for the SAI Team to answer based on their observations during the various activities. Questions on each activity report are answered in response to what was observed on that single activity. The data collection tools are not designed to be a checklist of questions that are asked directly of the Certificate Holder's personnel. It is inappropriate to give the Certificate Holder's personnel a copy of the data collection tool and ask them to "fill it out".

Job Task Items (JTIs) - Job Task Items (JTIs) are included with questions for inspector reference only. JTIs aid the inspector in determining if a certificate holder's written policies, procedures, instructions and information are adequate. The inspector is not expected to respond to each JTI individually. The JTI's listed below each question are there to aid an inspector in answering the question. If a question appears to be non specific, for example: "Do the carriers procedures for *manual distribution* meet the requirements in 8300.10", the JTI's listed below that question identify the specific requirements for *manual distribution* contained in 8300.10.

Each SAI attribute section includes the statement ***'To meet this objective, the inspector will answer the following questions'***. The following paragraphs describe some of the typical questions in each section of the data collection tool.

Section 1 – Procedures Attribute

In order to respond to the questions in this section, the SAI Team needs to gain a thorough understanding of the Certificate Holder's policies, procedures, instructions and or information for this specific process. The purpose is to determine the method used by the Certificate Holder to accomplish the process associated with the element. The Team is asked to **determine if written procedures exist**, if the procedures contain sufficient detail, and if they are in compliance with the CFRs. A reference in this section to the manual where these procedures are located provides helpful information for future SAI and EPI inspections, and may be entered into the text box that becomes available when a "yes" response is entered into the ATOS data repository. A list of procedures for this process is included in this section. Many of these listed procedures have specific regulatory requirements for this process, although the Certificate Holder may have some latitude in implementing others. For this reason, a response of "no" to one of these questions doesn't necessarily mean that the company is in violation of a regulation or that any action is required.

General Instructions for Completion of 1.x Safety Attribute Inspections

Section 2 – Control Attribute

Controls are checks and restraints that must be built into the Certificate Holder's processes to help ensure that the desired result of the process is continually achieved. While most controls are not regulatory, they are an important safety attribute with desirable features that help to reduce risk. Each SAI lists a series of controls. Some common types of controls are flags, data system backups, authorized signatures, separation of duties, or a final review. It is important to note that Certificate Holders must be able to demonstrate their controls. Few of these controls have their basis in specific regulatory requirements. For this reason, a response of "No" to one of these questions doesn't necessarily mean that the company is in violation of a regulation or that any action is required.

Section 3 – Process Measurement Attribute

The questions in this section focus on how well the Certificate Holder knows that their process is working, what they use to measure how well the process is working, how they document that information, and how they use that information to improve their process. The purpose of this attribute is to require that a quality assurance function be developed by the air carrier to detect, identify, analyze, and document potential causes of non-conformity within their process. Each SAI lists process measures that are specific to that element. Process measures are designed to measure if the Certificate Holder's policies, procedures, and controls are achieving the desired results or the purpose for that element. In most cases, process measures are non-regulatory. For this reason, a response of "No" to one of these questions, while not a violation, would be an indication of a risk that may require additional action on the part of the CMT.

Section 4 – Interfaces Attribute

This section focuses on the interactions between the process under inspection and other processes within the Certificate Holder's organization. Each SAI data collection tool lists some of the interfaces that are specific to that element. There may be additional interfaces that the inspection team identifies which should be listed on the data collection tool. The first question asks if the Certificate Holder has recognized and addressed the interfaces identified in Section 1 Procedures Attribute. The second question asks if the Certificate Holder's manual documents the location of the interfaces that were identified in question 1. The third question is really not a question but a subsequent location for SAI Team members to identify additional interfaces.

Section 5 – Management Responsibility and Authority

This section asks a series of questions about a clearly identifiable person who is answerable (responsible) for the quality of the process or who has authority to establish and modify the process. The first two questions require that a name be entered. In any organization there is not always one individual who is in charge - authority and responsibility are often disbursed. A person can be an individual, a department, a committee, or a position (such as pilot in command). The intent is to identify the highest level person (at the appropriate level within the organization) who is responsible or has the authority for that particular element of the Certificate Holder's system. The remaining questions for this section ask if the duties and responsibilities and qualification standards are clearly documented.

Master SAI Record:

General Instructions for Completion of 1.x Safety Attribute Inspections

SAIs are team inspections, with each team responsible for a subsystem or portion of a subsystem, under the leadership of a team coordinator. This structure allows the CMT to assess the entire subsystem and obtain a “big picture” look at how the Certificate Holder operates. Inspectors may be tasked to respond only to certain elements within a system, to certain attribute sections within a data collection tool, or even to certain questions. It is necessary to only answer each SAI question once before the SAI Team Coordinator can save the Master SAI to final. When completing an individual activity for an SAI, the ASI will answer and enter responses only to those questions that can be answered directly from the activity being reported. The SAI team will coordinate their individual activities as necessary to accurately answer all the questions on the Master SAI.

SAI Activities:

SAIs involve multiple activities over multiple dates (a sufficient number of activities to answer all the questions and perform a thorough, quality inspection). They are typically performed at the Certificate Holder’s general offices, main operations base or main maintenance base. A general rule of thumb is that any time that the common data field information changes, (date, location, etc.) it is a new activity and should be recorded as a new report, even if only a single question can be answered. Since an activity is a snapshot of the operator’s system at that moment, most activities will probably be opened and closed in a single day.

SAI Common Data Fields:

Enter all the information you have available from each activity. At a minimum, every inspection activity should include Activity Start Date, Activity End Date, and Departure Point/Location. Additional guidance for each data field is found in the ATOS Automation User Guide.

Response Definitions :

Since the SAI questions are answered with either a "Yes" or "No" and for some SAI questions, a third answer option of "N/A"; it is important to understand the implications of those answers.

?? A **“Yes”** answer **means** that the specific question being asked, for the particular SAI activity being observed, complies with applicable specific regulatory requirements (SRR) and any FAA guidance appropriate to that element. Further, a “Yes” indicates that the observed procedures incorporate any system safety principles approved/accepted for the Certificate Holder’s in the applicable safety attribute.

Note: A **“Yes”** answer always indicates a positive response. Great care should be taken when determining if the response is positive. If the inspector records a positive answer using a qualifier (e.g. “Yes, but...”) this may indicate that the answer should actually be a “No.” In that case the inspector should re-evaluate his/her answer.

?? A **“No”** answer means that on the specific question being asked, for the particular SAI activity being observed, the operator either does not comply with applicable specific regulatory requirements (SRR) and FAA guidance for that element or that the Certificate Holder’s procedures do not incorporate system safety principles within the attribute.

General Instructions for Completion of 1.x Safety Attribute Inspections

A “No” answer can also mean that system safety procedures are weak in the area being evaluated and that the Certificate Holder’s approved/accepted procedures are inadequate.

Observed non-compliance with regulations should necessitate coordination with the Principal Inspector and may result in an enforcement investigation. It should be noted that an **enforcement investigation would not be required** when a “No” response identifies weaknesses in a system that has literal compliance with the regulations.

NOTE: Significant issues or items of immediate concern, as determined by the inspector, shall be verbally conveyed to the PI in a timely manner. Either an electronic message or memorandum should follow up verbal conveyance.

Drop Down Menus:

A “No” response requires the inspector to select one or more potential problem areas from a drop-down menu. The inspector must include an explanation in the “No” comments box for each area selected. If the choices available do not adequately describe your observation, select “Other” and provide an explanation in the comment block.

?? An “N/A” (**Not Applicable**) answer should only be used for those questions that do not apply to all Certificate Holders. An “N/A” answer means that a particular question does not apply to the Certificate Holder being evaluated due to such reasons as type of operation, type of aircraft, or area of operation, etc. An “N/A” answer does not mean “not observed” or that not enough time was available to answer the question. If a question applies to an operator, then an observation should be conducted to appropriately answer the question.

Comment Fields:

All comments should be written in clear, concise language, using sentence case and proper spelling. Explanations should be complete and descriptive, with as much information as necessary for other CMT members to understand the comments without requiring further information from the inspector. Comments submitted in the ATOS automated tools should include who, what, where, when, why, and how. References should be entered when appropriate.

ASIs should not enter the word “None” in any comment field. If a particular comment field does not apply, just leave it blank. Comment fields should be used to report observed facts, not inspector opinion. Comments that do not directly relate to the question being answered are inappropriate. An important function of the Data Evaluation Program Manager (DEPM) is the review of comment fields to ensure that quality data enters the ATOS database. The comments entered into the ATOS Data Repository are expected to conform to the guidance contained in the “ATOS Data Quality Guidelines” published on the ATOS website. **The DEPM shall return any records for correction that do not meet these guidelines.**

SAI Team Concept

General Instructions for Completion of 1.x Safety Attribute Inspections

An SAI team may be composed of any combination of operations, airworthiness, or cabin safety inspectors. The team coordinator should assign elements, sections, attributes, or questions to the specialty most closely related to the area being evaluated.

An SAI Team evaluates an ATOS subsystem or a portion of a subsystem. Each team member is responsible for completing certain elements within a system, or a particular attribute section, or possibly certain questions within an attribute section. After performing these inspection activities, each SAI team member is responsible for reporting his or her own responses into ATOS automation. Although communication between team members is essential, there is no need to share answers between team members for the purpose of having each team member answer every question. In fact, this is an undesirable action resulting in duplication. It is the function of the SAI Team Coordinator (TC) to ensure that inspection activities are not repetitive or redundant, and that all inspection activities are completed with all questions answered accurately on the SAI. The purpose of SAI Team concept is to allow the distribution of inspection activities among the SAI team so that the required data is collected in a timely manner and only once.

There may be instances when a SAI Team or a group of inspectors from a Team work together. This is certainly required during the initial planning for the inspection activities. Another team activity that might be appropriate is completing the Interface Attribute and comparing the information between multiple manuals. At the completion of this particular activity, the team coordinator may input all of the responses; or the responses could be divided up between the inspectors for input, but there should not be duplicate entries.