Air Carrier Training Aviation Rulemaking Committee (ACT ARC)

ACT ARC Recommendation 21-14
Best Practices to De-escalate Cabin Misconduct

I.   Submission

The recommendations below were submitted by the De-escalation Training Enhancement Workgroup (DTE WG) for consideration by the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) Steering Committee at its November 17, 2021, meeting. The ACT ARC Steering Committee adopted the recommendations, and they are submitted to the Federal Aviation Administration (FAA) as ACT ARC Recommendations 21-12, 21-13, and 21-14.

II.   Statement of the Issue

Title 14 of the Code of Federal Regulations (14 CFR), Part 121 requires each certificate holder to have approved initial and recurrent training programs that ensure each crewmember is adequately trained to perform his or her assigned duties.

III.   Background

To support certificate holders' compliance with 14 CFR Part 121 regulations, the Federal Aviation Administration (FAA) has published guidance on developing, implementing, reinforcing, and assessing training for flight attendants. Detailed lists and summaries of most of the applicable regulations and available guidance for flight attendant training are provided by the FAA Flight Standards Information Management System (FSIMS). Detailed information for training relevant to managing onboard misconduct is provided by the FAA Safety Assurance System (SAS) Part 121 Flight Attendant Passenger Handling Element Design Data Collection Tool ED 5.2.4 121A OP Passenger Handling, and the FAA Element Performance Inspection Data Collection Tool 4.2.4, Training of Flight Attendants, Element Summary Information. This latter tool specifically collects the following training center inspector check data that are related directly or indirectly to a flight attendant's handling of abnormal passenger behavior:

> 1.1.15. … emergency training which includes instruction on the handling of illness, injury, or other abnormal situations involving passengers or crewmembers to include familiarization with the emergency medical kit, in accordance with the Certificate Holder's design. *Sources: 121.135(b)(15); 121.417(a); 121.417(b)(3)(iv)*
>
> 1.1.16. … instruction on the handling of hijacking and other unusual situations, in accordance with the Certificate Holder's design. *Sources: 121.135(b)(15); 121.417(a); 121.417(b)(3)(v)*
>
> 1.1.18. … initial ground general subject training of passenger handling in accordance with the Certificate Holder's design. *Sources: 121.415(a)(2); 121.421(a)(1)(ii)*
>
> 1.1.19 … initial ground general subject training approved crew resource management initial training, in accordance with the Certificate Holder's design. *Sources: 121.404; 121.415(a)(2); 121.421(a)(1)(iii)*

2.14. … instruction in passenger handling policies and regulations relating to flight attendant activities, in accordance with the Certificate Holder's design. *Sources: FAA Order 8900.1 Chap 23, Vol 3, Sec 3, Para 3-1769B3*

2.26. … joint pilot and flight attendant CRM and evacuation training in accordance with the Certificate Holder's design. *Sources: FAA Order 8900.1 Vol 3, Chap 23, Sec 4, Para 3-1792B1*

2.47. … training on passenger abuse of flight attendant in accordance with the Certificate Holder's design. *Sources: FAA Order 8900.1, Chap 23, Vol 3, Sec 4, Para 3-1798B8*

2.48. … training on passengers who appear to be under the influence of intoxicating substances, in accordance with the Certificate Holder's design. *Sources: FAA Order 8900.1, Chap 23, Vol 3, Sec 4, Para 3-1798B8*

2.49. … training on passengers who may jeopardize aircraft or passenger safety in accordance with the Certificate Holder's design. *Sources: FAA Order 8900.1, Chap 23, Vol 3, Sec 4, Para 3-1798B8*

2.58. … aircraft ground training that includes instruction on the crewmember general passenger handling responsibilities, in accordance with the Certificate Holder's design. *Sources: FAA Order 8900.1, Vol 3, Chap 23, Sec 5, Para 3-1828C*

2.60. … aircraft ground training that includes instruction on the crewmember passenger handling responsibilities for smoking and no smoking requirements, in accordance with the Certificate Holder's design. *Sources: FAA Order 8900.1, Vol 3, Chap 23, Sec 5, Para 3-1828C*

2.62. … procedures to handle passenger disturbances involving alcoholic beverages, passenger noncompliance with FAR's, and situations that may result in interference with crewmembers, in accordance with the certificate holder's design. *Sources: FAA Order 8900.1, Chap. 23, Vol 3, Sec 6, Para 3-3546*

2.69. … training in regulatory smoking prohibitions, signage and passenger briefings, and procedures to follow when passengers do not comply with smoking regulations, in accordance with the certificate holder's design. *Sources: FAA Order 8900.1, Chap 23, Vol 3, Sec 6, Para 3-1851D1*

Taken together, the above documents, in combination with various regulations, policies, and guidance materials developed by the FAA; Departments of Transportation (DOT), Justice (DOJ), and Homeland Security (DHS); and Transportation Security Administration (TSA) identify many of the passenger behaviors that have the potential to adversely affect aviation safety and security. While certificate holders must train crewmembers to recognize, evaluate, and manage these behaviors, the existing guidance is inconsistent and fails to identify many current, specific types of passenger misconduct. In most cases the available guidance lacks recommendations for training employees to de-escalate, effectively manage, and appropriately report incidents. While many certificate holders develop these detailed training elements on their own, a proactive collaboration between regulators and industry would improve the consistency in reporting and effectiveness of the procedures, lead to widespread adoption of best practices, and ultimately enhance aviation safety and security.

For these reasons, the DTE WG was formed to recommend the development of and/or updates and improvements to de-escalation training guidance. Specifically, the Steering Committee tasked the DTE WG to study and address the specific topic of de-escalation techniques and the current methodologies used to deliver de-escalation training to flight attendants, as noted in the Workgroup Terms of Reference.

Although the FAA notes the need for procedures to manage unruly or disruptive behavior in the aircraft cabin, current industry and FAA guidance does not address many recent abnormal or disruptive behaviors, such as onboard use of personal electronic devices to record incidents, refusal to wear masks, etc. The proposed recommendations suggest methodologies that can be used to deliver de-escalation training based on the specific training objectives and are products of the DTE WG's in-depth review of current certificate holder training methodologies.

Spielfogel and McMillen define de-escalation as a "verbal or nonverbal communication strategy that can help a person regain a sense of calm and self-control." They go on to note that two "common elements of de-escalation are (1) the attempt to reduce the use of heightened, disproportionate, or harsh responses to perceived conflict, and (2) the attempt to reduce heightened negative emotions present in the situation."

The ACT ARC agrees that airline de-escalation training should develop the ability of each employee to utilize, with appropriate competence, effective verbal/nonverbal communication strategies when confronted with situations that involve perceived conflicts or negative emotions that could jeopardize the safety or security of flight or the health or safety of other employees or the traveling public.

The ACT ARC further agrees that there is no "one size fits all" solution for de-escalation training, which must be tailored to the individual air carrier's operation. Guidance on de-escalation training should incorporate industry best practices to provide as much information as possible for an air carrier developing such training. Each air carrier meets de-escalation training requirements by incorporating those requirements in its approved programs under 14 CFR part 121, subparts N and O; 14 CFR part 121 subpart Y (Advanced Qualification Program (AQP)); 49 U.S.C. §44918 Crew training; 49 U.S.C. §44734 Training of flight attendants; or its Employee Assault Prevention and Response Plan (EAPRP), which is required by Section 551 of Public Law 115-254 (FAA Reauthorization Act of 2018).

The ACT ARC also agrees that AC 120-65, *Interference with Crewmembers in the Performance of their Duties*, contains useful terms and definitions related to de-escalating incidents. As noted in its purpose statement, this AC "provides information … which may be used to manage and reduce the instances of passenger interference with crewmembers." The current threat environment goes beyond terrorist actions to include other forms of interference in the cabin, and some terms and definitions from this AC have become relevant again. A copy of AC 120-65, published in October 1996 and canceled following the creation of the Transportation Security Administration (TSA) and a shift from managing hijackings to counter-terrorism after 9/11, is included with this report as Appendix A.

The ACT ARC further encourages incorporating elements of de-escalation training, as appropriate, into Crew Resource Management (CRM) training. As described in AC 120-51E, CRM provides one way of "optimizing the human/machine interface and accompanying interpersonal activities. These activities include team building and maintenance, information transfer, problem solving, decision-making, maintaining situational awareness, and dealing with automated systems. CRM training is comprised of three components: initial indoctrination/awareness, recurrent practice and feedback, and continual reinforcement." It should also be noted that AC 120-65, which as discussed above has been canceled, is referenced in AC 120-51E:

> l. Training for crewmembers in appropriate responses when passengers intimidate, abuse, or interfere with crewmember performance of safety duties. Training should address crew coordination and actions, which might defuse the situation.
> **See AC 120-65, Interference with Crewmembers in the Performance of their Duties, dated October 18, 1996.** Training should include specific communication topics, such as conflict resolution, with particular attention to the most serious passenger interference, attempted hijack. (*Emphasis added, excerpted from AC 120-51E, p. 2 of Appendix 3*)

IV.   Recommendations

The ACT ARC recommends the FAA consider the following actions:

> **Recommendation 21-14:** *The ACT ARC recommends the FAA work with industry to develop and encourage use of best practices on training and techniques to de-escalate incidents of misconduct in the cabin.*

The ACT ARC developed a research case based in part on academic studies that have been conducted about de-escalation strategies used across multiple industries including customer service, mental health clinicians, health care providers, and law enforcement.

The industry members of the DTE WG engaged in conversations with several airline inflight training departments to identify current training policies and practices across U.S. carriers. A second phase of the research effort involved conversing with working flight attendants to develop insights on recommended practices and training methodologies, as well as to identify practices being used in the field that are considered effective.

The industry members of the DTE WG held discussions with airline inflight training departments to identify how de-escalation techniques for flight attendants are codified, trained, evaluated, and assessed. The DTE WG identified four key training elements: 1) de-escalation training is provided; 2) an assessment of skills is conducted; 3) remediation is provided as needed; and 4) identification and tracking of at least one related operational metric is carried out. The DTE WG identified five carriers that incorporate all four of these elements in their flight attendant training programs.

Follow up conversations were then held with inflight training department managers from these five carriers to provide further insight. During the meetings, the DTE WG gained insight into current training and evaluation techniques being used, scenario development, and use of data sources. The DTE WG also solicited input and collaboration on best practices for de-escalation and handling misconduct in the cabin. These results are summarized as follows:

- All five inflight training departments that incorporate all four flight attendant training elements use scenarios during de-escalation training with either group activities or role playing. In these training scenarios, flight attendants are asked to role play or watch videos and discuss.
- Many airlines center their de-escalation training around passenger misconduct related to security and threat levels.
- Most carriers use a mnemonic or abbreviation to simplify de-escalation strategies. (e.g., CALM, LAST, LEAP, ABC)[1] While the terms vary greatly, there are common elements in each.
- Some airlines tie de-escalation training to hospitality curriculum.
- Some airlines tie de-escalation training to gaining passenger compliance with regulations and airline policies.
- Evaluation of training effectiveness and remediation strategies are inconsistent across the airlines.

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[1] CALM : Clarify, Ask, Listen, Move Forward (alternatively, Compose, Acknowledge, Listen, Make it Happen);
LAST: Listen, Apologize, Solve, Thank;
LEAP : Listen, Empathize, Apologize, Problem Solve;
ABC: Ask, Bargain, Convince

- Most of the airlines focus on de-escalation of customer conflict, not on preventing occurrences of misconduct.

The industry members of the DTE WG also held discussions with frontline flight attendants regarding their airlines' policies, training, and use of effective techniques when responding to situations that could be potentially volatile or had already escalated. The information provided revealed a very strong recognition among flight attendants that their respective airlines provide guidance for dealing with potentially volatile situations or techniques to de-escalate situations that had already escalated specifically in response to a security threat. There is an equally strong recognition of having been trained in those techniques. However, there is a possibility that training provided does not resonate or is not memorable to crewmembers and lacks relevance in context. The information obtained through discussions with flight attendants also revealed there is a lack of awareness of the contents of their operating manuals with respect to de-escalation practices and procedures.

The ACT ARC identified five sub-recommendations 21-14(a) through (e) that flow from the main recommendation 21-14 to enhance elements of de-escalation training.

> ***Sub-recommendation 21-14(a):*** *The FAA should identify in collaboration with the TSA and harmonize techniques used by flight attendants to prevent unruly behavior, conflict, or a disturbance from escalating in the cabin, as well as when or whether it is appropriate to use de-escalation techniques to contain a security threat level.*

In general, it appears that there is little recognition of the difference between prevention of potentially volatile situations and those that have already escalated. Additionally, there seems to be very little distinction between when de-escalation techniques should be used relative to security situations as defined by TSA threat levels. There is an opportunity to better understand how prevention of escalation and de-escalation fit into a continuum of passenger behaviors that range from mildly disruptive to those that pose severe security threats.

> ***Sub-recommendation 21-14(b):*** *To better solidify crewmembers' knowledge of the contents and location of applicable information, the FAA should encourage carriers to integrate the use of operational manuals in training and when manual revisions are made, implement mitigation strategies such as off-cycle training and operational briefings.*

Discussions with frontline flight attendants revealed a gap in recollection of the contents of their operational manuals relative to the questions asked around volatile passenger situations and de-escalation. One flight attendant indicated not easily being able to find the pertinent information in their operational manual.

Training departments should reference the specific location of applicable information and have flight attendants consult their operational manuals during the training process. Carriers should also be prudent when revising operational manuals as frequent updates could lead to confusion. When revisions to operational manuals are required, carriers should consider mitigation strategies to assist flight attendants' synthesis of new information such as use of operational briefings or off-cycle training activities.

> **Sub-recommendation 21-14(c):** *To ensure that training is memorable to flight attendant trainees, the FAA should encourage carriers to develop and use real-world, scenario-based training in the prevention or de-escalation of heightened situations. These scenarios could include subjects otherwise explicitly identified by the FAA such as alcohol use, and smoking, but should also include other relevant and current scenarios. For example, at the time of preparation of this report, mask usage/compliance is a hot topic that would be completely relevant and current. The FAA should encourage carriers to consider an integrated approach in which these skills are taught and evaluated throughout the training program.*

With respect to the effectiveness of training, and with acknowledgment that there is high recognition of having been trained in prevention or de-escalation of cabin misconduct incidents, conversations with frontline flight attendants suggest that de-escalation training is not memorable to flight attendants. Using real-world scenarios will keep de-escalation training relevant and therefore, more memorable. As referenced in ACT ARC Recommendation 21-13, the FAA should encourage airlines to use relevant and current data, collected through a number of streams such as SMS for use in the creation of multiple relevant training scenarios.

When examining the guidance or models provided by airlines to their flight attendants, two general types of models were observed. One type of model focuses on resolution of customer conflict and the other generally focuses on how to get a passenger to comply. While compliance situations are likely to escalate, they are not the only situations where techniques for prevention and de-escalation are indicated. Likewise, techniques for prevention and de-escalation are similar to those presented in resolution of customer service issues or customer complaints, but they are not mutually exclusive.

The FAA should encourage each carrier to implement and continuously update a variety of training techniques for the prevention and de-escalation of potentially volatile situations. These techniques apply to customer resolution, conflict management, and compliance issues. The ACT ARC suggests avoiding compartmentalizing the training of de-escalation and prevention techniques to only those subjects identified by traditional guidance such as smoking, alcohol use, and/or security scenarios. These techniques should be viewed as applicable throughout all job tasks in which a flight attendant interacts with other humans. An integrated approach should be used where these skills are taught and evaluated in any situation where they are deemed appropriate, not only when driven by regulations and guidance or for gaining compliance. Additionally, there are training implications for other customer-facing work groups such as airport agents. Finally, the ACT ARC considers as a best practice ensuring that training and evaluation of both prevention and de-escalation techniques are accomplished.

> **Sub-recommendation 21-14(d):** *The FAA should encourage carriers to identify metrics or performance indicators from training and/or line operations to monitor training and line performance relative to prevention and de--escalation of customer situations.*

All complete training programs should include a systematic means of validation and on-going evaluation of efficacy. To ensure the effectiveness of the training it is important to continuously monitor outcomes and evaluate relevancy of training curriculum and determine whether de-escalation training was used to de-escalate incidents of misconduct in the cabin.

> **Sub-recommendation 21-14(e):** *The FAA should encourage carriers to design policies and de-escalation training incorporating the elements of the De-escalation Best Practices Guide included in this report.*

The De-escalation Best Practices Guide (see Appendix B) was developed based on professional literature review and best practices of law enforcement, healthcare, and airlines. When compared to other industries where potentially volatile human interactions are present, such as law enforcement and medical/mental health services, there is an opportunity to adopt more robust practices for the use in the airline setting. In general, we do not see any significant impact on customer perceptions should airlines adopt these practices from other industries. Two examples that may be missing from the airline models are knowing when or how to engage with someone in conflict, and how to maintain a professional yet polite boundary. There is also some recognition among flight attendants with the power or authority differential when dealing with these types of situations. The models used in the healthcare setting may be particularly helpful as the authority and power differentials experienced in that field more closely resemble those of the airline cabin.

V.   References

- Spielfogel, J.E. and McMillen, J.C. *Current use of de-escalation strategies: Similarities and differences in de-escalation across professions.* Social Work in Mental Health, 2017, 15:3, 232–248. https://doi.org/10.1080/15332985.2016.1212774
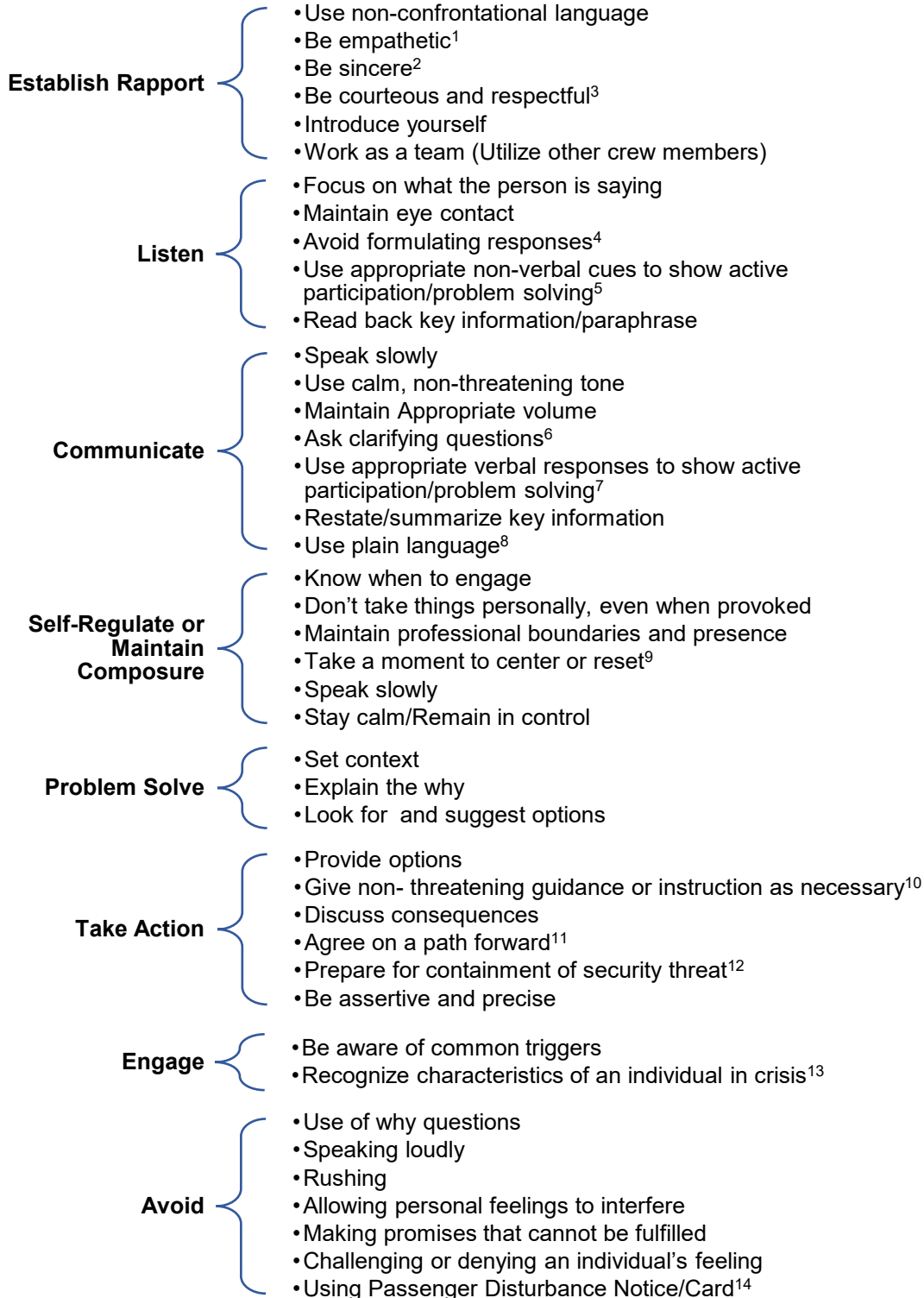
Appendix A.   AC 120-65. INTERFERENCE WITH CREWMEMBERS IN THE PERFORMANCE OF THEIR DUTIES (10/18/96, canceled after 9/11/2001)

[Cancelled AC Redacted]

Appendix B: De-escalation Best Practices Guide
Elements and Sub-elements for Preventing Escalation and Facilitating De-escalation

Superscripts refer to the detailed, numbered examples and tactical approaches listed below. Additional information is included only when deemed necessary in the context of cabin safety.

Establish Rapport
- Use non-confrontational language
- Be empathetic[1]
- Be sincere[2]
- Be courteous and respectful[3]
- Introduce yourself
- Work as a team (Utilize other crew members)

Listen
- Focus on what the person is saying
- Maintain eye contact
- Avoid formulating responses[4]
- Use appropriate non-verbal cues to show active participation/problem solving[5]
- Read back key information/paraphrase

Communicate
- Speak slowly
- Use calm, non-threatening tone
- Maintain Appropriate volume
- Ask clarifying questions[6]
- Use appropriate verbal responses to show active participation/problem solving[7]
- Restate/summarize key information
- Use plain language[8]

Self-Regulate or Maintain Composure
- Know when to engage
- Don't take things personally, even when provoked
- Maintain professional boundaries and presence
- Take a moment to center or reset[9]
- Speak slowly
- Stay calm/Remain in control

Problem Solve
- Set context
- Explain the why
- Look for and suggest options

Take Action
- Provide options
- Give non- threatening guidance or instruction as necessary[10]
- Discuss consequences
- Agree on a path forward[11]
- Prepare for containment of security threat[12]
- Be assertive and precise

Engage
- Be aware of common triggers
- Recognize characteristics of an individual in crisis[13]

Avoid
- Use of why questions
- Speaking loudly
- Rushing
- Allowing personal feelings to interfere
- Making promises that cannot be fulfilled
- Challenging or denying an individual's feeling
- Using Passenger Disturbance Notice/Card[14]

Examples and Tactical Approaches

<u>Establish Rapport</u>

1. Be empathetic

    Try to understand where someone is coming from and avoid accepting or taking on their feelings.

    Put your own feelings and thoughts aside yet express understanding.

    Don't pre-judge.

    > SAY: "I can imagine how you might be feeling" vs. "I understand how you feel."

    > SAY: "I imagine that must be frustrating" or "I understand how it could be frustrating."

2. Be Sincere:

    Let them know what's important to them is important to you.

    Be genuine in wanting to resolve the issue.

    Be honest and straight forward without pretense or deceit.

    > SAY: "I want to work with you on a solution."

    Pay attention and communicate a desire to solve the issue by using eye contact.

3. Be Courteous and Respectful:

    Make sure to use commonly used words.

    Communicate using plain English and avoid overly technical language or jargon.

    Use words of basic courtesy such as Please, Thank you, and Excuse me.

    Be sure to listen and do not interrupt.

    Focus on the situation not the person and avoid "You" statements.

Listen

4. Avoid formulating responses.

    Focus your full attention on the speaker.

    Try to understand (but not necessarily agree with) the speaker's perspective.

5. Use appropriate non-verbal cues to show active participation/problem solving:

    Use appropriate eye contact.

    Use affirmative head nod.

    Use open posture such as open arms.

    Get on the same eye level if possible.

Communicate

6. Ask Clarifying Questions:

    SAY: "Can you tell me more about…."

    SAY: "Can you help me understand why/how…."

7. Use appropriate verbal responses to show active participation and problem-solving:

    Demonstrate understanding by using affirmative phrases like, "okay, I understand what you're saying, help me understand, or how can we work together."

8. Use plain language:

    Avoid the use of technical terminology, jargon and quoting regulations.

Self-Regulate or Maintain Composure

9. Take a moment to center or reset.

    Do not engage in or respond to personal attacks.

    Do not respond to language or tone.

    Deflect language and focus on the situation.

    Step away and if possible, get someone else involved.

    Create a safe place.

<u>Take Action</u>

10. Give non-threatening guidance or instruction as necessary.

SAY: "I would appreciate it if…"

SAY: "Can you help me out by…"

SAY: "In the interest of safety, may I ask that…"

11. Agree on a path forward (for resolution or possible containment).

Try to give the individual a sense of being able to make a choice.

If possible, ask vs. tell what the next step is/will be.

12. Prepare for containment of security threat:

It may be necessary to explain the next step.

Mentally prepare to restrain the individual per Level 2 security protocol if de-escalation techniques are ineffective.

<u>Engage</u>

13. Recognize an Individual in Crisis:

Look for obvious body language like crying, screaming, pacing, tense posture, frequent shifting of seating position, foot or finger tapping, removing corrective glasses or wearing sunglasses, closed posture (leaning back, arms folded across chest, or legs crossed high up).

Speech behavior may include: fast and loud speech, short durations with brief pauses, increase in speed or volume of speech when the interviewer tries to talk.

Facial Expressions may include: frowning, tensed lips, chin and head thrust forward, wide eyes, not smiling, little or no eye contact.

<u>Avoid</u>

14. Use of Passenger Disturbance Notice/Card:

Avoid issuance of a passenger disturbance form or notice of illegal behavior until all options for resolution have been exhausted.

Issuance of this type of notice often escalates a situation.