“Ask the IS-BAO Auditor”

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Services by AeronomX

• Audits
• Consulting
• Aircraft Sales & Acquisitions
• Education
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Agenda

• IS-BAO Quick Overview
• Common Misunderstandings
• IBAC’s Top 10 List
• Common Faults
• Q&A Following

(Caveat: specific auditor interpretations may vary)
## IS-BAO Standards Sections

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Common Misunderstandings

• Not just for flying internationally
• Compliance is voluntary
• Don’t overthink a standard
• It is scalable to size and complexity of the operator
• No need to reformat your manual
• Your company HQ may have OSHA, EPA, ERP processes
Common Misunderstanding

• GM (formerly AMC) may not be the best for your operation
• Protocol (checklist) paraphrases the Standards
• On the protocol write down a manual reference cite (“Book, Chapter, Verse”)
• Try to write down almost all procedures
• Doing IS-BAO recommendations are nice, but not required
IBAC Top 10 List of Operator Faults

10) RVSM monitoring not being accomplished.
9) CAMP (or similar) is *not* a maintenance control system.
8) Not realizing that parts of OSHA applies to all operators.
7) Late registration extension requests or insufficient reasons to grant extension.
6) Not scheduling subsequent audits in a timely manner.
IBAC Top 10 List of Operator Faults

5) Not realizing they have oversight responsibilities for some standards they do not accomplish themselves.
4) Not providing the auditor with a completed protocol prior to the audit.
3) Not conforming to essential SMS items after initial registration.
2) Not assigning accountabilities for all actions required to ensure conformance with standards.
1) Conformance statements in company manuals do not contain adequate processes or procedures.
3: Mostly focused on SMS

• The 4 Pillars
  – Safety Policy
  – Risk Management
  – Safety Assurance
  – Safety Communications
3: Mostly focused on SMS

SMS Stages

1: “Documented, Approved, Resourced, & Being Implemented”

2: “Functioning, & Results Being Measured”

3: “Sustained & Supported by Ongoing Improvement Process”
Common SMS Faults

- Not doing what you said you would do
- Safety policy in word, but not deed
- Don’t need to have an online reporting process
- Must have HITS (3.2.2), but you choose what additional SMS tools to use (SRP, FRAT)
- Non-reprisal policy language (3.2.1.a)
Common SMS Faults

• If you have a Safety Committee, describe its membership and function
• Get participation throughout your organization
• Actually train all employees on your SMS
• Document Safety Communications process (3.2.4.b)
• Have a process to keep manuals up-to-date (within Form 8.1, but not in Standard)
SMS Documentation Faults

• Hazard (Safety) Reports (3.2.2)
  – Analysis
  – Recommendation implementation
  – Tracking for effectiveness

• If allowed, Manual Exceptions (or Deviations) require risk analysis (10.3)
SMS Documentation Faults

• Safety meeting minutes
• Safety performance measures (use KPI)
• Change management risk analysis
• SMS training recorded
• Must demonstrate (i.e. prove) compliance monitoring (use a checklist)
4: Organization & Personnel

• Designate a PIC (4.2.2)
• PIC responsibilities (4.2.3)
  – Crew illness (a & b)
  – Communicable disease (o)
  – Unlawful interference (p)
  – PIREPS (new for 2013) (r)
5: Training, Proficiency, & Records

• Training curriculum reference (5.1.2)
• Pilots train annually in each type aircraft (5.1.3.a.i)
• Check rides are not training, they are proof of proficiency/competency
• Mechanics get aircraft training (5.1.6), but the recurrent cycle is not designated (every 2 yrs recommended per 5.1.6.e)
• If training not documented = it didn’t happen
• Digital records are OK
• CSR vs. cabin crew member training requirement
6: SOP & Flight Operations

• 2-Pilot crews, SOP for each type of aircraft (6.1)
• SOP seems to mean different things to people, GM 6.1 is a good guide
• Confusion with IFR alternate destination requirements and weather minimums (6.2.3, 6.2.4)
• Refueling with passengers onboard need 2-way comm with fueler (6.2.9.c)
• Passenger safety briefing cards not accurate with location of safety equipment (6.11.5)
• Aircraft checklist effective or revision dates (6.12.1)
6: SOP & Flight Operations

• Fatigue management system (6.13)
  – Missing guidelines & training
  – Flight and duty time limit required
    • Limit is up to you
  – Often missing limits for maintenance personnel
  – Missing evaluation process of effectiveness
  – Deviations require risk analysis & be recorded
7: International Operations

• Responsible for disembarking passengers (7.2.2)
8: Aircraft Equipment

• Aircraft can be equipped as per your local CAA
• iPads for charts are OK (if CAA approved), as backup too
• Onboard documents (8.3.1)
  - Checklists: training vendor, dates, current to AFM
  - Aircraft registration expiration date
  - Expired insurance certificates
  - Radio station license
  - LOA: contact person, training requirements
  - OEM noise certificate
8: Aircraft Equipment

• Helicopters over water
  - takeoff or landing requires life jackets
  - 25NM offshore requires flotation
• 406 MHz ELT for international
• FDR differences
• MEL, if available
9: Maintenance

• Inadequate description of the maintenance control system (9.1.1)
• Tool control program (9.1.4.L)
• Inadequate description of defect recording and rectification (9.1.6)
• RVSM height monitoring (6.6.1.d)
10: The Ops Manual Itself

• Revision process
• Keep up with the annual IS-BAO Standards changes
• Manual exception (if you allow) requires risk analysis
11: Emergency Response Plan

• Plan should include how to return to normal operations (3.2.1.d)
• Must address non-flight situations (11.3)
• Notification of next-of-kin (11.4.d)
  • Collect next-of-kin contact information
  • Who is going to make notification
• Training (11.5)
• Practice drill now required (11.5)
12: Environmental

- These are procedures for "environmental" laws/requirements, not FAA or operational issues
- Fuel & de-icing environmental issues
  - Your own fuel
  - Fuel from vendor at home base
- Disposal of toxic materials
- EU-ETS
13: Occupational Health & Safety

• Workplace safety program
• Fall protection, ladders, platforms
• GSE maintenance, training, safety checks
• Chemicals – MSDS, PPE
• Flammables
• Unmarked containers
• Lockout/tag out with machines
• Hearing program & protection
• Bloodborne pathogens training for lav servicing
• Signage entering the work area
14: Dangerous Goods

• Training every 2 years
• Training records
• Passenger notification
15: Security

• Must have process to assess threats & vulnerabilities
• “Appropriate” Training
• “Appropriate” Testing of your program
IS-BAO Preparation

- Encourage you to take IS-BAO course or NBAA Ops Manual Workshop
- Start with protocol and do Gap Analysis
- Develop or embellish the areas identified in Gap Analysis
- Call IBAC or auditor with any questions
  - Auditor can help but cannot audit their own work product
- Using protocol, complete another Gap Analysis
- Consider using auditor to assist in Gap Analysis
Audit Missteps

• Have protocol completed with cites
• Recommend a gap analysis review
• Have personnel available during onsite visit
• Know your own manual
• Know your online SMS tools
• The “perfect” audit is rare
Questions?
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