



*PURSuing EXCELLENCE*



## **Achieving Continuous Improvement**

I've been working with hundreds of corporate and air taxi operators adopt, implement and manage their SMS since 2006. For many small to medium sized operators struggling to comply with the requirements of SMS, collecting the right data and generating reports and other documentation, plus establishing an ongoing training program and performing regular internal audits, can be a time-consuming distraction that defeats the purpose of the program in the first place.

To simplify the process, I developed tools to ensure the SMS provides benefit, while keeping your program in conformity to industry best standards. After spending years providing ISBAO and IASE audits, it became clear that many operators needed support between audits. So, I built three programs to fill that void and to give operators options to fit their specific needs:

1. S.A.F.E. Program
  2. CMP Program
  3. Internal Evaluation Program (IEP) Audit Program
- The S.A.F.E. program provides basic administration, documentation and continuous safety training, while ensuring standard conformity and advocacy. Your FRAT/FOQA data input, is documented to validate your safety efforts, while giving you the peace of mind that comes with some professional oversight.
  - The Collaborative Management Program is a partnership, where you benefit from having an experienced SMS manager completely running your program. This option is robust and is described below in greater detail to give you a better idea of how broad the program is.
  - The Independent Aviation Safety Evaluation program is designed to provide you with an onsite confirmation of conformity audit and SMS program tune-up once a year.

For most operators, the CMP program is the equivalent of having a full-time safety officer on your staff who ensures the training, documentation, report writing and internal audits are being completed and recorded, while ensuring hazards are identified and mitigated. The CMP includes the following support services:

1. Annual Confirmation of Conformity Audit (IASE)
2. Manages all administrative roles (Documentation, reports, training, etc.)
3. Available 24/7 SMS support
4. Provides monthly safety training bulletins
5. Provides quarterly internal audit protocols-checklist
6. Monitors and analyzes FOQA and SPI data for trends
7. Reviews and monitors FRAT-FOQA-AAR form
8. Provides third-party point of contact
9. Annual Safety Performance Assessment (SPA)
10. Crew Resource Management recurrent training

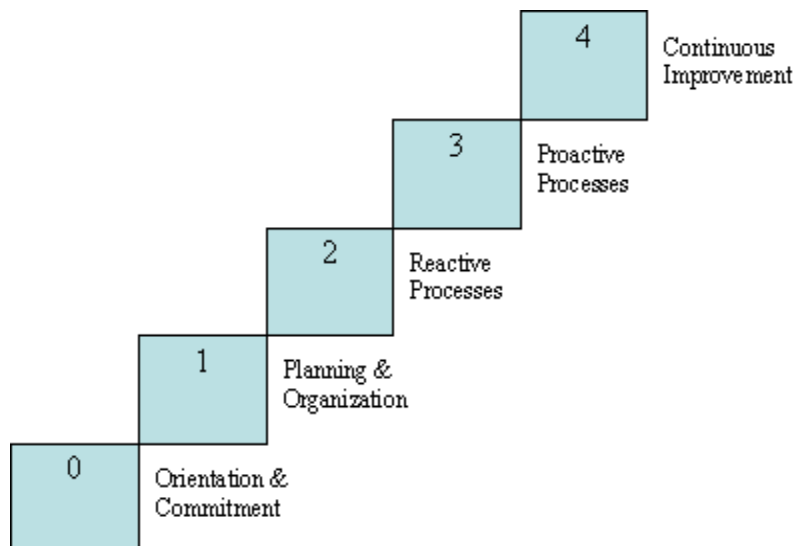


The reporting process is as simple as it can be, you simply text, email or call us when you need to convey a reportable event, (we provide the list). We then take appropriate action that could include: investigation, mitigation, corrective action, training and documentation.

The purpose of the CMP is to provide you professional level oversight, while freeing up your staff to focus on their primary roles and responsibilities. The process starts with SMS initial training that ensures all employees fully understand what they are looking for and what constitutes a safety hazard. When they see a problem, they report it and we then perform the time-consuming managerial tasks such as report writing, data collection, trend analysis, corrective actions and safety training. Over time, the process becomes seamless and highly effective, demonstrating continuous improvement, improved morale, higher hazard awareness and greater job satisfaction.

We provide a FRAT/FOQA form that you can use that gives us the data needed to fully utilize all the SMS tools available. Or, you may prefer to use your existing flight planning forms, simply copy or take a picture and hit send. It's that simple.

- Another important component of the SMS is having a continuous training program, which is why we provide safety officer bulletins each week. Those SOB's cover a wide subject matter including, OSHA regulations, FAA safety material, SMS updates, ICAO requirements, accident causation, CRM and a long list of other related topics that ensures your team's safety awareness remains high throughout the year.
- As part of the CMP, we also provide a one-day CRM recurrent training program that may be the most important training you get all year long. That can be conducted on-site or virtually.





## **DOCUMENTATION WE GENERATE**

The CMP depends on accurate and timely submissions of information from crew members, technicians and cabin crew, simply text, email or call us and we will review your submission and take appropriate actions including:

1. Corrective action reports
2. Root-Cause Analysis reports
3. Incident/accident investigation reports
4. Near Miss and SOP deviation reports
5. FOQA and Trend Analysis reports
6. SPI/KPI reports

SMS4Aviation evaluates, analyzes, and generates appropriate reports, which is available to you at any time. Operators receive findings and recommendations along with instructions for implementation when appropriate and then follow-up for verification of corrective action. The process is circular and continuous, ensuring your SMS is providing benefit and value.

## **QUARTERLY SAFETY COMMITTEE MEETINGS**

The following items should be discussed at your quarterly safety meeting and SMS4Aviation is always available to participate on request:

1. CAR review
2. Trend reports
3. Review of incidents/accidents
4. Review lessons learned
5. Training program
6. Change management

## **UNSCHEDULED EVENTS**

When an unusual event, incident, or accident occurs, it is important to notify SMS4Aviation immediately so we can assist you with the investigation, remediation, and documentation.

Examples are:

- FAA enforcement action, deviations from FAR's
- Deviations from company SOP's, flight crew performance issues
- Near miss events and filing of ASRS reports

All reports are confidential and at no time will be released without your express written permission. The goal of this process is to provide third-party support during an event with possible serious regulatory consequences.



## **INTERNAL/EXTENAL AUDITS**

Most operators pursue a third-party (external) audit every 12 to 36-months to verify conformity to the industry best practices and standards. While there is no regulatory requirement to do so, many operators are advised to do so from their insurance carriers, who in the past have maintained premiums or provided the cost of an audit.

Regardless, you should perform quarterly “Internal-Audits” which are performed by your personnel, typically your acting safety officer. We will provide you with protocols and checklist and guide you through the process that typically takes 30-minutes to complete. SMS4Aviation will also provide your safety officer with auditor training as well. Each quarter a different part of the organization is reviewed. Once the checklist is complete, the form is submitted for analysis and review. Any “findings” will receive mitigation instructions along with instructions for implementation.

## **SAFETY PERFORMANCE ASSESSMENT (SPA)**

As part of the CMP, we provide a SPA, formerly called a management review annually, which reviews the entire program, audits, training, and other aspects of your operation and submits a report with findings and recommendations as appropriate for your operation. This is in addition to your onsite or virtual audit and usually is completed at the 12-month mark.

## **SMS SUPPORT**

As a Collaborative SMS client, you have unlimited SMS support via phone, email, and video conferencing. Our goal is to assist you build a robust program that provides ongoing benefit throughout the life of your program. Anything that is related to safety, morale, performance and conformity should be submitted to our team for review.

## **Independent Aviation Safety Evaluation Standard (IASE)**

SMS4Aviation shall periodically measure the effectiveness of the Company Safety Program in compliance with industry best practices and standards. The IEP protocols were developed using ISBAO, Wyvern, FSF and OHSAS 18001 standards, and represents the most detailed tool available.

SMS4Aviation will perform the Independent Aviation Safety Evaluation, (virtually or onsite) and any findings or corrective actions required will be provided to your Safety Officer and department manager for implementation. The assessment shall be scheduled so that at least one manager is present for the entire procedure, while all personnel can be interviewed virtually as needed.

The physical inspection will take place with the assistance of the flight department representative. The assessment will include facility conditions, work practices, documentation, and personnel interviews. Any hazardous situations or equipment shall be either placarded or removed from service until the hazardous situation is corrected.



The written report will be completed as soon as practicable following the assessment. A copy of the assessment report will be forwarded to the flight department's management. SMS4Aviation will provide follow-up monitoring of deficiency corrections.

### **Feedback Loop**

Quality control takes place by use of a feedback loop. Feedback is a dynamic process whereby output of a system is passed (fed back) to the input to continually achieve the desired results. Often, this is done intentionally to control the behavior of the system. The use of feedback to continually monitor the divergence between objectives and outcomes while implementing changes to reduce the variance is also known as a closed-loop. An IEP should be designed to achieve quality control through closed-loop feedback.

- (1) An effective IEP provides quality-related information to the affected employee group and associated management team members. In addition, information derived from IEP should also be fed back into the operating departments from which the data was obtained. Effective corrective actions that were driven by root-cause analysis of findings may have applicability in other areas of the operation.
- (2) Quality-related information is similar to safety-related information typically provided to employee groups via a variety of channels. Feedback may include the sharing of best practices, typical system/process weaknesses, common management errors, etc.
- (3) Such information may be disseminated via less formal channels, such as employee "Read and Sign" files, bulletins, newsletters, or Web sites, or it may be incorporated in structural changes.

### **Continual Process**

To effectively anticipate problem areas and correct them before actual findings occur, an IEP should be a continual, ongoing process. An internal evaluation should be more than spot-check inspections of operating practices. Stand-alone, spot-check inspections do little more than identify symptoms of potential problems. A continual process is needed to verify whether findings are isolated instances or actual symptoms of systemic policy, process, or procedural problems.

The evaluation should also include ongoing data collection and analysis to identify opportunities for preventative action to preclude adverse events before they occur. Having a well-structured program ensures that all areas of operations are assessed at appropriate intervals. It also institutionalizes the process so that a change in personnel does not adversely affect the program. A continuous process is equally important, however, to identify problems that may otherwise be missed by periodic audits. Where appropriate, a continuing process of data collection and analysis can enhance the efficiency of the evaluation by reducing the need for complete system audits, enabling a data-driven determination of when audits are needed, or providing the information needed to validate the effectiveness of corrective action previously initiated.



## **Corrective Action Plan**

It is the responsibility of the flight department's Safety Officer and Chief Pilot or Director to analyze and implement corrective-action plans provided by SMS4Aviation to address the root cause of the deficiency, correct existing deficiencies, and prevent recurrence of the deficiencies in the future. The company's management team is responsible for corrective action validation, verification, and follow-up reviews associated with the internal quality audit process. SMS4Aviation will guide and support that process.

**(3) Approve the Corrective Action Plan.** Prior to implementation, our team and your Safety Committee will review the corrective action plan for concurrence and approval.

**(4) Implement the Corrective Action.** The Department's management will implement the process changes as defined in the corrective action plan.

**(5) Validate the Corrective Action.** Upon completion of corrective action implementation, the department's management will verify that the process changes were effective in correcting the existing deficiency and preventing recurrence.

- If the validation process indicates that the corrective action was not effective, your onsite SMS manager will initiate additional corrective action and notify the department's management of the new corrective action implementation plan. Revalidation of new corrective action will be built into the implementation plan to ensure long-term consistency.

**Close the Audit Findings.** After indication of completion, the company's management will verify that the process changes were effective in correcting the existing deficiency and preventing recurrence. If the verification process indicates that the corrective action was not effective, the company's management will request additional corrective action and revalidation.

**File Report.** Audit reports, including corrective action and closure data, should be maintained on file for a minimum of two years, and be accessible for reference by future auditors.

Senior management involvement in the CMP is crucial to program success. Your Company's program will include periodic senior management review of audit results and findings. We always provide suggestions and recommendations based on our experience and objective evidence, but also realize there are multiple ways to achieve the same outcome and remain flexible regarding corrective action.

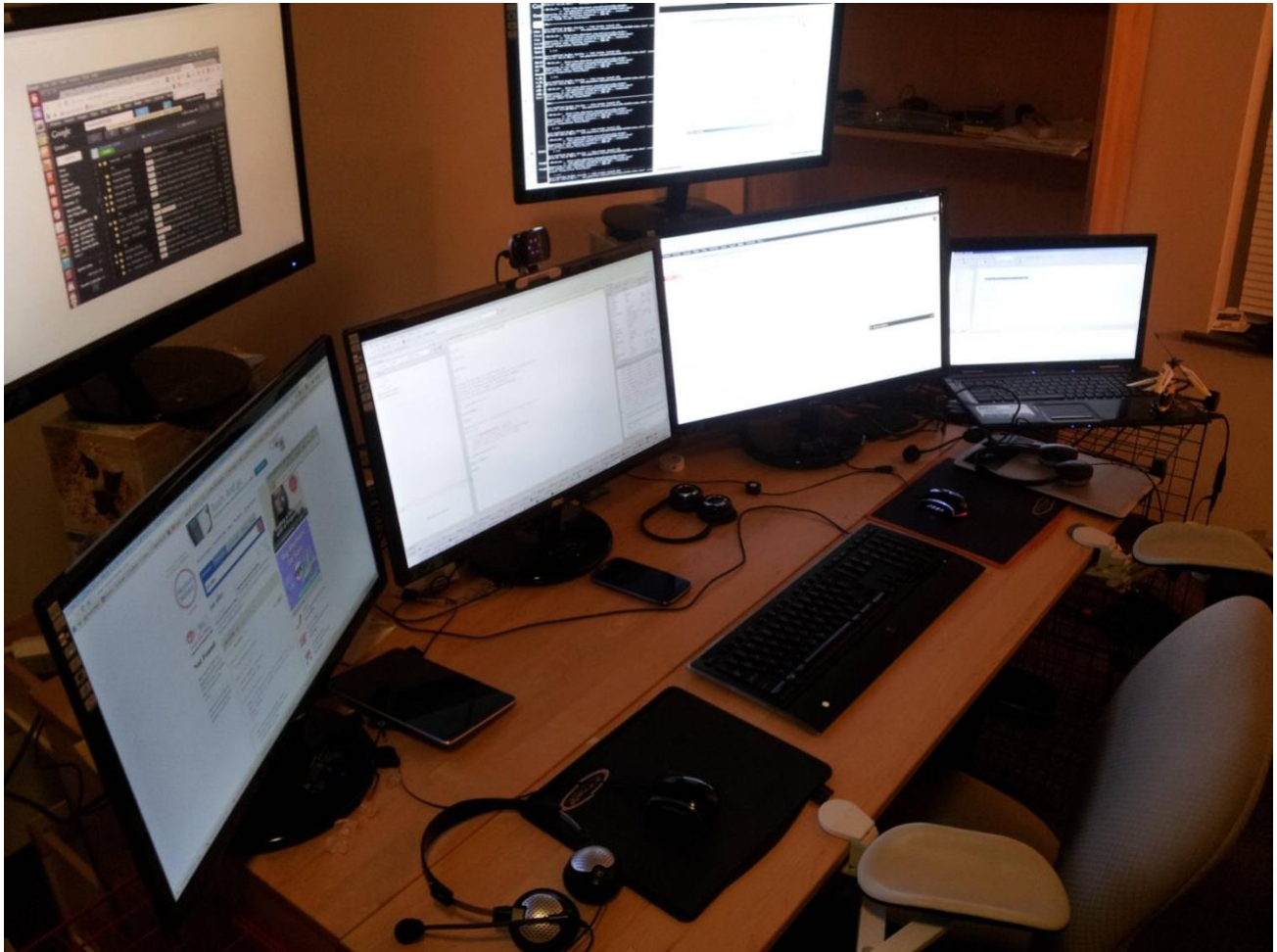
For the purposes of this program, senior management includes the flight department's Chief Pilot or Director of Operations, Director of Maintenance, Safety Officer or an equivalent position that has the authority for action to resolve issues.

The purpose is to review current performance and opportunities for improvement in an open discussion format to foster idea generation. An agenda should be prepared and distributed to participants at least one week prior to the meeting. As a minimum, the agenda should include:

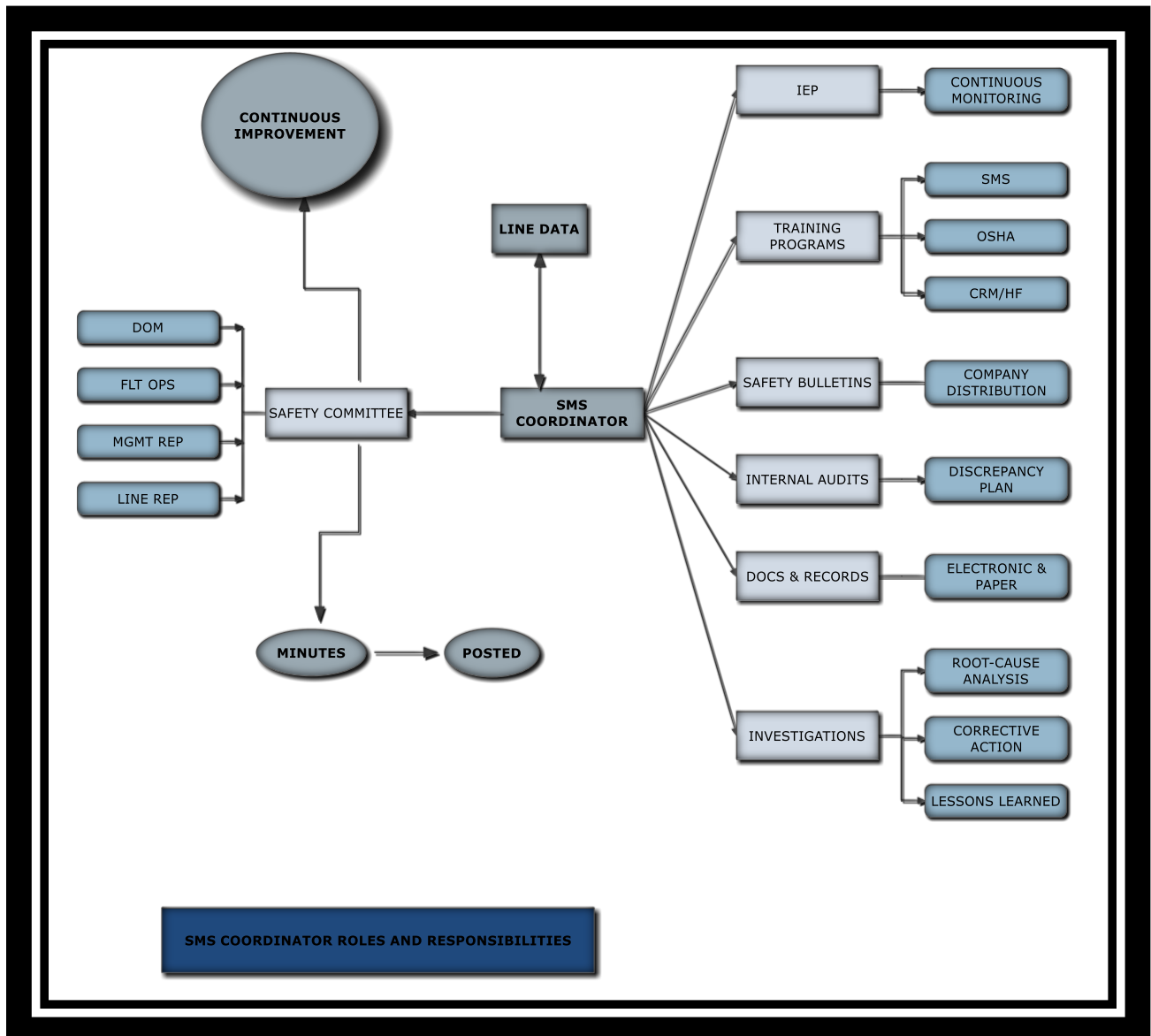




- Follow-up actions from previous management reviews
- A report on significant or systemic deficiencies, with associated status reports
- Strategic or operational changes that could affect the IEP.
- Establishment of new or revised objectives.
- Recommendations for improvement and required resources.







The CMP acts like a full-time safety officer and performs dozens of roles and relies on participation from your on-site SMS Manager or Safety Officer. That individual is our primary point-of-contact and can expect to spend 8 hours per month completing the following tasks:

1. Ensure pilots are submitting Post-Flight Form
2. Completes quarterly internal audit forms we provide
3. Ensures Corrective Action Plans we provide are implemented
4. Provides point-of-contact for our team



## PROGRAM COST

PROGRAM	COST*
S.A.F.E. Program	\$3,900
Collaborative Management Program	\$6,900
IEP Audit Program	\$6,900
Stand-alone CRM Recurrent Program	\$1,900

**\*Travel/accommodations are not included in the above prices.**

- We can provide all services onsite or virtually, depending on your covid restrictions and preferences. Our team is fully vaccinated.*

*Don't hesitate to call me anytime you have questions about SMS, no obligation and no pressure, and I'll do my best to steer you straight.*

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