

DCA21FA174

OPERATIONAL FACTORS/HUMAN PERFORMANCE

Attachment 19

Rhoades Aviation, Inc. Safety and Internal Evaluation Manual [Excerpts]

May 4, 2022

Rhodes Aviation, Inc., dba



Safety and Internal Evaluation Manual

Document SIEM

Manual Producer:
Director of Safety

FAA Air Carrier JRAA169N
100 Iolana Place
Honolulu, Hawaii 96819

1.0 RAI Manuals**1.1 Manual Ownership and Responsibility**

The Director of Safety (DS) has primary responsibility for the development and content of the RAI Safety and Internal Evaluation Manual. The Director of Safety will coordinate with the Manager of Technical Publications to ensure the Safety and Internal Evaluation Manual is administered in accordance with the RAI Administrative Manual and will assist in identifying interfaces with other manuals in the RAI manual system.

1.2 Manual Functionality

The Safety Management System (SMS), provided in this manual was designed to contain all four required safety pillars; Policy, Safety Risk Management, Safety Assurance, and Safety Promotion. At the same time, it allows ease of scalability to the size and scope of the company's operations.

1.3 Manual Maintenance, Distribution, and Revision

All employees involved in the safety process are empowered to influence the effectiveness of the safety process by submitting recommendations for the revision to the content of this manual. The RAI Administrative Manual (ADM) contains the duties and responsibilities, instructions, procedures and forms applicable to the management of this manual. Compliance with the procedures detailed in Chapter 6 of the ADM will ensure all employees involved in the safety process are able to utilize the most current information available in performing their duties with respect to the safety process.

1.4 Technical Publications Department

1. The RAI Technical Publications Department maintains a master copy of this manual at the principal base of operations. Copies of this manual are furnished to the Director of Safety, other appropriate management personnel, other staff who require the information in this manual to carry out their responsibilities, and representatives of the Administrator assigned to RAI.
2. This manual shall not be contrary to applicable Title 14 Code of Federal Regulations and, in RAI's case as a supplemental operation, any applicable foreign regulation, or RAI's operations specifications or air carrier certificate. Compliance with our Operations Specifications and this manual is mandatory. Operations Specifications or excerpts from the Ops Specs will be clearly marked as such
3. Each person to whom a copy of this manual is furnished shall keep it up-to-date with the changes and additions furnished to that person, and shall have appropriate parts of this manual accessible when performing relevant duties.

1.4.1.2 Location

Rhoades Aviation, Inc.
100 Iolana Place
Honolulu, HI 96819

1.5 Safety Policy Statement of Commitment

The executive management of Rhoades Aviation Inc. (RAI) which includes the Accountable Executive, and all levels of upper management recognize that a well-organized, thought out and effective S.M.S. (Safety Management System) is the key to the company's continued success, excellent safety record and assurance of a future place in the aviation industry of today.

To enable RAI to achieve and maintain the highest level of safety, the company's executive management is totally committed to implement and maintain a functioning and effective S.M.S

The objective being to be able to continuously identify hazards and manage the associated risks. With the main objective being to eliminate or at least severely reduce the identified risks, to a point that is as low as reasonably practicable.

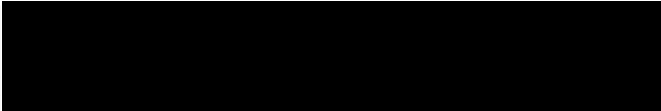
Our goal is for the continuous improvement to the level of safety throughout all aspects of RAI's operations.

- With RAI's executive management and safety committee's guidance and direction there will be specific safety objectives issued.
To keep the RAI workforce informed and current, these safety objectives (including results) will be periodically published and distributed. Company notice boards, emails or simple printed handouts are all acceptable means for the dissemination of our safety informative updates.
- To ensure safety objectives are being met, and that safety guidelines & procedures are being observed, these items will be monitored, measured, and tracked (recorded).
- All members of management and all Rhoades employees are responsible and accountable to produce the highest level of safety performance.
 - 1) Hazard identification, and risk assessment.
 - 2) Assuring the effectiveness of Safety Risk Control
 - 3) Promoting Safety Risk Controls
 - 4) Reporting to the Accountable Executive on the performance of our SMS.
- RAI's executive management has established a total commitment to provide the necessary financial, personnel, and all other associated aspects required in establishing and maintaining a fully functional S.M.S.
- RAI's executive management is dedicated in providing, without fear of reprisal, a confidential employee reporting system, which will enable any person within the organization to report hazards, incidents, accidents, or any issue they may consider to be safety oriented. It is the responsibility of all employees to report any of the above items in a timely manner.
- RAI's policy covering disciplinary action regarding unacceptable behavior and intentional disregard of FAA regulations, company policies and procedures, (including, illegal activities, drugs or alcohol), gross negligence, and repeated violations of workplace safety, will continue to be strictly enforced, and will be included with reviews for on going improvements, as part of RAI's – SMS.

RAI takes these violations of safety very seriously. As such, disciplinary actions would

include the steps of verbal warnings and written notices of reprimand, with the ultimate final notice of suspension or dismissal being issued to the offender.

- The policies and procedures of RAI's Emergency Response Plan have been established. The plan uses available current regulatory and guidance material. It will continue to be maintained and continuously reviewed to ensure currency, plan objectives, feasibility, and the practicality of procedures, along with reporting and record keeping issues to ensure that all are observed accordingly.



Mr. Teimour Riahi – CEO.
The Accountable Executive

11-7-17

2.0 Safety Management System 14 CFR Part 5.95

2.1 General

RAI's airline Safety Management System is designed around a culture of senior management leadership dedicated to promoting the growth of a positive safety culture. The Director of Safety promotes and communicates safety information to the employees to maintain the highest degree of safety possible in providing air cargo transportation while maintaining a safe and healthy workplace for our employees. In pursuit of this goal, an aggressive safety strategy has been incorporated into all company operations which are based upon sound policy, safety risk management, safety assurance, and safety promotion.

2.1.1 Policies

1. All subject matter identified in the RAI manual section, sub-section, and sub-sub-section headers has been developed to deal with the general policies required by regulation for the processes described herein.

2.1.2 Safety Management System

The main processes defined herein are designed with key procedures with embedded controls designed to ensure procedural completion. The interfaces between the processes and procedures are clearly identified to ensure compatibility with other departments and processes. The responsibility for the process and authority to revise the process as necessary are clearly identified. Finally, the process outcomes are measured to provide feedback and a means for safety assurance. This manual will contain all processes, procedures and controls for compliance with 14 CFR Part 5.

2.1.3 Distribution

1. RAI's manuals are distributed in accordance with the RAI Administrative Manual, ADM 6.6.

2.1.3.2 FAA

1. A copy of the SIEM will be delivered to RAI's CMO, the Honolulu Certificate Management Office.

2.1.3.3 RAI Manual Location

1. Copies of the SIEM shall be located and maintained in each of the following RAI locations:
 - a. RAI Principal Base of Operations Master Manual Set
 - b. All Process Owners (119 Management Personnel)
 - c. Flight following Library
 - d. The Director of Safety's Office
 - e. Other Management Personnel as required by DS or Accountable Executive

2.1.3.4 RAI Individual Distribution

1. The Technical Publications Manager (TPM) maintains the distribution list for the Safety Procedures Manual. See ADM 6.6 for distribution procedures.

2.1.4 Manual Holder Responsibility to Maintain Manual

1. Each RAI employee who is issued the SIEM has the responsibility to maintain the manual in accordance with ADM 6.6.4 which lists the procedures for keeping the manual up-to-date with RAI changes and additions. Each RAI employee shall have

access to the manual or appropriate parts of it accessible when performing their assigned duties.

2. All revisions must be inserted when received, and logged on the revision page of this manual in accordance with the procedures defined in ADM 6.6.

2.1.5 Reference to Regulatory Requirements

1. In accordance with regulatory requirements, RAI has inserted into their manuals, where applicable, references to the appropriate Title 14 Code of Federal Regulations or Operations Specifications as required.

2.2 Duties and Responsibilities 14CFR 5.23

2.2.1 Positions

1. The following RAI positions have primary duties and responsibilities for the processes covered in the SIEM:
 - a. C.E.O. (As Accountable Executive) (Refer to ADM 3.7.1 for Duties and Responsibility)
 - b. General Manager
 - c. Director of Safety
 - d. Chief Pilot
 - e. Chief Inspector
 - f. Director of Operations
 - g. Director of Maintenance

2.2.2 Duties and Responsibilities of Process Owner(s) 14 CFR 5.23

Process owners, (usually 119 Management) within their areas of responsibility are accountable for developing, implementing and maintaining the SMS process, including but not limited to:

- i) Hazard identification and safety risk assessment
- ii) Assuring the effectiveness of safety risk controls
- iii) Promoting safety as required in Part 5. Subpart 'E' namely training to ensure all individuals attain and maintain the competencies necessary to perform their duties.
- iv) Advising the accountable executive on the performances of the SMS, and any need for improvement.

It should be noted that in order for the above individuals to adequately fulfil their positions with SMS, direct access to RAI's CEO, the Accountable Executive must always be maintained and readily available.

1. The duties and responsibilities of the positions listed in 2.2.1 above are delineated in ADM Chapter 3 and meet the requirements of 14 CFR Part 5.25. If more specific duties and responsibilities are applicable to the processes covered in this manual, they will be listed in the applicable section of this manual. Refer to ADM 3.7.1(c) for additional duties and responsibilities for the Director of Safety as required by 14 CFR 5.25 (c)(2).

2.3 Responsibility/Authority

1. The RAI Director of Safety (DS) is a full-time position and is responsible for the content and quality and has the authority to prepare, establish, modify and maintain the RAI Safety Program processes and procedures.

2.4 Manual Approval/Acceptance

1. The SIEM is accepted by the following of the RAI CHDO:
 - a. Principal Operations Inspector (POI)
 - b. Principal Maintenance Inspector (PMI)
 - c. Principal Avionics Inspector (PAI)

2.5 Interfaces**2.5.1 Manual Interfaces**

1. Policies, procedures, information and instructions for implementing the processes described and defined in the SIEM can also be found in applicable sections of the following manuals:
 - a. Aircrew Training Manual (ATM)
 - b. Maintenance Training Manual (MTM)
 - c. Safety & Internal Evaluation Manual (SIEM)
 - d. General Operations Manual (GOM)
 - e. General Maintenance Manual (GMM)
 - f. Aircraft Inspection Program (AIP)
 - g. Continuous Analysis & Surveillance Program (CASS) (Chapter 14 of GMM)
 - h. General Fueling Manual (GFM)
 - i. Rhoades Flight Crewmember Hazardous Materials Training (HAZMAT)
 - j. Administrative Manual (ADM)
 - k. Aircraft Operations Manual / Quick Reference Checklist (AOM/QRH)

2.5.2 Assessing the Impact of Changes to Interfaces

1. The procedure for assessing the impact of changes to the associated interfaces with processes covered in the SIEM is covered in (ADM 6.12)

2.6 SIEM Feedback

1. All personnel involved in the processes described in the SIEM are highly encouraged to submit feedback to the program. The preferred method is the RAI System Improvement Feedback Form (ADM-001) but any means available may also be used. Submit the feedback to your immediate supervisor or the Director of Safety. The ADM-001 is located in the forms chapter of the ADM. (ADM 8.3.1.2)

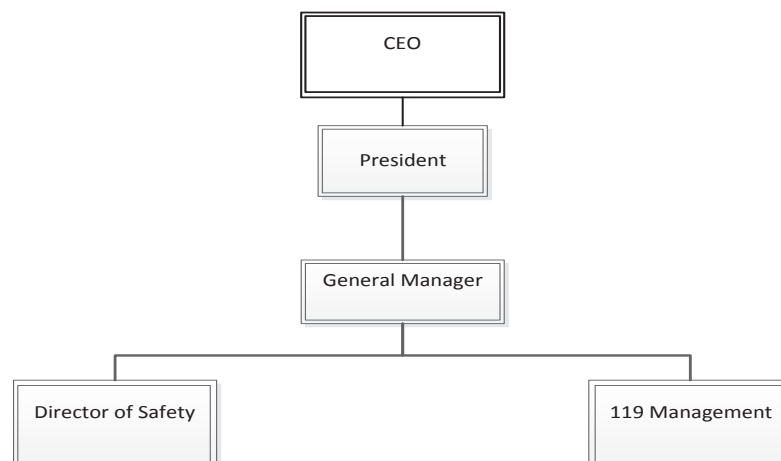
2.7 Reserved

3.0 Safety Organizational Structure

3.1 Organization

3.1.1 Executive Organization

1. The General Manager, with concurrence of the Accountable Executive of RAI will ensure that the Director of Safety position is occupied.
2. The Director of Safety reports directly to the Accountable Executive of RAI. The position of Director of Safety is a full-time position.
 - a. **Control:** The General Manager will ensure that all positions required by 14 CFR 119.65(a) are filled with individuals who are listed in operations specifications paragraph A006, and meet the requirements of 14 CFR 119.65. These shall be full time positions within the company.



3.2 Safety Management System Description

3.2.1 Purpose

1. The purpose of the RAI Safety & Internal Evaluation Manual is to provide RAI management a means to achieve and maintain the highest degree of safety
2. In recognition of this fact, RAI is committed to providing a safe and healthy working environment free of recognized hazards for its employees and a safe operating environment for its customers.

3.2.2 Program Scope

1. In pursuit of RAI's commitment to safety, an aggressive safety strategy has been incorporated into all company operations. Safety is not only a responsibility of all RAI management personnel but it is also an individual responsibility and must exist in each employee's thinking, planning, and actions. All RAI personnel, including contract employees, shall be held accountable for fulfilling their responsibilities under this safety program.
2. The organization and structure, which is described in this chapter, for the RAI Safety Program is appropriate for the scope and size of RAI operations.

3.2.2.2 Principles of System Safety

1. The foundation of the RAI safety program is built upon the principles of system safety. RAI is committed to eliminating hazards and minimizing potential risks through the diligent practice of risk analysis and risk management. Hazards and incidents resulting from RAI operations shall be identified at all levels. Conditions and acts posing

unacceptable risk shall be eliminated or mitigated to prevent aircraft accidents, personnel injury or illness and property damage or loss.

3.2.2.3 Safety Compliance

1. RAI shall ensure compliance with all regulatory safety requirements through its Internal Evaluation Program (see SIEM Chapter 4), Risk Management Program (see SIEM Chapter 5), and its comprehensive Aviation Safety Education program, (see SIEM Chapter 7). Incorporating the concepts of system safety, the RAI Safety Program is designed to maintain the highest degree of safety possible in providing air transportation to its customers and to provide its employees a safe and healthy workplace.
2. The RAI SIEM details how this will be accomplished.

3.2.2.4 RAI Safety Program 14CFR Part 5.23

1. The RAI Safety Program has been developed in accordance with applicable CFRs, specifically Part 5 and Federal Aviation Administration (FAA) guidelines and are referenced throughout the RAI manual system as required. The RAI safety program incorporates the following to improve and sustain safety:
 - a. Hazard identification and safety risk assessment
 - b. Assuring the effectiveness of safety risk controls
 - c. Safety Promotion, training and safety communication and reporting
 - d. Advising the accountable executive on the performance of the SMS and on any need for improvement.
 - e. Employee relative to the certificate holder's safety performance.
2. RAI policy is to maintain an active and aggressive aviation safety program and all employees are expected to participate in the program and take an active role in the identification, reduction and elimination of hazards. Process Owners (normally 119 management), within their areas of responsibility, have the authority to accept risk after it has been mitigated to as low as reasonably practical (ALARP).

3.2.2.5 Delegation of Authority Procedure 14CFR Part 5.27

1. Where responsibility and authority have been conferred upon a person by law, regulation, or policy, that person may delegate the authority but not the responsibility. A person with delegated authority may then sub-delegate the authority to another.
2. At RAI, ongoing authority is delegated by a letter of assignment that delineates the delegated authority, or by a letter of assignment in conjunction with a job description, where the two documents, read together, delineate the on-going authority delegated to an individual employee.
3. Ongoing authority is the authority to act on a continuing basis and must be done in writing. One-time authority may be delegated by an express written authorization or command, which will be disseminated to all company 119 management positions.
4. One-time authority is authority to act in a single instance when a temporary assignment is necessary; such as an illness.

3.2.2.6 Program Documentation

1. RAI has developed the following internal documents to serve as process measurements and controls in its Aviation Safety Program.
 - a. Aviation Safety Report (SIEM-001) (SIEM 9.4.2)

- b. Aviation Safety Report Tracking Record (SIEM-002) (SIEM 9.5.2)
- c. Safety Action Plan Record (SIEM-003) (SIEM 9.6.2)
- d. Audit Report: (SIEM-004) (SIEM 9.7.2)
- e. Audit Report Tracking Record (SIEM-005) (SIEM 9.8.2)
- f. Auditor Training Record (SIEM-006) (SIEM 9.9.2)
- g. Preliminary Accident Reporting Form (SIEM-007) (SIEM 9.10.2)
- h. Accident/Incident Information Form (SIEM-008) (SIEM 9.11.2)
- i. Incident/Unusual Occurrence Report (SIEM-009) (SIEM 9.12.3)
- j. ERP Communication/Event Log (SIEM-010) (SIEM 9.13.2)
- k. ERP Checklist [SIEM-011) (SIEM 9.14.2)
- l. Risk Report (SIEM-012) (SIEM 9.15.2)
- m. Risk Worksheet (SIEM-013) (SIEM 9.16.2)

3.2.3 Program Objectives and Elements

3.2.3.1 Program Objectives

1. In accordance with FAA guidelines and recommendations, The RAI Safety Program encompasses the principles of system safety by incorporating the following objectives and elements:
 - a. To motivate safe actions through developing and maintaining a dynamic corporate safety culture
 - b. To identify hazards to safe operations and work with other company departments
 - c. To develop and implement safety interventions
 - d. To monitor intervention strategies to validate effectiveness; and,
 - e. To communicate the results throughout all RAI departments and offices.

3.2.3.2 Data Collection Tools

1. An Internal Evaluation Program (IEP) (SIEM Chapter 4)
2. A Voluntary Disclosure Program (SIEM Chapter 6)
3. A Safety Incident/Accident Reporting System (SIEM 8.4)
4. Safety Audits And Inspections (SIEM 4.5 and SIEM 4.6)
5. Operational Risk Assessment (SIEM Chapter 5)
6. Open Reporting Systems (SIEM Chapter 5.4)
7. Routine Monitoring And Trend Analysis Programs (SIEM 5.11)
8. Review of External Evaluation Programs (SIEM 4.11.3)
9. An active Safety Committee(s) (SIEM 3.5)
10. Aviation Safety Education (SIEM Chapter 7).

3.2.3.3 Program Overview

1. To serve both as a process measure and control, the DS and the Safety Committee shall annually review current and suggested safety elements:

- a. The Safety Committee shall evaluate the effectiveness of each program as practiced and will decide by majority vote if a new procedure shall be incorporated into the RAI Safety Program.
- b. Programs may be deleted, revised, or adopted during any Safety Committee meeting.
- c. Documentation for any programs or process actions taken shall be maintained in Safety Committee minutes.
- d. If it is determined that a program or process shall be deleted or revised, an amendment to this manual will be prepared in accordance with the procedures defined in ADM Chapter 6.
- e. In addition, programs or processes may be added, deleted or revised as in the RAI Safety Program due to changes in the size and scope of RAI operations.

3.3 RAI Safety Objectives 14 CFR Part 5.21

3.3.1 Safety of Flight

1. Safety of Flight is the primary consideration in all flight operations. Every RAI employee and staff contracted by RAI must take all possible precautions to safeguard crewmembers, and equipment involved in aircraft operations. It is the responsibility of each RAI manager, crew member, employee and contractor/vendor to operate in accordance with the provisions of this manual.

3.3.2 Safety Objectives 14CFR Part 5.21

1. To accomplish the RAI safety objectives, the following guidelines have been established. The DS shall ensure that these guidelines are reviewed with all RAI employees during basic company indoctrination, and as applicable: Operations Indoctrination is in the Airplane Training Manual (ATM), Maintenance Indoctrination is in the MTM. Additionally, the guidelines shall be reviewed periodically during the RAI Safety Education program (SIEM Chapter 7). The RAI safety guidelines are:
 - a. Safety will be considered by management and employees to be an integral and vital part of the successful performance of any job. To meet this objective, RAI will actively participate in industry and government safety forums and incorporate the lessons learned into all operational policies and procedures.
 - b. Flight and maintenance procedures shall be developed so that checks and double checks will reduce the chance of individual errors.
 - c. Direct responsibility for the safety of an operation will rest with the applicable Process Owner of each operation.
 - d. Each employee is personally responsible for performing his or her duties and shall give primary concern to personal safety as well as that of his or her fellow employees, RAI property and equipment entrusted to his or her care.
 - e. Employees shall notify management for prompt corrective action to prevent situations developing into unsafe conditions. This includes situations involving individual and group work practices, work place conditions, and equipment hazards. Corrective actions will be reviewed by the Safety Committee using the risk management procedures as outlined in this manual.
 - f. Each employee is encouraged to research, develop, and recommend procedures to the DS that will improve the safety of operations while being adaptable to the services provided. The RAI Aviation Safety Report (SIEM-001) can be used for this purpose.

- g. Any deteriorating condition or procedure that may jeopardize safety or lead to the violation of any Federal Aviation Administration (FAA) regulation or company policy must be brought to the immediate attention of management personnel and the DS in accordance with the risk management procedures set forth in this manual.

3.3.3 Safety Responsibilities

1. It is the responsibility of all RAI management personnel, RAI employees, contractors and vendors to report conditions which could be detrimental to safe operations to their immediate manager and to the DS by means of the RAI Aviation Safety Report (SIEM-001) as reflected in SIEM 9.4.2, and in accordance with the instructions contained in SIEM 9.4.1. This includes but is not limited to passenger misconduct, hijacking, sabotage, fires, dangerous goods incidents, and other hazards or situations, which may be a threat to the safety of the airplane and its occupants.

3.4 Program Staffing and the Director of Safety

3.4.1 Regulatory Requirements and Guidelines

1. This section of the RAI SIEM meets the intent of the following regulatory requirements and applies the listed in 14CFR Part 5.

3.4.2 Director of Safety

1. The Director of Safety (DS) is a full time position that reports directly to the General Manager of RAI. It is the responsibility of the General Manager of RAI to assure that the position of DS is filled by a qualified person in accordance with the criteria set forth in the RAI Administrative Manual (ADM 3.6.1). The General Manager of RAI shall review the candidate's job history, training records, collegiate and government certificates and degrees, and conduct an interview with the candidate to validate knowledge of aviation matters pertaining to safety.

3.4.2.2 Director of Safety Qualifications

1. The list of authority, duties, and responsibilities for the DS are presented in ADM 3.6.1.2 which include the following qualifications:
 - a. The DS of RAI shall possess the required qualifications, be qualified through training, experience, and expertise; and discharge his duties to meet applicable legal requirements and maintain safe operations.
 - b. The DS has completed an aviation safety education program consistent with the position's responsibilities. If an individual has not completed such a program prior to appointment, the DS should attend one to supplement his/her experience. Participation in industry safety meetings, conferences or schools is considered an essential part of the continuing education of the DS. Training should include such subject areas as:
 - (i) Corporate safety culture;
 - (ii) The role of the safety director as advisor to Senior management officials;
 - (iii) Safety philosophy;
 - (iv) Safety data collection and analysis programs;
 - (v) Risk management;
 - (vi) Incident/accident prevention and investigation; and
 - (vii) Human factors.

3.4.2.3 Authority, Duties and Responsibility

1. The authority, duties and responsibilities for the DS are presented in ADM 3.6.1.2 and 3.6.1.3

3.4.2.4 Physical address of record retention

1. All SIEM manual references to document/record storage or retention by the DS or Office of the DS that are related to any material developed as part of the RAI Safety Program shall be construed to mean the office located at 100 Iolana Pl, Honolulu, HI 96819

3.4.2.5 Unavailability of the Director of Safety

1. In the absence or unavailability of the DS, the General Manager of RAI will execute the succession plan as contained in ADM 3.3.
2. The General Manager of RAI will advise the certificate holding district office (CHDO) of the designee and will ensure that the RAI Operation Specifications A006, is amended within 10 days from the date of the designation in accordance with the procedures defined in ADM 3.4.

3.4.3 RAI Safety Program Staffing**3.4.3.1 Staffing**

1. The staffing for the RAI Safety Program consists of the following:
 - a. A Director of Safety (DS), as stated in RAI Operations Specifications (see A006 Management Personnel).
 - b. A RAI Safety Committee (RAI-SC), see SIEM 3.5, and
 - c. Designated Internal Evaluation Program Auditors, SIEM Chapter 4.4.

3.4.3.2 Structure and Scope

1. The structure of the RAI Safety Program and assigned safety staff is appropriate for the scope and size of RAI operations
 - a. The program is designed to encompass both Part 91 and Part 121 operations.
 - b. The Safety Committee shall on an annual basis, review the number of personnel assigned safety program responsibilities to determine if the size and scope of the program should be increased or decreased.

3.4.3.3 Safety Committee

1. The staffing requirements for the RAI Safety Committee are presented in Section 3.4 of this chapter. The Safety Committee is comprised of RAI management and all manual owners responsible for their respective processes.

3.4.3.4 Internal Evaluation Program Auditors

1. The staffing requirements and qualifications for the RAI Internal Evaluation Program Auditors are presented in SIEM 4.4.

3.5 RAI Safety Committee**3.5.1 Purpose of Safety Committee**

1. The purpose of the RAI Safety Committee is to promote a safety culture for all RAI operations and disciplines.

3.5.2 Safety Committee Duties

1. The RAI Safety Committee shall accomplish the above purpose by:

- a. Reviewing and discussing current safety issues and concerns and making recommendations to management and operating areas;
- b. Completing RAI Aviation Safety Reports (SIEM-001) and RAI Safety Action Plan Record (SIEM-003) as described in the Forms Chapter, SIEM Chapter 9. Refer to chapter 4 of this manual for the Internal Evaluation Program (IEP).
- c. Identifying hazards and developing corrective actions;
- d. Conducting risk analysis of identified hazards;
- e. Reviewing audit findings and associated action plans;
- f. Evaluating new safety initiatives;
- g. Reviewing accident data; and
- h. Evaluating the effectiveness of the Safety Program and determining if Safety Program elements need to be added, deleted, or modified.

3.5.3 Safety Committee Organization

1. The RAI Safety Committee is comprised of the following RAI personnel:
 - a. Accountable Executive (CEO)
 - b. General Manager (GM)
 - c. Director of Safety (DS)
 - d. Director of Operations (DO)
 - e. Director of Maintenance (DOM)
 - f. Chief Inspector
 - g. Chief Pilot (CP)
 - h. Additional representatives from Operations, Cargo, and Maintenance will be appointed by the Director of Safety to the Safety Committee as warranted by future company growth in size and scope of operations.

3.5.4 Safety Committee Schedule

1. The committee will meet monthly after the conclusion of the CASS meeting. The DS will schedule and notify the members of the Safety Committee of other unscheduled meetings by e-mail or written memo.

3.5.5 Safety Committee Meeting Procedures

1. The DS shall serve as the chairperson for the Safety Committee. Another member of the Committee may serve as chair if the DS is not available. The DS shall ensure the meetings will be recorded in the meeting minutes and stored in the Director of Safety's 'Meetings File'. For Interface and Control of this process see ADM 5.4.
2. The Chair of the Safety Committee shall:
 - a. Schedule meetings;
 - b. Create agenda;
 - c. Arrange for recording of minutes;
 - d. Facilitate meetings in an appropriate manner;

- e. Ensure that all Safety Committee documentation that was reviewed is completed; and,
 - f. Distribute findings as appropriate.
3. The chairperson for the Safety Committee meeting shall prepare an agenda prior to the safety meeting to ensure that the following topics are addressed and tasks completed as applicable for each meeting:
- a. A review of previously reported safety issues to include action plan status;
 - b. When additional safety concerns are identified, the DS will initiate a RAI Aviation Safety Report (SIEM-001), and initiate appropriate follow-up action. The associated RAI Safety Action Plan Record (SIEM-003) will be assigned to and completed by a team representing the operational areas affected by the RAI Aviation Safety Report;
 - c. The chairperson shall distribute any completed reports and action plans to the Safety Committee member by e-mail prior to the meeting or hard copies during the meeting;
 - d. Recommendations to be made to management or operational areas; and,
 - e. The DS or chairperson will compile minutes of each safety meeting and distribute them to each Safety Committee member by e-mail as soon as practical after each meeting or in hard copy at each meeting. The minutes will be retained on file for a minimum of three years in the Office of the DS.
 - f. A review of the Emergency Response Plan for currency during the annual review.

3.6 RAI Safety Program Process Measurements and Controls

3.6.1 RAI Safety Program Process Measurements

1. Process measurements are incorporated into the programs and processes that make up the RAI Safety Program. Responsibilities that address process measurements include the following:
 - a. The DS is responsible for the Internal Evaluation Program (IEP) including but not limited to process measurement of all procedures contained in RAI manual system.
 - b. The DS shall notify the appropriate manager of any findings of non-compliance with published procedures, inconsistencies in procedures and/or manuals, and non-compliance with applicable CFRs by the most expeditious means (e.g., e-mail, telephone, etc.).
 - c. The appropriate manager shall review the findings of the DS and Safety Committee to determine whether or not the finding is a “one-time” condition or a systemic problem that necessitates an amendment to a published procedure, training and/or customer handling. The manager shall report the conclusion to the DS by written memo or e-mail.
 - d. The appropriate manager shall work with the DS and Safety Committee to develop and implement an interim corrective action plan in accordance with SIEM 5.8
 - e. The DS shall report any findings of non-compliance and accompanying corrective action plans resulting from audit findings, employee/management concerns and/or safety issues to the Accountable Executive of RAI by means of written memo or other acceptable means.

- f. The DS shall report any findings of unacceptability of corrective action taken resulting from any audit findings, employee or management concerns to the Accountable Executive of RAI by written memo or by other acceptable means.

3.6.2 RAI Safety Program Controls

1. In addition to the controls developed for the various RAI Safety Program processes, the following controls have been adopted to ensure that the RAI Safety Program maintains an active and aggressive policy towards maintaining safety both in flight and on the ground.
 - a. The General Manager of RAI will conduct annual qualification and performance reviews of the DS to ensure that the designated individual is continually able and qualified to perform the duties, responsibilities and authority defined in the position description provided in ADM 3.6. The review will be stored in his employee file of the DS.
 - b. The scope and size of the safety program will be reviewed at least once a year by the Safety Committee to determine if the program scope and staff is sufficient. The DS shall report the findings of this review by written memo to the General Manager of RAI for appropriate action.
 - c. The Safety Committee will review the procedure for notifying the General Manager of RAI in the event the DS position becomes vacant. It is the responsibility of management to notify the General Manager by the most expeditious means if the DS position is vacant or the DS is not meeting his or her responsibilities.
 - d. The DS shall ensure on an annual basis that all applicable interfaces between RAI manuals and the Safety Program Manual have been incorporated by means of the audit procedures defined in the Internal Evaluation Program contained in SIEM Chapter 4.

3.7 RAI Safety Program Interface Procedures

3.7.1 Procedures for Proposed Changes

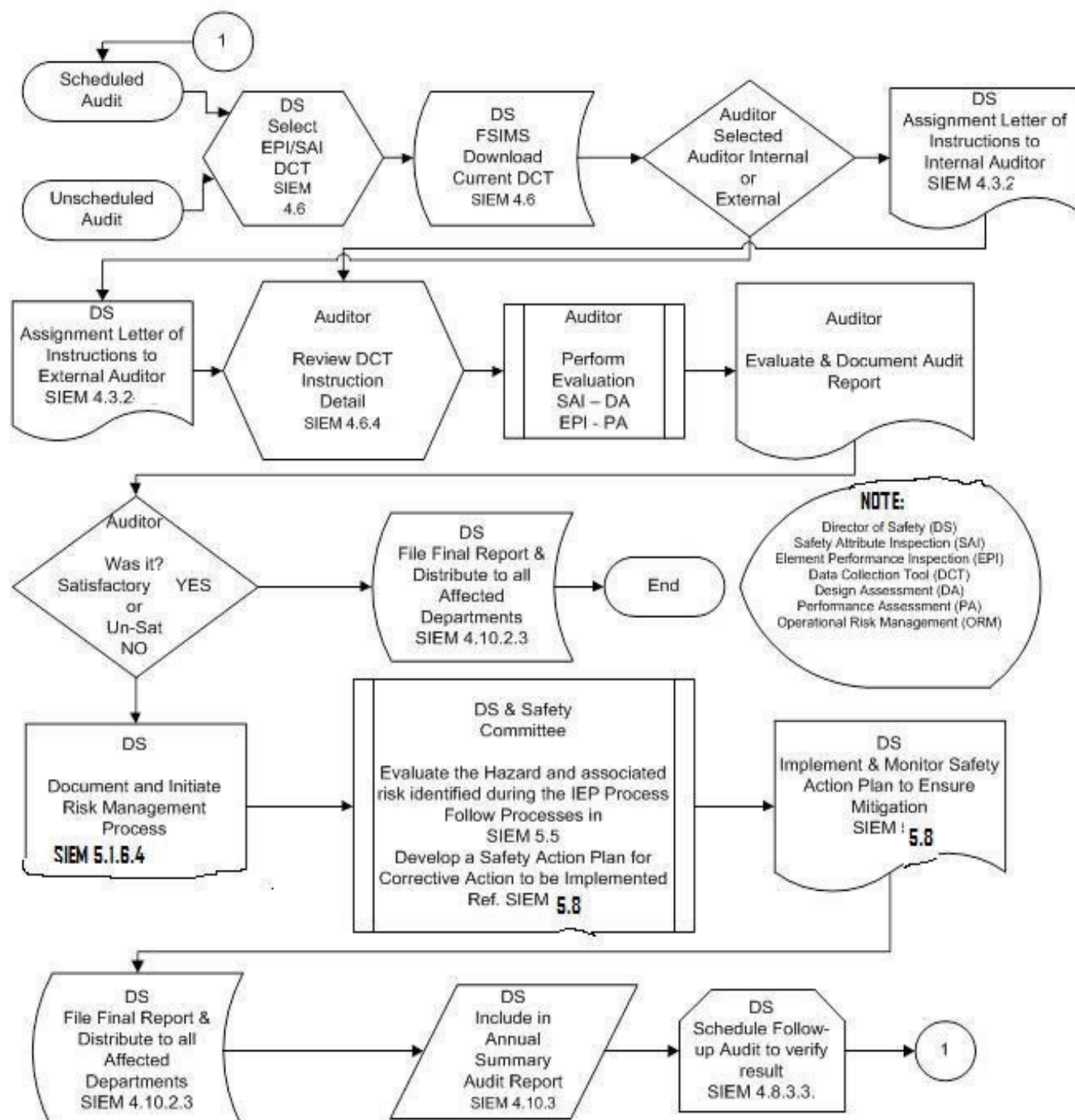
1. Any time a change is proposed to the elements contained within the RAI Safety Program, the DS shall ensure that all process owners are notified of the impending change in accordance with the procedures stipulated in ADM 6.12. Interfaces from other manuals with the SIEM will be reviewed in accordance the procedures outlined in ADM 6.12 and ADM 6.13.
2. Each process owner shall review any proposed change to his or her manual system to ensure that unintended negative consequences do not occur within the interfaces of the RAI manual system.
3. When the review of the proposed change is complete and reviewed and accepted/approved by the FAA, the proposed change and update to the manual system shall be published in accordance with the procedures stipulated in ADM 6.5.
4. The DS shall confirm that all RAI manuals are revised as required and audit yearly to confirm correct interfacing. (SIEM Chapter 4).

4.0 Internal Evaluation Program4.1 Internal Evaluation Program Description

The RAI Internal Evaluation Program (IEP) was developed using current regulatory and guidance material:

4.1.1 Program Overview

1. Overview of Internal Evaluation Program Audits, Corrective Action, and Closed Loop

4.1.1.2 Purpose of RAI IEP

1. The RAI IEP is a systematic way of conducting surveillance and analysis of the entire RAI system in order to maintain the highest degree of safety. The IEP provides the

means to identify problems of relationships, structures, and of interdependence. RAI maintains that a robust IEP can facilitate documentation of its safety management and quality assurance activities.

4.1.1.3 Responsibility and Authority

1. The DS is responsible for and has the authority to prepare, modify and maintain the RAI Internal Evaluation Program (IEP) processes and procedures.

4.1.1.4 Program Functions

1. The functions of the IEP include monitoring company procedures and operating practices to continuously maintain the highest degree of safety and to ensure compliance with all applicable Federal Aviation Regulations, and RAI's Air Carrier Certificate, Operations Specifications, and approved/accepted manuals.

4.1.1.5 Program Policy

1. The RAI IEP incorporates four basic principles that define IEP policy.
 - a. The RAI IEP uses a continual process incorporating the techniques of inspections, audits, and evaluations to assess the adequacy of managerial controls in company systems, programs, and processes.
 - b. The RAI IEP encompasses assessments that extend beyond regulatory compliance to determine the causes of deficiencies and detect needed improvements to company operating practices before deficiencies occur.
 - c. The RAI IEP is an ongoing program that identifies deficiencies, develops corrective actions to correct the deficiencies, and perform follow-up actions.
 - d. The RAI IEP is an independent function within RAI that has straight line reporting to the General Manager of RAI.

4.1.1.6 Program Scope

1. RAI has given consideration to defining the scope of the RAI IEP and includes the following areas in its IEP:
 - a. Organizational management,
 - b. Flight operations and Flight following,
 - c. Training of Pilots and Mechanics,
 - d. Station operations,
 - e. Aircraft maintenance,
 - f. Security, and
 - g. Ground handling.

4.1.1.7 Employee Participation

1. It is the responsibility of every RAI employee to participate in the RAI Internal Evaluation Program (IEP). This program will only be effective if employees participate in the process.
2. If any employee identifies an IEP process that is not working, or an IEP Auditor who is not appropriately accepting his or her responsibilities, it is the obligation of the employee, with no fear of retribution, to bring the situation to the attention of the DS by means of the RAI Aviation Safety Report (SIEM-001), e-mail, written memo or personal contact.

3. The DS shall review and assess the concern in association with the RAI Safety Committee and shall take any action appropriate to mitigate the concern including revising the audit process or removing the auditor from auditor status.

4.2 Key Terms and Definitions

1. The purpose of this section is to provide a standard list of key terms and definitions that are used in the RAI IEP. The Federal Aviation Administration (FAA) defines key terms and phrases used in an Air Carrier Internal Evaluation Program to ensure a standard interpretation and understanding of the FAA's recommendations regarding an Internal Evaluation Program
2. RAI has adopted these terms and added others that address specific activities in the RAI IEP.

4.2.1 RAI Terminology

1. The terminology used in the RAI IEP is consistent with that in other manuals that make up the RAI manual system. The following list defines terms as they are used in the context of the IEP. Words or terms listed below are specific to the RAI IEP. Refer to Ch. 5 of this manual for SMS definitions as outlined in 14 CFR Part 5.5
 - a. Action Plan: An action plan is a documented course of activities developed by a team representing an operational area, which is affected by an identified deficiency, to address audit findings or other investigative findings to correct deficiencies in RAI systems, programs, or processes.
 - b. Analysis: Analysis is the process of using the data collected through the IEP processes to provide the Safety Committee and RAI management the information needed to develop and implement corrective actions and to identify follow-up actions that must be taken.
 - c. Audit: The IEP audit is a structured and objective evaluation of a RAI operational area or contractor to determine the level of conformity with applicable standards and recommended practices as set forth by company standards as defined in the RAI manual system, FAA regulatory requirements, FAA Element Performance Inspection data collection tools, and Transportation Security Administration regulatory requirements. The RAI IEP uses the following types of audits:
 - Scheduled Audit: The scheduled audit is an evaluation that is conducted in accordance with a planned cycle that has been established by the DS and the Safety Committee at the beginning of each calendar year. The timetable for scheduled audits shall be published by memo and distributed to all affected departments once the schedule has been determined.
 - Special Audit: The special audit is an evaluation that is conducted because of concerns or priorities identified by the Safety Committee or called for by the FAA, the General Manager of RAI, the Director of Safety, Director of Operations, Chief Pilot, Director of Maintenance, Chief Inspector, RAI employees, contractors, or vendors.
 - Follow-Up Audit: The follow-up audit is an evaluation that is conducted to ensure a corrective action plan was implemented and objectives stated in the corrective action plan were met.
 - Vendor Audit: The vendor audit is an evaluation of a contractor that provides services, products or appliances to RAI. Vendor audits may consist of scheduled, special, or follow-up audits.

- d. IEP Auditor: An IEP auditor is a RAI employee or contractor who has been assigned the authority to conduct an IEP audit by the DS. The DS shall approve the person assigned as an IEP auditor and ensure that the person meets the qualification and competence standards as set forth in SIEM 4.4.
- Note: the term IEP Auditor also refers to the DS serving as an auditor.*
- e. Best Practice: A best practice is a safety standard stipulated in the RAI manual system that is more restrictive than a regulatory requirement.
- f. Concern: A concern is a conclusion reached by the DS or IEP Auditor, supported by objective evidence, gathered during the audit process which is seen as a potential problem, trend, or inefficiency that may become a finding.
- g. Condition: A condition is a “state of being.” It identifies a hazard that causes a concern, doubt, anxiety, or uncertainty that may lead to injury, illness, death, or damage to or loss of equipment or property.
- h. Corrective Action: A corrective action is the activity taken to resolve a finding, concern, or condition. There are two types of corrective action plans used by the RAI IEP:
- Comprehensive Corrective Action Plan: A Comprehensive Correction Action Plan is the design of a long-term permanent fix to an audit finding or identified high risk situation including non-conformity with a RAI standard or regulatory requirement.
 - Interim Corrective Action: An Interim Corrective Action is the action taken that provides satisfactory resolution of non-conformity with a RAI standard or regulatory requirement on a temporary basis until a comprehensive corrective action plan can be implemented.
- i. Data Collection Tools (DCT): DCTs consist of the documents available on the FAA FSIMS website for use by RAI to conduct the following:
- Performance Assessments: PA's were developed for the Air Transportation Oversight System (ATOS) by the FAA. They are used to determine if the air carrier (RAI) conforms to its system, program, and process design requirements. DCT's assess whether the air carrier follows its written procedures and controls, and meets its established performance measures for each system element. RAI uses Performance Assessments to validate that it continues to comply with its approved/accepted procedures and controls and perform to the standards described in RAI manuals.
 - Design Assessments: DA's are the design assessment documents used to determine the ability of an organization's design of its systems, programs, and processes to meet regulatory requirements and operator risk management objectives. They provide the air carrier instructions on how to meet the requirements for associated DCT's.
- j. Evaluation: Evaluation is the process by which a determination of adequacy of RAI standards, procedures, and processes based on the data and information gathered during an IEP audit is made.
- k. Evidence: Evidence is a documented statement of fact prepared by the DS or IEP Auditor that may be quantitative or qualitative and is based on observations, measurements, tests, or interviews that can be verified by the DS or IEP Auditor. Evidence is necessary to substantiate findings and is included in IEP Audit

Reports as applicable. Evidence gathered during IEP activities is referred to as “objective evidence.”

- Objective Evidence: Objective evidence is evidence that is derived from documents or manuals reviewed; equipment examined; activities observed; or interview data that substantiates conclusions identifying conditions, findings, or concerns.
- I. Finding: A finding is a condition, supported by objective evidence gathered during an IEP audit that indicates an operational area or contractor is not in conformity with a RAI standard. The RAI IEP classifies findings into levels that describe the status of regulatory compliance.
- Level I Finding: A Level I Finding is a condition discovered during an IEP audit that reflects non-compliance with 14 CFR 61; 14 CFR 91; 14 CFR 119; 14 CFR 121; or other requirement and required immediate corrective action.
 - Level II Finding: A Level II Finding is a audit finding that is contrary to company policies or procedures but is not in a non-compliance condition with FAA regulatory requirements, and shall be corrected as soon as practical.
 - Level III Finding: A Level III Finding is a condition identified during an IEP audit in which a potential for a Level I or Level II finding is possible if the condition is allowed to continue.
- m. Hazard: A hazard is anything, real or potential, that could make possible, or contribute to, directly or indirectly, an accident.
- n. Operational Area: An Operational Area is a specific part of RAI operations that performs defined company processes such as shipping and receiving, Flight following, maintenance, flight activities, etc.
- o. Risk: Risk is an expression of the impact of an undesired event in terms of event severity and event likelihood. It is the combination of the likelihood of an undesired event occurring and the severity of its potential. The RAI IEP classifies risk into one of three classifications:
- Red Risk Classification: A red risk classification is a risk that has been determined to represent a dangerous level of likelihood and severity of a defined consequence. It represents a high likelihood that the failure could lead to an unsafe condition.
 - Yellow Risk Classification: A yellow classification of risk represents a medium likelihood of occurrence of a defined consequence with a level of severity less than that represented by a red risk classification. Yellow indicates that the risk may be acceptable with appropriate management review.
 - Green Risk Classification: A green risk classification of risk represents a low risk condition, which is considered acceptable without further action.
- p. Risk Analysis: Risk analysis is the process whereby hazards are identified and analyzed for their likelihood to occur and severity of consequence.
- q. Risk Assessment: Risk assessment is the process of combining the impact of risks discovered in risk analysis and comparing them against criteria established by RAI. The results of this comparison are used in decision-making and development of corrective actions.

- j. The DS, or his designee, shall confirm the development of a corrective action plan and implementation of that plan within the timeline specified by the General Manager of RAI and/or the RAI Safety Committee by confirming that the plan's milestone dates have been met by verifying that the associated action steps have been completed.
- k. Duties of the DS may be augmented on an as need basis by other employees and/or outside resources designated to act in behalf of the DS. A RAI employee so designated shall be referred to as an IEP Auditor.
- l. The DS shall ensure that persons selected as an IEP Auditor meet the qualifications and training requirements; he/she will then issue the auditor an assignment letter containing detailed task work instructions.
- m. The DS shall work in partnership with the Director of Maintenance and the Chief Inspector to ensure that the RAI Continuing Analysis and Surveillance System (CASS) audits have been completed, audit reports filed, and action plans developed and implemented as required by the RAI IEP.(GMM 14.0)

4.4 Staffing

4.4.1 Size of IEP Staff

1. The size of the staff assigned to the RAI Safety Program and IEP will depend on the size and scope of RAI operations.
 - a. The DS, the Safety Committee, and the General Manager of RAI will review the staffing requirements on an annual basis, or when a size and/or scope concern is expressed by any member of the Safety Committee.
 - b. The DS may augment the IEP staff by designating RAI employees as IEP Auditors to conduct IEP audits.
 - c. RAI employees selected to serve as IEP Auditors shall complete IEP Orientation.
2. Training will be documented for SMS, IEP or other staff training and orientation and shall serve as process measurements for the IEP staffing process. Records shall be retained in the Office of DS for as long as the individual remains with the company.(14CFR 5.97(c))

4.4.2 IEP Auditors

1. The DS has the responsibility to oversee IEP audits and the authority to designate, approve, and assign a RAI employee to serve as an auditor to augment the IEP. (ref SIEM 4.2.1.1.d)

4.4.2.2 IEP Auditor Qualifications

1. For a person to serve as a RAI IEP Auditor, the DS shall ensure that the person designated meets the following qualifications and completes the listed training requirements.
 - a. The designee must be an employee of RAI or contractor.
 - b. The designee must have a minimum of three years operational experience in 14 CFR 121 operations and operational knowledge of the area to which he or she will be assigned to audit.

4.4.2.3 Designated Auditor Training

1. The designee must complete an IEP orientation given by the DS prior to conducting any IEP audit activities. The orientation shall be scheduled for a minimum of two (2) hours and include the following topics:
 - a. An overview of RAI Internal Evaluation Program policy, methods, processes, and reporting;
 - b. A review of key terms used in the IEP with a focus on findings, concerns and conditions;
 - c. The types of audits used in the IEP;
 - d. The use of Element Performance Inspection and Safety Attribute Inspection Data Collection Tools;
 - e. A review of the interface of the IEP with the RAI Voluntary Disclosure Program;
 - f. A review of the interface of the IEP with the RAI Risk Management Program;
 - g. A review of the interfaces between the RAI IEP and the RAI Continuing Analysis and Surveillance System (CASS).

- h. Reporting procedures to include the completion of the a RAI Audit Report (SIEM-004) and RAI Aviation Safety Report (SIEM-001);
- i. The role of the Safety Committee; and,
- j. Other topics deemed necessary by the DS.

4.4.2.4 Designated Auditor's Duties

1. The designated IEP Auditor shall conduct a RAI IEP audit under the guidance of the DS prior to performing IEP audits on an individual basis.
2. An IEP Auditor shall not be assigned to audit an operational area in which he or she holds direct management responsibility.

4.4.2.5 Letter of Designation

1. Upon completion of the IEP orientation, the DS shall prepare a letter of designation and approval in narrative form that names the RAI employee as an IEP Auditor and retain it in a file in the DS office.

4.4.2.6 IEP Review

1. IEP Auditors shall complete a review of IEP policies and procedures conducted by the DS once each calendar year. This review shall be documented on a RAI Auditor Training Record (SIEM-006) and retained in a file in the Office of the DS. The records will be maintained for a period of 1 year.
2. In the event an IEP Auditor has not completed an audit within the previous twelve (12) calendar months, then the IEP Auditor reverts to designee status and must complete the orientation training prior to assuming designated status and conducting any IEP audit activities.

4.5 Audits

4.5.1 Audit Methods

The RAI Internal Evaluation Program (IEP) incorporates various audit and surveillance methods in order to continuously and effectively monitors the entire RAI air carrier system. The methods include scheduled audits, special audits, follow-up audits, and external audits which include observations of operational activities, record reviews, interviews, inspections, and reporting.

4.5.2 Types of Audits

RAI IEP audits are conducted by the DS or designated IEP Auditor(s) and incorporate the following four (4) types of audits:

4.5.2.1 Scheduled Audit

The scheduled audit is an evaluation that is conducted in accordance with a planned cycle that has been established by the DS and the Safety Committee at the beginning of each calendar year. The timetable for scheduled audits shall be published by memo and distributed to all affected departments once the schedule has been determined.

4.5.2.2 Special Audit

The special audit is an evaluation that is implemented based on concerns or priorities identified by the Safety Committee or called for by the FAA, the General Manager of RAI, DS or other RAI managers. Special audits also fall under the sphere of evaluations conducted by external resources contracted to evaluate RAI operations as described in SIEM 4.11.

4.5.2.3 Follow-up Audit

The follow-up audit is an evaluation conducted to ensure corrective action plans were developed, implemented in accordance with the plan's timelines, and objectives stated in the corrective action plan were met.

4.5.2.4 External Audit

The external audit is an evaluation of a contractor that provides services, products or appliances to RAI. External audits may consist of scheduled, special, or follow-up audits.

4.5.3 Continuing Analysis and Surveillance Program

4.5.3.1 Purpose

1. The RAI Continuing Analysis and Surveillance System (CASS) is required to accomplish surveillance and analysis of the RAI CAMP from two perspectives: verifying performance and verifying effectiveness.
2. The first step, verifying performance, is based on auditing. The CASS processes and procedures, including audit plans and procedures, are contained in GMM Chapter 14.
3. The second step, checking effectiveness, involves the trend analysis program that is detailed in GMM 14.1 and SIEM 4.9 which reviews the number of events to determine process effectiveness.

4.5.3.2 Role of the Internal Evaluation Program

1. The RAI Internal Evaluation Program recognizes that CASS includes a comprehensive audit plan covering all aspects of the RAI CAMP. The RAI IEP will not audit those areas covered by the CASS audit program, except as instructed by the DS to validate the CASS audit process. All CASS audits are conducted in accordance with the GMM, Chapter 14 and IEP audits per the SIEM manual.

2. The DS or Designated Auditor will audit the CASS process at least once a calendar year to determine that the CASS Program is effective and efficient, and if there are opportunities for improvements in the program. This audit will serve as a performance measure for the CASS.

4.5.3.3 Use of SAls And DCTs

1. In order to avoid duplication of audits and to maximize the utilization of personnel and other resources, the SAls and DCTs relating to the CAMP have been designated as requirements of the CASS.

4.5.3.4 IEP Processes

1. The RAI IEP uses the FAA Safety Assurance System (SAS) Data Collection Tools as primary instruments to conduct RAI IEP audits and incorporates the following methods and procedures.

4.5.3.5 Controls

1. As a control to the CASS process, the DS will receive and review all CASS reports to ensure that the process is in accordance with RAI procedures.
2. The RAI Safety Committee will review the DS's findings and address any concerns regarding the CASS process.

4.6 IEP Methods

1. The RAI IEP uses FAA Element Performance Inspection/Data Collection Tool and the Safety Attribute Inspection/Data Collection Tool as primary instruments to conduct RAI IEP audits and incorporates the following methods and procedures.

4.6.1 Data Collection Tools (DCT)

1. The DCTs encompass observations of operational activities, record reviews, interviews, and hands-on inspections as defined below:
 - a. Observations of operational activities involve the surveillance of identified operational processes, tasks, and processes during which the IEP Auditor documents his or her evaluation. An example would be observing the changing of an aircraft tire to ensure compliance with company maintenance procedures and documenting the observation on a RAI Audit Report (SIEM-004).
 - b. Record reviews encompass examinations of records for a specific operational area to ensure record currency, accuracy and completeness. An example would be the verification of currency for required airmen medicals that are maintained in pilot records and documenting the review on a RAI Audit Report (SIEM-004).
 - c. Interviews are discussions between the IEP Auditor(s) and members of a specific operational area to explore and probe for hazard identification, system deficiencies, and to identify safety concerns. Interview results shall be documented on a RAI Audit Report (SIEM-004).
 - d. Hands-on inspections are examinations of manuals, checklists, reports, records, etc. to determine compliance with RAI standards. An example would be an inspection of an individual pilot's GOM to determine currency and documenting the inspection on a RAI Audit Report (SIEM-004).

4.6.1.2 Application of DCTs to IEP

RAI has adopted SAS data collection tools to conduct IEP audits. These tools provide a means to identify hazards and allow for internal adjustments to RAI operations necessary to mitigate identified risks and to continuously monitor company operational activities to

maintain the highest degree of safety. It is always to the goal to reduce risk to as low as reasonably practical (ALARP).

1. Safety Assurance System DCT's (DCTs) are available on the FAA FSIMS website:
<http://fsims.faa.gov/home.aspx>
 - a. RAI IEP Auditors shall be provided applicable DCTs and associated SAIs when preparing to conduct an audit by the DS. The retrieval of the Data Collection Tools from the FAA website ensures up-to-date and current tools for conducting RAI IEP audits are used.
 - b. The IEP auditors shall use DCTs to assess the output of RAI systems, processes, and tasks against established performance measures that are based on FAA regulatory requirements and safety attributes established by RAI.
 - c. IEP auditors shall use DCTs as the means to determine if RAI continues to follow its written procedures and controls and perform to the standards described in RAI manuals.
 - d. In the event the audit indicates problems within a specific area as reflected by "No" answers to questions listed on the DCT, the IEP auditor shall then refer to the associated SAI to help determine why the problem exists.

4.6.1.3 Reserved

4.6.1.4 Safety Assurance System

1. The RAI IEP uses the five SAS process modules as defined by the FAA.
 - a. The following seven ATOS air carrier systems encompass the RAI system which identifies the IEP's general evaluation areas:
 - System Configuration: Normally only used for air carrier certification, but can be used when an air carrier request a new or modified scope of operation.
 - Planning: Used to develop a risk base, data supported plan.
 - Resource Management: Ongoing process to ensure that available resources are assigned to highest risk priorities.
 - Data Collection: Consists of data collection, data reporting and data review.
 - Analysis, Assessment and Action: Self Explanatory.
2. Each of the processes listed above are the basis for the RAI IEP. In turn each is further divided into specific elements that form the basis for the SAS Data Collection Tools.
 - a. SAS Charts are presented at the end of this Section. The charts reflect 43 Elements applicable to RAI. It is these elements that are used by the FAA to create the DCT and SAS Data Collection Tools, which are, in turn, used by RAI to conduct its Internal Evaluation Program.
3. The DCT/DCT is divided into two sections (2). The first section is titled DCT Section 1, Performance Observables; and the second section is titled DCT Section 2, Management Responsibility and Authority Observables.
4. The SAI/DCT is divided into five (5) sections. The five sections address the six safety attributes that system safety requires to be in place:

- a. Section 1: Procedures Attribute
 - b. Section 2: Controls Attribute
 - c. Section 3: Process Measurement Attribute
 - d. Section 4: Interfaces Attribute
 - e. Section 5: Management Responsibility and Authority Attribute
5. The Airworthiness Elements and Operations Elements are presented in SIEM 4.6.4.5 and 4.6.4.6. These Elements are incorporated into RAI's CASS Forms and Audit Checklists and will be accomplished as part of the CASS. (Ref GMM 14.0)

4.6.2 Use of Data Collection Tools

4.6.2.1 Data Collection Tool Procedures

1. When an Internal Evaluation Program (IEP) audit is initiated, the IEP auditor assigned to perform the evaluation will be provided the applicable DCT; the DS will download the current DCT from [FSIMS](#), for the airworthiness or operational area(s) to be evaluated.
2. The DCT's shall be downloaded within seven (7) days of a scheduled audit or follow-up audit.
3. For a special audit, the Data Collection Tools shall be downloaded prior to the audit with sufficient time for the IEP Auditor to complete the procedures provided in SIEM 4.8.3.2.
4. For an external audit, the DCT(s) shall be downloaded by the DS with sufficient time to submit the DCT(s) to be included with the audit plan and sent to the contractor as stated in SIEM 4.11. SAs shall be downloaded but reserved for use by the IEP auditor, if necessary, when on site.
5. The IEP auditor shall review the DCT Scope, Objective, Specific Instructions, Regulatory Requirements, Policy, the Performance Observables, the Management Responsibility and Authority Observables for the applicable DCT prior to performing the audit to ensure that the instructions and tasks detailed in the DCT are addressed prior to and during the audit.
6. The IEP auditor shall also review the tasks and questions for each attribute listed in the applicable SA(s) in the event it will have to be used.

4.6.3 DCT Review

The following provides guidelines for DCT reviews. The IEP auditor shall review the following information provided in the Element Summary Information, Supplemental Information, and Management Responsibility and Authority Observables of the DCT:

4.6.3.1 DCT Summary Information:

The IEP auditor shall review the Purpose of the DCT which defines the intent of the audit and the scope of RAI responsibility. This instruction defines RAI responsibility for the intended audit

1. The IEP auditor shall review the associated data collection tools and the results of any previously completed DCT's. The review will provide the IEP Auditor with useful information about RAI systems and can help the auditor identify areas of potential risk. It is important for the auditor to understand that most controls are not regulatory but

that they are an important safety attribute with desirable features that help to reduce risk.

2. The auditor shall review any related DCTs that are listed in the DCT that may be used for reference and background information. IEP auditors should be aware that activities for one DCT might be accomplished in conjunction with activities of related DCTs.
 - a. The IEP auditor shall review the applicable RAI policies and procedures for the element they are evaluating in order to plan their audit activities. This will usually involve reviewing sections of the appropriate Operations Specifications, manuals, training programs and other guidance documents.
 - b. Observe the process (as applicable) to gain an understanding of the procedures, instructions and/or information contained in RAI manual(s).
3. The IEP auditor shall explore the process detailed in the applicable DCT and discuss with personnel involved in the process (other than management) to determine how well the personnel in the operational area being audited perform the duties and responsibilities required by the process and how well performance measures were being met.
4. The IEP auditor shall review the question section listed in the DCT. Each DCT lists a series of questions that supplement the listed tasks that the IEP auditor shall answer based on the auditor's observations made during the various audit activities.
5. The IEP auditor shall develop a plan of research, observation, inspection, and evaluation based on the tasks and questions listed in the DCT. The plan should provide for the gathering of quality data. IEP Auditors should remember that questions are to be used for expanded understanding of what the main question is asking; use them to help you understand what is being asked.
 - a. Were the policies and procedures followed? If they don't appear to be, or a step was missed the IEP Auditor shall ask the person performing the procedure to help you understand the process by explaining what he/she is accomplishing and how.
 - b. Were the identified controls followed? This question refers to the controls that are identified in the associated section. Controls are checks and restraints that are built into RAI process to help ensure that the desired results (purpose of the element) are consistently achieved. A review of those controls will help the IEP auditor answer this question. Not all the controls will be observed during each activity.
 - c. Did the records comply with the policy and procedures? The IEP auditor shall review the RAI process under audit sufficiently to identify what records and reports are generated or used during the processes and procedures for the applicable DCT. The IEP Auditor shall review a representative sample of these records to ensure compliance with regulations and RAI policies, procedures, and instructions. The IEP Auditor shall make an entry on the RAI Audit Report (SIEM-004) of the records and reports that were reviewed.
 - d. Were the Process Measurements effective in identifying and providing corrective action for problems or potential problems? The IEP auditor shall review the DCT's and RAI manuals to understand the measures the RAI operational area designed into its process. Additionally, the IEP Auditor shall review any past Findings applicable to the DCT being used to determine if past corrective actions remain effective and current process measurements are effective in identifying potential problems.

- e. Did personnel properly handle the associated interfaces by complying with other RAI written policies, procedures or instructions and information that are interrelated with the DCT being used?

4.6.3.2 Management Responsibility and Authority Observables

1. The IEP Auditor shall review Section 2, Management Responsibility and Authority Observables of the applicable DCT prior to performing the audit. This section asks a series of questions about the RAI employee who is answerable (responsible) for the quality of the RAI process and/or who has the authority to establish and modify the process. Items to be reviewed in this section include:
 - a. The IEP auditor shall review the Objective(s) listed in the Management Responsibility and Authority Observables section which will assist the IEP Auditor in evaluating RAI personnel who are answerable (responsible) for the quality of the RAI process and/or who have the authority to establish and modify the process.
 - Identify the person that has overall authority for the process. The intent of the task is to identify the highest-level person (at the appropriate level within RAI) who is responsible for the quality of, or who has the authority to change, the process. A person can be an individual, a department, a committee, or a position. If applicable, the IEP Auditor shall verify that the individual named in RAI Operation Specifications is the same.
 - b. If there have been personnel or program changes affecting the Responsibility or Authority Attributes listed in the applicable DCT since the last IEP audit or FAA Inspection, then the following tasks shall be addressed:
 - Review the duties and responsibilities of the person(s) documented in ADM 3.6 and/or ADM 3.7. The IEP auditor shall review the duties and responsibilities of individuals assigned the responsibility for, or authority to establish or modify the operational area and process being audited.
 - Evaluate the qualifications and work experience of the person(s) above (or resume, if appropriate). The IEP auditor shall verify by checking RAI records that the individual assigned to an operational area that has the responsibility and authority within that area possess the qualifications for that position as stated in ADM 3.6 and/or ADM 3.7.
 - Review the RAI organizational chart, which is published in ADM 3.1 to confirm currency.
 - The IEP Auditor shall review the current RAI organizational chart to verify that the personnel who possess responsibility and authority for the area being audited are reflected on the current RAI organization chart in ADM 3.1.
 - Discuss the process with the person(s) responsible for the operational area being audited to seek out and identify areas of process weakness, bottlenecks in information flow, equipment concerns, current standards, and any other subjects that emerges that affect safety

4.6.3.3 Airworthiness Elements

(FAA Color codes used for planning) **Red Elements=High Criticality (Audit Once Every 6 Months interval)** Red elements are where a hazard, system, or performance failure could result in a safety issue resulting injury.

Green Elements=Medium Criticality (Audit once Yearly)

Blue Elements=Low Criticality (Audit Once Every 2 Years)

1.0	Organizational Management	4.4	Technical Administration (L)
1.1	Safety Programs (H)	4.4.1	Special Flight Permits
1.1.3	CASS	4.4.2	MIS/SDR
1.1.6	Safety Program	4.4.3	Short-term Escalation
		4.4.4	Aircraft Acceptance Process
1.3	Airworthiness Management (L)	4.4.5	Weight & Balance Program
1.3.1	Part 119 Required Personnel		
1.3.2	Manual Management	4.5	Maintenance facilities/Providers (M)
		4.5.1	Maintenance Facility/Main Maintenance Base
1.5	Safety Management (M)	4.5.2	Maintenance Providers
1.5.1	Accountable Executive		
1.5.2	Emergency Response	4.7	Maintenance Tools & Parts Control (M)
1.5.3	SMS Record Keeping	4.7.1	Control of Calibrated Tools & Test Equipment
		4.7.2	Aircraft Parts/Material Control
4.0	Technical Operations		
4.1	Training & Qualifications (L)	6.0	Ground and Station Operations
4.1.1	RII Personnel	6.2	Ground Handling (M)
4.1.2	Maintenance/Inspection Requirements	6.2.1	Fueling
4.1.3	Maintenance/RII Training Program		
		6.3	Cargo Acceptance and Handling (H)
4.2	Maintenance Operations (H)	6.3.3	Cargo Handling Equipment Systems & Appliances
4.2.1	Maintenance Release/Maintenance log Requirements	6.3.4	Carriage of Cargo
4.2.2	Maintenance/Inspection Schedule		
4.2.3	AD Management		
4.2.4	Recordkeeping		
4.2.5	Maintenance Control Functions		
4.3	Maintenance Operations (H)		
4.3.1	Maintenance Release/Maintenance Log Requirements		
4.3.2	RII		
4.3.3	MEL/CDL/NEF & Other Deferred Maintenance		
4.3.4	Major Repairs & Alterations		

4.6.3.4 Operational Elements

Red Elements=High Criticality (Audit Once Every 6 Months interval) Red elements are where a hazard, system, or performance failure could result in a safety issue resulting injury.

Green Elements=Medium Criticality (Audit once Yearly)

Blue Elements=Low Criticality (Audit Once Every 2 Years)

1.0	Organizational Management	3.2	Flight Operations Engineering (M)
1.1	Safety Programs (H)	3.2.1	Aircraft Performance Operating Limitations
1.1.2	Safety Program (Ground and Flight)	3.2.2	Use of Approved Areas, Routes, and Airports
		3.2.3	Special Navigations Area of Operation
1.2	Operational Management (L)		
1.2.1	Part 119 Required Personnel	3.3	Flight Planning & Monitoring (H)
1.2.2	Manual Management	3.3.1	Operational Control
		3.3.2	Dispatch/Flight Release
1.5	Safety Management (M)	3.3.3	Flight/Load Manifest/Weight & Balance Control
1.5.1	Accountable Executive	3.3.4	MEL/CDL/NEF Procedures
1.5.2	Emergency Response		
1.5.3	SMS Recordkeeping	6.0	Ground and Station Operations
		6.1	Training & Qualifications (M)
2.0	Flight Operations	6.1.1	Training of Station Personnel
2.1	Training & Qualifications (M)	6.1.2	Hazardous Material Training Program
2.1.1	Training of Flight Crewmembers		
2.1.2	Training of Check Airmen & Instructors	6.2	Ground Handling (H)
2.1.3	Simulators/Training Devices	6.2.4	Line Station Operations/ Ground Personnel Duties
2.1.5	Appropriate airmen/Crewmember Checks & Quals		
2.1.7	Flight Crewmember Flight/Duty/Rest Time	6.3	Cargo Acceptance & Handling (H)
		6.3.1	Carriage of Cargo
2.2	Aircraft Operations (H)	6.3.2	Hazardous Material
2.2.1	Airmen Duties/Flight Deck Procedures		
2.2.3	Pilot Operating Limitations/Recent Experience		
2.3	Aircraft Equipment (M)		
2.3.1	Appropriate Operational Equipment		
3.0	Operational Control		
3.1	Training & Qualifications (M)		
3.1.1	Training and Qualifications of Flight Followers		

4.7 Findings and Concerns

4.7.1 Purpose

1. The purpose of this section is to provide an explanation of RAI IEP findings and concerns.

4.7.2 Level of Findings

4.7.2.1 Finding Categories

1. RAI Internal Evaluation Program audit findings and safety concerns are categorized as to their order of importance and impact on safety, CFR compliance, and RAI standards. The categories in order of importance, which are referred to as “level of findings,” are as follows:
 - a. Level I Finding: Level One is a condition discovered during an IEP audit that reflects non-compliance with applicable CFRs.
 - Any Level 1 Finding shall be immediately reported by the person making such finding to the General Manager of RAI, the DS, and the senior manager for the operational area identified.
 - The non-compliance item shall be reported to the FAA Certificate Holding District Office (CHDO) and to the appropriate FAA principal inspector in accordance with the RAI Voluntary Disclosure Program.
 - An interim correction action shall be implemented as soon as possible (a period not exceed 30 days) by the manager of the operational area in which the non-compliance occurred with the approval of the CHDO principal inspector and the RAI senior manager of the affected area of operations.
 - A corrective action plan shall be developed by a team representing affected operational areas and the DS.
 - b. Level II Finding: Level Two is a condition that is contrary to company policies or procedures but is not in a non-compliance condition with FAA regulatory requirements.
 - Any Level Two Finding shall be corrected as soon as practical.
 - A corrective action plan shall be developed by a team representing affected operational areas and the DS.
 - c. Level III Finding: Level Three is a condition identified during an IEP audit in which a potential for a Level I or Level II finding is possible if the condition is allowed to continue.
 - A corrective action plan shall be developed by a team representing affected operational areas and the DS.

4.7.3 Documentation of Findings and Concerns

4.7.3.1 Documentation Procedures

1. The IEP auditor with accompanying explanation(s) shall document findings and concerns identified during the IEP process on the RAI Audit Report (SIEM-004).
2. The IEP Auditor shall submit a RAI Aviation Safety Report (SIEM-001) with an appropriate Risk Statement entered for each hazard identified to the DS and Safety Committee. The DS and Safety Committee shall review the finding/concern and initiate a Risk Management Process Review (RMP)

3. Following the RMP the DS and Safety Committee will develop a Corrective Action Plan/s to improve the process and implementation of such plan/s will adhere to the procedures detailed in SIEM 5.7.4.
4. If no findings are made during the audit, the auditor shall enter “No Findings” in the form area titled “Findings”.

4.8 IEP Audit Schedules

4.8.1 Purpose

1. The purpose of this section is to detail how and when RAI IEP audits are scheduled.

4.8.2 DS Responsibility and Authority

1. The RAI DS is responsible for and has the authority to schedule RAI IEP audits. The following information provides the scheduling procedures for the types of audits used in the RAI Internal Evaluation Program (IEP).

4.8.3 Audit Schedules

4.8.3.1 Scheduled Audits

Element Performance Inspections performed by the FAA CHDO are planned for at 6 month, yearly, and once every 2 year intervals based on the criticality and risk score.

Red Elements=High Criticality. Red elements are where a hazard, system, or performance failure could result in a safety issue resulting in injury.

Green Elements=Medium Criticality.

Blue Elements=Low Criticality.

Safety Attribute Inspections using the SAI:

Elements = (Audit Once Every 5 years) unless required sooner by an DCT Performance deficiency.

RAI Scheduled Audits will be scheduled using the following procedures:

1. The DS will generate an annual matrix indicating all applicable areas to audit and will arrange for IEP scheduled audits quarterly as necessary. The basis for the audit unless staff and available time allow for more; trend analysis may indicate a specific area with issues that needs to be evaluated in addition to the normal quarterly basis. The audit list (matrix) indicates all applicable areas and schedule calendar time (i.e., monthly, quarterly, biannually).
2. At his or her discretion, the DS may conduct these audits, assign IEP auditors, or contract outside expert auditors.
 - a. If outside auditors are selected to perform an audit, the DS shall remain responsible for the audit and shall serve as RAI’s principal contact to the audit firm.
 - b. Outside audits must contain the same data and be conducted using the same criteria as a RAI IEP. If there are any omissions, the open items shall be included in a future RAI audit.
3. All RAI departments and contractors are subject to IEP scheduled audits, but the following departments undergo scheduled audits as part of CASS Program requirements.
 - a. Flight Operations;
 - b. Maintenance

- c. Training; and
 - d. Flight Following
4. The four listed departments have many departmental functions. The Data Collection Tools will assist the DS to schedule focused audits on each function or “branch” based on the various elements addressed in the DCTs. The DS should schedule these audits well in advance and give a minimum of thirty (30) days’ notice to a department manager. Objectives include, but are not limited to;
- a. To determine the effectiveness of the certificate holder’s procedures in meeting the desired output of the process.
 - b. To determine if the certificate holder follows its procedures, controls, process measurements, and interfaces for the observed process.
 - c. To determine if there were any changes in the personnel identified by the certificate holder as having responsibility and/or authority for the observed process.

4.8.3.2 Special Audits

1. RAI Special Audits will be scheduled and considerations given for pairing with the FAA inspectors as a way of taking credit and sharing information used to take immediate correction action on any issues found during the audit. Advantage of doing this is taking credit for the audits and any findings can be disclosed with minimal consequences.
- a. The Special Audit is an evaluation that is implemented based on concerns or priorities identified by the RAI Safety Committee or called for by the FAA, the DS or any RAI Manager.
 - b. The DS shall schedule a Special Audit on an immediate basis of any operational area that has an open RAI Aviation Safety Report (SIEM-001) that reflects a “Red” risk classification assigned in accordance with risk management procedures detailed in SIEM Chapter 5.
 - c. The DS shall schedule a Special Audit on as-soon-as-possible basis if any operational area has an open RAI Aviation Safety Report (SIEM-001) that reflects a “Yellow” risk classification assigned in accordance with risk management procedures detailed in SIEM 5.5.
 - d. RAI Safety Reports assigned a “red risk” classification shall have priority for audit scheduling over reports assigned a “yellow” risk classification.
 - e. A Special Audit will be initiated by the DS when any of the following circumstances occur:
 - An aircraft accident involving RAI aircraft or aircraft chartered by RAI;
 - A National Transportation Safety Board (NTSB) reportable event as defined in 49 CFR 830 Subpart D; or
 - A Letter of Investigation (LOI) is received from the FAA.

4.8.3.3 Follow-up Audits

1. RAI Follow-Up Audits will be scheduled using the following procedures:
- a. The follow-up audit is an IEP audit conducted to ensure corrective action plans were implemented and that the objectives stated in the corrective action plan were met (SIEM 4.3.2 [item 3g] and 4.8.3.3).