

Aviation Safety Report

INTERAGENCY COMMITTEE FOR AVIATION POLICY

AVIATION RESOURCE MANAGEMENT SURVEY TEAM

ARMS REPORT

EVALUATIVE

OF THE
U.S. Department of Agriculture
Animal Plant Health Inspection Services

CONDUCTED
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I. OVERVIEW

A. INITIAL MEETING(S)

The ICAP was requested by the U.S. Department of Agriculture (USDA) Animal Plant Health Inspection Services (APHIS) to conduct an ARMS through a formal letter signed by Mr. William Clay, Deputy Administrator of Wildlife Services dated July 2, 2007.

Numerous telephone calls and emails with Mr. Jacob Wimmer and Mr. Michael Worthern of APHIS were used to coordinate and finalize the ARMS Team members, establish the dates the ARMS Team would travel to the various APHIS locations in Utah and Texas and establish the areas in the checklist that would be surveyed by the ARMS Team as requested by USDA/APHIS/WS.

B. TEAM MEMBERS

The ARMS Team consisted of the following individuals:

ARMS Team Leader
Mr. Christopher Keyes
Federal Aviation Administration (FAA)

ARMS Team Member
Mr. Mike Miles
General Services Administration (GSA)

ARMS Team Member
Mr. Standley Cobb
Federal Aviation Administration (FAA)

ARMS Team Member
Mr. Tony Butcher
General Services Administration (GSA)

C. IN-BRIEFING

On January 23, 2008, the ARMS team conducted the formal in-brief at the USDA/APHIS/WS Aviation Training Operations Center at Cedar City, Utah. Present were:

Mr. Christopher Keyes, FAA, ARMS Team Leader
Mr. Mike Miles, ARMS Team, GSA
Mr. Standley Cobb, ARMS Team, FAA
Mr. Tony Butcher, ARMS Team, GSA
Mr. Jacob Wimmer, APHIS
Mr. Lloyd Burraston, APHIS
Mr. John Eisemann, APHIS

The ARMS Team was requested by Mr. Wimmer to review the following areas from the ARMS GUIDE:

1. Management and Administration
2. Training
3. Safety Management/Administration
4. Operating Procedures, Manual and Directives
5. Operations Records
6. Flight Operations
7. Maintenance Management
8. Refueling Facilities and Operations
9. Aviation Life Support Equipment
10. Physical Security
11. Aviation Accident Response Plan
12. Gold Standard Verification

Mr. Chris Keyes, FAA introduced the ARMS team and discussed the purpose of the ARMS and the areas requested to be surveyed. Mr. Wimmer, USDA/APHIS/WS then introduced the members of USDA/APHIS/WS followed by a brief explanation of APHIS/WS and its mission. All in attendance briefed their respective areas of responsibility in order to give the ARMS team a better understanding of the USDA/APHIS/WS aviation operation. Following the in-brief the ARMS Team began the ARMS process interviewing key personnel.

D. REVIEW PROCESS

The review and evaluation was conducted at the USDA/APHIS/WS Aviation Operations Center at Cedar City, Utah. Prior evaluations were conducted in Junction, Texas (January 17, 2008). The method of the evaluations was accomplished by:

Reviewing available management and operations procedures manuals, reviewing training records, reviewing maintenance records and procedures, reviewing safety procedures and safety manuals, and interviewing USDA/APHIS/WS personnel to include; management, pilots, administrative personnel, maintenance, and contractors as appropriate. Personnel from the Eastern Region were included in the interview process.

The ARMS Team conducted interviews with 15 USDA/APHIS/WS employees and contractors assigned at the various described locations. All persons interviewed demonstrated complete candor and willingness to cooperate. The hospitality extended by all USDA/APHIS/WS personnel was outstanding. Comments from interviewees were based on their individual perceptions. The ARMS Team acknowledges the premise that perceptions can be distorted at times. Never the less, these same perceptions influence the habit and thought patterns of the USDA/APHIS/WS employees. The comments and recommendations of the ARMS Team in this report are opinions based on observations and interviews.

E. OUT-BRIEFING

A formal out-briefing was conducted at the USDA/APHIS/WS Aviation Training Operations Center at Cedar City, Utah, Friday, January 25, 2008, for key USDA/APHIS/WS personnel. The members of the ARMS Team briefed their respective areas and fielded questions from those present.

The purpose of an out-briefing is to allow all persons impacted by the survey the opportunity to question the team as a whole and individually. As stated earlier, the survey comments (Observations and Recommendations) are opinions of the ARMS Team members based on observations and interviews with agency employees. Once the out-brief is accomplished, the survey report is finalized and submitted to USDA/APHIS/WS. The ARMS Team has no further interest in the ARMS Report once it is completed. If the opportunity for rebuttal is not taken during the out-brief the report cannot be easily altered.

The ARMS Report is for the exclusive use of USDA/APHIS/WS that must consider if implementation of recommendations is appropriate. The ARMS Report is not an Inspector General type report. Comments, justifications, rebuttals or specifics to the report are not required or necessary.

Present at the outbriefing were:

Mr. Christopher Keyes, FAA, ARMS Team Leader
Mr. Mike Miles, ARMS Team, GSA
Mr. Standley Cobb, ARMS Team, FAA
Mr. Tony Butcher, ARMS Team, GSA
Mr. Jacob Wimmer, APHIS
Mr. Lloyd Burraston, APHIS
Mr. John Eisemann, USDA [via telecom]

II. EXECUTIVE SUMMARY

The USDA/APHIS/WS operates in accordance with applicable Federal Aviation Regulations (Part 91, Part 43, etc.), Public Law, and the Code of Federal Management Regulations (FMR 102-33) that pertain to a Federal agency aviation operation. There are USDA/APHIS/WS program manuals, policies, and procedures in place designed to effectively manage the organization. It is the opinion of the ARMS Team that the USDA/APHIS/WS aviation program is being operated in a safe, efficient, and effective manner.

As background, the US Department of Agriculture Animal Plant Health Inspection Services Wildlife Services (USDA/APHIS/WS) is a multi-faceted agency with a broad mission area that includes administering the Animal Welfare Act and carrying out wildlife damage management activities. One way the USDA/APHIS/WS accomplishes these responsibilities is through the use of aircraft.

The USDA/APHIS/WS aviation program provides capable, mission-ready aircraft and professional crews trained to conduct the USDA/APHIS/WS mission wherever and whenever required. Some of the aviation missions the USDA/APHIS/WS carries out include animal eradication, bird surveys, mammal survey, delivery of oral rabies vaccines, predator control, and training. USDA/APHIS/WS conducts these missions by using helicopters and fixed wing aircraft. The USDA/APHIS/WS operates in 28 states using 74 agency owned, contractor owned and operated, and "exclusive use" leasing aircraft. The USDA/APHIS/WS flight crews are required to conduct missions that include demanding flight regimes. The central USDA/APHIS/WS training facility is located in Cedar City, Utah and this center supports the USDA/APHIS/WS operations in each state.

The following is a general summary of the USDA/APHIS/WS operations that the ARMS Team evaluated during the survey.

A. MANAGEMENT AND ADMINISTRATION:

It is the opinion of the ARMS team that USDA/APHIS/WS has an appropriately defined organizational structure in place that is staffed with trained, qualified and experienced personnel. It is clear that USDA/APHIS/WS has put significant effort into establishing an aviation management structure that conforms to the requirements contained in FMR 102-33.

During the course of the evaluation, ARMS members interviewed numerous management, support, and administrative personnel. The interviews regarding management were positive. Overall morale of the staff seems good.

The system seems to be working well for USDA/APHIS/WS. Managers felt they had appropriate input into the planning and budget process. All felt their program needs were being met. All managers and supervisors with budget responsibility were especially happy with their autonomy in dealing with their budgets, programs and

challenges. A high degree of team effort was noted between the various program managers in dealing with budget issues and needs.

USDA/APHIS/WS appears to be proactive in its fleet planning with an active and recurring effort to review and evaluate its mission and program.

Overall, indications are that management enjoys the confidence and support of the employees.

OBSERVATION 1: The position of National Aviation Coordinator (NAC) is currently vacant. The duties and responsibilities are being covered by an acting NAC. The past NAC did not have an aeronautical background but did receive some training from the ATOC in the form of Senior Level Aviation Management (SLAM) training.

RECOMMENDATION 1: The NAC, out of necessity, should be a qualified aviator. It may not be necessary, although highly desirable, that they have a background as an APHIS pilot, but they should definitely have aviation experience. It only stands to reason that an individual that is in a position to create and influence aviation policy have aviation experience. In the civilian world, this position would equate to a Director of Operations for an air carrier or air taxi operator. Federal Aviation Regulations (14 CFR Part 119) require that an individual in that position be a current line pilot in at least one aircraft that the operator operates. The position of NAC at USDA/APHIS/WS WS should be filled by a qualified aviator. This will give instant credibility to the position and to the safety and training programs.

OBSERVATION 2: The budget for the aviation program is managed by the WRO budget and Staff Assistant under the WRO Administrative Officer (AO). The AO reports to the Director of the Western Region as well as the NAC.

RECOMMENDATION 2: Budget authority and management should have clear lines of authority. The current organizational structure blurs these lines and makes it difficult for aviation management to ensure funds are expended for goods and services that are required for an appropriate aviation program. The NAC should have a dedicated budget analyst that reports directly to him/her to ensure the program is supported in an efficient and effective manor.

OBSERVATION 3: As a government entity there is much information that must be collected, disseminated, and reported in conjunction with flight operations. APHIS/WS not only has its internal need for the collection of information regarding each flight, but there are other external requirements for information imposed by OMB, GSA and other entities. A review of manuals and extensive interviews indicate that there is no standardized report or means of recording required information. Some pilots report information into the Management Information System (MIS) on a weekly basis, some daily, and some monthly. Some have a crewmember enter the required information. How the information is captured varies from pencil and paper to laptop, Blackberry, or even text message from a cell phone. Information for the Federal Aviation Information Reporting System (FAIRS) is currently being collected in a satisfactory manner by the Aviation Program Analyst through the individual state budget analyst.

RECOMMENDATION 3: APHIS should put together a working group consisting of representatives from all parties within APHIS that need information from pilots at the conclusion of a flight. The goal of the working group would be to identify all information that needs to be captured. This would include operational information, flight and crew information, information for invoicing purposes, and maintenance information. A standard form could be added to the MIS program that a pilot would complete and enter at the completion of a flight. The reporting interval should also be standardized and made a pilot in command requirement. This would greatly enhance management's ability to determine the status of any pilot, crewmember or aircraft, at any given moment. Reporting in a manner such as this is the standard for most government operations as well as civilian operations.

OBSERVATION 4: USDA flight operations are divided into two regions, Western and Eastern. The vast majority of flight operations conducted by USDA/APHIS/WS using USDA aircraft and pilots/crewmembers are in the Western Region. There appears to be adequate oversight of these operations. However, the bulk of flight operations conducted in the Eastern Region are conducted by contract pilots and aircraft. The commercial operators working for USDA/APHIS/WS in the Eastern Region are required, by contract, to be certificated by the Federal Aviation Administration in accordance with 14 CFR Part 135. Because of their lack of aviation background and limited experience with these contractors it appears that State Directors (SD) in the Eastern Region have a tendency to let the Federal Aviation Administration (FAA) conduct oversight of these contract operators as it is the FAA that certifies them. Many of these contract operators meet only the minimum standard for certification due to their limited size. It is very difficult for the FAA, with their limited resources, to conduct effective oversight of these smaller operators.

RECOMMENDATION 4: To ensure the highest level of safety for the USDA/APHIS/WS employees that must fly on these contracted aircraft it is incumbent upon the NAC, ATOC, Safety Officer, and Aviation Safety Inspector-Airworthiness, to provide the ER SD's with appropriate support and oversight to the maximum extent possible. This support should take the form of on-site observations of the contractors operations and well as the document reviews, which they now conduct. Upper management should support the necessity for these key individuals to expand their current level of support/oversight of ER flight operations.

OBSERVATION 5: APHIS aircraft are aging. The airplane fleet appears to be the appropriate aircraft for most of the geographical locations that APHIS operates. However, other aircraft such as small single engine helicopters should be considered for other geographical locations that do not lend itself to airplane operations.

RECOMMENDATION 5: APHIS should develop a planning document that outlines a budget and timetable for the purchase/replacement of aircraft. The plan should consider the cost of operating older aircraft versus newer aircraft as well as determining the appropriateness of a particular aircraft type for the terrain that it is to operate in. Aircraft that are identified as 'scheduled for replacement' should be considered as candidates for the General Services Administration's 'exchange/sale'

program. Older aircraft could be sold and the monies received could be used to purchase newer aircraft for the APHIS fleet.

B. TRAINING:

USDA/APHIS/WS has an established flight training program. The majority of the initial and recurrent training is conducted at the Aviation Training and Operations Center (AOTC) in Cedar City, Utah. The training facility is staffed with a minimum of qualified personnel to accomplish the training mission. The ATOC manager has developed an effective training curriculum using a set of manuals, simulators and training devices that provide outstanding quality training that is geared to the specific tasks of the WS pilot and crewmember. The training promotes safety through standardization. Training records are maintained at the ATOC facility both hard copy and electronically. A review of the records indicates that they are well maintained, accurate and complete. All personnel interviewed indicated that the training has improved dramatically over the past few years and gave it high marks for effectiveness, timeliness, and applicability. The training operation is considered to be outstanding.

OBSERVATION 1: Training conducted at the ATOC is highly specialized and very effective. The ATOC has established an outstanding training facility with specialized curriculums and training devices/simulators that are very effective and specialized for the operations conducted. The training facility is on a par with many FAA 14 CFR Part 141 Certificated Flight Schools. All those interviewed that have attended training of one type or another had nothing but praise for the training. The prevailing opinion is that the training is highly effective and applicable to their job tasks. It is a proven fact that quality training enhances safety.

RECOMMENDATION 1/1: The ATOC has developed an outstanding training program that enhances safety in APHIS flight operations. Upper management should continue to support the training program with necessary financial and human resources that might be required for the ATOC to continue providing outstanding and effective training.

RECOMMENDATION 2/1: For each course of training the ATOC should add a "Completion Standard". This would bring the training curriculums up to industry standards (14 CFR Part 141). In addition, it gives the student a complete understanding of what level of performance is expected of them at the completion of a module of training.

RECOMMENDATION 3/1: The ATOC should develop a policy addressing how unsatisfactory ("U") item(s) on a check flight (pilot evaluation flight) will be processed. By establishing quantitative completion standards (see RECOMMENDATION 1 above) there is no question as to whether a pilot was successful or not. Also, remedial training and how many attempts to satisfactorily complete a maneuver should be addressed. The process should be included in the Aviation Operations Handbook which will become policy as it is signed by the Deputy Administrator. This policy would be a great benefit to human relations personnel should it become necessary to take action affecting an employee's employment status as the reason for the action is quantified and is no longer subjective. This is a standard policy in the air carrier industry.

RECOMMENDATION 4/1: Serious consideration should be given to the addition of another full time Certified Flight Instructor (CFI) to the Cedar City training facility staff. This would alleviate scheduling and resource problems/issues created when the ATOC goes to a State Director to secure the services of one of his/her pilots who provide CFI services. An additional CFI would provide more timely checking (evaluating pilots during a flight)) and enhance standardization and thus safety.

RECOMMENDATION 5/1: When contractors are scheduled to attend training they should be paid a salary in addition to the travel and per diem that is now given.

C. SAFETY MANAGEMENT/ADMINISTRATION:

The USDA/APHIS/WS aviation safety program is outlined in the USDA/APHIS/WS/Wildlife Services-Aviation Safety Manual. The USDA/APHIS/WS Aviation Safety Officer (ASO) manages the aviation safety program. He is a school trained (US Army) aviation safety officer. The aviation safety program meets all requirements of the FMR 102-33.180 thru .185.as well as FMR 102-33.445 and .450. It is operating in an effective manner with all of the required elements of a successful aviation safety program in place.

OBSERVATION 1: The ASO does not have a checklist designed for facility inspections in accordance with USAD/APHIS Aviation Safety Manual 2-2.

RECOMMENDATION 1: The ASO should develop a checklist to conduct facility inspections. It should cover areas such as hangers, offices, ramp space, grounding locations, fire extinguishers, HAZMAT/MSDS, etc. in accordance with OSHA requirements.

OBSERVATION 2: The USDA/APHIS/WS Safety Manual states that Hazard Maps will be maintained in the State Safety Files (2-1.3).

RECOMMENDATION 2: The Hazard Map should be a function of the ASO and should be required for each operating location. Hazard maps should be co-located in the area where flight planning is conducted. As a recommendation, the maps should be posted in each hanger with APHIS aircraft and kept up to date on a weekly basis.

OBSERVATION 3: The USDA/APHIS/WS Safety Manual requires an Aviation Safety Committee (1-7.5).

RECOMMENDATION 3: The Safety Manual should be changed to require a Safety "Council" in lieu of the "Safety Committee" if only to be more in line with the FMR 102-33.180(f)(5) which requires a "safety council". The change should be expanded to include: safety council required members, and safety council minutes are to be printed and distributed to all APHIS/WS employees.

OBSERVATION 4: The USDA/APHIS/WS Safety Manual does contain an awards program (Section 4).

RECOMMENDATION 4: The existing awards program contained in the USDA/APHIS/WS Safety Manual should be expanded to include the GSA Federal Aviation Awards Program.

D. OPERATING PROCEDURES, MANUALS AND DIRECTIVES:

The USDA/APHIS/WS Aircraft Operations Manual (2004) is the document used by all aviation and management personnel to conduct flight operations. The manual is currently under revision and requires only minor changes to bring it up to standards required by the Federal Management Regulation, Federal Aviation Regulations, and WS Directives.

USDA/APHIS/WS State Directors and the WS also issue Directives to augment the Aircraft Operations Manual.

OBSERVATION 1: APHIS does not require employees or passengers who fly aboard APHIS/WS aircraft to sign a "Disclosure Statement" as outlined in the FMR 102-33.165 (e).

RECOMMENDATION 1: APHIS/WS should adopt the Disclosure Statement as outlined in the FMR 102-33.165 and modify it to meet APHIS/WS mission needs. All APHIS/WS employees (flight personnel) and any person that flies on an APHIS/WS aircraft should be required to sign the Disclosure Statement. APHIS/WS employees should sign the statement when hired, and each year during aviation related training.

OBSERVATION 2: WS Directive 2.620, WS Aviation Safety and Operations is dated 12/04/06. The Aircraft Operations Manual was last updated on 05/11/04.

RECOMMENDATION 2: The Aircraft Operations Manual needs to be updated to incorporate changes contained in the WS Directive as well as other procedural changes that have been implemented and are being practiced by managers and pilots. This will bring it up to standards required by the FMR, FAR, and WS Directive.

E. OPERATIONS RECORDS:

The pilots training and certification records are being maintained in several locations within USDA/APHIS/WS. From interviews and discussions, the records appear to be maintained IAW the FMR and FAR. Flight time records being maintained appear to be accurate and complete.

OBSERVATION 1: Pilot training and certification records are being maintained in several locations including the pilots base of operations, ATOC, and Ft. Collins, CO.

RECOMMENDATION 1: All pilot training and certification records should be maintained in a central repository at the ATOC. This would enable aviation management to monitor all pilot training and certification requirements and ensure they were being accomplished IAW the FMR and FAR. This information could then be shared with Region and State Directors and other management organizations as appropriate.

F. FLIGHT OPERATIONS:

The USDA/APHIS/WS flight operations are highly decentralized and located in rural areas close to the areas in which they conduct their flight operations. This wide dispersal of flight operations was not conducive to practical observations by the ARMS teams. However, one ARMS team member was able to observe the flight operations of a contract operator in Oral Rabies Vaccination operations being conducted in Junction, Texas, on January 17, 2008. Interviews and reviews of manuals and WS Directives lead the ARMS team to a good understanding of how flight operations are being conducted.

OBSERVATION 1: Pilot records (except training records) were not reviewed. They are not maintained at the ATOC but reside with the individual State Directors (SD). The Aviation Operation Manual (B-1.2) describes in detail what documents must be in the pilot's record, to include WS Form 135-5. This requirement for the contents of a pilot record mirrors that industry standard established by 14 CFR Part 135.

RECOMMENDATION 1: Pilot Records should be centrally located to provide assurance of completeness and standardization. This will provide management and personnel officials with quick access to necessary and required pilot information. It would no longer be necessary for management to go hunting for required information. This would not preclude the SD from keeping appropriate copies of the documents at his location.

G. MAINTENANCE MANAGEMENT:

It is the opinion of the ARMS Team that the USDA/APHIS/WS aviation maintenance program is operating in a safe manner.

The USDA/APHIS/WS maintenance management is addressed in the Aviation Operations Manual in a disjointed manner. There is no designated chapter in the Aviation Operations Manual that addresses maintenance procedures and no 'stand alone' General Maintenance Manual. However, all USDA/APHIS/WS aircraft are required to have "a valid FAA Airworthiness Certificate" in accordance with the Aviation Operations Manual, Section B. It is assumed that every USDA/APHIS/WS aircraft falls under a manufacturer's maintenance program, which includes FAA oversight. The ARMS Team reviewed the USDA/APHIS/WS existing maintenance procedures and documents, applicable Title 14 Code of Federal Regulations (CFR), Federal Aviation Regulations (FAR), FAA Type Certificate Data Sheets (TCDS), and FAA Advisory Circular (AC) 00.1-1 Public Aircraft Operations, for the basis of determining the effectiveness and regulatory compliance of USDA/APHIS/WS maintenance management. The survey included personal interviews with key USDA/APHIS/WS maintenance personnel and contractors.

The USDA/APHIS/WS requires all USDA/APHIS/WS aircraft to be certified, maintained, and operated in accordance with all pertinent regulations and

guidelines set forth by AOC, FAA, ICAO, DOD, and Aircraft Manufacturers to the fullest extent practical. FAR Part 91 has been established as the minimum standard for maintenance and inspection of USDA/APHIS/WS aircraft.

It appears that there is limited communication between the State Director, National Aviation Coordinator (NAC), and field personnel on the airworthiness status of aircraft operated by the USDA/APHIS/WS. It is also difficult to determine who has the oversight responsible for tracking aircraft times and scheduled inspections.

OBSERVATION 1: It appears that there is limited communication between the State Director (SD) and National Aviation Manager (NAM) / Coordinator on issues of managing the aviation program.

RECOMMENDATION 1: For continuity, the NAM should have all oversight responsibilities for the aviation programs as stated in the Aviation Operations Manual.

OBSERVATION 2: Pilot in Command (PIC) has total control of the operation of the aircraft and making the determination of its airworthiness status. The NAC does not have access to the aircraft maintenance records or control of reviewing the aircraft times of operation in order to schedule inspections. The PIC schedules all inspections.

RECOMMENDATION 2: PIC's should provide the aircraft times of operation on a weekly basis to the NAC. This will allow the NAC to know the airworthiness status of all aircraft and help schedule inspections and maintenance in a timely manner. This will also allow maintenance to be scheduled from a centralized location. (See Observation 3/Recommendation 3 under A. Management and Administration for a discussion regarding Management Information System).

OBSERVATION 3: Review of the USDA/APHIS/WS Aviation Operations Manual procedures indicates that (Maintenance, Sections B, C & J) are not current with agency guidelines and Federal Aviation Regulations (FAR).

RECOMMENDATION 3: Revise Aviation Operations Manual Sections B, C, & J to reflect current guidelines/policy of USDA/APHIS/WS operations.

OBSERVATION 4: Maintenance contractors are not audited on a regular scheduled basis to ensure that they are in compliance with USDA/APHIS/WS guidelines, requirements, and applicable FAR's.

RECOMMENDATION 4: Audit maintenance contractors on an annual basis to ensure quality of maintenance is being performed on agency aircraft, USDA/APHIS/WS guidelines, requirements, and FAR's are complied with. Develop an audit checklist to ensure standardization.

OBSERVATION 5: Aircraft in hangar were not grounded to a grounded wire. There were no fire extinguishers in the aircraft storage hangar.

RECOMMENDATION 5: Install grounding wires to ground aircraft and install fire extinguishers to comply with OSHA regulations.

OBSERVATION 6: Aircraft maintenance may be provided in as many as 38 different locations.

RECOMMENDATION 6: Aircraft maintenance providers should be limited to no more than 3 or 4 locations. This will enhance standardization throughout the aviation program and reduce the number of audits of maintenance providers.

H. REFUELING FACILITIES AND OPERATIONS:

The USDA/APHIS/WS normally conducts in-house refueling services. There are procedures in the USDA/APHIS/WS Aircraft Operations Manual under Section B-Flight Operations, B-9 Aircraft Refueling Procedures. Overall, aircraft refueling appears to be conducted in a safe manner with sufficient procedures in place as outlined in the Operations manual.

OBSERVATION 1: The refueling procedures are addressed in the Operations Manual.

RECOMMENDATION 1: None

I. AVIATION LIFE SUPPORT EQUIPMENT (ALSE):

There is no formal USDA/APHIS/WS "ALSE Program" in place. However, ALSE is worn by each USDA/APHIS/WS pilot. Each pilot wears a helmet, nomex flight suit, nomex gloves, and leather boots. In addition, each aircraft carries an Emergency Locator Transmitter (ELT) and a survival kit. The ALSE equipment is distributed by APHIS/WS personnel and inspected on an annual basis as per the Aviation Operations Manual Section B-15.3.3. Any equipment that requires repair or replacement is done so at that time.

OBSERVATION 1: There is no official "ALSE Manager" assigned that is responsible for ALSE equipment. Mr. Scott Jensen is responsible for the distribution and inspection of ALSE equipment. Any items requiring repair must be sent to the manufacturer/vendor.

RECOMMENDATION 1: APHIS should formalize the ALSE Program and designate an "ALSE Manager" who would be responsible for the ordering, tracking, distribution, inspection, and repair (or return to manufacturer) of ALSE equipment. This "ALSE Manager" would also be responsible for the evaluation of ALSE equipment and for developing policy for the use of ALSE equipment by APHIS/WS flight crew and personnel.

J. PHYSICAL SECURITY:

The USDA/APHIS/WS addresses physical security in Directive 1650.2 (2/28/06) the APHIS Aviation Security Program. This directive directs USDA/APHIS/WS personnel to conduct risk analysis for each mission as well as security procedures for aircraft, personnel, and facilities. The security program is a function of the USDA. It is the USDA that conducts security reviews and issues security policy for each USDA operation. The Directive states that the Director, Employee Services Division (ESD) is responsible for the functional management and leadership of the

APHIS Aviation Security Program and the APHIS Aviation Security Officer is responsible for APHIS employees, aircraft, and facilities. The ATOC facility in Cedar City is equipped with video monitors, and key control management policies and processes. Personnel are briefed and trained in USDA security requirements.

Overall, the USDA security program is operating in an effective manner and is compliance with FMR 102-33.

OBSERVATION 1: The ATOC facility in Cedar City does not have an assigned security manager in accordance with USDA Directive 1650.2.

RECOMMENDATION 1: APHIS should appoint an Aviation Security Officer in order to comply with USDA Directive 1650.2.

K. AVIATION ACCIDENT RESPONSE PLAN:

The USDA/APHIS/WS has aviation accident response plans (pre-accident plan) for each state program and the USDA apparently has an overarching aviation accident response plan that appears to meet requirements of the Emergency Response Plan that follows the procedures as suggested by the National Transportation Safety Board in the NTSB Federal Plan for Aviation Accidents Involving Aircraft Operated by or Chartered by Federal Agencies (NTSB Plan). The “state” pre-accident plans were reviewed by the ARMS Team. The USDA plan was not.

OBSERVATION 1: Wildlife Services (WS) does not have an Accident Response plan that fully meets the requirements of the Emergency Response Plan as required by FMR 102-33.185(b). WS relies on the USDA to fulfill the requirements of the NTSB requirements that go beyond (state) pre-accident plans.

RECOMMENDATION 1: WS should continue to develop its internal Emergency Response Plan (draft) and incorporate it into the Safety Manual, and into the USDA overarching emergency response plan.

L. GOLD STANDARD VERIFICATION:

The USDA/APHIS/WS meets the requirements of the ICAP Gold Standard Certificate program.

OBSERVATION 1: USDA/APHIS/WS meets the requirements of the Gold Standard Certificate.

RECOMMENDATION 1: USDA/APHIS/WS should apply for the Gold Standard Certificate soon as possible.

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Animal Plant Health Inspection Services/Wildlife Services

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I. OVERVIEW

A. INITIAL MEETING(S)

The ICAP was requested by the U.S. Department of Agriculture (USDA) Animal Plant Health Inspection Services (APHIS) to conduct an ARMS through a formal letter signed by Mr. William Clay, Deputy Administrator of Wildlife Services dated July 2, 2007.

Numerous telephone calls and emails with Mr. Jacob Wimmer and Mr. Michael Worthern of APHIS were used to coordinate and finalize the ARMS Team members, establish the dates the ARMS Team would travel to the various APHIS locations in Utah and Texas and establish the areas in the checklist that would be surveyed by the ARMS Team as requested by USDA/APHIS/WS.

B. TEAM MEMBERS

The ARMS Team consisted of the following individuals:

ARMS Team Leader
Mr. Christopher Keyes
Federal Aviation Administration (FAA)

ARMS Team Member
Mr. Mike Miles
General Services Administration (GSA)

ARMS Team Member
Mr. Standley Cobb
Federal Aviation Administration (FAA)

ARMS Team Member
Mr. Tony Butcher
General Services Administration (GSA)

C. IN-BRIEFING

On January 23, 2008, the ARMS team conducted the formal in-brief at the USDA/APHIS/WS Aviation Operations Training Center at Cedar City, Utah. Present were:

Mr. Christopher Keyes, FAA, ARMS Team Leader
Mr. Mike Miles, ARMS Team, GSA
Mr. Standley Cobb, ARMS Team, FAA
Mr. Tony Butcher, ARMS Team, GSA
Mr. Jacob Wimmer, APHIS
Mr. Lloyd Burraston, APHIS
Mr. John Eisemann, APHIS

The ARMS Team was requested by Mr. Wimmer to review the following areas from the ARMS GUIDE:

1. Management and Administration
2. Training
3. Safety Management/Administration
4. Operating Procedures, Manual and Directives
5. Operations Records
6. Flight Operations
7. Maintenance Management
8. Refueling Facilities and Operations
9. Aviation Life Support Equipment
10. Physical Security
11. Aviation Accident Response Plan
12. Gold Standard Verification

Mr. Chris Keyes, FAA introduced the ARMS team and discussed the purpose of the ARMS and the areas requested to be surveyed. Mr. Wimmer, USDA/APHIS/WS/Wildlife Services (WS) then introduced the members of USDA/APHIS/WS followed by a brief explanation of APHIS/WS and its mission. All in attendance briefed their respective areas of responsibility in order to give the ARMS team a better understanding of the USDA/APHIS/WS aviation operation. Following the in-brief the ARMS Team began the ARMS process interviewing key personnel.

D. REVIEW PROCESS

The review and evaluation was conducted at the USDA/APHIS/WS Aviation Operations Training Center at Cedar City, Utah. Prior evaluations were conducted in Junction, Texas (January 17, 2008). The method of the evaluations was accomplished by:

Reviewing available management and operations procedures manuals, reviewing training records, reviewing maintenance records and procedures, reviewing safety procedures and safety manuals, and interviewing USDA/APHIS/WS personnel to include; management, pilots, administrative personnel, maintenance, and contractors as appropriate.

The ARMS Team conducted interviews with 17 USDA/APHIS/WS employees and contractors assigned at the various described locations. All persons interviewed demonstrated complete candor and willingness to cooperate. The hospitality extended by all USDA/APHIS/WS personnel was outstanding. Comments from interviewees were based on their individual perceptions. The ARMS Team acknowledges the premise that perceptions can be distorted at times. Never the less, these same perceptions influence the habit and thought patterns of the USDA/APHIS/WS employees. The comments and recommendations of the ARMS Team in this report are opinions based on observations and interviews.

E. OUT-BRIEFING

A formal out-briefing was conducted at the USDA/APHIS/WS Aviation Operations Training Center at Cedar City, Utah Friday, January 26, 2008, for key USDA/APHIS/WS personnel. The members of the ARMS Team briefed their respective areas and fielded questions from those present.

The purpose of an out-briefing is to allow all persons impacted by the survey the opportunity to question the team as a whole and individually. As stated earlier, the survey comments (Observations and Recommendations) are opinions of the ARMS Team members based on observations and interviews with agency employees. Once the out-brief is accomplished, the survey report is finalized and submitted to USDA/APHIS/WS. The ARMS Team has no further interest in the ARMS Report once it is completed. If the opportunity for rebuttal is not taken during the out-brief the report cannot be easily altered.

The ARMS Report is for the exclusive use of USDA/APHIS/WS that must consider if implementation of recommendations is appropriate. The ARMS Report is not an Inspector General type report. Comments, justifications, rebuttals or specifics to the report are not required or necessary.

Present at the outbriefing were:

Mr. Christopher Keyes, FAA, ARMS Team Leader
Mr. Mike Miles, ARMS Team, GSA
Mr. Standley Cobb, ARMS Team, FAA
Mr. Tony Butcher, ARMS Team, GSA
Mr. Jacob Wimmer, APHIS
Mr. Lloyd Burraston, APHIS
Mr. John Eisemann, USDA [via telecom]

II. EXECUTIVE SUMMARY

The USDA/APHIS/WS operates in accordance with applicable Federal Aviation Regulations (Part 91, Part 43, etc.), Public Law, and the Code of Federal Management Regulations (FMR 102-33) that pertain to a Federal agency aviation operation. There are USDA/APHIS/WS program manuals, policies, and procedures in place designed to effectively manage the organization. It is the opinion of the ARMS Team that the USDA/APHIS/WS aviation program is being operated in a safe, efficient, and effective manner.

As background, the US Department of Agriculture Animal Plant Health Inspection Services Wildlife Services (USDA/APHIS/WS) is a multi-faceted agency with a broad mission area that includes administering the Animal Welfare Act and carrying out wildlife damage management activities. One way the USDA/APHIS/WS accomplishes these responsibilities is through the use of aircraft.

The USDA/APHIS/WS aviation program provides capable, mission-ready aircraft and professional crews trained to conduct the USDA/APHIS/WS mission wherever and whenever required. Some of the aviation missions the USDA/APHIS/WS carries out include animal eradication, bird surveys, mammal survey, delivery of oral rabies vaccines, predator control, and training. USDA/APHIS/WS conducts these missions by using helicopters and fixed wing aircraft. The USDA/APHIS/WS operates in 28 states using 74 agency owned, contactor owned and operated, and "exclusive use" leasing aircraft. The USDA/APHIS/WS flight crews are required to conduct missions that include demanding flight regimes. The central USDA/APHIS/WS training facility is located in Cedar City, Utah and this center supports the USDA/APHIS/WS operations in each state.

The following is a general summary of the USDA/APHIS/WS operations that the ARMS Team evaluated during the survey.

A. MANAGEMENT AND ADMINISTRATION:

It is the opinion of the ARMS team that USDA/APHIS/WS has an appropriately defined organizational structure in place that is staffed with trained, qualified and experienced personnel. It is clear that USDA/APHIS/WS has put significant effort into establishing an aviation management structure that conforms to the requirements contained in FMR 102-33.

During the course of the evaluation, ARMS members interviewed numerous management, support, and administrative personnel. The interviews regarding management were positive. Overall morale of the staff seems good.

The system seems to be working well for USDA/APHIS/WS. Managers felt they had appropriate input into the planning and budget process. All felt their program needs were being met. All managers and supervisors with budget responsibility were especially happy with their autonomy in dealing with their budgets, programs and challenges. A high degree of team effort was noted between the various program

managers in dealing with budget issues and needs. USDA/APHIS/WS appears to be proactive in its fleet planning with an active and recurring effort to review and evaluate its mission and program.

Overall, indications are that management enjoys the confidence and support of the employees.

B. TRAINING:

USDA/APHIS/WS has an established flight training program. The majority of the initial and recurrent training is conducted at the Aviation Training Operations Center (ATOC) located in Cedar City, Utah. The training facility is staffed with a minimum of qualified personnel to accomplish the training mission. The Aviation Training and Operations Center (ATOC) manager has developed an effective training curriculum using a set of manuals, simulators and training devices that provide outstanding quality training that is geared to the specific tasks of the WS pilot and crewmember. The training promotes safety through standardization. Training records are maintained at the ATOC facility both hard copy and electronically. A review of the records indicates that they are well maintained, accurate and complete. All personnel interviewed indicated that the training has improved dramatically over the past few years and gave it high marks for effectiveness, timeliness, and applicability. The training operation is considered to be outstanding.

C. SAFETY MANAGEMENT/ADMINISTRATION:

The USDA/APHIS/WS aviation safety program is detailed in the USDA/APHIS/WS/Wildlife Services-Aviation Safety Manual. The USDA/APHIS/WS Aviation Safety Officer (ASO), Mr. Jacob Wimmer, manages the aviation safety program. Mr. Wimmer is a school trained (US Army) aviation safety officer. The aviation safety program meets all requirements of the FMR 102-33 180 thru .185 as well as FMR 102-33.445 and .450. It is operating in an effective manner with all required elements required of a successful aviation safety program.

D. OPERATING PROCEDURES, MANUALS AND DIRECTIVES:

The USDA/APHIS/WS Aircraft Operations Manual (2004) is the document used by all aviation and management personnel to conduct flight operations. The manual is currently under revision and requires only minor changes to bring it up to standards required by the Federal Management Regulation, Federal Aviation Regulations, and WS Directives.

USDA/APHIS/WS State Directors also issue State Directives to augment the Aircraft Operations Manual.

E. OPERATIONS RECORDS:

The pilots training and certification records are being maintained in several locations within USDA/APHIS/WS. From interviews and discussions, the records appear to be maintained IAW the FMR and FAR. Flight time records being maintained appear to be accurate and complete.

F. FLIGHT OPERATIONS

The USDA/APHIS/WS flight operations are highly decentralized and located in rural areas close to the areas in which they conduct their flight operations. This wide dispersal of flight operations was not conducive to practical observations by the ARMS teams. However, one ARMS team member was able to observe the flight operations of a contract operator in Oral Rabies Vaccination operations being conducted in Junction, Texas, on January 17, 2008. Interviews and reviews of manuals and WS Directives lead the ARMS team to a good understanding of how flight operations are being conducted.

G. MAINTENANCE MANAGEMENT:

The USDA/APHIS/WS maintenance management is addressed in the Aviation Operations Manual in a disjointed manner. There is no designated chapter in the Aviation Operations Manual that addresses maintenance procedures and no 'stand alone' General Maintenance Manual. However, all USDA/APHIS/WS aircraft are required to have "a valid FAA Airworthiness Certificate" in accordance with the Aviation Operations Manual, Section B. It is assumed that every USDA/APHIS/WS aircraft falls under a manufacturer's maintenance program, which includes FAA oversight. The ARMS Team reviewed the USDA/APHIS/WS existing maintenance procedures and documents, applicable Title 14 Code of Federal Regulations (CFR), Federal Aviation Regulations (FAR), FAA Type Certificate Data Sheets (TCDS), and FAA Advisory Circular (AC) 00.1-1 Public Aircraft Operations, for the basis of determining the effectiveness and regulatory compliance of USDA/APHIS/WS maintenance management. The survey included personal interviews with key USDA/APHIS/WS maintenance personnel and contractors.

The USDA/APHIS/WS requires all USDA/APHIS/WS aircraft to be certified, maintained, and operated in accordance with all pertinent regulations and guidelines set forth by AOC, FAA, ICAO, DOD, and Aircraft Manufacturers to the fullest extent practical. FAR Part 91 has been established as the minimum standard for maintenance and inspection of USDA/APHIS/WS aircraft.

It appears that there is limited communication between the State Director, National Aviation Coordinator and field personnel on the airworthiness status of aircraft operated by the Agency. It is also difficult to determine who has the oversight responsible for tracking aircraft times and scheduled inspections.

It is the opinion of the ARMS Team that the USDA/APHIS/WS aviation maintenance program is operating in a safe manner.

H. REFUELING FACILITIES AND OPERATIONS:

The USDA/APHIS/WS normally conducts in-house refueling services. There are procedures in the Aircraft Operations Manual under Section B-Flight Operations, B-9 Aircraft Refueling Procedures. Overall, aircraft refueling appears to be conducted in a safe manner with sufficient procedures in place as outlined in the operations manual.

I. AVIATION LIFE SUPPORT EQUIPMENT (ALSE):

There is no formal USDA/APHIS/WS "ALSE Program" in place. However, ALSE is worn by each USDA/APHIS/WS pilot. Each pilot wears as a minimum, a helmet, nomex flight suit, nomex gloves, and leather boots. In addition, each aircraft carries an Emergency Locator Transmitter (ELT) and a survival kit. The ALSE equipment is stored in a central location, distributed by APHIS personnel, and inspected on an annual basis as per the Aviation Operations Manual Section B-15.3.3. Any equipment that requires repair or replacement is done so at that time.

J. PHYSICAL SECURITY:

The USDA/APHIS/WS addresses physical security in Directive 1650.2 (2/28/06) the APHIS Aviation Security Program. This directive directs USDA/APHIS/WS personnel to conduct risk analysis for each mission as well as security procedures for aircraft, personnel, and facilities. The security program is a function of the USDA. It is the USDA that conducts security reviews and issues security policy for each USDA operation. The Directive states that the Director, Employee Services Division (ESD) is responsible for the functional management and leadership of the APHIS Aviation Security Program and the APHIS Aviation Security Officer is responsible for APHIS employees, aircraft, and facilities. The ATOC facility in Cedar City is equipped with video monitors, key control, and the personnel are briefed and trained in USDA security requirements.

Overall, the USDA security program is operating in an effective manner and is in compliance with FMR 102-33.

K. AVIATION ACCIDENT RESPONSE PLAN:

The USDA/APHIS/WS has aviation accident response plans for each state program and the USDA has a aviation accident response plan that appears to meet the requirements of the Emergency Response Plan that follows the procedures as suggested by the National Transportation Safety Board in the NTSB Federal Plan for Aviation Accidents Involving Aircraft Operated by or Chartered by Federal Agencies (NTSB Plan).

L. GOLD STANDARD VERIFICATION:

The USDA/APHIS/WS meets the requirements of the ICAP Gold Standard Certificate program.