



Bureau of
Safety and
Environmental
Enforcement

National Aviation Management Plan

August 2024 (Revision 1)



Signatures and Updates

The BSEE National Aviation Management Plan (October 2023) has been formally reviewed and is approved.

STACEY NOEM Digitally signed by STACEY
NOEM
Date: 2023.10.17 16:27:02 -04'00'

Chief, Office of Offshore Regulatory Programs

The BSEE Office of Offshore Regulatory Programs National Aviation Manager has reviewed and updated the 2022 National Aviation Management Plan.

ANDREW WAREHAM Digitally signed by
ANDREW WAREHAM
Date: 2023.10.17 11:42:25
-08'00'

BSEE National Aviation Manager

The BSEE Office of Offshore Regulatory Programs National Aviation Manager has reviewed and updated the 2023 National Aviation Management Plan.

ANDREW WAREHAM Digitally signed by
ANDREW WAREHAM
Date: 2024.08.02
08:39:44 -08'00'

BSEE National Aviation Manager

(Revision 1) The BSEE Office of Offshore Regulatory Programs National Aviation Manager has reviewed and updated the 2024 National Aviation Management Plan to reference “Gulf of America” where appropriate.

BSEE National Aviation Manager



National Aviation Management Plan

| | |
|--|--------|
| Table of Contents | iii-v |
| Summary of Updates..... | vi-x |
| Abbreviations..... | xi-xiv |
| Introduction | 1 |
| Section 1 Aviation Organization | 2 |
| A. Roles and Responsibilities..... | 2 |
| B. Aviation Program Objectives..... | 9 |
| C. Authorities and References..... | 10 |
| D. National Aviation Management Plan Revision Schedule | 13 |
| E. BSEE Organizational Requirements..... | 13 |
| Section 2 Aviation Administration | 16 |
| A. Contracts (non-fleet)..... | 16 |
| B. Acquisition (fleet)..... | 17 |
| C. Use Reports and Payments Processes..... | 17 |
| D. Record Keeping Requirements..... | 22 |
| E. Administrative Requirements | 23 |
| Section 3 Aviation Safety..... | 24 |
| A. Policy..... | 24 |
| B. Risk Management | 24 |
| C. Promotion..... | 27 |
| D. Assurance..... | 30 |
| E. Personal Protective Equipment..... | 33 |
| Section 4 Aviation Operations | 47 |
| A. Special Use..... | 47 |
| B. Fixed Wing | 48 |
| C. Rotary Wing | 48 |
| D. Fleet Operations | 49 |
| E. Cooperator Operations | 49 |
| F. Passenger Transport | 49 |

| | |
|--|--------|
| G. Hazardous Materials Transport..... | 52 |
| H. Flight Planning | 53 |
| I. Flight Following..... | 53 |
| J. Uncrewed Aircraft Systems..... | 54 |
| K. Operational Environmental Considerations | 54 |
| L. Documentation Requirements..... | 55 |
| M. Bureau-Specific Operational Requirements..... | 55 |
| Section 5 Aviation Training..... | 61 |
| A. Management Responsibilities | 61 |
| B. Required Aviation Training..... | 62 |
| C. Specialty Training..... | 65 |
| D. Contracting Officer’s Representative (COR) requirements..... | 65 |
| E. Documentation Requirements..... | 66 |
| F. Bureau-Specific Training Requirements (HUET, CA-EBS, IAT)..... | 66 |
| Section 6 Aviation Security..... | 67 |
| A. Aviation Facilities | 67 |
| B. Aircraft and Equipment..... | 67 |
| C. Aviation Fuel Security | 67 |
| D. General Aviation Security Programs..... | 67 |
| E. U.S. Coast Guard (USCG) Maritime Security (MARSEC) and DHS National Terrorism Advisory System (NTAS) | 67 |
| Section 7 Airspace Coordination | 69 |
| A. General | 69 |
| B. Definitions..... | 69 |
| C. De-Confliction Procedures | 70 |
| D. Emergency Security Control of Air Traffic (ESCAT) Procedures | 70 |
| E. Bureau-Specific Airspace Requirements | 70 |
| Section 8 Aviation Project Planning Requirements..... | 71 |
| A. Policy..... | 71 |
| B. Regional Aviation Management Plans (RAMPs)..... | 71 |

Appendices

Appendix Section A – Offshore Travel Authorization

| | |
|---|----|
| Appendix A.1. Authorization for Use of BSEE Contract Aircraft | 72 |
| Appendix A.2. DOI Solicitor’s Letter, Feb 13, 2020, “Company Representatives on Agency Inspection Flights to Uncrewed Platforms” | 77 |
| Appendix A.3. Offshore Visitors Information Form..... | 78 |

Appendix Section B – BSEE Director’s Safety and Occupational Health Policy

| | |
|--|----|
| Appendix B. BSEE Director’s Safety and Occupational Health Policy Statement..... | 80 |
|--|----|

Appendix Section C – OAS/BSEE Policy Exceptions

| | |
|--|----|
| Appendix C.1. BSEE Policy Exception – A-110 Aviation Transportation of HAZMAT..... | 81 |
| Appendix C.2. Vessel Landings Waiver..... | 82 |
| Appendix C.3. Sample Aviation Life Saving Equipment (ALSE) Waiver..... | 84 |

Appendix Section D – Aviation Hazard Reporting Program

| | |
|--|----|
| Appendix D. Aviation Safety Communiqué (SAFECOM) | 86 |
|--|----|

Appendix Section E – Aviation Training

| | |
|--|----|
| Appendix E.1. Helicopter Underwater Egress Training (HUET) with Compressed Air – Emergency Breathing Systems (CA-EBS)..... | 93 |
| Appendix E.2. BSEE – Request for Modified Helicopter Underwater Egress Training (HUET) with Compressed Air – Emergency Breathing System (CA-EBS)..... | 97 |

Appendix Section F – Risk Assessment Tools

| | |
|--|-----|
| Appendix F.1. Risk Assessment Matrix | 98 |
| Appendix F.2. Operational Risk Management Worksheet | 99 |
| Appendix F.3. Special Use Risk Assessment – Airborne PASP..... | 100 |

Appendix Section G – Additional Aviation Safety Tools & References

| | |
|---|-----|
| Appendix G.1. Pilot Briefing | 101 |
| Appendix G.2. BSEE Mission Lead – Checklist..... | 102 |
| Appendix G.3. Sea States and Float Limitations | 104 |
| Appendix G.4. Designated Mountain Areas | 110 |
| Appendix G.5. Aerial Hazard Maps | 111 |
| Appendix G.6. Fatality/Serious Injury Notification Guide (aka Line of Duty Death Guide) | 112 |

2024 NAMP Summary of Updates

The NAMP has been updated to replace the titles for BSEE Managers and Mission Chief with the previous title of “Chief” with their newly assigned titles per the Director’s guidance.

- Chief, OORP is now Assistant Director, OORP.
- Deputy Chief, OORP is now Deputy, OORP.
- Chief, OSIB is now Manager, OSIB.
- Mission Chief (MC) is now Mission Lead (ML).

Also, all NAMP appendices references have been updated.

BSEE Employee Prerogative.

No changes.

Section 1 - Aviation Organization.

Section A. Roles and Responsibilities, 2. BSEE, i. Managers and Supervisors, iv., (a), Updated Footnote #9 to read, “A Unit Aviation Training Advisor (UATA) assists management by monitoring the aviation training status (completion and currency) of all employees, *managers/supervisors* assigning IAT courses to new employees, and removing employees from the unit’s IAT roster who are no longer in the unit.” The word “supervisors” was added, Page 9.

Section B. Aviation Program Objectives, 3. Program Objectives, Updated to read, “...while maintaining high personnel standards and a commitment to excellence, integrity, and *continuous improvement of* safety, environmental protection, and conservation of resources.” Replaced the phrase, “...the innovation of progressive ideas to further enhance...” with “...continuous improvement of...”. Page 10.

Section C. Authorities and References, 3. Collaborating Aviation Safety Organizations, Added the text, “*BSEE Management is encouraged to have BSEE’s subject matter experts (aviation managers, supervisory inspectors, field engineers, and supervisors/managers) routinely participate in organizational conferences of interest below.*” Page 12.

Section C. Authorities and References, 3. Collaborating Aviation Safety Organizations, d. Helicopter Safety Advisory Conference (HSAC), added, “*BSEE Aviation Managers/Aviation Safety Managers are encouraged to attend at least one HSAC Conference per year.*” Page 12.

Section C. Authorities and References, 3. Collaborating Aviation Safety Organizations, added *K. Offshore Operators Committee (OOC)*. Page 13.

Section E. BSEE Organizational Requirements, 2. Project Aviation Safety Plans (PASP), General guidance for project aviation safety planning, c. Updated the Note to reflect the updated Appendix and title, “*Note: See Appendix Section F.3 for additional guidance and the “Special Use Risk Assessment – Airborne PASP” example.*” Page 14.

Section E. BSEE Organizational Requirements, 2. Project Aviation Safety Plans (PASP), General guidance for project aviation safety planning, f., Updated to read, “All PASPs for pre-planned missions will be reviewed by the RAM/RASM for policy adherence and concurrence/non-concurrence.” Page 15.

Section 2 - Aviation Administration.

C. Use and Payment Processes, e. Mission Codes, the Figure 6. Mission Code Chart was updated to include the Note section. Page 21.

Section 3 - Aviation Safety

Section D. Assurance, 1. Aviation Mishap Response Planning. Added, “Aviation Mishap Response Plans will be developed at the Regional and District levels *in coordination with contracted vendors.*” Page 30.

Section D. Assurance, 1. Aviation Mishap Response Planning. c. RAMs, 4. Added, “Are reviewed and updated a minimum of annually *in coordination with contracted vendors;*” Page 31.

Section D. Assurance, 2. Aviation Mishap Reporting. **Updated to read,** “Any BSEE flight that results in damage to the aircraft or injury to any person, ***no matter how slight, must be reported immediately by the vendor per contract.*** A BSEE emergency contact checklist should be tailored by each Region and District in collaboration with the contracted vendor. See Section 3, Appendix G.6, and Regional Aviation Management Plans.

In general, the vendor will make initial notification to the Department of Interior via the Interior Operations Center (IOC), Phone: (1-888-464-7427 / 1-888-4MISHAP) and make notifications as required per their contracts. The IOC in-turn will contact the Office of Aviation Services who will notify BSEE.

When the OAS (or regional aviation management if notified prior) contacts the NAM/NASM, the NAM/NASM will make additional notifications to BSEE Headquarters staff to include Public Affairs, Human Resources, Executive Aviation Committee Member, Directors, Office of Emergency Management, Safety Manager, Manager of OSIB, Assistant Director OORP, etc., unless specified notifications are required to be made by regional staff per the Regional Aviation Management Plan.” Pages 31-32.

Also, updated Footnote 26 to read, “The NAM/NASM will notify the BSEE Safety Manager, POCs: Raynette Lennix, (504)736-2888, or, Nicole Reaves, (703)787-1401. And, BSEE Emergency Management Coordinator, Dana Miller, (703) 787-1327.” Page 32.

Section D. Assurance, 2. Aviation Mishap Reporting, added, “c. ***Reporting Airspace Conflicts through the SAFECOM System.*** See Appendix D – Aviation Safety Communiqué (SAFECOM), 17. Near Mid-Air Collision, Note: Reporting Airspace Conflicts using the SAFECOM.” Page 33.

Section 4 - Aviation Operations

Section A. Special Use, 1. General, c., added Footnote #52 which reads, “*The BSEE GOAR has an approved Vessel Landings Carding Waiver. See Appendix C.2.*” Page 47.

Section F. Passenger Transport, 2. Official Passengers, d. Added, “*See 6. Space-Available Travel below.*” Page 50.

Section F. Passenger Transport, 6. Space-Available Travel. Added, “*Not currently applicable to BSEE’s aviation contracts.*” Page 51.

Section H. Flight Planning, 2. Updated “Flight Hazards Maps” to “Aerial Hazards Maps” for continuity throughout the NAMP, NAMP Appendices, and with DOI guidance. Page 53.

Section M. Bureau-Specific Operational Requirements, 7. Sea States and Helicopter Float Limitations, b. Policy, 1. Risk Mitigation and Approval, a. Preflight, III. Added, “*A PASP is required to be completed and submitted for the appropriate risk review level of approval.*” Page 59.

Section 5 - Aviation Training

Section A. Management Responsibilities, 5. Updated the Note to read, “*Note: In Alaska and Pacific Regions the RAM/RASM reviews employees’ IAT training and provides a summary to the Regional Supervisor of Field Operations or their designee, and the NAM/NASM.*” Added, “*...Pacific Regions...*,” and “*...or their designee...*”. Page 62.

Section 6 – Aviation Security.

No changes.

Section 7 - Airspace Coordination.

Section C. De-confliction Procedures, added, “*See Appendix D. Aviation Safety Communiqué (SAFECOM), 17. Near Mid-Air Collision, Note: Reporting Airspace Conflicts using the SAFECOM.*” Page 70.

Section 8 – Aviation Project Planning Requirements. No major changes.

No changes.

Appendix A.1. Authorization for Use of BSEE Contract Aircraft

Section B. Procedures, 3. Federal Non-BSEE (GS-level) and Military Officials. Added, “or designee” to the sentence, “The RAM/RASM is responsible for ensuring the Regional Director or designee is notified prior to the planned OCS facility visit.” Page 75.

Section B. Procedures, 5. Summary of Required Documentation. Updated the note to include, “...Salary information is not required on OAS Form-110 unless requested by the Solicitors’ Office.” Page 76.

Appendix A.2. DOI Solicitor’s Letter, Feb 13, 2020, “Company Representatives on Agency Inspection Flights to Unmanned Platforms”

No changes.

Appendix A.3. Offshore Visitors Information Form.

No changes.

Appendix B. BSEE Director’s Safety and Occupational Health Policy Statement.

No changes.

Appendix C.1. BSEE Policy Exception – A-110 Aviation Transportation of Hazmat.

No changes.

Appendix C.2. Vessel Landings Waiver.

Newly added. Pages 82-83.

Appendix C.3. Sample Aviation Life Saving Equipment (ALSE) Waiver.

No changes.

Appendix D. Aviation Safety Communiqué (SAFECOM).

Procedures. Who Can Submit a SAFECOM? Revised third paragraph to read, “...If anyone is in doubt about whether or not to submit a SAFECOM, *they’re encouraged to contact the RAM/RASM, or the BSEE NAM/NASM to discuss the issue prior to submitting a SAFECOM.* If we don’t know about a problem we can’t fix it.” Page 88.

Appendix E.1. Helicopter Underwater Egress Training (HUET) with Compressed Air – Emergency Breathing System (CA-EBS)

Updated Appendix E.1 title and body to include, “with Compressed Air – Emergency Breathing System (CA-EBS).” Pages 93-96.

Appendix E.2. Request for Modified Helicopter Underwater Egress Training (HUET) with Compressed Air – Emergency Breathing System (CA-EBS)

Updated Appendix E.2 title to include, “with Compressed Air – Emergency Breathing System (CA-EBS).” Page 97.

Appendix F.1. Risk Assessment Matrix.

No changes.

Appendix F.2. Operational Risk Management Worksheet

No changes.

Appendix F.3. Special Use Risk Assessment – Airborne PASP.

Updated with current Risk Matrix version. Page 100.

Appendix G.1. Pilot Briefing

No changes.

Appendix G.2. BSEE Mission Lead – Checklist

During the Mission Section, updated the name of *the Special Use Risk Assessment – Airborne PASP* (NAMP Appendix F.3). Page 103.

Prior Appendix G.3. Example of Aviation Safety Meeting Notes

The previously recommended format was removed from the RAMP.

Appendix G.3 – Sea States and Float Limitation

No changes.

Appendix G.4 – Designated Mountainous Areas

No changes.

Appendix G.5 – Aerial Hazard Maps

No changes.

Appendix G.6. Fatality/Critical Incident Response Guide (aka Line Of Duty Death (LODD) Guide).

Section on Preparing for an Aircraft Accident Investigation Team: Action to be Taken by the Local Unit – Section III, updated this section to include the *FAA* and/or the *NTSB*. Pages 126-128.

2023 NAMP Abbreviations

| | |
|--------|---|
| AC | Advisory Circular (FAA) |
| ACE | Aviation Centered Education |
| ADIZ | Air Defense Identification Zone |
| AGL | Above Ground Level |
| AIRE | Aviation Incident Response Exercise |
| AIRS | Aviation Information Reporting Support |
| AKOCSR | Alaska Outer Continental Shelf Region |
| ALNOT | Alert Notice |
| ALSE | Aviation Life Support Equipment |
| APE | Aviation Program Evaluation |
| API | American Petroleum Institute |
| ASAP | As Soon As Possible |
| ASM | Aviation Safety Manager |
| AQD | Acquisition Services Directorate |
| ATC | Air Traffic Control |
| ATCSCC | Air Traffic Control System Command Center |
| AUR | Aircraft Use Report |
| AV | Availability |
| A-100 | Basic Aviation Safety |
| A-116 | General Awareness Security Training |
| A-200 | Mishap Review |
| A-220 | Train the Trainer |
| A-302 | Personal Responsibilities and Liabilities |
| A-310 | Introduction to Crew Resource Management |
| A-310E | Crew Resource Management (IAT identifier for BSEE CRM) |
| A-312E | Water Ditching and Survival (IAT identifier for HUET or T-HUET) |
| BSEE | Bureau of Safety and Environmental Enforcement |
| C | Celsius |
| CA-EBS | Compressed Air Emergency Breathing Apparatus |
| CFR | Code of Federal Regulations |
| CO | Contracting Officer |
| COA | Certificate of Authorization |
| COR | Contracting Officer's Representative |
| COTR | Contracting Officer's Technical Representative |
| DHS | Department of Homeland Security |
| DM | Departmental Manual |
| DM | District Manager |
| DOD | Department of Defense |
| DOI | Department of the Interior |

| | |
|---------|--|
| DROTAM | Drone Notice to Air Mission |
| DVFR | Defense Visual Flight Rules |
| EAB | Executive Aviation Board |
| EAC | Executive Aviation Committee |
| EAS | Executive Aviation Sub Committee |
| EBS | Emergency Breathing Apparatus |
| ELT | Emergency Locator Transmitter |
| ESCAT | Emergency Security Control of Air Traffic |
| ETA | Estimated Time of Arrival |
| F | Fahrenheit |
| FAA | Federal Aviation Administration |
| FAA AC | Federal Aviation Administration Advisory Circular |
| FAR | Federal Aviation Regulation |
| FCC | Federal Communications Commission |
| FMR | Federal Management Regulation |
| FSDO | FAA Flight Standards District Office |
| FT | Flight Time |
| FTA | Fire Traffic Area |
| GA | General Aviation |
| GOAR | Gulf of America Region |
| GSA | General Services Administration |
| HAI | Helicopter Association International |
| HSAC | Helicopter Safety Advisory Conference |
| HSAC RP | Helicopter Safety Advisory Conference Recommended Practice |
| HUET | Helicopter Underwater Egress Training |
| IAA | Interagency Agreement |
| IAT | Interagency Aviation Training/Trainer |
| IATS | Interagency Aviation Training Sub Committee |
| IB | Information Bulletin |
| IBC | Interior Business Center |
| ICAO | International Civil Aviation Organization |
| IIC | Investigator In Charge |
| IPP | Internet Payment Platform |
| IWP | Incident With Potential |
| IFR | Instrument Flight Rules |
| IMC | Instrument Meteorological Conditions |
| IIMC | Inadvertent Instrument Meteorological Conditions |
| KTS | Knots, Nautical Miles per Hour |
| LODD | Line Of Duty Death |
| MARSEC | Maritime Security |
| ML | Mission Lead |
| METS | Modular Egress Training Simulator |

| | |
|---------|---|
| MSL | Mean Sea Level |
| MST | Marine Survival Training |
| M2 | Aviation Management for Supervisors |
| M3 | Aviation Management Line Manager's Briefing |
| NAM | National Aviation Manager |
| NASM | National Aviation Safety Manager |
| NAMP | National Aviation Management Plan |
| NAS | National Airspace System |
| NFPA | National Fire Protection Association |
| NM | Nautical Mile |
| NOAA | National Oceanic and Atmospheric Administration |
| NOTAM | Notice to Air Mission |
| NTAS | National Terrorism Advisory System |
| NTSB | National Transportation Safety Board |
| NVG | Night Vision Goggles |
| NWCG | National Wildfire Coordination Group |
| NWS | National Weather Service |
| OAS | Office of Aviation Services |
| OAS TD | Office of Aviation Services Training Division |
| OCS | Outer Continental Shelf |
| OCSLA | Outer Continental Shelf Lands Act |
| O&G | Oil and Gas (Industry) |
| OMB | Office of Management and Budget |
| OPITO | Offshore Petroleum Industry Training Organization |
| OORP | Office of Offshore Regulatory Programs |
| OPM | Office of Personnel Management |
| OPM | Operational Procedures Memoranda/Memorandum |
| OSIB | Offshore Safety Improvement Branch |
| PAM | Project Aviation Manager |
| PASP | Project Aviation Safety Plan |
| PI | Project Inspector |
| PIC | Pilot in Command |
| POCSR | Pacific Outer Continental Shelf Region |
| PPE | Personal Protective Equipment |
| PwC | Price Waterhouse Coopers |
| RAM | Regional Aviation Manager |
| RAMP | Regional Aviation Management Plan |
| RASM | Regional Aviation Safety Manager |
| RD | Regional Director |
| RSFO | Regional Supervisor of Field Operations (Alaska) |
| SAFECOM | Safety Communiqué |
| SEMS | Safety and Environmental Management System |
| SES | Senior Executive Service |

| | |
|--------|--|
| SIC | Second in Command |
| SME | Subject Matter Expert |
| SMS | Safety Management System(s) |
| SOL | DOI Office of the Solicitor |
| SOP | Standard Operating Procedures |
| sUAS | small Uncrewed Aerial System |
| SWET | Shallow Water Egress Trainer |
| TAG | Threat Advisory Guidelines |
| TFR | Temporary Flight Restriction |
| T-HUET | Tropical Helicopter Underwater Egress Training |
| TPL | Thermo-Plastic Liner |
| TSA | Transportation Security Agency |
| UATA | Unit Aviation Training Administrator |
| UAS | Uncrewed Aerial System(s) |
| U.S.C. | United States Code |
| USCG | United States Coast Guard |
| VFR | Visual Flight Rules |
| VIP | Very Important Person |
| VMC | Visual Meteorological Conditions |

Introduction

The Bureau of Safety and Environmental Enforcement (BSEE) National Aviation Program plays an essential role in supporting the Bureau's ability to achieve OCS mission objectives. Its purpose is to promote a safety culture of sound aviation management practices that reduce risks inherent in aviation and eliminate unnecessary or unacceptable risks associated with the use of aviation. Management at all levels is responsible for the safety of aviation operations under their control. This responsibility includes direct supervision, training, and providing safe working conditions.

BSEE Employee Prerogative. While performing their duties, BSEE personnel may elect, without fear of reprisal, to not fly under any condition they consider to be unsafe.

It is the employee's responsibility to immediately report any aviation hazard that compromises the safety of personnel or equipment via a Safety Communiqué (SAFECOM) <https://www.safecom.gov/>. If the concerns are not aviation safety related, the employee should report concerns to their immediate supervisor/manager.

Additionally, BSEE personnel have the authority to terminate specific aviation operations (stop-work) when, in their judgement, that activity is unnecessarily risky (unsafe) ¹.

Department of the Interior (DOI) policy requires all Bureaus with aviation programs to develop and publish a National Aviation Management Plan (NAMP) that addresses the minimum elements to improve aviation safety and realize operational efficiencies through broad standardization.

The BSEE NAMP provides a comprehensive bureau-wide aviation plan that will allow all BSEE aviation users to easily acquire the necessary policies and information to manage aviation operations. The NAMP describes intent, policy, authority, objectives, roles and responsibilities, and procedures for the management and implementation of the BSEE aviation management program.

The NAMP is consistent with the provisions of DOI aviation policy established in Parts 350-353 of the Departmental Manual (DM) and the DOI Office of Aviation Services (OAS) Operational Procedures Memorandums (OPM). The NAMP also includes guidelines for the use of all aviation resources owned, leased, or chartered by the Interior Business Center Acquisition Services Directorate (AQD) for BSEE mission accomplishment including the use of cooperator (i.e. military and other Government agencies) aircraft. The NAMP applies to BSEE personnel traveling as non-revenue passengers aboard civil aircraft operating in accordance with 14 CFR 91, 125 or 135.

The policies, procedures and guidelines set out in this NAMP are to be followed unless specific waivers are approved in writing by the BSEE Director or the Director's designee² per [119 DM 4](#).

Reference BSEE Director Kevin M. Sligh's updated letter for Safety and Occupational Health Policy Statement, dated 04/27/23, in Appendix B.

² Policy exceptions from BSEE policy per the NAMP will be requested via written request submitted by the RAM/RASM in BSEE's Data Tracking System (DTS) and routed through the Regional Director, NAM, and OORP prior to being routed to the Director for approval. Coordination should be made with the NAM prior to submittal.

Section 1. Aviation Organization

A. Roles and Responsibilities

1. **Department of the Interior.** The DOI seeks to enhance collaboration and sharing of strategic aviation opportunities across bureaus and offices and to promote the use of enterprise aviation services using high value, national level information to inform and enhance priority initiatives, natural resource management decisions and related policy formulation. While the DOI presently owns, and procures aviation resources through an enterprise approach, improvement in the enterprise-level management of these assets across the DOI is needed to address large scale strategic policy development, implementation, cost, and safety issues.
 - a. **Office of Aviation Services (OAS)**³. The OAS is responsible for Departmental functions related to aircraft services. The OAS provides service offerings that include; aviation safety services (mishap investigations, program evaluations, and safety alerts/bulletins), aviation technical services, fleet management, fleet property accountability, aviation user training services, and flight scheduling and coordination services.
 - b. **Interior Business Center (IBC) Acquisition Services Directorate (AQD), Boise Branch.** The AQD provides department-wide centralized contracting for aviation flight services for DOI and DOI customers. AQD is responsible for the centralized contracting for aircraft and related services for all DOI Bureaus and other Federal and State agencies upon request. Other acquisition management activities include property accountability and small purchase service in support of OAS and Bureau operations including DOI fleet aircraft.
 - c. **Executive Aviation Board (EAB).** The EAB is chartered under the direction of the Assistant Secretary for Policy, Management, and Budget and is responsible for the DOI aviation program. The EAB provides executive oversight and performance accountability and assures that Department-wide strategies and initiatives are developed collaboratively and implemented consistently. The EAB has authority over all aviation related boards/committees/groups within DOI. The Assistant Director, Office of Offshore Regulatory Programs (OORP) serves as BSEE's EAB representative.
 - d. **Executive Aviation Committee (EAC).** The EAC functions as the primary executive body responsible for developing strategic aviation objectives and initiatives as well as implementing EAB initiatives and strategies. The EAC is comprised of DOI Bureau aviation executives and management. The Assistant Director, Office of Offshore Regulatory Programs (OORP) serves as BSEE's EAC representative.
 - e. **Executive Aviation Sub-Committee (EAS).** To collectively consider aviation issues that are common to all Bureaus, the EAC formally established the EAS. The EAS functions as the primary Subject Matter Expert (SME) with regards to DOI aviation topics and is the primary group to complete

³ See [350 DM 1](#) for a complete list of functions and responsibilities. The OAS organizational structure and responsibilities are contained in [112 DM 12](#).

tasks issued by the EAC. BSEE is represented on the EAS by the National Aviation Manager. The EAS has the authority to establish work groups comprised of bureau subject matter experts (SME) with detailed knowledge of EAC assigned tasks and/or DOI aviation.

Current EAC work groups organized under the EAS that BSEE participates in include:

- f. Interagency Aviation Training Subcommittee (IATS):** Serve as a group of aviation specialists that represent their Agency/Bureau requirements specific to the non-fire Interagency Aviation Training Program. The Subcommittee will provide guidance and recommendations to aviation managers regarding non-fire aviation training standards and requirements.
- 2. Bureau of Safety and Environmental Enforcement.** Ultimate responsibility for the management of all aviation programs, activities and resources lies with the Director of BSEE in accordance with [352 DM 1.6 C](#). This responsibility is administered through the Assistant Director⁴ and BSEE's aviation governance structure. More specifically, aviation responsibilities are delegated as follows:

 - a. Assistant Director, Office of Offshore Regulatory Programs (OORP).** The Assistant Director of OORP is responsible for the oversight of BSEE aviation management ([119 DM 4](#)) and is BSEE's EAB and EAC representative.
 - b. Manager, Offshore Safety Improvement Branch (OSIB).** The Manager of OSIB provides aviation policy oversight and guidance to the BSEE Aviation Team consisting of the National Aviation Manager and other designees.
 - c. National Aviation Manager (NAM).** The NAM serves as the principle aviation advisor to BSEE management. The NAM assists in the oversight of aviation management and programs at the national level and provides technical expertise that supports and improves BSEE's capacity to manage its aviation programs in a result-oriented and efficient manner. This position provides leadership and technical expertise for aviation safety management systems, risk management, and accident prevention programs. Specific responsibilities for the NAM position include:

 - i. Ensuring aviation programs, procedures, and guidelines comply with and implement DOI aviation policy and directives;
 - ii. Providing oversight in the planning and technical analyses relating to acquisition and cost-effectiveness of aviation resources;
 - iii. Reviewing, revising, and maintaining the National Aviation Management Plan annually;
 - iv. Representing BSEE as a member of the DOI Executive Aviation Subcommittee (EAS);
 - v. Collaborating with the Regional Aviation Managers to ensure safe and efficient use of all aviation resources in the accomplishment of the BSEE mission;

⁴ In the absence of the BSEE Assistant Director, OORP, the BSEE Deputy, OORP, will fulfil the aviation responsibilities.

- vi. Providing oversight of BSEE's aviation training program and providing training/certification guidance (curriculum, and course materials, instructing) for all BSEE aviation users;
 - vii. Evaluating the effectiveness of existing BSEE aviation safety programs and identification, development, and implementation of new opportunities that enhance BSEE's aviation safety culture;
 - viii. Providing oversight and management of the BSEE SAFECOM program to include the investigation and tracking of reported incidents for trend analysis and publishing BSEE SAFECOM Summaries;
 - ix. Providing oversight and management of the BSEE HUET (Helicopter Underwater Egress Training) and CA-EBS (Compressed Air Emergency Breathing Systems) programs and investigation of reported incidents;
 - x. Serving as the BSEE liaison to National Transportation Safety Board (NTSB) and OAS accident investigation teams;
 - xi. Representing BSEE at the Interagency Aviation Training Subcommittee (IATS), and other non-BSEE aviation organizations (e.g. HSAC, OPITO, etc.); and,
 - xii. Collaborating with Regional aviation managers to ensure safe and efficient use of all aviation resources in the accomplishment of BSEE missions.
- d. National Aviation Safety and Training Manager (NASM).** The NASM serves as the principal aviation safety and aviation training advisor to BSEE management, including the Assistant Director of OORP, NAM, and all BSEE aviation users. This position provides leadership and technical expertise for aviation safety management systems, risk management, and accident prevention programs. Specific responsibilities include:
- i. Oversight of BSEE aviation training programs providing training/certification guidance (curriculum, and course materials, instructing) for all BSEE aviation users;
 - ii. Evaluation of the effectiveness of existing BSEE aviation safety programs and identification, development, and implementation of new opportunities that enhance BSEE's aviation safety culture;
 - iii. Oversight and management of the BSEE SAFECOM program to include the investigation and tracking of reported incidents for the purpose of trend analysis and publishing quarterly and annual BSEE SAFECOM Summaries;
 - iv. Oversight and management of the BSEE HUET and EBS Pilot programs and investigation of reported incidents;
 - v. Serving as the BSEE liaison to National Transportation Safety Board (NTSB) and OAS accident investigation teams;

- vi. Representing BSEE at the Interagency Aviation Training Subcommittee (IATS), and non-BSEE aviation organizations (e.g. HSAC, OPITO, etc. as assigned);
 - vii. Collaboration with the National and Regional aviation managers to ensure safe and efficient use of all aviation resources in the accomplishment of BSEE missions.
- e. Regional Director (RD).** Each Regional Director is responsible for:
- i. Administering and adhering to DOI aviation policy, the BSEE National Aviation Management Plan and the Regional Aviation Management Plan.
 - ii. Managing and funding contracted aviation resources and services within their Region.
 - iii. Implementing an effective aircraft accident prevention program within their respective region.
 - iv. Designating in writing a Regional Aviation Manager⁵ (either full-time or collateral) and Regional Aviation Safety Manager/Coordinator (either full-time or collateral) with copies of the written designations forwarded to the Assistant Director of OORP, and Bureau NAM and NASM. Either the RAM or RASM/C may be appointed by the RD to fulfil either role as needed. RDs are encouraged to designate a Regional Aviation Safety Manager (RASM/C).
 - v. Reviewing, approving, and signing the Regional Aviation Management Plan a minimum of every three years.
- f. Regional Aviation Manager (RAM)⁶.** The RAM serves as a principle aviation advisor to the RD and provides aviation management direction and aviation expertise for their respective region. Specific aviation responsibilities include:
- i. Serving as the primary point of contact for all Regional aviation matters;
 - ii. Reviewing, revising, and maintaining the Region's Aviation Management Plan annually;
 - iii. Assisting the RD and NAM in establishing aviation safety programs, and accident prevention measures;
 - iv. Participating in operations, evaluations and reviewing aviation plans and procedures;
 - v. May serve as the contracting officer's representative (COR) on Regional aviation service contracts or any end-product contracts that involve aviation services or equipment. If the RAM does not perform COR duties on aviation contracts the RAM will be involved to ensure the Departmental and BSEE aviation management, aviation safety, and aviation contract policies are complied with;

⁵ The written designation requirement may be documented in the RAMP, in the individual's PD, in an email or on Regional letterhead.

⁶ For expanded list of RAM duties see NAMP Section 1. Aviation Organization, 2. BSEE, f. RAM.

- vi. Collaborating with the NAM to ensure that regional and district aviation management, and safety programs comply with applicable DOI and BSEE aviation policies, regulations, and guidelines;
 - vii. Disseminating all Departmental Manual releases, policy statements, and other aviation related material;
 - viii. Providing oversight and monitoring the management of aviation resource usage and requirements;
 - ix. Providing information to the Regional Director for budget preparation and other aviation related fiscal matters; and,
 - x. Managing, and supporting participation in, the SAFECOM program, to include the investigation and tracking of reported incidents;
 - xi. Managing, and supporting participation in, the BSEE Aviation Awards program.
 - xii. Providing oversight of the Region's aviation training program. Regional Aviation Managers are encouraged to become qualified IAT trainers and will either conduct, or assist in the conduct of, all A-310 (Crew Resource Management) and A302 (Personal Responsibilities and Liabilities) courses in order to provide Regional input to those courses;
 - xiii. Providing oversight and management of the Regional HUET and CA-EBS programs and investigation of reported incidents;
 - xiv. Serving as the Region's primary liaison to National Transportation Safety Board (NTSB) and OAS accident investigation teams;
- g. Regional Aviation Safety Manager/Coordinator (RASM/RASC)** serves as the principle aviation safety and aviation training advisor to their Regional Director, RAM, and all BSEE regional aviation users. This position provides leadership and technical expertise for aviation safety management systems, risk management, and accident prevention programs. Specific responsibilities include:
- i. Oversight of regional aviation training programs (e.g. BSEE required IAT, CA-EBS, HUET) providing training/certification guidance (curriculum, and course materials, instructing) for all aviation users;
 - ii. Evaluation of the effectiveness of existing regional aviation safety programs and identification, development, and implementation of new opportunities that enhance the region's aviation safety culture;
 - iii. Collaboration with the RAM to provide oversight and management of the regional SAFECOM program to include the investigation of reported incidents and tracking for the

purpose of trend analysis. The RASM will coordinate with the NAM/NASM on the follow-up to all SAFECOMs. This includes coordinating with the NAM/NASM to publish BSEE SAFECOM Summaries;

- iv. Oversight and management of the regional HUET CA-EBS program;
 - v. Serving as the regional liaison to BSEE's National Aviation Program in support of the National Transportation Safety Board (NTSB) and/or OAS accident investigation teams;
 - vi. When requested by the NAM, support the RAM to represent BSEE at aviation organizations/functions (e.g. HSAC, OPITO, IATS, etc.);
 - vii. Collaboration with the RAM to ensure safe and efficient use of all aviation resources in the accomplishment of aviation missions.
 - viii. Assist the RAM in the maintenance and updating of the RAMP.
- h. Mission Lead (ML).** Unless otherwise designated by the RD, the most senior BSEE Inspector onboard the aircraft and/or the person designated to sit in the front left seat will assume the role of Mission Lead. The Mission Lead will:
- i. Assist in the pre-mission planning and safe execution of the mission;
 - ii. Maintain a working knowledge of the DOI aviation policies and BSEE National and Regional Aviation Management policies;
 - iii. Maintain a general knowledge of aircraft and aircrew capabilities and limitations;
 - iv. Exercise Crew Resource Management skills.
 - v. Collaborate with the pilot in:
 - (a) In-flight emergency duties of passengers;
 - (b) Ensuring the pilot provides a pre-flight passenger briefing in accordance with the specific contract, and applicable CFR and OAS requirements. (see Appendix G.1 Pilot Briefing).
 - vi. Report any condition, observation, act, problem, or circumstance that has the potential to cause aviation related mishaps or accident to the pilot and via SAFECOM;
 - vii. Ensure that pilots and aircraft are properly carded for the mission(s) to be conducted;
 - viii. Ensure that emergency equipment required by the contract is aboard each flight (Emergency Locator Transmitters, Life Raft, survival equipment, etc.);
 - ix. Ensure occupants of the aircraft have, and are properly using and not removing, required

personal protective equipment (flight helmet, hearing protection, life vest, etc.)

- x. Before each flight BSEE Non-Routine Offshore Travelers and Visitors must review the vendor's EBS training (or video) and the pilot must specifically brief the passenger(s) on EBS procedures for the flight.
- xi. Ensure all equipment is properly stowed and the security of doors.
- xii. Collaborate with the Pilot to verify and accurately complete documentation related to the flight. This includes:
 - (a) Verifying a current copy of the contract is present,
 - (b) Verification of Hobbs meter reading before and after flight.
 - (c) Accurate documentation of flight times⁷ and passenger information, and
 - (d) If the mission changes from a Point-to-Point flight to a special use mission, coordinate with the pilot to complete a Airborne PASP Risk Assessment. The MC should always ensure there is a copy on the aircraft of the *Special Use Risk Assessment – Airborne PASP (NAMP Appendix F.3)*. The MC will ensure a completed Airborne PASP Risk Assessment is attached to related SAFECOM.
- xiii. Ensure that all DOI requirements for special use activities⁸ are complied with before special use activities (e.g. reconnaissance missions, low-level flights, vessel landings, and mountainous operations) are conducted;
- xiv. Ensure pandemic or other health-related protective measures are in place and enforced as required.
- xv. Ensure the pilot is aware of any potential Hazardous Materials (HAZMAT) prior to the flight.
- i. **Managers and Supervisors.** All BSEE managers and supervisors who supervise employees that use aviation resources to achieve mission goals must ensure all aviation operations are conducted in a safe, efficient, and environmentally sound manner. Managers and supervisors whose employees use aviation resources will:
 - i. Ensure they and their employees comply with the DOI and Bureau regulations, policies, and guidelines;
 - ii. Ensure compliance with BSEE's Employee Prerogative.
 - iii. Ensure personnel performing aviation functions receive and maintain currency in aviation training (IAT, HUET, and CA-EBS) as required by DOI and BSEE policy (See also Appendices E.1 and E.2).
 - iv. Ensure aviation training records for their organization are reviewed monthly and report the

⁷ See detailed description on documentation of flight times in Section 2 C 1, and the appropriate Regional Aviation Management Plan

⁸ Requirements for special use activities are discussed in Section 1, para E. 2., Section 8.

status to the RAM/RASM on behalf of the RD.

- (a) District Managers (DMs) are encouraged to appoint a Unit Aviation Training Advisor (UATA)⁹ to assist in the administration of the District's aviation training program.
 - (b) UATAs will coordinate with the RAM/RASM, and OAS Training Division (OAS TD) to get access to the IAT records for that District.
- v. Advise unit personnel when their aviation training is within 90, 60, and 30 days of expiration. Ensure unit personnel complete required aviation training prior to travel offshore or training expiration.
 - vi. Ensure that personnel who are not in compliance with BSEE aviation training requirements are restricted from performing aviation duties until they are in compliance. This includes verifying flight manifests do not include any personnel out of compliance with aviation training, and or, on the "No Fly List" spreadsheet provided monthly by the Regional Aviation Safety Manager/Coordinator, or by the Regional Aviation Manager¹⁰
 - vii. Ensure aviation life support equipment is available and maintained in serviceable condition.
 - viii. Ensure personnel are provided with, and properly wear, appropriate personal protective equipment;
 - ix. Complete and maintain currency in IAT courses required by [OPM-04](#) and the NAMP (Section 5). Managers and supervisors who fail to complete or maintain currency with their IAT requirements are prohibited from exercising their management or supervisory roles over aviation personnel or operations until those IAT requirements are complete and current.

B. Aviation Program Objectives.

- 1. Mission Statement.** BSEE works to promote safety and efficiency, protect the environment, and conserve resources offshore through vigorous regulatory oversight and enforcement. Aviation plays an essential role in supporting BSEE's ability to achieve mission objectives.
- 2. Philosophy.** BSEE aviation safety and aircraft mishap prevention is based on the philosophy that all

⁹ A Unit Aviation Training Advisor (UATA) assists management by monitoring the aviation training status (completion and currency) of all employees, managers/supervisors assigning IAT courses to new employees, and removing employees from the unit's IAT roster who are no longer in the unit. The UATA should also notify the employee, their supervisor, and the District Manager when an employee's aviation training is about to expire or has expired.

¹⁰ The monthly *BSEE Aviation Training Compliance* spreadsheet will be generated through the Offshore Safety Improvement Branch (OSIB) (POCs: NASM Michael Jordan, and, Program Analyst Craig Thomas). This document will reflect current information presented in IAT, and contain the "No Fly List" Tab in addition to all of BSEE's aviation units training compliance data. This spreadsheet will be forwarded by OSIB to the NAM, RAMs, RASM/Cs, and the National Offshore Training Center. It is the responsibility of the RASM/Cs in collaboration with the RAMs to disseminate this information throughout their regions and ensure regional training compliance is updated in the IAT suite on-line.

aircraft mishaps can be prevented, and that mishap prevention is an inherent function of management. The Director is ultimately responsible for the management of aviation resources and the implementation of effective aircraft mishap prevention programs. Supervisors and managers at all levels are delegated responsibility for the safety of aviation operations under their control.

Within this NAMP are the practical requirements to provide safe working conditions, prevent injuries to employees, and protect property from damage. Application of approved practices is a fundamental responsibility of managers and supervisors and represents an area in which performance and accountability must be emphasized.

3. Program Objectives. BSEE intends to expand its role as a world leader in safety and environmental stewardship. BSEE will promote a safety culture of sound aviation management practices that reduce risks inherent in aviation and eliminate unnecessary or unacceptable risks associated with the use of aviation while maintaining high personnel standards and a commitment to excellence, integrity, and continuous improvement of safety, environmental protection, and conservation of resources. BSEE's aviation program objectives include:

- a. Expand aviation safety leadership role for advancing OCS aviation safety;
- b. Promote efficient aviation policy and aviation management processes;
- c. Provide guidance for aviation programmatic and operational risk management.
- d. Promote an effective aviation training program for management and aviation users;
- e. Provide aircraft acquisition support as specified by management objectives.
- f. Lead aviation safety assurance and promotion programs.
- g. Promote aviation safety awareness among aviation users and their supervisors.

C. Authorities and References. The directives listed below are adopted as policy and must be made available to all BSEE employees involved in aviation activities.

1. Authorities.

- a. **Title 14 CFR [91](#), [125](#), and [135](#).** The Federal Aviation Regulations (FAR) regulations are the basic guide for piloting, aircraft operations, and airspace within the United States.
- b. **Departmental of Interior Manual (DM) ([DM Parts 350-353](#))** establishes mandatory responsibilities, policies, and procedures for the overall management and operations of aviation resources within the DOI.
- c. **Bureau of Safety and Environmental Enforcement, DOI Manual [119 DM 4](#)** establishes that

the BSEE Assistant Director, Office of Offshore Regulatory Programs is responsible to provide oversight of Bureau aviation management.

- d. **Office of Aviation Services Operational Procedures Memoranda (OPMs)** Published under the issuing authority of the OAS Director OPMs are interim directives used to disseminate timely information and procedures.
- e. **Office of Management and Budget Circulars [A-76](#), [A-123](#), [A-126](#).** Published under the issuing authority of the OMB the Circulars provide instructions or information to Federal agencies.
- f. **BSEE Manual Chapter on National Aviation Management Program.** This Manual Chapter highlights high level policy and responsibilities, and most importantly establishes that the NAMP is policy within BSEE.
- g. **BSEE National Aviation Management Plan (NAMP).** The NAMP describes intent, policy, authority, objectives, roles and responsibilities, and procedures for the management and implementation of a comprehensive bureau-wide aviation management program.

2. DOI References.

- a. **DOI or Interagency Handbooks.** DOI [Handbooks](#) provide detailed procedures and requirements of policy established in the applicable chapter of the DM.
 - i. DOI publications are available at <https://www.doi.gov/elips/browse>
 - ii. DOI aviation publications are available at <https://www.doi.gov/aviation/library/>
- b. **DOI Information Bulletin (IB).** Announcements and information of general interest are published as an IB. The IBs are non- directive, bear no expiration date, and may be discarded at the discretion of the recipient. Any superseded IBs will be noted in the new release. Annually, the OAS will issue a listing of all current IBs.
- c. **DOI or Interagency Safety Alerts.** **Red-bordered [Safety Alerts](#)** are time-sensitive documents which are utilized to disseminate information of a significant nature regarding aviation safety. The three areas addressed are operations, maintenance, or publications. Safety Alerts are published on an as needed basis.
- d. **DOI or Interagency Aviation Accident Prevention Bulletins.** **Green-bordered [Aviation Accident Prevention Bulletins](#)** are used to disseminate information of a general nature regarding aircraft mishap prevention concepts, methods, procedures, and efforts. Prevention Bulletins are published on an as needed basis.
- e. **DOI or Interagency Tech Bulletins.** Technical data and recommendations regarding aircraft are published as [Tech Bulletins](#).

- f. **DOI Guides.** A [Guide](#) communicates preferred procedures for a specific aspect of aviation operations. Within DOI Guides are not mandatory but may be adopted by the Bureau.

3. Collaborating Aviation Safety Organizations.

BSEE Management is encouraged to have BSEE's subject matter experts (aviation managers, supervisory inspectors, field engineers, and supervisors/managers) routinely participate in organizational conferences of interest below.

- a. **Federal Aviation Administration FAA.** An agency of the U.S. Department of Transportation, the [FAA's](#) mission is to provide the safest, most efficient aerospace system worldwide. The FAA has authority to regulate and oversee all aspects of U.S. civil aviation through FAR and other aviation programs.
- b. **National Transportation Safety Board (NTSB).** The [NTSB](#) is an independent federal agency charged by Congress with investigating every civil aviation accident in the U.S. and significant accidents in other modes of transportation-railroad, highway, marine and pipeline. The NTSB determines the probable cause of each accident investigated and issues safety recommendations aimed at preventing future accidents.
- c. **Office of Management and Budget (OMB).** As the implementation and enforcement arm of Presidential policy government-wide, [OMB](#) carries out its mission through five critical processes including management, oversight of agency performance, Federal procurement, financial management, and information/IT.
- d. **Helicopter Safety Advisory Conference (HSAC¹¹).** The [HSAC](#) is an organization, consisting of representatives of government agencies, oil industry, helicopter operators, and aviation specialists, with working experience in both domestic and international areas, in an effort to share operating experiences and increase "Safety through Cooperation". The HSAC develops Recommended Practices (HSAC RP)¹¹ to improve aviation safety in the offshore oil and gas industry. BSEE Aviation Managers/Aviation Safety Managers are encouraged to attend at least one HSAC Conference per year.
- e. **International Civil Aviation Organization (ICAO).** The [ICAO](#) is an international forum organized to promote the safe and orderly development of international civil aviation worldwide. It sets standards and regulations necessary for aviation safety, security, efficiency, and regularity, as well as for aviation environmental protection.
- f. **Offshore Petroleum Industry Training Organization (OPITO).** [OPITO](#) is an Industry owned not for profit organization that exists solely to service the needs of the Oil and Gas Industry. OPITO is employer led in all aspects of what it does, therefore all standards development activities are at the behest of industry employers. The standards are driven by the needs of employers to help create a safe and competent workforce.

¹¹ At present BSEE recognizes the value of HSAC RPs, but has not officially adopted any HSAC RPs

- g. **Helicopter Association International (HAI).** [HAI](#) is an international association organized to advance the helicopter community by providing programs that enhance safety, encourage professionalism and economic viability.
- h. **HeliOffshore.** [HeliOffshore](#) is a global safety-focused organization formed by major offshore helicopter transportation providers. Their objective is to develop, share and apply best practices, create, and use advanced technology, and advocate for harmonized flight standards.
- i. **American Petroleum Institute (API).** The [API](#) is the only national trade association that represents all aspects of America's oil and natural gas industry.
- j. **U.S. Coast Guard (USCG).** The [USCG](#) is one of the five armed forces of the United States and the only military organization within the Department of Homeland Security. BSEE partners with the USCG in the oversight of the offshore oil and gas industry, with BSEE responsible for fixed offshore facilities and the Coast Guard responsible for floating facilities.
- k. **Offshore Operators Committee (OOC).** The OOC is a non-political technical trade organization representing offshore lease holders on the US Outer Continental Shelf (OCS) and the critical services companies that facilitate safe, responsible development of offshore energy and carbon storage related endeavors. Topics discussed by the OOC may occasionally be of interest to BSEE's aviation program.

D. National Aviation Management Plan Revision Schedule. The NAMP will be formally reviewed and approved by the BSEE Director, or their designee the Assistant Director, Office of Offshore Regulatory Programs (OORP) at a minimum of every three years. The BSEE National Aviation Manager (NAM) will review the NAMP annually and is authorized to make interim revisions as required. The Plan will be issued annually (with interim revisions as necessary) in accordance with [OPM-06](#).

E. BSEE Organizational Requirements.

1. Region Aviation Management Plan (RAMP). Each BSEE Region must, to the degree dictated by the level of their aviation program, prepare and maintain a RAMP. The RAMPs will be based on the NAMP with additions/clarifications as necessary to identify Regional-specific issues and policies. The RAMP does not need to be any more complex than necessary to ensure safe, efficient and effective aviation operations and include at a minimum the elements addressed in Appendix 1 of [OPM-06](#).

The RAM will review the RAMP annually and is authorized to make interim revisions as required. Following any review (annual or triennial) the RAM will provide a copy of the RAMP to the NAM.

The RAMP shall be formally reviewed by BSEE aviation managers (RAM and NAM,) and approved by the RD at a minimum of every three years. The RAMP shall be no less restrictive than the NAMP.

2. Project Aviation Safety Plans (PASP). A PASP must be developed for all special use missions^{12, 13} unless the elements of a PASP are properly addressed in the NAMP and/or RAMP. Examples of special use missions that BSEE conducts are:

- a. Reconnaissance.
- b. Low Level (flights below 500' above the surface).
- c. Vessel landings.
- d. Mountainous terrain¹⁴.

It is important to understand that a routine **point-to-point flight becomes a special use mission, with all of the corresponding requirements:**

- a. When you divert to conduct an oil spill/sheen reconnaissance or,
- b. When you divert to land on a vessel for a no notice inspection or,
- c. When flying low level (below 500' AGL) or,
- d. When flying in designated mountainous areas.

General guidance for project aviation safety planning:

- a. Repeated flights of the same nature may be conducted using the same PASP.
- b. PASPs should describe in enough detail the mission, risks¹⁵, and mitigations in place to safely, efficiently, and effectively accomplish the mission but not be more complex than necessary.
- c. PASPs must be updated when significant changes occur (e.g., weather, crew, mission, aircraft type, etc.). Note: *See Appendix Section F.3 for additional guidance and the "Special Use Risk Assessment – Airborne PASP" example.*
- d. PASPs will at a minimum include the elements listed in [OPM-06](#) Appendix 2 and Section 8 of this NAMP.
- e. Each region will determine and specify in their RAMP who has approval authority for medium and low risk missions.

¹² See [350 DM 1](#) for the definition of a special use mission.

¹³ See [OPM-29](#) for examples, policies, and pilot qualifications/evaluation requirements for special use missions.

¹⁴ BSEE's Alaska and Pacific Regions are likely to fly point-to-point over designated mountainous terrain.

¹⁵ See Appendix F.3 for a Risk Assessment designed for use by BSEE when time is limited or when a change in mission is required.

- f. All PASPs for pre-planned missions will be reviewed by the RAM/RASM for policy adherence and concurrence/non-concurrence.

Note: A PASP should be tailored to the specific mission profile and completed per [OPM-06](#).

3. BSEE Aviation Standard Operating Procedures (SOPs). The appendices listed below have been developed to provide aviation management and operation standardization within BSEE and constitute current policy.

- a. **Authorization for Use of BSEE Contract Aircraft.** Appendix Section A of this document provides specific guidance on the policy, requirements, and procedure necessary to gain advanced authorization for all Federal and BSEE employees including Senior Executive Branch Officials, Senior Federal Officials, Military Officials, and non-Federal visitors traveling offshore on BSEE contract aircraft.
- b. **Aviation Safety Communiqué (SAFECOM).** Appendix D of this document provides specific guidance on the use of SAFECOMs to report any condition, observation, act, maintenance problem, or circumstance with personnel or the aircraft that has the potential to cause an aviation-related mishap. Note: *SAFECOMs may also be used to identify accident prevention or other commendable actions.*
- c. **Helicopter Underwater Egress Training (HUET).** Section 5. Aviation Training and Appendix Section E – Aviation Training details BSEE’s HUET program and provides national-level guidance to ensure consistent implementation by BSEE personnel and visitors flying on BSEE contract aircraft. Additionally, the NAMP Section 5. Aviation Training clarifies BSEE policy on minimum training requirements for warm and cold-water HUET training.
- d. **Interagency Aviation Training (IAT) Program.** The NAMP Section 5. Aviation Training of this document addresses BSEE’s IAT Program requirements in accordance with DOI policy for aviation training found in [OPM-04](#).
- e. **Gulf of America Weather SOP** This SOP outlines a detailed written procedure that discusses weather sources, use of weather ships, weather dispute protocol, and overall transparency for aviation operations. Further, this establishes effective working relationships required to successfully complete the mission. BSEE and their contractors’ cooperation, professionalism, and positive attitudes towards aviation safety and accomplishment of the mission are integral elements of this relationship. *This SOP serves as a positive resource for all BSEE’s regions.* See the BSEE Gulf of America RAMP for additional information.

Section 2. Aviation Administration

A. Contracts (non-fleet).

1. **General.** The Department's Interior Business Center (IBC), Acquisition Services Directorate – Boise Branch ([AQD](#)) is responsible for the centralized contracting of aircraft and related aviation services that support DOI agency program.
2. **Contract Administration.** The administration of BSEE's exclusive use aviation contracts is a joint responsibility of AQD and BSEE with ultimate responsibility and authority vested in the AQD Contracting Officer. Specific administrative responsibilities are contained in [353 DM1](#).
 - a. **Contracting Officer (CO).** The CO has the authority to enter into, administer, and/or terminate contracts and is responsible for all contractual actions including contracting procedures and methods, contract legality with existing laws and regulations, and proper contract administration. The CO may delegate certain contract inspection and administration functions however, the CO is the only individual authorized to modify or change a contract provision.
 - i. GOAR: Justin Kondeff, (208)433-5033, Justin.Kondeff@ibc.doi.gov; Angelina.Clements@ibc.doi.gov, (571)479-0325, angelina.clements@ibc.doi.gov.
 - ii. POCSR: Stephanie Boles, (202)601-9010, stephanie.boles@ibc.doi.gov.
 - iii. AKOCSR: None as of the date of this NAMP.
 - b. **Contracting Officer's Representative (COR).** The COR is a BSEE representative appointed by, and directly responsible to, the CO for ensuring compliance with the administrative provisions of the contract. Primary responsibility of the COR is monitoring contract performance, communications with the contractor in day-to-day operations, and verifying accurate completion and timely submission of invoices. The COR may recommend to the CO proposed changes and adjustments in the contract, but may not commit the Government to such changes, adjustments, or modifications. The COR is responsible for verifying the work performed upon which payment is based. For the current COR contact the RAM.
 - i. GOAR: Eric Brewton, (504)736-7598, eric.brewton@bsee.gov.
 - ii. GOAR: Michael Hanson, (504)736-7588, michael.hanson@bsee.gov.
 - iii. POCSR: Latrice Bennett, (805)384-5341, latrice.bennett@bsee.gov.
 - iv. AKOCSR: None as of the date of this NAMP.

Project Inspector (PI). If necessary, due to distance or geographic dispersion of offshore sites, the COR may request in writing the CO appoint a PI to monitor the contract in their absence. The CO will appoint the PI in writing with copies to the Contractor and the COR. The PIs will not be delegated COR authority and must immediately bring any potentially controversial

matter to the COR for action. The COR will remain the delegated Government representative directly responsible to the CO.

3. **Contracting Officer's Technical Representative (COTR).** The COTR is an OAS representative appointed by, and is directly responsible to, the CO for ensuring compliance with the technical provisions of the contract. The COTR conducts required and requested inspections, including initial inspections, and approves the contractor's aircraft, equipment, and personnel prior to, and during, contract performance. The COTR may discuss changes or modifications in equipment or other requirements of the contract and provide recommendations to the CO, but may not commit the Government to such changes, modifications, or adjustments.
4. **Alternate (COTR) and Alternate (COR).** The Alternate COTR and Alternate COR are appointed by the CO and temporarily serve in the capacity of the COTR and COR to cover periods (generally greater than 7 continuous days) when the COTR or COR are unavailable to effectively perform his/her duties. The temporary assignment must be directed in writing by the COTR or COR with notification provided to the Contractor and the CO.

B. **Acquisition (fleet).** Not currently applicable to BSEE.

C. **Use Reports and Payments Processes¹⁶.**

1. **Daily Flight Logs¹⁷.** BSEE's aviation service providers are responsible for completing a Daily Flight Log that is accurate and legible. All sections of the daily flight log should be completed. Reasons for late flight departure or early returns should be noted in the remarks section of the flight log.

a. Routine Signature Process.

1. Before beginning each flight. The BSEE Mission Lead will verify the Hobbs meter reading and then initial adjacent to the pilot's Hobbs meter starting entry on the flight log.

| | |
|-------------|----------|
| CUSTOMER | BSEE |
| SPECIAL # | |
| HOBBS START | 460.3 JS |

Figure 1. Initialing the starting Hobbs meter reading.

2. After terminating each flight. The Mission Lead, or the senior BSEE inspector on board, will:

- i. Verify that the pilot's ending Hobbs meter entry matches the Hobbs meter

¹⁶ Procedures specific to each Region will be documented in their Regional Aviation Management Plan.

¹⁷ BSEE Region's will add to these minimum requirements as needed

reading in the aircraft and then will initial adjacent to the ending Hobbs meter entry in the flight log.¹⁸

| | | |
|-------------|-------|----|
| TOTAL | 87 | |
| NON-REVENUE | | |
| REVENUE | 87 | |
| HOBBS END | 461.7 | JS |

Figure 2. Initialing the ending Hobbs meter reading.

- ii. Verify any codes for the day and then draw a line horizontally below the last entry to prevent any additional entries from being made.
- iii. After verifying all information is accurate, will sign in the remark's column next to the last line.

| ① | ② | ③ | ④ | ⑤ | ⑥ | ⑦ | ⑧ | ⑨ | ⑩ | ⑪ | ⑫ | ⑬ | ⑭ | ⑮ | ⑯ | ⑰ | ⑱ | ⑲ | ⑳ |
|-----|-------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 817 | 57204 | | | | | | | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | | | | | | | | |
| 9 | | | | | | | | | | | | | | | | | | | |

Figure 3. Lining through and signing below the last entry.

- iv. Obtain a copy of the flight log immediately upon signature, or create an independent record, and deliver this to the BSEE operations assistant for record and review purposes.

3. Conflict Resolution. If there are any questions or conflicts about how a flight should be coded the BSEE employee will not sign the flight log and will notify their supervisor or aviation project inspector immediately upon return to the office.

- b. Aircraft returns for maintenance with no passengers.
 - 1. Procedures for documenting the flight prior to the aircraft returning for maintenance will be in accordance with paragraph C. 1. a. 1. Above.
 - 2. BSEE employees will **NOT** initial the ending Hobbs reading or sign the form unless they are present during the flight.
- c. Offshore replacement aircraft.
 - 1. If an employee is picked up offshore by a replacement aircraft that already has a BSEE employee on board then flight time verification is the responsibility of the employee already on the aircraft.

¹⁸ If Hobbs Meter is out of service, clock time will be used to account for flight time instead of the Hobbs Meter. BSEE personnel on the flight will verify the clock time for each flight. This should only be applicable for return to base flights. See the RAMP for additional information.

2. If an employee is picked up offshore by a replacement aircraft that is not already carrying another BSEE employee, then they will treat it as a new flight and will comply with the flight time verification procedures in paragraph C. 1.a. 1. above.

Note: If the pilot uses the Hobbs meter reading from the beginning of the flight rather than from when the BSEE employee is picked up the BSEE employee will **NOT** initial the Hobbs meter reading since BSEE is not responsible to pay for that leg of the flight.

- d. Flights to take BSEE employees offshore for an overnight inspection and which return without passengers.
 - 1. If BSEE inspectors will be remaining overnight and the aircraft will return without the inspectors, the Hobbs meter reading for the initial (outbound) flight must still be initialed in accordance with the procedures in paragraph C. 1. a. 1.
 - 2. The Mission Lead will draw a horizontal line below the last leg of the flight they were on and write "Overnight" under their signature, but they will **NOT** initial the Hobbs meter reading.

| | | | | | | | | | | | | |
|---|------|-------|--|--|------|------|-------|------|--------|------|------|----|
| 4 | B-7E | 57204 | | | 5113 | 5997 | 139.4 | 1293 | 1400.9 | 1357 | 1101 | 02 |
| 5 | B-7E | 57204 | | | 5060 | 5997 | 139.2 | 1293 | 1400.9 | 1357 | 1101 | 02 |
| 6 | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | |
| 9 | | | | | | | | | | | | |

Figure 4. Documenting an overnight flight.

- 3. On a flight where the inspectors remain overnight and no one is picked up for the return flight (solo pilot flight) an additional signature is needed.
 - i. If another BSEE inspector is available to sign for the flight upon return, that inspector may do so.

| | | | | | | | | | | | | | | |
|----|------|-------|--|--|------|------|-------|------|--------|------|-------|------|------|----|
| 4 | B-7E | 57204 | | | 5113 | 5997 | 139.4 | 1293 | 1400.9 | 1357 | 1101 | 02 | | |
| 5 | B-7E | 57204 | | | 5060 | 5997 | 139.2 | 1293 | 1400.9 | 1357 | 1101 | 02 | | |
| 6 | | | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | | | |
| 8 | B-17 | KHUM | | | 0 | 0 | 5060 | 5997 | 139.2 | 1293 | 140.9 | 1310 | 1410 | 60 |
| 9 | | | | | | | | | | | | | | |
| 10 | | | | | | | | | | | | | | |
| 11 | | | | | | | | | | | | | | |
| 12 | | | | | | | | | | | | | | |

Figure 5. Third party verification of flight time.

- ii. If no BSEE inspector is available to sign for the flight upon return to base the pilot must scan and email the flight log to the inspector's supervisor or the District flight coordinator for signature.
- iii. The supervisor or District flight coordinator will **NOT** initial next to the

Hobbs meter end reading since they are not able to verify the Hobbs meter reading.

- iv. The supervisor or District flight coordinator will review the flight time for the return leg and if it seems appropriate will draw a horizontal line below the last entry and then sign and date to the right of the line.
 - v. If the flight time for the return flight seems to be too much of a deviation from the outbound flight the supervisor or District flight coordinator will contact the Contracting Officer's Representative (COR) or the Regional Aviation Manager.
- e. Mission Codes.
- 1. BSEE personnel initialing Hobbs meter readings and signing for completed flights must verify that the correct mission code(s) are on the flight log because they are used to determine flight time (FT) and availability (AV) costs.
 - 2. BSEE employees don't need to memorize mission codes, but Mission Leads should be familiar with them (see figure 1 below).
 - 3. The pilot should always know the correct code but if BSEE personnel suspect that the code is not correct they should ask the pilot to change it or do not sign it.

| MISSION CODE | USE_DESCRIPTION |
|--------------|--|
| 16O | Flight (For FT and AV, pay item code) |
| EM | Early return due to mechanical problem - Credit Issued |
| LM | Late start due to aircraft mechanical problem - Credit Issued |
| LP | Late Start for pilot - Credit issued |
| NM | No flight due to aircraft maintenance - Credit issued |
| NP | No flight due to pilot unavailable - Credit Issued |
| AC | Contractor request aircraft release on regular workday - NO AV Paid |
| AR | Aircraft released by contractor (PAY ITEM CODE IS "RE") - NO AV paid |
| WK | Weekend - Aircraft not used - AV Paid on 7 day aircraft only |
| HL | Holiday - Aircraft not used - AV Paid on 7 day aircraft only |
| REL | BSEE Release aircraft - No AV paid IF used by contractor |
| NFR | No flight requested - AV Paid |
| NMR | No Flight - No mission/flight requested - AV Paid |
| ROP | Remained on Platform overnight - AV Paid |
| NI | NO FLIGHT - No BSEE personnel available to fly - AV PAID |
| AO | No flight due to BSEE office meeting/training - AV Paid |
| LO | Late Start, BSEE office meeting/training - AV Paid |
| EO | Early Return to Office - AV Paid |
| EX | Early Return due to weather - AV Paid |
| LX | Late Start due to weather - AV Paid |
| 9X | Flight attempted, unable to reach destination due to weather - AV Paid |
| CX | No flight due to low ceilings - AV Paid |
| FX | No flight due to fog/visibility - AV Paid |
| SFX | No flight due to sea fog - AV Paid |
| TX | No flight due to water temperatures - AV Paid |
| SX | No flight due to convective weather/ thunderstorms - AV Paid |
| HX | No flight due to high winds - AV Paid |
| HUR | No flight due to Emergency/Hurricane/Tropical Storm - AV Paid NO FT |
| 4A | Onshore inspection landing at undesignated heliports - Info Only |
| 9P | Flight from point to point on land - Info Only |

Note: Customs charges will be coded as Pay Item Code: "SC". The Mission Code will be 99G, and should be noted under Remarks under the Pay Item Code section of FBMS. Contact the RAM, RASM, COR, or refer to RAMP for additional information.

Figure 6. Mission Code Chart.

- f. Flight Verification Training. Regions will provide training/guidance to all inspectors on the flight verification and documentation procedures in this Plan.

Training will include:

1. How to determine that hours flown are accurate,
2. How and when to initial/sign the flight log,
3. When to not sign the flight log, when to notify their supervisor or the District flight coordinator,

4. When to contact the Contracting Officer's Representative (COR) or the Regional Aviation Manager.

g. The COR will review these procedures with the aviation service provider.

2. **Cross-Servicing Agreements.** All DOI AQD contract aviation services procured by BSEE will be funded via a cross-servicing agreement. The cross-servicing agreement is initiated with a requisition that is routed directly to AQD, bypassing the BSEE contracting shop. The traditional Interagency Agreement (IAA) is no longer used as of 2018. A requisition approval form may be required as an attachment to the cross-servicing agreement requisition.
3. **Aviation Information Reporting Support (AIRS)** is a web-based system used for generating and processing Aircraft Use Reports (AURs). The aviation contractor is responsible for preparing and submitting the electronic AURs in AIRS for DOI aviation service contracts.
4. **Internet Payment Platform (IPP).** The IPP is a comprehensive electronic invoicing and payment information service made available to all Federal agencies and their suppliers by the U.S. Department of the Treasury's Financial Management Service. IPP centralizes transaction processing in the order-to-payment notification cycle, including purchase orders, invoices, and payments, in a Web-based portal (<https://www.ipp.gov/>).

D. Record Keeping Requirements. The requirement for monthly usage reports shall be written into exclusive use helicopter contracts as they are being negotiated. If the report requirement is not in the contract the vendor should be requested to prepare and submit to the BSEE COR/RAM, and NAM a monthly report that summarizes, by month and total, depicting data on a 13-month rolling basis that will include the following data, charts, and tables:

1. Summarized Aviation Data (Provided by BSEE finance Division)
2. Monthly Aviation Cost Comparison (Provided by BSEE Finance Division)
3. Annual Aviation Cost Comparison (Provided by BSEE Finance Division)
4. Available Fly vs. No Fly Days based upon contracted aircraft availability (5-day/7-day)
5. No Fly days Breakdown by defined category based on weather, maintenance, BSEE personnel availability etc.
6. Daily Available Rate vs. Variable Flight Costs
7. Average First Departure Utilization
8. Number of Inspections Completed (provided by BSEE inspection management team)
9. Refueling stops – onshore and offshore
10. Number of flights
11. Number of flight hours
12. Number of passengers flown
13. Average occupancy utilization (# of passengers flown divided by # of seats available)
14. Percent Payload utilized
15. U.S. Customs Flights completed
16. Company reports that detail aviation safety-related occurrences, maintenance deficiencies and corrective actions, damage, injuries, etc.

E. Administration Requirements.

- 1. Use of Government Aircraft.** Government aircraft are those which are under the operational control of the Government for the conduct of official business, regardless of whether it is owned, contracted, rented, or chartered. Such aircraft may be used only for official purposes. Refer to [OPM-07](#) *Improving the Management and Use of Government Aircraft* for additional information.
- 2. Senior Executive Branch and Senior Federal Officials, and Non-Federal Visitors¹⁹.** [OMB Circular A-126](#) requires all travel on government aircraft must have advanced authorization. All Senior Executive Branch Officials, Senior Federal Officials, Military Officials, and non-Federal visitors traveling offshore on government aircraft must be approved by the DOI's Solicitor or Deputy Solicitor, Division of General Law (SOL) in advance of the planned offshore travel.
- 3.** The BSEE National Aviation Manager will coordinate the review and approval process for Senior Executive Branch, Senior Federal Officials, and non-Federal visitors traveling on government aircraft.
- 4.** See Appendix Section A for detailed policy and procedures.
- 5. Emergency Use of non-BSEE third party aircraft.** BSEE personnel are permitted to use non-BSEE third party aircraft for emergency use. This includes transport on non-government aircraft in a special emergency situation per [OPM-07](#), Appendix 1, [OMB Circular No. A-126](#). A special emergency situation includes the life-safety critical evacuation of BSEE personnel from an offshore facility. Immediately following the emergency situation, the RAM will notify and coordinate with the NAM/NASM to ensure the appropriate authorization, documentation and coordination is made through OAS per [OMB Circular No. A-126](#) to include associated reimbursement for aircraft usage.

¹⁹ Refer to Appendices A.1, A.2, and [OPM-07](#) series for additional information.

Section 3. Aviation Safety

Aviation programs and the operation of aircraft within the BSEE are a highly visible activity, regularly scrutinized by the DOI, the public, and executive and legislative interests. The BSEE Aviation Safety Program has been developed and adapted to serve BSEE's unique mission and operating environment. BSEE's use of aviation complies with, and often exceeds, the requirements established in DOI policy.

- A. Policy.** BSEE is committed to promoting offshore safety at all levels, at all times. Safety is the first priority and leadership at all levels must foster a safety culture that encourages employees to communicate unsafe conditions, policies or acts that could lead to aviation incidents or accidents. Each BSEE employee and contractor involved with aviation has the responsibility to plan missions thoroughly, conduct missions with a conservative attitude, and with respect for the aircraft and the environment in which our missions operate

The BSEE NAM is the focal points for BSEE's Aviation Program and provides guidance and oversight for BSEE's Aviation Safety and Training programs. The RAM is the focal point for Regional Aviation Programs, and the District Manager (DM) is the focal point for District Aviation Programs.

Safety Culture. As part of BSEE's commitment to integrating safety and health into every program and operation, BSEE's Safety and Occupational Policy Statement was formally released on April 27, 2023. Refer to Appendix B, BSEE Director's Safety and Occupational Policy Statement for additional information.

B. Risk Management.

- 1. General.** Managing risks is well recognized to improve the likelihood of successful mission accomplishment and applies to all BSEE aviation missions. The risk management process is designed to manage risks to acceptable levels by the identification of hazards, the assessment of the impact of those hazards, and the mitigation of the hazards to safely accomplish the mission. The Department uses a 5-step process to describe the risk management process (below).

2. **5-Step Risk Management Process.** Risks must be managed throughout the mission. It starts in the planning stage, continues to the approval and scheduling phase, is evaluated, and adapted during the execution phase and is analyzed and collected as lessons learned in the post flight phase.



Figure 7. 5-Step Risk Management Process

- a. **Identify Hazards:** The first step in risk management is to identify hazards. Hazards are the potential sources of danger that could be encountered while performing a task or mission. Hazards include weather, time of flight, terrain, equipment, training, and proficiency level of personnel.
- b. **Assess Risk Level(s):** Hazard or risk assessment is part of the risk management process. Risk assessment can range from simple to complex but must be detailed. The process of assessing hazard causes personnel to analyze the degree of risk associated with each threat, and place these in perspective relative to the objectives of the mission and organization.
- c. **Develop Controls/Make Decisions:** Starting with the highest threat, identify the control options (mitigation measures) that reduce the likelihood and/or severity of all risks identified in the previous steps that exceed an acceptable²⁰ level of risk.
 - 1. **ALARP** (as low as reasonably practicable), is a term used in safety-critical industries and organizations to describe reducing risks to a point where the residual risk²¹ is at a point where the additional costs or operational restrictions outweigh any new safety or operational benefits.
- d. **Implement Controls:** Implement the plan and ensure that the risk controls are known by all and are utilized. Ensure that people know and do what is expected of them. A high level of risk that cannot be effectively controlled should be reported to the person

²⁰ The acceptability of risk is a determined by an established risk approval authority. Risk approval authority is defined in section 3 of the BSEE NAMP and may be more restrictive in Regional Aviation Management Plans (RAMP), Project Aviation Safety Plans (PASP), or as otherwise established by the Regional Directors.

²¹ Residual risk is the risk which remains after all mitigation measures are in place.

supervising the operation. Continually evaluate the effectiveness of the controls and ensure that the risk remains in balance with the benefits.

- e. **Supervise and Evaluate:** Document any changes to the operation, equipment, environment, and/or people and how they may affect (or how they did affect) your plan. It is important to remember that risk management is a continuous process. Adjust to changes in the situation in real time by remaining vigilant and maintaining your situation awareness to identify unexpected as well as anticipated issues. Documented after action reviews are a good way to assure that the supervision and monitoring of the mission are effective and that lessons learned are captured for the future.

3. Risk Management Principles. The following decision-making principles must be considered before and during any aviation mission is performed:

- a. **Accept no unnecessary risk:** Unnecessary risk does not contribute to the safe accomplishment of a task or mission i.e. flying lower than necessary over a populated area, flying into clouds or fog while VFR, having a minimally qualified passenger sit in the front seat while more experienced inspectors sit in the rear seats, etc. The most logical choices for accomplishing a mission are those that meet all the mission requirements while exposing personnel and resources to the lowest possible risk²².
- b. **Make risk decisions at the appropriate level:** Making risk decisions at the appropriate level establishes clear accountability. Those accountable for the success or failure of a mission must be included in the risk decision process. Supervisors at all levels must ensure subordinates know how much risk they can accept and when they must elevate the decision to a higher level.
- c. **Integrate risk management into planning and execution at all levels:** To effectively apply risk management, leaders at all levels must dedicate time and resources to incorporate risk management principles into the planning and execution phases of all operations. Integrating risk management into planning as early as possible provides the decision maker with the greatest opportunity to apply risk management principles.

4. Levels of Managing Risks.

- a. **Time Critical:** This method is an “on-the-run” mental or verbal review of the situation using the risk management process without necessarily recording the information. The process is used to consider risk while making decisions in a time limited situation such as during the flight. Rapid risk assessment requires effective training of personnel, effective operational practices and a thorough understanding of objectives of the mission. Note that “time critical” does not mean “hasty” or “uninformed.”
- b. **Deliberate:** When time permits, more deliberate and in-depth planning is possible. Before a mission begins time is often available to conduct a more systematic identification

²² See the discussion on ALARP (as low as reasonably practical) in discussion on Develop Controls/Make Decisions (above).

of the hazards and to develop more effective control measures. When time permits these risk management decisions should be documented and reviewed/improved following the mission.

- c. **Strategic:** Strategic Risk management should be used in instances such as contract solicitation where new technology or major changes occur. It commonly takes more time and involves a more detailed analysis of costs and benefits. The strategic process produces a more permanent record of findings and decisions used for long term planning, organizational decision-making, and as authoritative training resources.

5. Risk Assessment Tools. The second step of risk management is assessment of the threats/hazards. There are several tools that may be used to document the hazards and to determine that level of risk involved in the operation. number of risk assessment tools can be found in the [NWCG Standards for Helicopter Operations](#) and in [Air Force Pamphlet 90-803](#). Tools that should be used at the Deliberate and Strategic levels of risk management are found in Appendix Section F.

6. Risk Management Summary. All employees are responsible for understanding and managing the risks in aviation operations. It is particularly important for managers and supervisors to consider these three questions

- a. Do you know what could go wrong? (Hazard Identification)
- b. Do you know what systems BSEE has in place to prevent this from happening? (Risk Controls)
- c. Do you have the information and resources to ensure that the systems are working effectively? (Feedback/Key Performance Indicators)

Note: Remember, risk management procedures are not fully effective without application, oversight, and enforcement.

C. Promotion

1. Aviation Training. BSEE's aviation training program is documented in detail in Section 5 (Aviation Training).

2. Aviation Safety Communiqué – SAFECOM.

- a. The SAFECOM is DOI's voluntary safety reporting and feedback system. Department policy requires that SAFECOMs be used for accident prevention purposes only.
- b. All personnel involved in BSEE aviation activities are responsible for identifying hazards

and, to the degree possible, eliminating or reducing the associated risks. In all cases, they are expected to report unsafe working conditions to their supervisor and to BSEE management. Personnel who observe what they consider to be an unsafe act or condition are encouraged to submit a SAFECOM report. Personnel in doubt about completing a SAFECOM or who need assistance should contact their Regional Aviation Manager or the NAM.

- c. When an emergency is encountered, the pilot shall take appropriate action to ensure safety of flight. These situations shall be reported by the pilot to the FAA (if required) and the pilot's management or government supervisor. The emergency will be documented electronically on a DOI SAFECOM (OAS-34 / FS 5700-14) at www.safecom.gov.
- d. All SAFECOMs should be submitted the day of the event, but no later than five days after the event.
- e. For a detailed discussion of the SAFECOM System see Appendix D.

3. Aviation Awards. Aviation awards are an integral component of BSEE's aviation program and support our Safety Culture by recognizing exceptional acts or service in support of aviation safety and aircraft accident prevention.

- a. Specific awards available to BSEE personnel, organizational units, and our aviation service providers include:
 - 1. DOI Airwards.
 - 2. DOI Award for In-Flight Action.
 - 3. DOI Award for Significant Contribution to Aviation Safety.
 - 4. Secretary's Award for Outstanding Contribution to Aviation Safety.

Note: For additional guidance on DOI Aviation Awards see [DOI Safety Awards Program](#) and [DOI Safety Awards Program Policy & Guidance – 352 DM 4](#), and [BSEE SharePoint Aviation](#) site which includes [BSEE Safety Awards Program](#) information.

- b. General guidelines and procedures for the submission of aviation awards are described in [352 DM 4](#).²³
- c. Any individual having sufficient knowledge of contributions worthy of recognition may submit a nomination. Aviation award recommendations within BSEE should be submitted

²³ See the [BSEE Aviation](#) SharePoint site (internal to BSEE) for additional information on BSEE's aviation awards and links to additional references.

through the RAM to the NASM. The NASM:

1. Reviews the award recommendation against the criteria of [352 DM 4](#).
2. Reviews the associated SAFECOM (if applicable).
3. Coordinates with the RAM, District Manager, and aviation service provider to validate the actions of the recipient.
4. Complies with the requirements of [352 DM 4](#) for OAS Aviation Safety Manager and OAS Regional Director review/approval.
5. Provides award nomination and citation to the NAM who reviews the award recommendation packet.
 - a. If approved the NAM forwards the award recommendation to the BSEE EAC member for review/approval (as required for the award category per [352 DM 4](#)).
 - b. If denied the NAM will return the award packet to the NASM and RAM with justification for the denial.
6. Upon approval, the NAM coordinates with the RAM/RASM for presentation of the award.
7. Every effort should be made to have aviation awards presented in a timely manner by a senior BSEE leader, preferably by the BSEE Director or Regional Director at a large gathering of BSEE inspectors (i.e., National Inspector's Meeting).
8. Management representatives from aviation service provider should be invited to be present especially when the award is recognizing their employees

d. The RAM/RASM:

1. Reviews SAFECOMs and other sources of information against the criteria of [352 DM 4](#) to identify events and actions worthy of recognition using an aviation award.
2. Coordinates with the District Manager and the aviation service provider to validate the actions of the recipient.
3. Submits award recommendations to the NASM.
4. Upon approval coordinates for presentation of the award with the NAM, NASM, and the aviation service provider.
5. Notifies the contracting officer if the award is being presented to the aviation service provider.

- 4. Aviation Safety Meeting(s).** Each Region will hold a monthly aviation safety meeting that focuses on aviation safety issues and education. The RAM shall:
- a. Organize, conduct, and record minutes of each Regional aviation safety meeting.
 - b. Invite meeting participants to include Region aviation users and their supervisors and managers, the NAM and NASM, and representatives of the Region’s aviation service provider.
 - c. Prepare and circulate aviation safety meeting minutes to all participants for review and comment. A copy of the safety meeting minutes, and attendance roster will be provided to the NAM and NASM within 7 days of the safety meeting.
 - d. Encourage the aviation service provider to conduct monthly aviation safety meetings that are open to BSEE aviation managers and supervisors.
 - 1. Meetings should be conducted at the District level and not run by the Region. Documentation of the meeting (aka minutes) will be provided to the RAM.
 - 2. Participation should be coordinated through the CO or COR to ensure the request complies with the contract
 - e. The RAM should request to participate in vendor Base Safety Meetings, Safety Town Hall Meetings, etc.
 - f. BSEE District Managers are encouraged to conduct District-level aviation safety meetings at least monthly. District level meetings are intended to be led by District personnel with the RAM and RASM present as observers. DMs are encouraged to invite local representatives of the aviation service provider such as the lead pilot, pilots, or maintenance personnel (as appropriate). Districts should provide documentation of the safety meeting to the RAM/RASM.

D. Assurance.

1. Aviation Mishap Response Planning.

- a. **Aviation Mishap Response Plans** will be developed at the Regional and District levels in coordination with contracted vendors.
- b. **Regional Directors** will ensure that an Aircraft Mishap Response Plan is developed for their Region that is in compliance with [352 DM 3](#) and the Interagency Aviation Mishap Response Guide and Checklist or other approved guide. Refer to the see NAMP Section 3. Aviation Safety, D. Assurance. 1. Aviation Mishap Response Planning, and, 2. Aviation Mishap Response Reporting, and Appendix G.6²⁴ for additional information.

²⁴ Appendix G.6 – Fatality/Serious Incident Response Guideline is included in the NAMP as a resource for critical incident

c. **RAMs** will ensure that Regional and District level Aircraft Mishap Response Plans:

1. Outline appropriate responses to a loss of flight following an aircraft incident or accident;
2. Address initiation of Search and Rescue (SAR) operations, fire, and medical response;
3. Provide procedures for the timely notification of BSEE's Chain of Command and OAS;
4. Are reviewed and updated a minimum of annually in coordination with contracted vendors;
5. Are tested annually by conducting either a telephonic notification drill or an Aviation Incident Response Exercise (AIRE). For additional information see NAMP Section 3. Aviation Safety, D. Assurance. 1. Aviation Mishap Response Planning, and, 2. Aviation Mishap Response Reporting, (c) Aviation Incident Response Exercise (AIRE) program.
6. Will be included in the RAMP and will be provided to the NAM annually.

2. Aviation Mishap Reporting.

Aviation Mishap Reporting. Any BSEE flight²⁵ that results in damage to the aircraft or injury to any person, **no matter how slight, must be reported immediately by the vendor per contract.** A BSEE emergency contact checklist should be tailored by each Region and District in collaboration with the contracted vendor. See Section 3, Appendix G.6, and Regional Aviation Management Plans.

In general, the vendor will make initial notification to the Department of Interior via the Interior Operations Center (IOC), Phone: (1-888-464-7427 / 1-888-4MISHAP) and make notifications as required per their contracts. The IOC in-turn will contact the Office of Aviation Services who will notify BSEE.

When the OAS (or regional aviation management if notified prior) contacts the NAM/NASM, the NAM/NASM will make additional notifications to BSEE Headquarters staff to include Public Affairs, Human Resources, Executive Aviation Committee Member, Directors, Office of Emergency Management, Safety Manager, Manager of OSIB, Assistant Director OORP, etc., unless specified notifications are required to be made by regional

planning. This guideline is encouraged to be implemented into advanced Aviation Mishap Response Exercises and planning.

²⁵ The term "BSEE flight" refers to flights where BSEE exercises "operational control" as defined by 14 CFR 1.1 as well as mission flights conducted by other organizations where BSEE employees are passengers.

staff per the Regional Aviation Management Plan.²⁶

Note: *The NTSB uses the definition of operational control in 14 CFR 1.1 to determine which organization is responsible for an aircraft accident*²⁷.

a. Overdue or Missing Aircraft. If an aircraft is overdue or missing comply with the procedures in your Regional Aviation Mishap Response Plan. It is critical that the response plan is implemented, followed, and documented throughout the duration of the event.

1. An aircraft is considered “overdue” when it fails to arrive within 30 minutes past the estimated time of arrival (ETA) and cannot be located.
2. An aircraft is considered “missing” when its fuel duration, as reported on the request for flight following, or as reported on the FAA flight plan, has been exceeded and the aircraft location is unknown. It can also be considered missing when it has been reported to the FAA as “overdue” and the FAA has completed an administrative search for the aircraft without success.

Notifying the NAM or OAS and submitting a SAFECOM are required but they do not replace the requirement for initiating a DI-134 “Report of Accident/Incident,” as required in [485 DM 7](#). The Aviation Service Provider is required to notify the NTSB when an "Aircraft Accident" or NTSB reportable "Incident" occurs.

Note: *DOI prefers that OAS is notified first and that they handle communications with the NTSB. Aviation Service Providers should be advised of this during the initial contract pre-work meeting and periodically thereafter by the RAM and/or the COR.*

b. Aviation Incident Response Exercise (AIRE) Program.

1. BSEE Districts will establish and test procedures for responding to aviation mishaps. These procedures will establish which positions are responsible for which actions, who is to be notified in what order, what information may be shared with whom, and what information may not be released.
2. Testing of District procedures shall be conducted at a minimum of annually and should use the procedures for an Aviation Incident Response Exercise (AIRE) as described in Section 3. Aviation Safety.

²⁶ The NAM/NASM will notify the BSEE Safety Manager, POCs: Raynette Lennix, (504)736-2888, or, Nicole Reaves, (703)787-1401. And, BSEE Emergency Management Coordinator, Dana Miller, (703) 787-1327.

²⁷ 14 CFR 1.1 states “Operational Control, with respect to a flight, means the exercise of authority over initiating, conducting or terminating a flight.” Therefore, routine OCS flights where BSEE contracts for the aircraft and directs the initiation, conduct, and termination of the flight are considered to be under BSEE’s operational control.

Note: AIRE's should develop and progress in scope over time and are encouraged to cover one or more of the following hazards as practicable: Downed/overdue aircraft; In-flight Emergency; Fueling area emergency; Startup or landing emergency; Passenger or load emergency.

3. District procedures should use the Interagency Aviation Mishap Response Guide and Checklist in the development of their aviation mishap response plan (See Section 3. Aviation Safety, Appendix G.6, and Regional Aviation Management Plans).
 4. Notification requirements.
 - a. The RAM will notify the NAM/NASM 30 days prior to conducting a telephonic drill or AIRE to allow the NAM/NASM to participate (if able) and will provide the NAM/NASM with a written summary of the drill/AIRE within 30 days of the exercise.
 - b. The RAM will notify the BSEE Safety Manager, Rose Capers-Webb, (703)787-1541 and the BSEE Emergency Management Coordinator, Dana Miller, (703)787-1327 at least one week prior to any AIRE or other aviation mishap response training.
 5. Documentation Requirements. The RAM will provide a summary of any Aviation Incident Response Exercises to the NAM and NASM within 7 days after its completion and should include:
 - a. Scenario.
 - b. Unit pre-briefing.
 - c. Conduct of the drill.
 - d. After action review and lessons learned.
 - e. Participants.
- c. Reporting Airspace Conflicts through the SAFECOM System.** See Appendix D – Aviation Safety Communiqué (SAFECOM), 17. Near Mid-Air Collision, Note: Reporting Airspace Conflicts using the SAFECOM.

E. Personal Protective Equipment.

1. **General.** Aviation Life Support Equipment (ALSE) is required for all BSEE flights. If the required ALSE is not available for an individual the individual will not be permitted to fly. If required aircraft mounted ALSE is not available, the aircraft is considered unavailable and will not be used.

The minimum ALSE that must be worn is described in paragraph 4 below. For more information see BSEE policy 659.01-DS-G, [351 DM 1.7](#) and the [NWCG ALSE Handbook](#). Any questions concerning ALSE requirements and procedures should be directed to the RAM or the NAM.

2. Responsibilities.

- a. The BSEE Director has approval authority for all ALSE waivers.
- b. Regional Directors have the overall responsibility for their Region's ALSE program.
- c. RAMs implement Region aviation policy and provide oversight of the ALSE program.
- d. District Managers and the Alaska Regional Supervisor/Field Operations will ensure that:
 1. All personnel (BSEE and non-BSEE) flying on BSEE contracted aircraft are provided with appropriate and serviceable ALSE.
 2. The District ALSE program is staffed, equipped, and funded to meet mission requirements.
 3. All ALSE is inspected and maintained in accordance with DOI and manufacturer guidance, but no less than every 180 days.
 4. ALSE inspections are documented, and records of those inspections provided to the RAM/RASM and NAM/NASM on an annual basis²⁸.
 5. Personnel who inspect and maintain ALSE are properly trained and designated in writing. Copies of ALSE technician designations will be provided to the NAM annually.
- e. Mission Leads are responsible for ensuring all personnel engaged in BSEE aviation activities wear appropriate and serviceable ALSE based upon Departmental and bureau requirements. Non-BSEE fliers may be required by their Agency (i.e. USCG) to wear more restrictive ALSE.

Note: Unless otherwise designated by the RD, the Mission Lead is the most senior BSEE Inspector onboard the aircraft and/or the person designated to sit in the front left seat will assume the role of Mission Lead.

- f. ALSE users are responsible to:
 1. Inspect the ALSE they are provided for condition and serviceability before and after each flight and;
 2. Report any discrepancies to the Mission Lead or District Manager, and to the ALSE technician.
- g. ALSE Technician. BSEE defines an ALSE Technician as a person who has completed hands-on

²⁸ Annual requirements will be documented in the RAMP.

training and is authorized to inspect and maintain flight helmets and maintain other BSEE ALSE such as Compressed Air-Emergency Breathing Systems (CA-EBS).

Initial ALSE technician training will consist of hands-on inspection and repair of equipment being used and will be conducted by an approved source (e.g. Gentex, Gibson and Barnes, Switlik, Aqualung, military or other organizations that regularly inspect and repair flight helmets (e.g. BLM).

ALSE technicians are responsible to:

1. Attain and maintain the training and qualification required by DOI to inspect and repair flight helmets or other BSEE ALSE (e.g., CA-EBS).
 2. Inspect all flight helmets per the manufacturer's recommendations, but no less than every 180 days.
 3. Inspect all additional BSEE ALSE such as CA-EBS as required, per the manufacturer's recommendations.
 4. Repair and maintain flight helmets in accordance with DOI and manufacturer guidance.
 5. Track flight helmet inspections and provide an annual report to the District Manager, RAM/RASM, and NAM/NASM.
 6. Provide annual training to District personnel on user-level care, inspection, and maintenance of all ALSE equipment.
3. **Aircraft.** Aircraft contracted by the DOI and used to transport BSEE personnel, and/or cargo from various onshore locations to and from offshore facilities, vessels, and barges engaged in OCS oil and gas activities are required meet the technical specifications and general requirements addressed in their aviation services contracts including PPE and ALSE.
4. **Aviation Life Support Equipment.** ALSE requirements for BSEE vest and aircraft will meet the minimum requirements of the [NWCG ALSE Handbook](#). Additional items required by BSEE (i.e. CA-EBS) will be addressed in the National Aviation Management Plans. ALSE may require fitting, periodic inspections, testing, and scheduled replacement. Users must ensure that equipment is maintained in serviceable condition and in accordance with the manufacturer's guidance.
- a. **ALSE required for Point-to-Point flights (e.g. routine OCS missions or flights from a base airport to an onshore heliport/airport).** Routine flights between shore-based airports and offshore helidecks or onshore heliports/airports, where the route of flight is determined only by the pilot based on navigational requirements, are defined by DOI as point-to-point flights ([350 DM 1](#)) and have the following ALSE requirements:

Note: *If, during the conduct of a point-to-point flight a reconnaissance is conducted (e.g.,*

to observe an oil sheen), that portion of the flight is considered “special use²⁹” and the ALSE required for special use missions as required per this NAMP must be worn unless a has previously been granted by the BSEE Director.

1. Flight Helmets.

- a. Flight Helmets must be worn at all times when aircraft are in operation, including while entering or exiting running aircraft.
- b. Flight helmets should be maintained off of the aircraft while visiting an offshore facility due to the potential for the aircraft to depart the facility, leaving the individual without a flight helmet.
- c. All passengers on BSEE helicopters, and all BSEE employees who fly on other agency or industry helicopters, will wear a serviceable SPH-5 or HGU- 56/P flight helmet³⁰. For detailed information see the [Interagency ALSE Handbook](#) and the [DOI Flight Helmet User’s Guide](#).
- d. Before and after each flight the user will inspect their flight helmet for condition and serviceability.
- e. An ALSE Technician will inspect all flight helmets in accordance with DOI and manufacturer guidance.
- f. Reflective tape may be attached to the helmet to enhance visibility during a search and rescue operation. Location and pattern of reflective tape will be standardized by each Region in their RAMP.
- g. Helmets shall be equipped with a clean, serviceable visor.
- h. The visor is required to be worn in the down position unless the visor interferes with required prescription eyewear or if wearing the visor down hinders vision due to environmental conditions (i.e., fogging or lens, low light conditions, etc.).
- i. Helmets will be cleaned and disinfected in accordance with the procedures in the manufacturer’s guidance.

2. Personal Flotation Device (PFD).

- a. PFDs will be worn on all over water flights.

²⁹ See current [350 DM 1 App 2](#), [351 DM 1.7](#), [OPM-29](#), and Interagency ALSE Handbook.

³⁰ BSEE recommends the Gentex SPH-5 or HGU-56/P flight helmet for safety, standardization, and cost reasons. To use a flight helmet other than these, that helmet must meet all requirements of the Interagency ALSE Handbook and the DOI/USFS Aviation Helmet Standard. A waiver in accordance with the Interagency ALSE Handbook and this NAMP must be approved by the BSEE Director.

- b. PFDs must use a compressed gas cartridge located in the inflation chamber.
- c. Inflatable PFDs are specifically required because they do not restrict the occupant's movement or egress.
- d. PFDs shall have two separate inflation cells.
- e. The instructions for activating the inflation cartridge must be clearly accessible and marked.
- f. The PFD must have an oral inflation tube in the event that the cartridge(s) fail to inflate the inflation cells.
- g. Passengers must not inflate PFDs in the aircraft. Personnel wearing an inflated PFD may have trouble exiting if the aircraft is overturned or submerged.
- h. PFDs equipped with an automatic (water-activated) inflation mechanism are prohibited.
- i. PFDs will be compatible with Compressed Air Emergency Breathing Systems (CA-EBS).
- j. PFDs will be maintained and inspected according to manufacturer's instructions.
- k. PFDs must be FAA approved per Part 135.

3. Hearing Protection.

- a. Hearing protection must be worn when in, or within proximity to operating aircraft.
- b. Hearing protection in the form of an approved helmet, earplugs, or earmuffs can provide users with adequate hearing protection.
- c. Use of combination or double protection (such as helmet plus earplugs) is recommended.
- d. Communications Ear Plugs (CEP) are also an approved means of providing additional hearing protection without impeding intercom communication quality.
- e. The requirement for hearing protection and hearing conservation programs is 29 CFR 1910.95, the [NWCG ALSE Handbook](#), and this NAMF.

4. Base layers.

- a. Base layers, socks, and clothing worn under the flight suit and next to the skin will provide the best protection if made of Fire Resistant (FR). Natural fibers, such as cotton, wool, or wool/cotton blend, silk, as well as fire-resistant cotton and cotton blends, are acceptable substitutes.
- b. Materials with low temperature melting characteristics, such as synthetics (nylon, dacron, polyester, and so on) and synthetic blends, are not approved.

Caution: *In cold climates, cotton base layers and socks will absorb perspiration and water, subjecting the wearer to chill, hypothermia, and frostbite.*

5. Compressed Air Emergency Breathing Systems (CA-EBS³¹). The use of CA-EBS by BSEE personnel will be conducted under the following guidelines.

- a. The **National Aviation Manager** is responsible for programmatic oversight and policy related to CA-EBS at the national-level.
- b. **Regional Directors:**
 - 1. Are responsible for CA-EBS program administration, funding, maintenance, and property accountability within their Regions.
 - 2. Will establish procedures to:
 - a. Provide CA-EBS for Regional and visiting BSEE personnel who are qualified and current in their CA-EBS training.
 - b. Ensure visiting personnel³² who are not qualified with CA-EBS are still allowed to fly in Regional aircraft.
 - c. Prevent any person who is not properly trained and current from using CA- EBS.
 - d. Ensure EBS are properly maintained either by qualified:
 - i. BSEE personnel or,
 - ii. Employees of their aviation service provider or,
 - iii. Employees of other organizations (other bureaus, the USCG, or commercial businesses)

³¹ In this document Compressed Air Emergency Breathing Systems may be abbreviated as CA-EBS or simply EBS.

³² Visiting personnel may include VIPs, HQ staff, non-Feds.

- e. Fund all aspects of their CA-EBS program (acquisition, storage, maintenance, training, travel, etc.).
 - i. It is recommended that funding for EBS takes into consideration the need for enough spares to be able to rotate the EBS back to the manufacturer for required inspections.
 - ii. The number and percentage of spares to users will be reported to the RAM and NAM annually.
- 3. May grant CA-EBS equivalency to newly hired BSEE employees who are current with similar requirements from outside agencies (i.e. USCG).
 - a. Requests for CA-EBS equivalency will be routed through the employee's chain of command to the RAM and NAM for technical review and then to the Regional Director for approval.
 - b. Approval of such equivalencies will be documented in writing with copies provided to the RAM and NAM.
 - c. The period that an equivalency is valid for will not exceed 4 years and the employee will take CA-EBS training during their next HUET cycle.
- c. **Regional Aviation Managers** are responsible for programmatic oversight of their Region's CA-EBS program. RAMs will:
 - 1. Document Regional CA-EBS policies and procedures in the Regional Aviation Management Plan.
 - 2. Maintain current HUET and CA-EBS training records for:
 - 3. All Regional personnel qualified to use CA-EBS.
 - 4. Provide the NAM/NASM:
 - a. A record of all Regional personnel who are qualified to use CA-EBS annually.
 - b. Documentation of all maintenance discrepancies and/or SAFECOMs related to EBS use annually. This will specifically include delays or mission cancellations related to EBS.
 - c. Copies of all Regional CA-EBS policies and procedures as they occur.

d. **CA-EBS Users will:**

1. Successfully complete and maintain currency with HUET and CA-EBS training at least once every four years.
2. Familiarize themselves with the procedures for the EBS in the manufacturer's user's guide.
3. Inspect the EBS before and after each flight using the procedures in the EBS's manufacturer's user manual.
4. Immediately report any deficiencies with the EBS to the pilot or the employee's supervisor and then document the discrepancies using a SAFECOM.
5. Notify their chain of command and the RAM when a mission is delayed or cancelled due to EBS issues.
6. BSEE personnel are responsible for notifying their chain of command six months in advance of when their HUET & CA-EBS training is due.
7. USCG personnel are required to provide and use their own (USCG) ALSE equipment to include CA-EBS.

e. **CA-EBS Training:**

1. All BSEE routine offshore travelers are required to take the appropriate HUET course (Tropical or Cold Water) with CA-EBS for initial and refresher training.
2. To be issued CA-EBS the individual must have completed, and be current, with the CA-EBS training required by this NAMF and local Regional procedures or meet the CA-EBS requirements for visitors.
3. BSEE personnel will successfully complete the HUET with CA-EBS course initially, and every 4 years thereafter, to be qualified to use CA-EBS. Completion of all in-water exercises is required to receive a HUET/CA-EBS certificate and is a requirement for BSEE.

Note: BSEE Routine Offshore Travelers operating in a cold-water environment are required to complete HUET/CA-EBS training that includes Cold Water Survival. This training will be documented in the individual's IAT Training Records as A-312EC.

4. New BSEE employees with current CA-EBS and HUET qualifications from

other sources (i.e., military or industry) may request equivalency through their chain of command to their Regional Director or designee. Approval of such equivalencies will be documented in writing with copies provided to the RAM and NAM.

5. Travel and training costs are the responsibility of the individual's organization.

f. CA-EBS Equipment:

1. BSEE has tested the Survival Egress Air (SEA) Mk1.5 and approves the use of SEA CA-EBS models Mk 1.5, LV2, 3000, and 4500 with the dial gauge and 20" hose.
2. Requests to use any other model of EBS will comply with the ALSE exception and waiver process in this NAMP and the [ALSE Handbook](#). New equipment must meet or exceed the capabilities of the SEA 4500.
3. The EBS will be carried in a pocket designed for its use that is fixed to the employee's survival vest. All EBS users must have an appropriate flight vest that is designed to mount both the personal floatation device and the EBS.
4. CA-EBS and related equipment (adapters, refilling equipment, vest, life preserver units, etc.) will be maintained in accordance with the equipment manufacturer's current instructions, FAA regulations, and DOI policy.

g. CA-EBS Maintainers will:

1. Familiarize themselves with, and maintain the EBS in accordance with, the procedures for the EBS in the manufacturer's user's and technical guide.
2. Clean and disinfect³³ the EBS in accordance with the manufacturer's procedures after each flight.
3. Securely store the EBS and related equipment when not in use.
4. For BSEE owned and maintained equipment, develop a maintenance tracking system for EBS and related equipment. An ALSE Technician will inspect all EBS in accordance with DOI and manufacturer guidance. A copy of the EBS tracking documentation will be provided every 180 days to the RAM/RASM and annually (calendar year) to the NAM/NASM.

³³ Procedures for disinfecting Aqualung (SEA) EBS can be found at https://capewellaerialsystems.com/wp-content/uploads/2018/12/CA_EBS-disinfecting_301118.pdf

i. **CA-EBS Maintenance:**

1. EBS will be maintained in accordance with the procedures in the manufacturer's user's and technical guides.
2. EBS may be maintained either by qualified BSEE personnel or under contract by employees of the aviation service provider.
 - a. To be qualified to maintain CA-EBS an individual must meet the requirements in Section 3. F. 2. g.
 - b. Repair, service, and visual inspection must not be attempted by untrained or unqualified personnel.
 - c. Regional Aviation Management Plans and aviation contracts will document whether their EBS will be maintained by BSEE personnel or by their aviation service or approved provider.
3. Factory-level service for EBS must be performed as required by the manufacturer.

b. ALSE required for Special Use Missions. Additional ALSE is required for Special Use flights³⁴ (e.g. oil spill reconnaissance, any flights below 500' above the surface, vessel landings, or flight over mountainous terrain³⁵). All BSEE flights other than routine point-to-point OCS flights are considered by the Department to be special use. All DOI policies pertaining to special use missions must be adhered to (e.g. project aviation safety planning (PASP)³⁶, pilot and aircraft carding³⁷, and ALSE³⁸).

Examples of special use missions that BSEE might conduct include post-hurricane or oil spill reconnaissance³⁹, low level⁴⁰, mountainous terrain⁴¹, off-airport operations in wheeled airplanes⁴² (Alaska), and vessel landings⁴³.

³⁴ See current [350 DM 1](#) App 2, [351 DM 1.7](#), [OPM-29](#), Interagency [ALSE Handbook](#), and Section 1.E. 2. of this NAMP.

³⁵ See Appendix G.4.

³⁶ See current <https://www.doi.gov/sites/doi.gov/files/uploads/opm-06.pdf>, and this NAMP.

³⁷ See current [OPM-29](#).

³⁸ See current Interagency ALSE HB.

³⁹ Per [OPM-29](#) Reconnaissance flights may include but are not limited to: Aerial observation, reconnaissance, surveillance, photo flights, survey, tracking or patrol flights. BSEE missions might include post-hurricane and oil spill recons.

⁴⁰ Per [OPM-29](#) Low level flights are operations other than takeoff or landing where flight is conducted less than 500 feet above the surface.

⁴¹ Per [OPM-29](#) Mountainous terrain operations are those flights conducted within 1000 feet of terrain (horizontal or vertical) in the areas designated by the FAA as mountainous IAW 14 CFR 95 Subpart B, except take off, landing.

⁴² Per [OPM-29](#) Off-Airport Operations in wheeled airplanes are take-offs or landings anywhere that is not listed in, or maintained in accordance with, an FAA Chart Supplement.

⁴³ Per [OPM-29](#) Vessel landings involve takeoff and landing operations on vessels, drill ships, semi-submersible drilling platforms, barges, or other landing areas subject to pitch and roll of the sea.

In addition to the ALSE required for point-to-point flights (4a above), **the following ALSE is required for special use flights:**

1. Fire-Resistant (FR) Clothing⁴⁴.

- a. Fire Resistant clothing protects the wearer from flash fire burns and is required to be worn on all special use flights. Fire resistant clothing currently used by BSEE inspectors is approved for aviation operations.⁴⁵
- b. For optimum protection FR clothing must fit loosely, providing trapped air for insulation.
- c. Sleeves must be long enough to reach the first knuckle on the thumb before securing snugly over the flight gloves at the wrist. Shirt sleeves shall be worn down and fastened. The shirt tail must be tucked into the trousers and the trousers must cover the boot tops.
- d. Pant legs must reach the floor while standing and secure snugly over approved boots at the ankle while seated.
- e. Synthetic clothing such as polyester, nylon, etc., or blends thereof, are prohibited.
- f. Base layers should be made of a FR or natural fiber like cotton, or wool.
- g. All garments must be clean. Fuels, grease, oils, and other combustible materials embedded in the fabric will burn at their normal flash points even though the fire-resistant clothing will not char until a higher temperature is reached.

2. Boots.

- a. Leather, or approved non-leather, boots⁴⁶ are recommended to be worn during all helicopter flights but are required for special use flights.
- b. Boot tops must extend above the ankle and must be constructed so that metal parts, such as shoestring eyes or zippers, do not contact the wearer's skin.
- c. Non-leather boots must be flight approved in accordance with U.S. Military standards for aviation use per the [ALSE Handbook](#).
- d. Boots made of FR rubber are an acceptable substitute.

⁴⁴ See current Interagency [ALSE Handbook](#).

⁴⁵ If BSEE uniform policies change and no longer require the routine use of FR clothing BSEE employees will still be required to wear FR clothing during special use flights

⁴⁶ See [ALSE Handbook](#) Chapter 2.1.B.4 and Table 3.

3. **Extreme Cold Weather.** For flights in extreme cold weather the use of special cold weather foot gear may be approved by the BSEE Director under the waiver authority listed in the Interagency ALSE Handbook and this NAMP.

4. **Gloves**

- a. Gloves should be worn during all helicopter flights but **must** be worn during special use flights. (For additional information see Appendix C.3. Sample ALSE Waiver).
- b. Flight Gloves (type GS/FRP-2) constructed of a soft leather palm and stretchable NOMEX fabric for the back are preferred. These gloves have a long cuff extending several inches above the wrist providing total coverage when the flight suit sleeve is properly worn.
- c. All-leather gloves (without synthetic liners) or other non-synthetic gloves designed for extreme cold weather are acceptable if they provide the wearer with wrist coverage and finger dexterity.

c. **Cold Weather Clothing.**

1. **An anti-exposure garment** must be worn in single engine aircraft and readily available to occupants of multiengine aircraft when conducting extended overwater flights⁴⁷ when the water temperature is colder than 50°F.⁴⁸ (See Immersion Suits below for additional guidance).

2. **Outer Garments.**

- a. Garments worn over a FR uniform⁴⁹, such as coats, bib pants, and coveralls, should also be made of FR material.
- b. Outerwear garments made from natural fibers, such as leather, cotton, wool, or wool/cotton blends, as well as from fire-resistant cotton and cotton blends, are acceptable substitutes.
- c. Materials with low temperature melting characteristics, such as synthetics (nylon, Dacron, polyester, and so on) and synthetic blends, are not approved.

⁴⁷ [14 CFR 1.1](#) Extended over-water operation...with respect to helicopters, an operation over water at a horizontal distance of more than 50 nautical miles from the nearest shoreline and more than 50 nautical miles from an off-shore heliport structure.

⁴⁸ If an anti-exposure suit is not available, the flight/mission must avoid overflying areas where the water temperature is 50 degrees C or less.

⁴⁹ See Section 3. F. 4.b. 1 of this NAMP.

3. Immersion Suits⁵⁰.

- a. For flights over open water that is colder than 50 F° personnel will wear a cold-water immersion suit approved by the Regional Director.

Note: More restrictive personal protective equipment/ALSE may be directed by the aviation service provider.

- b. Immersion suits will be a Dry Suit type which will have waterproof feet that are integrated into the suit, and seals at the wrist and at the neck or around the face that will not allow water into the suit. The suit should also be large enough to allow multiple layers of clothing to protect the wearer from the temperature of the water being flown over.

Caution: *Aircraft occupants wearing anti-exposure garments may have trouble exiting from an overturned or submerged aircraft.*

d. ALSE Exceptions and Waivers.

1. Exceptions to DOI ALSE requirements are listed in the ALSE Handbook (paragraph 1.5.a.). None of these exceptions apply to the missions BSEE conducts.
2. ALSE waiver requests will conform to the process defined in the ALSE Handbook (paragraph 1.5.b). Specifically, a waiver of an ALSE requirement can be authorized by the BSEE Director if it is determined that the requirement presents a concern affecting the safety or security of the employee. See Appendix C.3 for an example of a current ALSE waiver.
3. The BSEE Director has delegated the approval authority for ALSE waivers to the Assistant Director, OORP.
4. ALSE waiver requests will be routed through the Regional Director to the NAM/RASM for technical review and then to the Assistant Director, OORP for approval. The ALSE waiver request will specify:
 - a. The safety or security concern,
 - b. The ALSE requirement being waived,
 - c. The risk mitigation measures taken to support a decision to grant a waiver.
 - d. The duration that the waiver is being requested for.

⁵⁰ When an immersion suit is worn FR garments are not required.

5. The NAM will provide a copy of the waiver and any written delegation to OAS Aviation Safety and Evaluations Division and the appropriate OAS Regional Director.
6. Each ALSE waiver request will be considered on its own merits on a case-by-case basis.

Section 4. Aviation Operations

A. Special Use

1. General. Special Use Activities involve the utilization of airplanes and helicopters in flight operations which do not meet the definition of point-to-point flight⁵¹ and which require special considerations due to additional equipment and/or the increased risks inherent in such operations.

BSEE contract aircraft are primarily used for the transportation of personnel from various onshore locations to and from offshore facilities engaged in OCS activities. By definition, these flights are point-to-point flights and not special use⁵² and must be flown in full compliance with the applicable provisions of 14 CFR.

Examples of missions that BSEE conducts that are considered special use by [OPM-29](#) are reconnaissance flights, low-level flights, vessel landings, and flight in mountainous terrain.

Note: It is important to understand that a point-to-point flight becomes a special use mission, with all of the corresponding requirements, when a flight is diverted to conduct an oil spill/sheen reconnaissance, when the flight is conducted below 500' above the surface, if the mission operates in designated mountainous areas, or when a landing is made to a vessel.

- a. Reconnaissance flights include aerial observation, reconnaissance, surveillance, and photography flights.
- b. Low level flights are any flights, other than taking off or landing, conducted below 500 feet above the surface. With the exception of landing or taking off, operating below 500' above the surface is restricted to mission-essential flights only. Flights below 500' above the surface are considered low-level and will comply with DOI/BSEE requirements for special use activities.
- c. Vessel landings are defined as takeoff and landing operations on vessels, drill ships, semi-submersible drilling platforms, barges, or other landing areas subject to pitch and roll of the sea.⁵³
- d. Mountainous operations are those flights conducted within 1000 feet of terrain (horizontal or vertical) in the areas designated by the FAA as mountainous IAW 14 CFR 95 Subpart B (except for takeoff or landing)⁵⁴.
 1. A mountainous terrain endorsement **is not required** for contract pilots conducting point to point flights IAW 14 CFR 135.

⁵¹ See [350 DM 1](#).

⁵² See [350 DM 1](#) and [OPM-29](#)

⁵³ The BSEE GOAR has an approved Vessel Landings Carding Waiver. See Appendix C.2.

⁵⁴ See map information at NAMP Appendix G.4. and G.5.

2. No PPE required for mountainous terrain in and of itself.
- e. [OPM-06](#) requires a Project Aviation Safety Plan (PASP) be developed for all special use missions.

Note: A PASP is not required if the individual elements are addressed in the NAMP or RAMP and the requirement for a PASP is explicitly exempted.

- f. A special use mission may require additional ALSE⁵⁵.
 - g. A PASP requires a qualified and current Project Aviation Manager.
 - h. The PASP requires a risk assessment and line manager approval **before** the mission is conducted.
 - i. OAS authorization for both pilot and aircraft is required **before** special use activities are conducted.
2. **Public/Civil Aircraft Operations.** DOI aviation activities include both “civil” and “public” operations ([FAA AC 00-1.1A](#)). However, all BSEE missions are considered civil aircraft operations and shall comply with 14 CFR (Federal Aviation Regulations). BSEE’s helicopter contractors are bound by their contract to conduct operations in accordance with their FAA-approved commercial operator or airline certificate specifications, unless otherwise authorized by the IBC/AQD contracting officer.
- B. Fixed Wing.** BSEE does not routinely conduct flights in fixed wing aircraft. If a special use flight is necessary, a specific PASP per [OPM-06](#) will be developed.
- C. Rotary Wing.** All flight(s), whether VFR or IFR, will be conducted in accordance with the applicable ceiling, visibility, and wind criteria addressed in either the BSEE aviation services contract, the vendor’s Operational Manual, or when appropriate aPASP.
1. **VFR (Visual Flight Rules) Operations.** VFR weather minimums will be equal or greater to the requirements in 14 CFR 91, the BSEE aviation services contract, or vendor’s operations manual whichever is more restrictive. BSEE Regional Directors may publish more restrictive weather minimums in their Regional Aviation Management Plans but will first coordinate those weather minimums with the RAM/RASM and their aviation service provider.
 2. **IFR (Instrument Flight Rules) Operations**⁵⁶. When authorized by a BSEE aviation services contract the following conditions will apply:

⁵⁵ See [OPM-29](#), the [ALSE Handbook](#), and this NAMP.

⁵⁶ All FAA and DOI regulations/policies related to IFR operations apply to BSEE.

- a. Only multiengine helicopters may be operated in Instrument Meteorological Conditions (IMC) conditions.

Multiengine helicopters certified for operations by a single pilot without a second-in-command may file and operate in IMC conditions on IFR flight plans through areas of coastal fog provided the autopilot is fully operational and the weather at the planned destination is considered visual meteorological conditions (VMC) and forecast to remain VMC for estimated time of arrival (ETA) plus or minus one hour.

- b. Flight in visible moisture when temperatures are at or below freezing require all anti-ice and de-icing equipment to be fully functional.
- c. BSEE passengers must be briefed by the pilot on what they should expect from helicopter flight in the OCS airspace under IFR conditions.

Notes: BSEE management and passengers must take into consideration that IFR flight may take more advanced notice and longer planning time and may not allow for flight plan deviation (e.g. response to requests for no-notice inspections).

IFR flights may decrease the effective range of an aircraft due to the requirement for extra fuel needed to fly to an alternate when landing at the initial destination is not possible.

D. Fleet Operations (i.e. Government owned aircraft). Not currently applicable to BSEE.

E. Cooperator Operations. Use of Non-BSEE Aircraft. All BSEE employees will comply with bureau and DOI aviation policies when performing mission-related duties on board any organization's aircraft and/or aircraft operated under any other organization's operational control (i.e. BOEM or USCG aircraft). These policies include, but are not limited to: approved aircraft and pilots (by OAS carding or cooperator letter of approval), flight following, ALSE, etc., (Reference [351 DM 4.1 and 4.2](#)).

F. Passenger Transport.

1. General. A passenger is any person aboard an aircraft who does not perform the function of a flight crewmember⁵⁷ or qualified non-crewmember⁵⁸. All passengers will:

- a. Use appropriate personal protective equipment as required by the ALSE Handbook, the NAMP, the appropriate RAMP, and the PASP if applicable.

⁵⁷ 14 CFR 1.1 – Flight crew member means a pilot, flight engineer, or flight navigator assigned to duty in an aircraft during flight time.

⁵⁸ [49 CFR 40125](#) – Qualified non-crewmember means an individual, other than a member of the crew, aboard an aircraft whose presence is required to perform, or is associated with the performance of, a governmental function. Personnel on point-to-point flights (airport to helideck and back) are not required to perform, or associated with the performance of, a governmental function. They are by definition passengers.

- b. Report aviation incidents or operations deviating from policy to their supervisor and through the SAFECOM system (Appendix D).
- c. Emphasize personal safety as well as the safety of others involved in the flight.
- d. Unless prohibited by the pilot (i.e. for weight and balance reasons etc.) a BSEE employee will sit in the front left seat to enhance Crew Resource Management (CRM).
- e. Passengers not qualified and current in their HUET/CA-EBS and IAT, are not permitted to sit in the front passenger seat or next to the passenger compartment exits when possible. See above information regarding ALSE waivers in the event one may be required. For waivers related to IAT, see Section 5.

Note: The intent of this policy is to enhance crew resource management (CRM) by putting experienced and trained personnel in positions where they have the best chance to assist the pilot in safely performing his/her duties (hazard identification, warning, etc.).

2. Official Passengers. The following categories of personnel are Official Passengers:

- a. Officers and employees of the Federal Government traveling on official business.
- b. Members of Congress and employees of Congressional committee staffs whose work relates to DOI programs;
- c. Non-Federal passengers when engaged in missions who enhance accomplishment of a DOI (including BSEE) program such as personnel of cooperating state, county, or local agencies; representatives of foreign governments; and contractors' representatives to include those employed by such agencies, and private citizens. See Appendix A – Offshore Travel Authorization (Appendices A.1 – A.3).
- d. Space-available passengers are authorized and approved in accordance with [OMB Circular A-126](#). Space-available travelers approved by the Secretary of the Interior (or designee) on a trip-by-trip basis. See 6. Space-Available Travel below.

Note: A Memorandum of Agreement (MOA) between the FAA and BSEE is being developed to outline additional guidance for FAA passengers flying on BSEE helicopters. The MOA will be attached in the Appendix in future editions of the NAMP. Contact the Gulf of America RAM/RASM for additional information.

3. Unauthorized Passengers. All personnel who are not official passengers shall be considered an unauthorized passenger and shall not be transported in any aircraft owned or operated by, or on behalf of, the DOI including BSEE. A person who is otherwise an official passenger could become unauthorized by performing a function for which that person is not authorized, e.g., a

passenger performing pilot duties without proper authorization.

4. **Passenger Manifest.** The pilot-in-command must ensure that a manifest of all crewmembers and passengers has been completed. A copy of this manifest must remain at the point of initial departure. Manifest changes will be left at subsequent points of departure when practical. In those instances where multiple short flights will be made which involves frequent changes of passengers, a single manifest of all passengers involved may be called into dispatch or left with an appropriate person to preclude unreasonable administrative burden.
5. **Official Passengers/Cargo.** Except for space-available travel, only persons and cargo required to accomplish missions are permitted onboard BSEE exclusive use contract aircraft.
6. **Space-Available Travel.** Not currently applicable to BSEE's aviation contracts.
7. **Administrative Travel for Federal Employees.** Government aircraft may be used for administrative travel purposes, provided that: (1) the cost is not more than commercial sources, including charter and rental; or (2) commercial aircraft is not reasonably available to meet the traveler's departure/arrival requirements within a 24-hour period, unless it can be demonstrated there are extraordinary circumstances which require a shorter period to fulfill the agency requirement. To assure compliance with [OMB Circular A-126](#) (revised), a travel cost analysis ([Form OAS-110](#)) must be prepared for all administrative flights.
 - a. **BSEE (non-SES) personnel.** BSEE (non-SES) personnel traveling from their duty station (i.e. HQ) to a different OCS Region must coordinate with the RAM when visiting an OCS facility on government aircraft. BSEE personnel traveling offshore must have prior approval (documented on an official **Travel Authorization – [Form DI 1020](#)**) from their immediate supervisor in advance of any planned OCS facility visit.

*Note: BSEE Routine Offshore Travelers⁵⁹ also require prior approval (documented on an official Travel Authorization - **Form DI 1020**) from their immediate supervisor in advance of any planned OCS facility visit. A one (1) year "blanket" Travel Authorizations is acceptable and recommended.*

- b. **Federal non-BSEE.** The BSEE NAM will coordinate the review and approval process for federal non-BSEE passengers. The Assistant Director or Deputy, OORP must approve all Federal non-BSEE and non-Federal visitors in advance of any planned offshore travel on BSEE contract aircraft. This requirement does not apply for U.S. Coast Guard personnel that are not considered Senior Federal Officials or for Oil & Gas personnel who meet the specific conditions of the DOI Solicitor's letter at Appendix A.2. subj: Company Representatives on Agency Inspection Flights to Uncrewed Platforms.

⁵⁹ A BSEE Routine Offshore Traveler is defined as a BSEE employee who flies offshore 5 or more times per year.

- c. **U.S. Coast Guard Personnel.** The DOI and the United States Coast Guard (USCG) entered into a Memorandum of Understanding (MOU) regarding air support operations. The **MOU** ([No.13-01](#)) authorizes the USCG to support the full range of DOI missions at the discretion of the local USCG commander and allow for the coordination of flights at the operational level at the discretion of individual DOI Bureaus.

In support of BSEE missions, USCG personnel (non-Senior Federal Officials) are permitted to accompany BSEE personnel on contract aircraft. These flights should be coordinated at the region or district level with notification to the appropriate RAM. The RAM is responsible for tracking all flights that transport USCG personnel on BSEE contract aircraft and ensure the RD is aware of these flights.

8. Senior Federal Officials, Senior Executive Branch Official Travel, or non-Federal⁶⁰.

- a. All travel on government aircraft must have advanced authorization.
- b. In accordance with OMB Circular A-126 and DOI aviation policy requests for all Senior Executive Branch Officials, Senior Federal Officials, Military Officials, and non-Federal visitors traveling offshore on BSEE contract aircraft must be reviewed by the NAM and approved by the Assistant Director or Deputy, OORP and DOI's Solicitor or Deputy Solicitor, Division of General Law in advance of the planned offshore travel.
 - 1. **These requests must be submitted to the Regional Aviation Manager a minimum of 10 working days prior to the date of requested travel.**
 - 2. Changes to SES travel plans (points of departure and destination, etc.) may require resubmission and approval.
- c. The BSEE National Aviation Manager will coordinate the review and approval process for Senior Executive Branch, Senior Federal Officials, and non-Federal visitors traveling offshore on BSEE contract aircraft.

G. Hazardous Materials Transport. Due to DOT requirements for the transportation of hazardous material (HAZMAT) by air it is recommended that BSEE require the Oil and Gas Operator to ship any potential HAZMAT. If BSEE must maintain positive control over a sample then fully complying with the DOT and aviation service provider's requirements (i.e. training, notification, packaging, etc.) is mandatory.

- 1. When required by BSEE the transportation of hazardous materials shall be in accordance with Title 49 CFR, the Contractor's Operation Specifications, and the contract.
- 2. BSEE passengers are responsible for notifying the pilot of the location and type of hazardous materials being transported and complying with the pilot's instructions.

⁶⁰ Does not apply to Oil & Gas personnel who meet the specific conditions of the DOI Solicitor's letter at Appendix A.2. subj: Company Representatives on Agency Inspection Flights to Uncrewed Platforms

3. The pilot is directly responsible and is the final authority for the operation of the aircraft to include the acceptance of hazardous materials.
4. BSEE IAT Trainers who teach the A-100 (Basic Aviation Safety) and M2 (Aviation Management Line Manager's Briefing) courses will ensure that aviation transport of hazardous material under BSEE exclusive use contracts are covered. See NAMP Section 5. Aviation Training for additional information.

H. Flight Planning.

1. Flight plans must be filed, and flight following must be conducted, for all BSEE aviation activities as outlined in [351 DM 1.4](#) and the specific contract.
2. Aerial Hazards Maps will be constructed for each Region/District's local operational area and for specific routes between the primary airport and the coast or other on shore locations. The Regional Aviation Management Plan will require:
 - a. Aerial Hazard Maps will be updated annually by March 1, or more frequently if significant aviation hazards change. Districts will implement procedures to document when the map is updated. See Appendix G.5 for additional Aerial Hazard Map Guidance.
 - b. Districts will provide a current copy of the aerial hazard map to the Regional Aviation Manager by March 1 each year. The RAM will notify the NAM by March 15 that all Districts have provided an updated flight hazard map.
3. Operating to or from Free Floating Vessels, Geo-Research Vessels, or Drill Ships.
 - a. Federal law requires ANY commercial conveyance (i.e., helicopter) arriving from a free-floating vessel on the OCS to file Advanced Passenger Information System (APIS) documentation (U.S. Customs Flights). This requirement applies regardless of whether the mission was planned to land at free floating vessel, geo-research vessel, or drill ship not in production or whether the landing was not planned in advance (i.e., unannounced inspection or precautionary landing).
 - b. BSEE mission planners and inspectors need to be aware that additional time for flight planning and customs documentation may be required. To avoid a delayed departure, it is recommended that mission requests for flights requiring APIS documentation be submitted to the aviation service provider the afternoon before the intended flight. Any changes made the morning of the flight require the aviation service provider to refile which can take 2-4 hours to get clearance from the time the documentation is submitted.
- I. Flight Following.** All aircraft transporting BSEE personnel require an operational satellite-based tracking/automated flight following (AFF) System before taking off from an on-shore base. BSEE's

aviation contractor must ensure:

1. The AFF system they use is compatible with the Government's AFF tracking network ([Webtracker](#)), or as specified per contract;
2. The AFF system they use is monitored during all BSEE flight operations; and,
3. The AFF system they use is available to BSEE and OAS to monitor (as required).
4. If the satellite-based/AFF system fails during a mission the flight may be continued, at pilot discretion, as long as 15-minute position reports can be made; and,
5. If the satellite-based/AFF system fails, and the 15-minute position reports cannot be made the pilot will land as soon as practicable at a location where communications with the vendor's flight operations center can be accomplished.
6. Once the aircraft has returned to the vendor's on shore base the AFF must be fully operational before it can be dispatched for further BSEE missions.

J. Uncrewed Aircraft Systems (aka: Drones).

1. **BSEE UAS Policy.** UAS operated on behalf of BSEE shall comply with all protections and procedures addressed in [OPM-11](#), whether DOI-owned or vendor-owned. Specific regional or unit UAS guidance and policy will be maintained in regional and/or unit aviation management plans. For more information contact the BSEE National Aviation Manager.
2. **Threat to BSEE Operations from Civil UAS.** BSEE's aviation management team will continually evaluate for potential threats. BSEE Routine Offshore Travelers are trained in Crew Resource Management which emphasizes situational awareness, including spotting and responding to potential UAS activity.

K. Operational Environment Considerations.

1. **General.** The offshore environment in which BSEE operates in is subject to weather conditions that can adversely affect the safety of aviation operations such as thunderstorms, fog, and cold-water temperatures. It is critical that all members of the BSEE aviation team are aware of, and alert to, changes in the environmental conditions.
 - a. **Managers** must be aware of how their actions may influence pilots to operate beyond their individual capability and the capability of their aircraft.
 - b. **Pilots** must be ever cognizant of environmental conditions in which they are expected to operate. The pilot is the final authority to make a "go" or "no-go" decision based upon

environmental and safety considerations.

Note: *The limiting factor for flight operations will be the most restrictive limitation of either the vendor's operations manual, the specific contract, or applicable BSEE policy (e.g. in the Gulf of America the most restrictive weather limits are found in GOA Regional policy).*

2. Operations over Cold Water (below 50°F).

- a. Operating over water that is below 50°F requires compliance with [351 DM 4](#) and the **ALSE Handbook**.
- b. An anti-exposure suit will be worn on single engine aircraft and will be readily available to occupants of multiengine aircraft.

Note: *The use of a helmet with an anti-exposure suit may not be possible. Under these circumstances the individual will need to secure a waiver (Appendix C.3 for an example).*

- c. An appropriate survival kit for environmental conditions per the DOI ALSE Handbook is required.

| Water Temperature | Exhaustion or Unconsciousness In | Expected Survival Time |
|---------------------|----------------------------------|------------------------|
| 70-80° F (21-27° C) | 3 - 12 hours | 3 hours - indefinitely |
| 60-70° F (16-21° C) | 2 - 7 hours | 2 - 40 hours |
| 50-60° F (10-16° C) | 1 - 2 hours | 1 - 6 hours |
| 40-50° F (4-10° C) | 30 - 60 minutes | 1 - 3 hours |
| 32.5-40° F (0-4° C) | 15 - 30 minutes | 30 - 90 minutes |
| <32° F (<0° C) | Under 15 minutes | Under 15 - 45 minutes |

(Sources: U.S. Coast Guard, U.S. Coast Guard Auxiliary, Cold Water Bootcamp by Dr. Gordan Giesbrecht, Cold Water Boating Safety, Alaska Division of Parks and Outdoor Recreation.)

L. **Documentation Requirements.** None.

M. Bureau-Specific Operational Requirements.

- 1. **General.** Aircraft used in over-water operations will comply with [351 DM 1](#), the requirements of this Plan, and the appropriate Regional Aviation Management Plan.
- 2. **Pilot Briefing.** The pilot in command for all BSEE contracted aircraft shall ensure that prior to flight all passengers have been briefed in accordance with the items contained in [14 CFR Part 135.117](#), the appropriate contract, and the elements listed in Appendix G.1. In those instances where short flights are made, the briefing does not need to be repeated unless new passengers come aboard. Pilot and passengers should review the route of flight and destination. BSEE passengers must acknowledge to the pilot that the route and destination(s) are correct.

- 3. Refueling Operations.** All refueling operations must be performed in accordance with the applicable BSEE aviation services contract. The safety of all refueling operations is the sole responsibility of the contractor. The Contractor must ensure all passengers understand that:
- a. Passengers are not on board the aircraft during refueling operations.
 - b. Passengers should not be on the helideck during refueling.
 - c. Loading of the baggage/passenger compartment is prohibited during refueling.
 - d. Passengers shall not be involved with the refueling of the aircraft unless the pilot has determined that it is an absolute necessity.
 - 1. Passengers required to be involved will be briefed on procedures by the pilot to include emergency shutdown and evacuation procedures.
 - 2. If BSEE personnel are requested by the pilot to participate in refueling due to an emergency a SAFECOM must be submitted.
 - e. Smoking is prohibited within 50 feet of the aircraft and fuel-servicing vehicles.
 - f. When permitted by the contract **and ordered by BSEE** with contractor concurrence, the rapid refueling of aircraft must be in accordance with:
 - 1. FAA-approved program for rapid refueling as directed by [14 CFR 135.23](#); and,
 - 2. NFPA 407: *Aircraft Fuel Servicing*.
- 4. Cell Phone Use.** The use of cell phones in BSEE contracted aircraft is prohibited during flight per Federal Communications Commission [47 CFR Part 22.925](#) (Prohibition on airborne operation of cellular telephones) and Federal Aviation Administration [14 CFR Part 135.144](#) (Portable Electronic Devices). There is no exemption for Federal Employees to use Cell Phones for official business while in flight.

Notes: The aviation contractor's operations manual procedures may be more restrictive than this policy.

With the pilot's permission the cell phone's camera feature may be used (still or video). Users should ensure phones are in the appropriate "Airplane" mode.

- 5. Lithium Battery Restrictions.** Lithium batteries are considered HAZMAT by DOT. DOT/FAA and our aviation service providers restrict their use on aircraft.

Vendor safety procedures will be complied with at all times. Lithium batteries (i.e. cell

phones, laptop computers, etc.) will be declared to the vendor (pre-boarding) and to the pilot (pre-flight briefing). The vendor may require physical inspection of equipment with Li-Ion batteries.

6. Minimum Equipment List (MEL⁶¹) Requirements.

- a. All BSEE aviation service contracts shall require that regardless of the provisions in the aviation service providers Operations Manual for Minimum Equipment List the following listed equipment must be operable within the specifications detailed below for dispatch from the designated base. If any of these equipment systems become inoperable offshore or do not meet the criteria below, the aircraft may be dispatched for return to base only.
 1. Main rotor brake.
 2. TCAS, TCAD, or TAS.⁶²
 3. Strobe light. If the contractor has installed a dual LED light on the horizontal stabilizer or upper cabin, the aircraft may be dispatched under the provision of the MEL if at least one white strobe is operational.
 4. Pulsating forward facing light(s).
 5. Transponder.
 6. Global Positioning System (GPS). The aircraft must have at least one system capable of VFR navigation; or capable of IFR navigation if flight is to be conducted under IFR.
 7. Intercommunication system (ICS) if the issue in the ICS system limits the communication ability between the passengers and the crew.
 8. Automatic Dependent Surveillance – Broadcast (ADS-B) equipment.
 9. Hobbs meter (or equivalent)⁶³
- b. Regardless of any provisions in the MEL, if the Satellite tracking system becomes inoperable it must be repaired within 48 hours from the time the malfunction is recorded. Any time the aircraft's Satellite tracking system is inoperative the remainder of the Contractor's flight following system for that aircraft must be fully functional. When the

⁶¹ A Minimum Equipment List (MEL) is a document and method aircraft operators use to obtain relief from Federal Aviation Regulations requiring that all equipment installed on the aircraft be operative at the time of flight. MEL is also known as deferred maintenance.

⁶² TCAS (Traffic Collision Avoidance System), TCAD (Traffic Collision Avoidance Device), TAS (Traffic Avoidance System).

⁶³ If Hobbs Meter is out of service or not installed, clock time will be used to account for flight time instead of the Hobbs Meter. BSEE personnel on the flight will verify the clock time for each flight. See the RAMP for additional information.

Satellite tracking system is inoperative the pilot must conduct radio flight following at intervals not to exceed 15 minutes. Failure of the Satellite tracking system will be documented using the DOI SAFECOM system.

7. Sea States and Helicopter Float Limitations⁶⁴.

a. Overview.

1. The aircraft floats on all BSEE-contracted helicopters are rated to sea state 4. Sea state 4 is defined in FAA Advisory Circular 29-2C as “moderate seas” with a significant wave height of between 4-8 feet and wind speed of 17-21 knots.
2. Due to a helicopter’s high center of gravity the float system is unlikely to keep a helicopter upright for an extended period regardless of the float rating. The float system is designed to give the occupants the time to get out of the helicopter and into the life rafts.
3. BSEE’s Pacific Region, and to a lesser degree, the Gulf of America Region, experience wave heights above sea state 4 often enough to warrant mitigation of those risks.
4. BSEE uses a systems approach towards risk mitigation involving **training** (HUET, CA-EBS, and marine survival) and **equipment** (floats, rafts, life vests, CA-EBS, and EPRIBs⁶⁵).

Note: Specific Sea States and Helicopter Float limitations may vary based upon contract considerations in each BSEE Region.

b. Policy.

1. Risk Mitigations and Approval:
 - a. Preflight.
 - i. Prior to the first flight of the day, and throughout the day as necessary, the pilot should use National Weather Service (NWS) and/or National Oceanic and Atmospheric Administration (NOAA) information to evaluate the meteorological and environmental conditions that will affect the planned route of flight. This will include wave height, wave steepness (if available), water temperature, winds, visibility, cloud ceilings, etc.
 - ii. If sea states 5 or 6 (waves 8 feet or greater) would be encountered during the

⁶⁴ See Appendix G.3 for additional information on sea states and float limitations.

⁶⁵ Emergency Position Indicating Radio Beacons (EPIRB) alert search and rescue services by transmitting a distress signal via satellite to the nearest rescue coordination center. BSEE requires the pilot’s flight vest be equipped with an EPIRB.

planned flight BSEE personnel, in coordination with the pilot, should consider altering the route, changing the destination, or canceling the mission to avoid the areas of higher sea states.

- iii. For each flight where sea states 5 or 6 will be encountered an operational risk assessment shall be conducted and approved by BSEE management prior to the flight. It is recommended that the risk management worksheet located in the BSEE NAMP Appendix Section F, or equivalent be used. A PASP is required to be completed and submitted for the appropriate risk review level of approval.
 - iv. Flights in areas of sea state 7 are prohibited.
- b. Risk Approval Level.
- i. Sea state 4 or lower (waves less than 8 feet). The mission risk approval level remains unchanged.
 - ii. Sea state 5 (waves 8-13 feet). The mission risk approval level is the Regional Director. Requests to operate over areas of sea state 5 will be documented on a Risk Assessment Worksheet stating the justification for accepting the additional risk. The request and worksheet will be routed through the District Manager to the Regional Director for approval.
 - iii. Sea state 6. The mission risk approval level is the BSEE Director. Requests to operate over areas of sea state 6 will be documented on the Risk Assessment Worksheet stating the justification for accepting the additional risk. The request and worksheet will be routed through the District Manager and Regional Director to the BSEE Director for approval.
- c. Pilot's preflight briefing should include the sea states (wave height) and winds expected to be encountered during that flight.

Sea States Codes

(World Meteorological Organization, as defined by FAA AC 27-1B & AC 29-2C)

| Sea State Code | Description of Sea | Significant Wave Height | | Wind Speed Knots |
|----------------|--------------------|-------------------------|--------------|------------------|
| | | Meters | Feet | |
| 0 | Calm (Glassy) | 0 | 0 | 0 - 3 |
| 1 | Calm (Rippled) | 0 to 0.1 | 1 to 1/3 | 4 - 6 |
| 2 | Smooth (Wavelets) | 0.1 to 0.5 | 1/3 to 1 2/3 | 7 - 10 |
| 3 | Slight | 0.5 to 1.25 | 1 2/3 to 4 | 11 - 16 |
| 4 | Moderate | 1.25 to 2.5 | 4 to 8 | 17 - 21 |
| 5 | Rough | 2.5 to 4 | 8 to 13 | 22 - 27 |
| 6 | Very Rough | 4 to 6 | 13 to 20 | 28 - 47 |
| 7 | High | 6 to 9 | 20 to 30 | 48 - 55 |
| 8 | Very High | 9 to 14 | 30 to 45 | 56 - 63 |
| 9 | Phenomenal | Over 14 | Over 45 | 64 - 118 |

Section 5. Aviation Training

The education and training requirements listed in [OPM-04](#) are the minimum required by the Department for promoting aircraft accident prevention awareness and developing operational and management skills. BSEE, at the national or lower organizational levels, may increase but not decrease [OPM-04](#) requirements.

A. Management Responsibilities.

1. **Managers.** The education, training, and qualification of DOI personnel at all organizational levels is the responsibility of management. Managers and supervisors:
 - a. Must be aware of Departmental and Bureau policy as it relates to aviation programs supporting BSEE missions for which they are responsible.
 - b. Will ensure that BSEE personnel are provided the time and opportunity to take the aviation training courses required by [OPM-04](#), this NAMP, and the applicable Regional Aviation Management Plan
 - c. Will identify, develop (or request assistance from the RAM/RASM in developing), and present additional aviation training to meet their mission needs.
 - d. Will prohibit personnel who are not complete and current with their aviation training requirements from performing aviation duties (flying or supervising personnel who fly).
 - e. Will provide time and resources for education and training as specified in [OPM-04](#).
2. **Supervisors.**
 - a. Will ensure that employees under their authority receive the level of aviation safety training required by Departmental policy **before participating in aviation operations**. This includes verification of the Routine Offshore Traveler's "No Fly List" updated monthly in the *BSEE Interagency Aviation Training Compliance Spreadsheet*.
 - b. Will review their employees' training progress in IAT monthly and provide a summary of that progress to the District Manager. In Alaska, this information will be provided to the Regional Supervisor of Field Operations.
3. **District Managers or in Alaska the Regional Supervisor/of Field Operations (RSFO)** should identify, develop, and present additional aviation training to meet their mission needs. DMs or the RSFO may request support from the RAM/RASM for the development of training for specific mission needs.

4. The **NASM** will monitor the BSEE aviation training program to ensure that the goals and competencies are being met. The NASM will ensure a summary of aviation training is available upon request.
5. The **RAM/RASM** will monitor aviation training within their Region to ensure that training requirements are being met and proficiency maintained. The RAM/RASM will provide a summary of aviation training monthly to the NAM/NASM.

Note: In Alaska and Pacific, the RAM/RASM reviews employees' IAT training and provides a summary to the Regional Supervisor of Field Operations or their designee, and the NAM/NASM.

B. Required Aviation Training

1. **Managers** must complete the M2 (Aviation Management Line Managers Briefing), or the M3 (Aviation Management for Supervisors), courses initially and every three years thereafter. The A-302 (Personal Responsibilities and Liabilities) course is required initially only.
 - a. *If a manager is not complete and current with their IAT requirements they may not supervise or manage aviation programs or activity until they complete their aviation training requirements.*
2. **Supervisors** must complete the M3⁶⁶ and A-200 (Mishap Briefing) are required initially and every three years thereafter. The A-302 (Personal Responsibilities and Liabilities) course is required initially only.
 - a. *If a supervisor is not complete and current with their IAT requirements, their subordinates are not allowed to perform their aviation-related duties (i.e. their subordinates are grounded).*
3. **Passengers.** BSEE recognizes two categories of passengers: Visitors/BSEE Non-Routine Offshore Travelers, and BSEE Routine Offshore Travelers. The number of offshore trips the individual flies, or is reasonably expecting to fly, on an annual basis determines their aviation training requirement(s)⁶⁷ (See NAMP Section 5. Aviation Training for more details).

⁶⁶ Supervisors are encouraged to attend an M2 (Aviation Management Line Managers Briefing). Taking the M2 does not automatically replace the requirement to take the M3 (Aviation Management for Supervisors). Supervisors should notify their RAM and request equivalency from OAS Training Division

⁶⁷ Aviation Training requirements (IAT and HUET/CA-EBS) apply to anyone who flies more than 4 times a year (i.e. visitors, VIPs, or BSEE employees).

- a. HUET or CA-EBS⁶⁸. If a BSEE Routine Offshore Traveler is not current or complete with their HUET or CA-EBS training, they are prohibited from participating in offshore flights until current again or are granted a 30-day extension, or until the next available class by their Regional Director.
- b. IAT. There are no extensions for A-100 or A-200 requirements⁶⁹. The RD may extend the requirements for A-310 until the first course (classroom or webinar) is available but for no more than 30 days.
- c. The NAMP Section 5. Aviation Training provides detailed discussion on these roles and training requirements.
- d. Required IAT course frequency (initial and refresher training) for BSEE routine offshore travelers:
 - 1. A-100 (Basic Aviation Safety)⁷⁰. Initially and every three years thereafter.
 - 2. A-200 (Mishap Review). Initially and every three years thereafter.
 - 3. A-310 (Introduction to Crew Resource Management). Initially and every three years thereafter. After the individual has taken the initial A-310 Regional Directors are encouraged to approve equivalent Crew Resource Management refresher training tailored to BSEE's mission. Such equivalent CRM training will be annotated in the IAT system as A-310E (E = "equivalent").
 - 4. A-312E (Water Ditching and Survival). BSEE uses the IAT system's A-312 course to track completion of BSEE's required HUET training. BSEE employees may take the A-312 course, but it does not take the place of HUET. HUET will be annotated in the IAT system as A-312E.

Note: HUET training is required every 4 years. See the NAMP Section 5.

Aviation

Training for details.

- 5. BSEE Routine Offshore Travelers operating in a cold-water environment are required to complete HUET training that includes Cold Water Survival. This training will be documented in the individual's IAT Training Records as A-

⁶⁸ The intent of this policy is to specifically enforce compliance for BSEE Routine Offshore Travelers. Visitors/BSEE Non-Routine Offshore do not have HUET or CA-EBS training requirements but are required to be briefed by the pilot on egress and CA-EBS safety before each flight. A100 and A200 are recommended for all passengers prior to any BSEE flight. This reduced level of training **DOES NOT** apply to BSEE Routine Offshore Travelers

⁶⁹ The A100 and A200 are required by DOI for Special Use missions (reconnaissance, low level, vessel landings, and mountainous terrain) and **any extensions to DOI required training must be approved by the OAS Director**

⁷⁰ BSEE IAT Trainers to ensure that aviation transport of hazardous material under BSEE exclusive use contracts will be covered during the A-100 (Basic Aviation Safety) courses taught by BSEE.

312EC.

4. Aviation Managers. Aviation Managers at the National (NAM and NASM) and Regional levels (RAM and RASM) are required to meet the [OPM-04](#) requirements for an Aviation Manager. Aviation Managers:

- a. Are required to complete all courses that are available online or via webinar within 6 months.
- b. Are required to complete all [OPM-04](#) requirements within 12 months.
- c. Are required to attend an OAS-sponsored ACE (Aviation Centered Education) within 12 months.
- d. Waivers to extend an aviation manager's requirements will be forwarded through the aviation manager's chain of command to the Assistant Director, OORP for approval.
- e. Aviation Managers should present or participate in all IAT presentations for their units.
- f. Aviation Managers are encouraged to become qualified IAT Trainers.

5. Extensions of Aviation Training Requirements⁷¹.

- a. The deadline for courses that are available online (e.g. A-100, A-200, and M3) may not be extended⁷².
- b. The deadline for courses that are required by BSEE (not DOI), and which are only available via classroom or webinar (A-302, A-310, and M2) may be extended for:
 - 1. Newly assigned personnel may request an extension of up to 90 days from the RD.
 - 2. Existing personnel may request an extension of up to 30 days, or until the next available class, from the RD.
- c. All extensions require chain of command approval and RAM/RASM &

⁷¹ Due to unforeseeable closures of training facilities and unavailability of academic courses that require an instructor, extensions for aviation training requirements of up to 90 days may be requested through the chain of command to the Assistant Director, OORP. The period of the extension will be valid from the date the individual's training currency expired. Regional Directors may request blanket extensions for their personnel. For extensions in excess of 90 days the RAM/RASM must contact the NAM/NASM prior to requesting the extension

⁷² The A100 and A200 are required by DOI for Special Use missions (reconnaissance, low level, vessel landings, and mountainous terrain) and M3 is required for DOI Supervisors and **any extensions to DOI required training must be approved by the OAS Director.**

NAM/NASM technical review must be completed before being submitted to the RD for approval.

- d. If an extension expires without completion of the required training the individual is prohibited from performing their aviation duties (flying, supervising, or managing) until their qualification is renewed.

C. Specialty training. BSEE specialized training is listed in Section 3.0 C. Promotion.

1. M2 Aviation Management Line Managers Briefing.

- a. **Policy.** All managers with line authority over aviation operations are required by DOI policy to take the M2 Aviation Management Line Managers Briefing or the M3 Aviation Management for Supervisors course every 3 years.

An M2 briefing is particularly well suited for senior managers and leaders (GS14 or higher) whose time is often limited and who would benefit more from detailed information on BSEE aviation programs rather than a generalized presentation on the Department's aviation program as presented in the M3 course.

Note: Currently [OPM-04](#) does not authorize supervisors to substitute the M2 briefing for the M3 course. If a supervisor participates in an M2 briefing, they may request equivalency for the M3 course through their RAM. The RAM will forward the request to the NAM who will coordinate the equivalency with the Chief, OAS Training Division.

D. Contracting Officer's Representative (COR) Requirements.

1. For all BSEE aviation contracts the Contracting Officer (CO), in consultation with the Program Office, determines the level of COR certification required for a contract. CORs will be developed and appointed as follows:
 - a. Level I – 8 hours of training and no experience required. This level is appropriate for low-risk contract vehicles, such as supply contracts and orders.
 - b. Level II – 40 hours of training and 1 year of previous COR experience required. This level is generally appropriate for contract vehicles of moderate to high complexity, including both supply and service contracts.
 - c. Level III – 60 hours of training and 2 years of previous experience required. These are the most experienced CORs within an agency who are called upon to perform significant program management activities. CORs assigned to major investments, as defined by OMB Circular A-11, are required to have a Level III certification.

E. Documentation requirements.

1. **Online** IAT courses are automatically documented within the IAT system.
2. **Classroom and webinar** attendance must be documented in the IAT system by the IAT trainer who presented the training.
3. **HUET** is not an IAT course but will be documented in the IAT system for tracking purposes. Employees will document their HUET completion by uploading the completion certificate into IAT as a course equivalency to A-312 (aka A312E or A312EC), Water Ditching and Survival⁷³.

F. Bureau-specific Training Requirements.

1. **Helicopter Underwater Egress Training (HUET)**. BSEE Routine Offshore Travelers must complete a HUET or approved HUET with cold water survival course every 4 years that meets or exceeds OPITO HUET training standards (see Appendix Section E and the NAMP Section 5. Aviation Training for information).
2. **Compressed Air Emergency Breathing Systems (CA-EBS)**. BSEE Routine Offshore Travelers are required to complete CA-EBS training initially and every 4 years thereafter. (See Appendices Section E and the NAMP Section 5. Aviation Training for information).
3. **Interagency Aviation Training (IAT) Trainer**. Prior to attending the A220 (Train-the-Trainer course) or completing the OAS Training Branch approved equivalency, candidates will:
 - a. Get written approval from their chain of command (specifically that the chain of command wants that individual to conduct training for their organization and will support the individual (time and travel) to actually conduct IAT training).

Note: BSEE IAT Trainers are often tasked to train or support training for other agencies within the DOI for courses they may be certified to instruct. This may include online webinars, in-person classes, and Aviation Centered Education (ACE) training conferences.
 - b. Individuals qualified to train or support training for DOI IAT courses will provide their training certification to the NAM/NASM prior to instructing for BSEE.
 - c. Be complete and current with all applicable IAT training for the position that they hold.
 - d. Have completed any IAT courses that they intend to teach.

⁷³ An IAT External Equivalency Upload Guide is found at https://www.iat.gov/help/equiv/equivalency_guide.asp

Section 6. Aviation Security

A. Aviation Facilities. The Contractor is responsible for ensuring that each location used for aircraft landing and takeoff at which BSEE exclusive use aircraft are permanently based are secured in accordance with their contract and [352 DM5](#).

1. **Personnel Screening.** The purpose of screening and searching is to ensure passenger safety by preventing the transport of weapons, incendiary devices, or any other dangerous or prohibited items. Screening and searching protects passengers, crew, and employees through all phases of transport. To achieve this, the aviation service provider shall conduct screening and searching of all persons to include but not limited to BSEE passengers (including transit and transfer passengers) and all items to be transported in an aircraft as required.
2. **Baggage and Cargo Screening.** All baggage and cargo shall be subject to inspection as required by the aviation service provider. Each passenger is responsible for declaring any hazardous materials in their possession and presenting all necessary documentation and identification. These documents must be in good condition.

B. Aircraft and Equipment.

1. BSEE's Contractors are solely responsible for the security of their aircraft, vehicles, and associated equipment used in support of BSEE exclusive use aviation service contracts and under the control of the DOI.

Any aircraft and equipment used under a BSEE exclusive use aviation services contract must be physically secured *per contract*.

C. Aviation Fuel Security. All contracts will require the aviation service provider to verify security, type, and quality of fuel.

D. General Aviation Security Programs.

1. [The Transportation Security Administration \(TSA\)](#) has implemented a national toll-free hotline that the general aviation (GA) community can use to report any "out-of-the-ordinary" event or activity at GA airports. The hotline -- (866) GASECURE (866) 427- 3287 -- is operated by the National Response Center and centralizes reporting to the appropriate local, state and federal agencies.
2. BSEE aviation users should report any suspicious activities immediately to the [National Response Center](#) (1-800-424-8802), local law enforcement, or call 911.

E. U.S. Coast Guard (USCG) Maritime Security (MARSEC) and DHS National Terrorism Advisory System (NTAS).

- 1.** BSEE's response to an OCS security threat level is guided by the USCG's three-tiered [MARSEC levels](#). MARSEC is designed to provide a means to easily communicate pre-planned scalable responses to increased [NTAS](#) threat levels.
- 2.** MARSEC levels are set to reflect the prevailing threat environment to the marine elements of the national transportation system, including ports, vessels, facilities, and critical assets and infrastructure located on or adjacent to waters subject to the jurisdiction of the U.S. The USCG Commandant sets the MARSEC level.
- 3.** The NTAS consists of two types of advisories: Bulletins and Alerts.
 - a.** Bulletins were added to the advisory system to communicate current developments or general trends regarding threats of terrorism on the homeland.
 - b.** NTAS Alerts - Elevated or Imminent-will provide a concise summary of the potential threat, information about actions being taken to ensure public safety, and recommended steps that individuals, communities, businesses, and governments can take to help prevent, mitigate, or respond to the threat.

Section 7. Airspace Coordination

A. General.

1. BSEE's mission may involve flights that operate within the Air Defense Identification Zone (ADIZ) of the United States. All flights that penetrate the ADIZ will comply with the requirements of 14 CFR 99. Flights may, depending on location and altitude, also operate within airspace of IFR/VFR routes or National Wildlife Refuges. Flights will be planned to avoid these areas or to comply with their requirements and restrictions.
2. Airspace coordination and guidance for the DOI is provided through the NWCG Standards for Airspace Coordination.

B. Definitions.

1. **ADIZ (Air Defense Identification Zone).** Defined as the area of airspace over land or water, extending upward from the surface, within which the ready identification, the location, and the control of aircraft are required in the interest of national security. ADIZ locations and operating and flight plan requirements for civil aircraft operations are specified in 14 CFR Part 99. Any aircraft that wishes to fly in or through the boundary must file either a Defense Visual Flight Rules (DVFR) flight plan or an Instrument Flight Rules (IFR) flight plan before crossing the ADIZ ([14 CFR 99.11](#)). While approaching and crossing the ADIZ aircraft must have an operational transponder and maintain two-way radio contact.
2. **DVFR (Defense Visual Flight Rules).** Rules applicable to flights within an ADIZ conducted under the visual flight rules in 14 CFR Part 91.
3. **FTA (Fire Traffic Area).** An FTA is a communication protocol for firefighting agencies. It does not pertain to other aircraft that have legal access granted by the FAA within a specific TFR. The FTA should not be confused with a TFR, which is a legal restriction established by the Federal Aviation Administration to restrict aviation traffic while the FTA is a communication tool establishing protocol within firefighting agencies.
4. **NOTAM (Notice to Air Mission).** A [NOTAM](#) is a notice containing information (not known sufficiently in advance to publicize by other means) concerning the establishment, condition, or change in any component (facility, service, or procedure of, or hazard in the National Airspace System) the timely knowledge of which is essential to personnel concerned with flight operations.
5. **TFR (Temporary Flight Restriction).** A TFR is a geographically limited, short-term, airspace restriction. Temporary flight restrictions often encompass major sporting events, natural disaster areas, air shows, space launches, and Presidential

movements. Pilots must check with flight service for ALL applicable NOTAMS immediately prior to flight to identify applicable TFRs. Some TFRs can be very complex in shape, movement, and duration.

- C. De-confliction Procedures.** All flights that enter an ADIZ shall be on either an IFR or DVFR flight plan, will flight follow with the FAA, and will comply with the requirements of 14 CFR 99. See Appendix D. Aviation Safety Communiqué (SAFECOM), 17. Near Mid-Air Collision, Note: Reporting Airspace Conflicts using the SAFECOM.
- D. Emergency Security Control of Air Traffic (ESCAT) Procedures.** ESCAT provides direction for the security control of civil and military air traffic during an air defense emergency.
1. The ESCAT Plan provides policy, assigns responsibilities, and prescribes procedures to be taken in the interest of national security. The ESCAT Plan supersedes the plan for the Security Control of Air Traffic and Air Navigations Aids (SCATANA). See FAA Advisory Circular 99-1D.
 2. During defense emergency or air defense emergency conditions, additional special security instructions may be issued in accordance with 32 CFR 245. Plan for the Emergency Security Control of Air Traffic (ESCAT).
 3. Under the provisions of 32 CFR 245, the military will direct the action to be taken in regard to landing, grounding, diversion, or dispersal of aircraft and the control of air navigation aids in the defense of the U.S. during emergency conditions.
 4. At the time a portion or all of ESCAT is implemented, ATC facilities will broadcast appropriate instructions received from the Air Traffic Control System Command Center (ATCSCC) over available ATC frequencies. Depending on instructions received from the ATCSCC, VFR flights may be directed to land at the nearest available airport, and IFR flights will be expected to proceed as directed by ATC.
 5. Pilots on the ground may be required to file a flight plan and obtain an approval (through FAA) prior to conducting flight operation.
- E. Bureau-specific airspace requirements.** Not applicable. BSEE does not have any bureau-specific airspace requirements.

Section 8. Aviation Project Planning Requirements

A. Policy.

1. [OPM-06](#) (Aviation Management Plans) requires a Project Aviation Safety Plan (PASP) for all special use missions (see [OPM-29](#) Special Use Activities and Revised Standards for Technical Oversight).
2. Rather than prepare a unique PASP for each special use mission [OPM-06](#) allows bureaus to incorporate the required information into the organization's aviation management plan (NAMP/RAMP) which is reviewed at least annually. In this instance, in place of a full PASP the bureau must have a documented process to capture the unique and special circumstances (ex. dispatch log, passenger manifest, etc.).

B. Regional Aviation Management Plan (RAMP).

1. RAMPs shall address the minimum elements required by [OPM-06](#) Appendices 1 and 2 in enough detail so that a separate PASP will not be required for routine OCS missions (i.e. taking off from a base airport and flying to and landing on OCS helidecks).
2. Non-routine missions (i.e. disaster response or non-OCS missions) or missions that are identified as special use in [OPM-29](#) (reconnaissance, low-level, vessel landings, or mountainous terrain) that are not addressed in the RAMP⁷⁴ will require a mission-specific PASP to capture unique and special circumstances (ex. dispatch log, passenger manifest, risk assessment, specific aviation life support equipment, and pilot and aircraft carding, etc.).
3. Project supervisors, Project Aviation Managers⁷⁵, and management-level project approvers are responsible for ensuring PASPs are completed. Each Region will have at least one qualified and current Project Aviation Manager (PAM). The RAM, RASM, NAM, and NASM will be qualified as Project Aviation Managers and will be available to assist in preparing these PASPs.⁷⁶

⁷⁴ Per [OPM-06](#), bureaus that perform similar special use aviation missions on a recurring or routine basis, the required PASP can be rolled into a station/unit aviation plan that is reviewed at least annually. In instances where the bureau has a documented process to capture the pending elements necessary to meet the minimum PASP requirement prior to the implementation of a project, the aviation plan must be reviewed by the appropriate approving authority to include the station/unit managers and the RAM/RASM as well as the NAM/NASM's review.

⁷⁵ A Project Aviation Manager is defined as an individual who plans, organizes, and manages the aviation operations of a project utilizing aircraft. The Project Aviation Manager may or may not be at the site. In accordance with [OPM-04](#) there are 15 specific IAT courses required to be qualified as a Project Aviation Manager

⁷⁶ Per [OPM-06](#), Appendix 2, 14. Signatures – Line Manager or appropriate level of approval based on the risk assessment or other bureau requirement. For BSEE, the person(s) approving a PASP may also be specified in the RAMP.

Authorization for Use of BSEE Contract Aircraft

A. GENERAL

[OMB Circular A-126](#) requires that all travel on government aircraft⁷⁷ must have advanced authorization. In accordance with OMB Circular A-126 and Department of the Interior (DOI) aviation policy in [OPM-07](#) all Senior Executive Branch Officials, Senior Federal Officials, Military Officials **and non-Federal visitors**⁷⁸ traveling offshore on government aircraft must be approved by the DOI's Solicitor or Deputy Solicitor, Division of General Law (SOL) in advance of the planned offshore travel. The only exception to this rule is for Company Representatives on Agency Inspections Flights to Uncrewed Platforms as defined in the DOI Solicitor's letter dated February 13, 2020 (NAMPA Appendix A.2).

1. Senior Executive Branch Officials are civilian officials appointed by the President with the advice and consent of the Senate, or civilian employees of the Executive Office of the President or Vice President.
2. Senior Federal Officials⁷⁹ are Senior Executive Service (SES) or federal employees paid at a rate of pay beyond a GS/GM-15.

Note: BSEE employees (operational staff) required to travel offshore in accordance with their position description do not require advanced travel authorization.

3. Military Officials include active-duty military personnel and military officers.
4. Non-Federal passengers are those visitors not federally employed. Procedures for non-Federal passengers are divided into two sub-categories:
 - a. Oil & Gas Operator employees who are picked up and taken to an uncrewed facility to accompany BSEE personnel conducting an inspection. Procedures for these non-Federal passengers are addressed paragraph B (below) and Appendix A.2/Company Representatives on Agency Inspections Flights to Uncrewed Platforms.
 - b. All other non-Federal passengers.
5. The NAM will coordinate the review and approval process for Senior Executive Branch, Senior Federal Officials, and non-Federal visitors traveling offshore on government aircraft.

⁷⁷ BSEE contract aircraft are considered Government aircraft. Per 41 CFR 102-33 "...Government aircraft is one that is operated for the exclusive use of an executive agency..."

⁷⁸ Appendix A.2, DOI Solicitor letter Company Representatives on Agency Inspection Flights to Unmanned Platforms.

⁷⁹ This includes Regional Directors using BSEE contract aircraft for point-to-point travel (November 2, 2011 email from Attorney Advisor, Office of the Solicitor).

6. The Assistant Director or Deputy, Office of Offshore Regulatory Programs (OORP) must approve all Federal non-BSEE and non-Federal visitors (other than those addressed in Appendix A.2) in advance of any planned offshore travel on government aircraft.

Note: This requirement does not apply for U.S. Coast Guard (USCG) personnel that are not considered Senior Federal Officials.

7. BSEE personnel (non-SES) traveling to an OCS Region must coordinate with the Regional Aviation Manager (RAM) when visiting an OCS facility on government aircraft. BSEE personnel traveling offshore must have prior approval (documented on an official Travel Authorization - Form DI 1020) from their immediate supervisor in advance of any planned OCS facility visit. Each OCS Region will establish their own requirements for allowing Region personnel (non-SES) to travel offshore.
8. OMB Circular A-126 requires semi-annual reporting⁸⁰ to GSA of all Senior Executive Officials traveling on government aircraft. The NAM will coordinate with the SOL and the DOI Travel Manager, Office of Financial Management in preparing the report. The DOI Travel Manager submits the travel documentation to the GSA's Travel Management Policy Division, 1800 F Street NW, Room G218, Washington DC 20405 (FAX: 202-501-0349).

B. PROCEDURES

1. **Senior Executive Branch and Senior Federal Officials, and Non-Federal Visitors** (other than Company Representatives on Agency Inspections Flights to Uncrewed Platforms⁸¹).
 - a. **Planning. Allow at least 10 working days from the initial mission request until the intended date of flight.** This time allows for the District and the aviation service provider to plan and staff the mission, the RAM and NAM to develop the required documentation, and the mandatory 5 working days for the DOI Solicitor⁸² to review and approve/disapprove the flight request.
 1. Flight requests submitted with less than 10 working days of lead time will be processed expeditiously but may not be approved if the review and approval process cannot be completed in time.
 2. The RAM is responsible for ensuring the Regional Director is notified prior to the planned OCS facility visit.

⁸⁰ Semi-annual reports are coordinated with the DOI, Attorney Advisor, Office of the Solicitor through the DOI Travel OFF and are sent to the GSA. The semi-annual reports cover the periods October 1 through March 31st (due May 31) and April 1 through September 30th (due November 30).

⁸¹ See Appendix A.2 and paragraph B.

⁸² See [OPM-07](#) Appendix 3.

- b. In advance of a planned OCS facility visit the RAM/RASM will send the NAM/NASM an e-mail notification that includes:
 - 1. Detailed purpose or justification of the visit;
 - 2. Facilities to be visited;
 - 3. Point of departure and return;
 - 4. Manifest of all visitors including BSEE escorts, along with who they work for and their titles/positions;
 - 5. Travel Cost Analysis ([OAS 110](#)) (prepared and signed by the RAM); and,
 - 6. Senior Federal Travel Form ([GSA Form 3641](#)).
- c. The NAM reviews the notification package for completeness and then forwards to the Assistant Director, OORP with a recommendation whether or not to approve the offshore travel.
- d. If approved by the Assistant Director, OORP the NAM submits the notification package to the SOL for their review and approval.
- e. The NAM will then forward the SOL's decision (approve or disapprove) with justification (Office of the Solicitor Correspondence Background Form) to the appropriate RAM.
- f. The RAM/RASM shall notify the NAM/NASM by email of any planned OCS facility visit that was completed, canceled, or postponed.
- g. The Solicitor in cooperation with the NAM will forward all SES travel reports to the Department of Interior's Travel Office (TO). The TO will forward all bureau SES travel reports semi-annually to the GSA.

2. Non-Federal Visitors (Company Representatives on Agency Inspections Flights to Uncrewed Platforms).

- a. Background. When BSEE inspects an oil and gas facility a representative of that company must accompany the BSEE inspector. For uncrewed facilities with helideck's that cannot accommodate multiple helicopters the only practical means to accomplish the mission is for the O&G employee to ride in the BSEE helicopter.

The nature of these inspections involves short or no lead times that prohibit the

normal approval process in paragraph A. above. As a result, BSEE asked the DOI Solicitor's Office to consider other approved means to accomplish our mission within existing policy.

The Solicitor's Office opined "...the travel of company representatives on agency inspections flights to uncrewed platforms, to the extent that their presence is necessary to enable BSEE inspectors fully to carry out their statutorily required inspections, fits within OMB's narrow definition of "**mission travel**," for which Solicitor's approval is not required."⁸³

3. Federal Non-BSEE (GS-level) and Military Officials. The RAM/RASM is responsible for ensuring the Regional Director or designee is notified prior to the planned OCS facility visit.

a. In advance of a planned OCS facility visit, the RAM/RASM sends the NAM/NASM an e-mail notification that includes:

1. Detailed purpose or justification of the visit;
2. Facilities to be visited;
3. Point of departure and return;
4. Manifest of all visitors including BSEE escorts, along with who they work for and their titles/positions; and,
5. Travel Cost Analysis ([OAS 110](#)) (prepared and signed by the RAM/RASM⁸⁴); and,
6. Senior Federal Travel Form ([GSA Form 3641](#)).

b. The NAM reviews the notification package for completeness and then forwards to the Assistant Director, OORP with a recommendation whether or not to approve the offshore travel.

c. NAM notifies the RAM/RASM via email of the Assistant Director, OORP decision.

d. RAM/RASM notifies NAM that the planned visit was completed, canceled, or postponed.

4. U.S. Coast Guard Personnel. USCG (non-Senior Federal Officials) personnel accompanying BSEE personnel on a scheduled mission using BSEE contract aircraft can be coordinated at the local level⁸⁵. The USCG must reimburse BSEE for their sole use of BSEE contract aircraft.

⁸³ See Appendix A.2 for the full Solicitor's letter

⁸⁴ The RAM/RASM should complete the OAS 110 form with time/financial considerations based at highest potential time and cost projections. These can be lowered as needed once approved.

⁸⁵ In accordance with the [MOU between the USCG and DOI](#), either agency may request USCG personnel accompany BSEE on a scheduled mission using contract aircraft and can be coordinated at the local level.

The BSEE RAM/RASM is responsible for tracking all flights that transport USCG personnel on BSEE contract aircraft.

5. Summary of Required Documentation. [OMB Circular A-126](#) requires that all travel on government aircraft must have advanced authorization. The following documents that may be required to gain approval include:

- a. RAM e-mails notification of the planned OCS facility visits to the NAM (see section A. 1. above);
- b. Travel Authorization ([Form DI 1020](#));
- c. Travel Cost Analysis ([OAS 110](#)) prepared and signed by the RAM.
- d. Senior Federal Travel Form ([GSA Form 3641](#)).

| Who is responsible: | Travel Authorization | Notification Email | OAS-110 | | | GSA 3641 |
|---|-----------------------|--------------------|---------|------|------------------|----------|
| | Next Level Supervisor | RAM/RASM to NAM | NAM | OORP | SOL | |
| BSEE employees | | | | | | |
| Senior Executive | - | ✓ | ✓ | ✓ | ✓ | ✓ |
| Senior Federal | - | ✓ | ✓ | ✓ | ✓ | ✓ |
| GS-level employees | ✓ | - | - | - | - | - |
| FEDERAL NON-BSEE | | | | | | |
| Senior Executive | - | ✓ | ✓ | ✓ | ✓ | ✓ |
| Senior Federal | - | ✓ | ✓ | ✓ | ✓ | ✓ |
| GS-level Employees | optional | ✓ | ✓ | ✓ | - | - |
| MILITARY OFFICIALS | | ✓ | ✓ | ✓ | - (High Rank) | |
| NON-FEDERAL VISITORS (Company Representatives on Agency Inspections Flights to Uncrewed Platforms). | | | | | | |
| NON-FEDERAL VISITORS (all other) | | ✓ | ✓ | ✓ | ✓ | ✓ |

RAM – Regional Aviation Manager/Regional Aviation Safety Manager, RD – Regional Director
 OORP – Assistant Director/Deputy, Office of Offshore Regulatory Programs, NAM – National Aviation Manager
 SOL – Office of the Solicitor

Note: Regarding Military Officials, notifications will be made per the checklist to maintain situational awareness within the aviation team and to provide due diligence ensuring proper coordination with BSEE’s senior management. Salary information is not required on OAS Form-110 unless requested by the Solicitors’ Office.

DOI Solicitor's Letter, Feb 13, 2020, "Company Representatives on Agency Inspection Flights to Unmanned Platforms"



United States Department of the Interior
OFFICE OF THE SOLICITOR
Washington, D.C. 20240

Note.

To: Andrew J. Wareham, National Aviation Manager,
Bureau of Safety and Environmental Enforcement

From: Jennifer Heindl, Attorney Advisor, Division of General Law, Branch of General Legal
Services *JH*

Re: Company Representatives on Agency Inspection Flights to Unmanned Platforms

Date: February 13, 2020

You have asked us to opine on whether, under OMB Circular A-126, the Solicitor's approval is required for each BSEE inspection flight to an unmanned platform in which a company representative accompanies the inspector. You have explained that inspections cannot be carried out on such platforms without a company representative in attendance, and that there is no room on the platforms for two aircraft to land.

Under OMB Circular A-126, the Solicitor's approval is required whenever certain agency officials or non-agency personnel travel on agency owned or chartered aircraft. We believe, however, that the travel of company representatives on agency inspection flights to unmanned platforms, to the extent their presence is necessary to enable BSEE inspectors fully to carry out their statutorily required inspections, fits within the OMB Circular's narrow definition of "mission travel," for which Solicitor's approval is not required.

Note that this opinion is limited to this precise travel scenario, and should not be used to justify other BSEE charter aircraft use "mission travel" under the terms of the OMB Circular without consultation with the Solicitor's Office. For example, flights on which senior agency officials, Congressional staff, or contractors are being taken out to rigs to observe the inspection process, or to do work for us or some other agency (such as FAA) do not meet the narrow definition of "mission travel," and continue to require Solicitor's approval under the OMB Circular.

If you have any questions about this note, please contact Jennifer Heindl at 202-208-7094 or Timothy Murphy, Acting Associate Solicitor for General Law, at 202-208-3510.

Offshore Visitors Information Form

Make sure that you coordinate all offshore travel with the appropriate Regional Aviation Manager to ensure aircraft and seats are available when you want to fly. Your Travel Authorization must include offshore travel.

ASAP: Please fill out the top portion of this page and email to the appropriate Regional Aviation Manager with a copy to the BSEE National Aviation Manager when traveling offshore.

| | | |
|--------------------|----------------|--|
| BSEE NAM | Andrew Wareham | andrew.wareham@bsee.gov |
| Alaska OCS Region | Michael Jordan | michael.shank@bsee.gov |
| GOA OCS Region | Eric Brewton | eric.brewton@bsee.gov |
| GOA OCS Region | Mike Hanson | michael.hanson@bsee.gov |
| Pacific OCS Region | Carl Lakner | carl.lakner@bsee.gov |
| Pacific OCS Region | Lou West | lou.west@bsee.gov |

BSEE will supply flight helmets, hard hats, steel-toed shoes, earplugs, and other safety equipment that is needed. When available, BSEE will provide fire-resistant clothing, boots, and fire-resistant gloves.

Note: *The guest is responsible to the RAM (above) for any Regional specific requirements Bring your official employee ID/credentials.*

Visitors Name _____

Date of Offshore Trip _____

Agency/Company Name _____

Destination _____

Purpose of Visit:

Shoe Size: _____ Jacket size _____

Men's _____ Women's _____

Weight: _____



The following information will be filled out the day of your trip (please do not email this information):
NAME OF EMERGENCY CONTACT:

TELEPHONE NUMBER FOR EMERGENCY CONTACT: _____

In order that you may experience a positive and safe offshore visit please read the following list of potential conditions and safety suggestions.

- A. Be sure to include offshore travel on the traveler's Travel Authorization.
- B. Please advise BSEE Region personnel of any medical conditions and/or medications "before" leaving the BSEE offices.
- C. In the event of unexpected overnight stays, bring all medications needed. This would include any medication for motion sickness during flight and while on the facilities. Also, please keep in mind the remote locations in relativity to any medical care needed.
- D. Be advised that excessive heights may be encountered during the flight and while on the offshore platforms/drilling rigs.
- E. There is always the potential for slips, trips, and falls due to uneven and slippery surfaces.
- F. You may experience occupational exposure to high noise levels, excessive heat, humidity, winds, or ice.
- G. Emergency evacuations could include either boat or capsule, which may require descending multiple flights of stairs or physical transference by personnel basket.

HELICOPTER SAFETY TIPS

Extreme caution should be always used when approaching or departing the helicopter.

A flight safety briefing that includes emergency evacuation will be presented by the pilot prior to flying offshore. If one is not given, ask for one.

Always approach and leave the helicopter in a direction that allows the pilot to see you.

Be aware there may be extremely high winds on the heliport and the facilities.

Helicopter travel could include emergency "ditching" on land and in water.

Administrative note: *FEGLI life insurance policy covers approved travel. If you have other life insurance, you should make sure you are covered when traveling in a helicopter for work purposes.*

BSEE Director's Safety and Occupational Health Policy Statement



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

Memorandum

To: BSEE Employees

From: Kevin M. Sligh
Director

Kevin Sligh
Digitally signed by Kevin Sligh
Date: 2023.04.27 12:24:33 -04'00'

Subject: Safety and Occupational Health Policy Statement

As the Director of the Bureau of Safety and Environmental Enforcement (BSEE), I believe that integrating safety and health into every program and operation is of utmost importance. There is nothing more important than the safety of our employees and our commitment to bringing them home safe each day.

BSEE's overall mission is hazardous by nature, but we will comply with all applicable safety and health laws and regulations governing our work operations. Safety is a shared responsibility between senior leaders, supervisors, managers, and employees.

Senior leaders are the backbone of the safety program. They are accountable for preventing workplace incidents, injuries, and illnesses. They will provide support of safety program initiatives and will consider all employee suggestions for achieving a safer, healthier workplace. In addition, senior leaders are expected to:

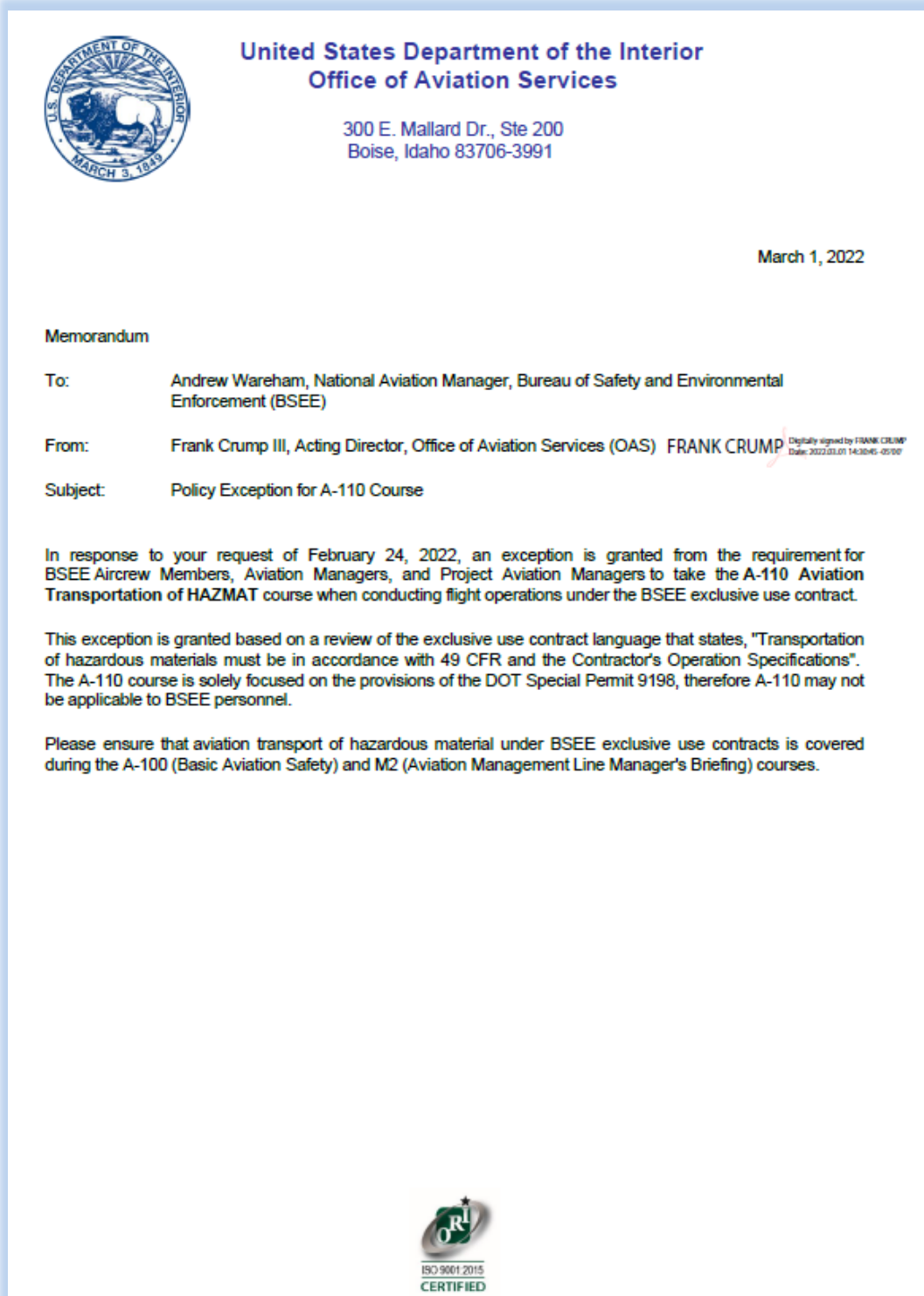
- Communicate that safety and productivity are mutually beneficial.
- Enforce tough and sometimes unpopular standards and hold people accountable for violations of safety standards and practices.
- Provide for quality safety and awareness training, and risk assessments for uncommon and particularly high-risk tasks so that employees are properly equipped to perform their work safely.

Managers and supervisors are responsible for ensuring that employees receive the appropriate level of safety training to facilitate performance of their work in a safe manner. Additionally, managers and supervisors will empower employees to speak freely, without the fear of reprisal, about unsafe and unhealthy working conditions.

All employees are expected to participate in safety and health program activities. Also, employees must report accidents, and are expected to report unsafe work conditions, hazards, and practices, and work with their supervisor or safety representative to eliminate or minimize those conditions where they exist.

The commitment of BSEE to employee safety and environmental stewardship is a top down and bottom-up approach, meaning, we all play a crucial part in managing safety and ensuring health and wellness. This mutual inclusiveness provides for a continual safety commitment to our employees, their family, and our community.

BSEE Policy Exception – A-110 Aviation Transportation of HAZMAT



Vessel Landings Waiver



United States Department of the Interior
 BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
 Gulf of Mexico OCS Region
 1201 Elmwood Park Boulevard
 New Orleans, Louisiana 70123-2394

November 30, 2023

Memorandum

To: Susan Bates
 Director, Office of Aviation Services

From: Bryan Domangue
 Regional Director, BSEE Gulf of Mexico

Thru: Eric Brewton
 Regional Aviation Manager, BSEE Gulf of Mexico

Thru: Andrew J Wareham
 National Aviation Manager, BSEE

Subject: Waiver Request

Under the provisions of the DOI Operational Procedures Memorandum No. 29 Special Use Activities for Crewed Aircraft (paragraph 5.C), the BSEE Gulf of Mexico Region is requesting a waiver from the DOI requirement for vessel landings. The requirement that BSEE is requesting a waiver for is OPM 29 paragraph 5.E.22.d "An initial and 36-month recurrent flight evaluation is required." This waiver will be valid from the date of signature until the end of the BSEE and Bristow contract #140D8021D0018 on September 30, 2031 for all BSEE GOM OAS carded pilots.

Vessels in the Gulf of Mexico are not easily accessible and the closest vessel to Bristow's main base is a 2.5 hour one way flight. These vessels are not owned by Bristow or the government and cannot come in closer to shore for the purpose of check rides. The average day rate of a vessel is \$1,200,000.

Justification:

The Bureau of Safety and Environmental Enforcement is mandated to inspect every oil and gas production facility annually and every well operations location monthly. In the Gulf of Mexico there are approximately 1100 platforms and 110 vessels with these activities.

BSEE has operated accident free for 49 years by choosing an aviation vendor with the highest standards of safety and training. Bristow is the current aviation vendor and the pilots that fly the BSEE contract are very experienced with an average flight time of 5286 hours and an average of 558 vessel landings.

Bristow's ground and flight training is conducted in accordance with the company's FAA approved 14 CFR Part 135 training program. Offshore operations including elevated helideck takeoffs and landings are integrated into every facet of the training program. All pilots receive recurrent (annual) general subjects training including on GoM specific helideck/vessel operations. Bristow has well developed procedures for vessel specific operations. Their FAA approved training program dictates required training and checking of BSEE assigned pilots. Annual line check rides conducted by Bristow Check Airmen under 14 CFR 135.293 & 299 include offshore operations. Bristow pilots assigned to BSEE are aircraft competency and offshore operations.

Modern vessels operating in the GOM have large (50'x 50'+) helidecks and employ state of the art dynamic positioning systems that implement a combination of computers, thrusters, and position reference systems to offset the effects of

wind, current and wave action. BSEE routinely flies to single pile “toadstool” platforms with small (25’x25’) helidecks which are significantly more challenging than common vessels yet have no specific requirement for an evaluation.

The vessels that Bristow are currently being required by OAS to travel to for evaluations require a 2.5 hour overwater flight in a single engine aircraft to perform a single deck landing.

Bristow’s pitch/roll and heave limitation of 3 degrees and 1.0 m/sec combined with BSEE wind limitations drastically reduce risk associated with deck movement and vessel operations.

The Bureau of Safety and Environmental Enforcement Gulf of Mexico region is requesting a waiver for OPM 29 paragraph 5.E.22.d “An initial and 36-month recurrent flight evaluation is required.” This waiver will be valid from the date of signature until the end of the BSEE and Bristow contract on September 30, 2031 for all BSEE GOM OAS carded pilots.

Signature Page

ERIC BREWTON
Digitally signed by ERIC BREWTON
Date: 2023.11.16 16:39:44 -06'00'

Eric Brewton, Regional Aviation Manager, BSEE GOM

Concur Do Not Concur

ANDREW WAREHAM
Digitally signed by ANDREW WAREHAM
Date: 2023.11.16 14:30:45 -09'00'

Andrew Wareham, National Aviation Manager, BSEE

Concur Do Not Concur

This request is hereby Approved Disapproved

SUSAN BATES
Digitally signed by SUSAN BATES
Date: 2023.11.17 11:14:20 -07'00'

Susan Bates, Director Office of Aviation Services (*Signature*)

Sample ALSE Waiver



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

Memorandum

To: Director

From: Bryan A Domangue
Regional Director, Gulf of Mexico Region

Through: Andrew J Wareham
National Aviation Manager

Subject: Request for Waiver from DOI Requirement to Use Fire-resistant Flight Gloves

Under the provisions of the DOI Aviation Life Support Equipment (ALSE) Handbook (paragraph 1.5B), the BSEE Gulf of Mexico Region is requesting a waiver from the DOI requirement that employees flying on Special-Use aircraft wear fire-resistant flight gloves (paragraph 2.1.B.3).

Justification:

During daily operations in the Gulf of Mexico Region, BSEE employees predominantly conduct point-to-point flights to offshore facilities to perform required inspections. This aviation activity does not require the use and wear of specialized fire-resistant flight gloves as designated in the ALSE handbook. "Special-Use" missions require more stringent ALSE requirements to include the use of fire-resistant gloves.

Occasions arise where a standard point-to-point flight may become a reconnaissance flight to investigate an oil sheen on the water, or post-storm damage assessment. These flights become considered "Special-Use" with more stringent ALSE requirements even though they pose no greater risk of possible exposure to a fire event.

During current operations, if inspectors find themselves in a situation where they need to take a closer look at a possible ongoing event, their attention becomes focused on searching for and locating their fire-resistant gloves. Taking their eyes off the outside event risks them losing their ability to determine their true body position, motion, and altitude relative to the earth and/or their surroundings. This also increases the possibility of not seeing other aircraft or hazards in the immediate area. In consideration of these risks, the Gulf of Mexico Region requests a waiver of the requirement for fire-resistant flight gloves during "Special-Use" missions.

This request is hereby Approved Disapproved

Kevin M. Sligh, Director

KEVIN SLIGH Digitally signed by KEVIN SLIGH
Date: 2022/05/12 16:02:21 -0400

Signature Page

ERIC BREWTON Digitally signed by ERIC BREWTON
Date: 2022.04.19 16:33:43 -05'00'

Eric Brewton, Regional Aviation Manager GOM

Concur Do Not Concur

BRYAN DOMANGUE Digitally signed by BRYAN DOMANGUE
Date: 2022.04.20 17:37:34 -05'00'

Bryan Domangue, Regional Director GOM

Concur Do Not Concur

ANDREW WAREHAM Digitally signed by ANDREW WAREHAM
Date: 2022.04.21 07:17:21 -08'00'

Andrew Wareham, National Aviation Manager GOM

Concur Do Not Concur

STACEY NOEM Digitally signed by STACEY NOEM
Date: 2022.04.25 10:28:07 -04'00'

Stacey L Noem, Chief OORP

Concur Do Not Concur

Sample ALSE Waiver – Page 2⁸⁶

⁸⁶ Contact the NASM for the most recent version of the ALSE Waiver in a fillable PDF version.

Aviation Safety Communiqué (SAFECOM)

BACKGROUND INFORMATION:

Overview: The Department of the Interior's Aviation Management Information System (AMIS) uses the Aviation Safety Communiqué ([SAFECOM](#)) to report any condition, observation, act, maintenance problem, or circumstance with personnel or the aircraft that has the potential to cause an aviation-related mishap.

Information provided by SAFECOMs is used by Department of Interior (DOI) and BSEE aviation managers to identify safety issues and to analyze trends as part of our efforts to continually improve our accident prevention processes and reduce risk to our employees. Local managers are encouraged to post public versions of completed SAFECOMs to bulletin boards to increase situational awareness and to discuss SAFECOMs during safety meetings.

Categories of events that should be reported using the SAFECOM system include, but are not limited to, aircraft mishaps, hazards to aviation operations, aircraft maintenance deficiencies, human performance deficiencies, airspace problems, management issues, as well as mishap prevention efforts and commendable actions including superior airmanship.

Situations that warrant a SAFECOM **include, but are not limited to:**

1. Damage to Aircraft. Any damage to the aircraft during contract operations.
2. Injury to personnel as a result of contracted aircraft operations.
3. Maintenance Deficiency. A defect or failure causing mechanical difficulties encountered in aircraft operations under the contract.
4. Forced Landing. A landing necessitated when continued flight is impossible.
5. Precautionary Landing. A landing warranted by apparent or impending failure of systems, or components, adverse weather, or incapacitation of the flight crew which makes continued flight inadvisable.
6. Deviations from policies, procedures, regulations, and instructions as contained in Federal Aviation Regulations, DOI or BSEE policy, or contract requirements.
7. Deviation from planned operations, flight plan, type of use (for example, landing at an alternate or rerouting flight due to adverse weather, wrong deck landing, etc.).
8. Flight following events (errors, lapses, equipment failures, etc.).
9. Failure to utilize, or availability of, PPE or ALSE (helmets, EBS, seat belts or shoulder harnesses, etc.).
10. Inadequate training, or failure to meet training requirements.
11. Failure to properly use manifests or calculate weight and balance.
12. Weather conditions (diversions or precautionary landing due to weather) (weather holds or cancellations do not warrant a SAFECOM submission).
13. Ground operations (ramp or helideck hazards).
14. Adverse or exemplary pilot procedures.

15. Fuel contamination.
16. Unsafe actions by pilot, passengers, or support personnel (pressuring or distracting a pilot, failure to comply with pilot's directions in flight, etc.)
17. Near Mid-Air Collision.

Note: **Reporting Airspace Conflicts using the SAFECOM.** Extensive BSEE operational experience in the same geographical areas has shown that the potential for airspace conflicts while conducting BSEE missions is generally considered "Low." However, for flights in the vicinity of airports the likelihood of an airspace conflict including the risk of a mid-air collision increases due to the density of air traffic and the risk level is considered "Medium" (i.e., the probability is "seldom" but still catastrophic if it would occur; see Appendix Section F – Risk Assessment Tools).

The primary responsibility for understanding and complying with National and International airspace procedures and reporting requirements rests with the aircraft operator. If an airspace conflict occurs the situation will be reported as necessary using either the SAFECOM system or the Aviation Mishap Reporting process described in the NAMP Section 3. Aviation Safety and Appendices D. (If any regional personnel submit a report through the Aviation Mishap Reporting Process, immediately notify the NAM/NASM).

18. Deviations from established procedures for hazardous materials handling and/or transport (lithium batteries, samples of oil or contaminated water, etc.)
19. Positive actions/performance that prevent a mishap or improve BSEE's accident prevention program.
20. Anytime a stop-work order is issued.

All SAFECOMs should be submitted within the same day, but no later than five days after the event.

If the SAFECOM identifies a **commendable action** the BSEE National Aviation Manager (NAM/NASM) or other BSEE management will review it to determine whether a safety award or other recognition is warranted. The first step to recognizing and rewarding mishap prevention efforts begins when someone takes the time to document the event. BSEE encourages the use of SAFECOMs to identify positive safety events.

Submitting a SAFECOM does not replace the requirement for immediate notification of an aircraft accident per 49 CFR 830.5 and [352 DM 3.4](#) or initiating a DI-134 "Report of Accident/Incident," as required by [485 DM 5](#). For reference see NWCG Aviation Mishap Response Guide and Checklist ([PMS 503](#)).

A SAFECOM is not a substitute for an "on-the-spot" correction, nor should it be considered the sole mechanism to report immediate safety of flight issues. It is a tool used to document, track, and ensure follow-up actions are taken to correct aviation safety issues. Ownership of workplace safety is an important responsibility for each employee and is a key indicator of an organization's safety culture. No one should ever walk past a problem to file a report.

The degree of participation by the workforce in a voluntary hazard reporting program such as SAFECOM is a leading indicator of the organization's safety culture. World-class safety requires

active reporting, so an area of emphasis for BSEE is to promote the active use of the SAFECOM system by both its employees and its aviation contractors.

Management’s Role. DOI requires all levels of BSEE management to promote the reporting of aviation hazards using the SAFECOM system.

Prompt replies to the person who submits the SAFECOM (if a name and telephone number/address is provided), timely action by management to correct problems, and discussing SAFECOMs at District meetings encourages situational awareness, active reporting, and the sharing of lessons learned.

Restrictions: DOI policy ([352 DM 3.10](#)) prohibits using SAFECOMs for initiating punitive actions against any person (employee or vendor). A SAFECOM’s sole purpose is for mishap prevention.

While the SAFECOM itself shall not be used for any purpose other than mishap prevention, any information discovered or further developed during the investigation of a safety concern, even if initially described in a SAFECOM, may be used for any lawful purpose.

The Office of Aviation Services (OAS) ASM is the Custodian of Record for Interior Mishap Information. Individuals granted access to initial SAFECOM information require training and are accountable for the proper use of SAFECOM data.

BSEE personnel are not required to fly when unsafe conditions exist. It is the employee’s responsibility to immediately report any such aviation hazard first to their supervisor and then to submit a SAFECOM.

PROCEDURES:

Who Can Submit a SAFECOM? Any person may submit a SAFECOM. This includes BSEE employees, vendor employees, visitors⁸⁷, and other government personnel in support of BSEE aviation activities.

Multiple SAFECOMs that address the same event may be necessary (i.e. the BSEE inspector and the pilot sharing their perspectives on an event). It is also acceptable, and may be necessary, for an inspector and the pilot to collaborate on the same SAFECOM.

If anyone is in doubt about whether or not to submit a SAFECOM, they’re encouraged to contact the RAM/RASM, or the BSEE NAM/NASM to discuss the issue prior to submitting a SAFECOM. If we don’t know about a problem we can’t fix it.

How to Submit a SAFECOM: A SAFECOM may be submitted via the Internet at <http://www.safecom.gov> using a computer, tablet, or smart phone.

Step 1 – Go to www.safecom.gov and select “Submit SAFECOM” (see Figure 1). No user ID or password is required.

⁸⁷ If a passenger who is a visitor identifies a safety concern, a SAFECOM should be submitted by the vendor or BSEE personnel on the flight.

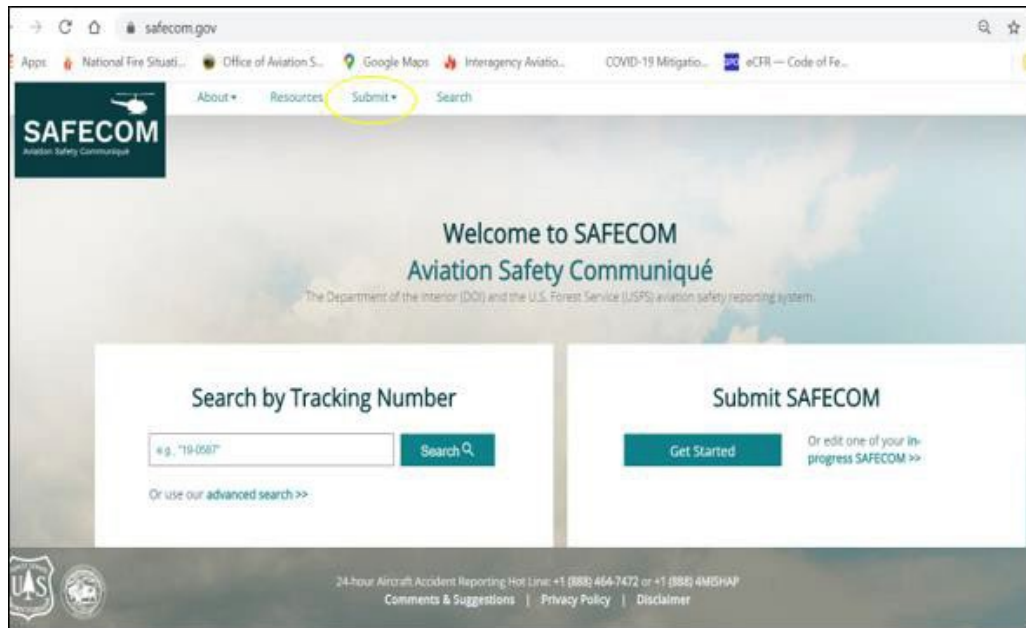


Figure 1. SAFECOM home page.

Step 2 – Enter the data for the event being reported (see Figure 2). Focus on providing the facts of what is wrong rather than who is wrong. Describe the event in enough detail for the reader to understand the significance of the event. If the corrective action is known at the time of submission, include it. If the corrective action is not known leave this section blank, that can be filled in later by the RAM/RASM/NAM/NASM. When finished entering data select “continue”. The next screen allows you to confirm what you are submitting and to upload images (.jpg) or documents (.pdf). When satisfied select “submit” and you’re done.

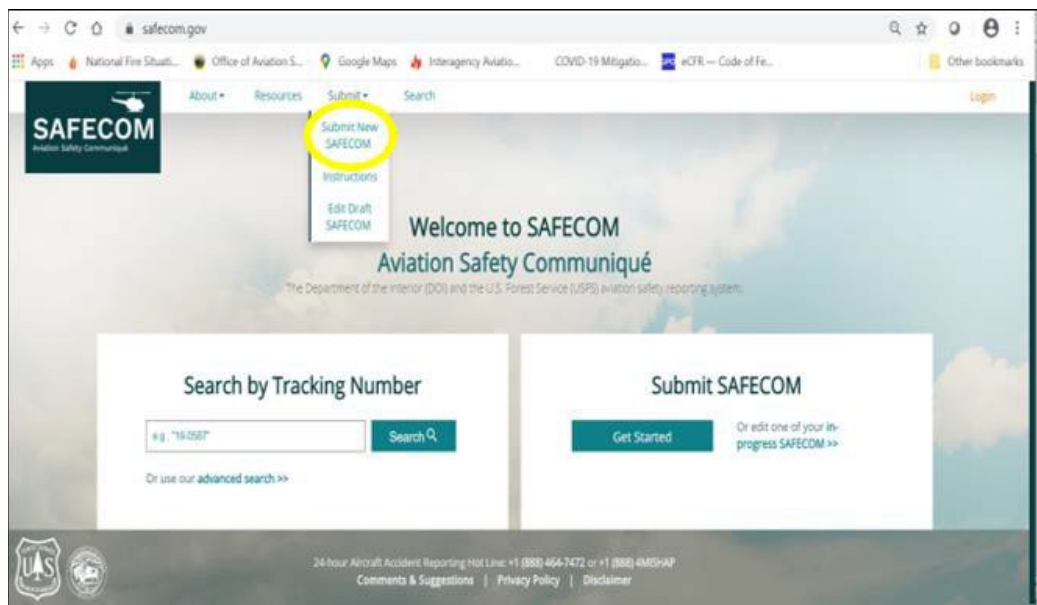


Figure 2. SAFECOM Search and Submit page.

Note 1: *It is important that the submitter select BSEE as the Agency having operational control. If that block is left blank or another organization is selected the SAFECOM will not be routed to BSEE managers for resolution.*

Note 2: *For all routine GOA or Pacific missions the "Type" of mission is always "Offshore", and the "Procurement" is always "Exclusive Use contract".*

What happens next (see Figure 3): Immediately upon submitting a SAFECOM you should get a notification showing you who the SAFECOM was sent to and an email thanking you for submitting the SAFECOM.

The SAFECOM will be reviewed by the BSEE NAM/NASM, the Regional Aviation Manager, managers and supervisors at the District-level, and managers and safety professionals at the OAS. Individuals granted access to initial SAFECOM information require training and are accountable for the proper use of SAFECOM data.

The RAM/RASM or NAM/NASM will coordinate as necessary to verify the information in the SAFECOM, to determine why the event occurred, and to determine what should be done (or what was done) to correct the issue. In accordance with OAS procedures the RAM/RASM or NAM/NASM will remove any identifying information from the SAFECOM (names of personnel or companies, tail numbers, etc.) before making the SAFECOM "public".

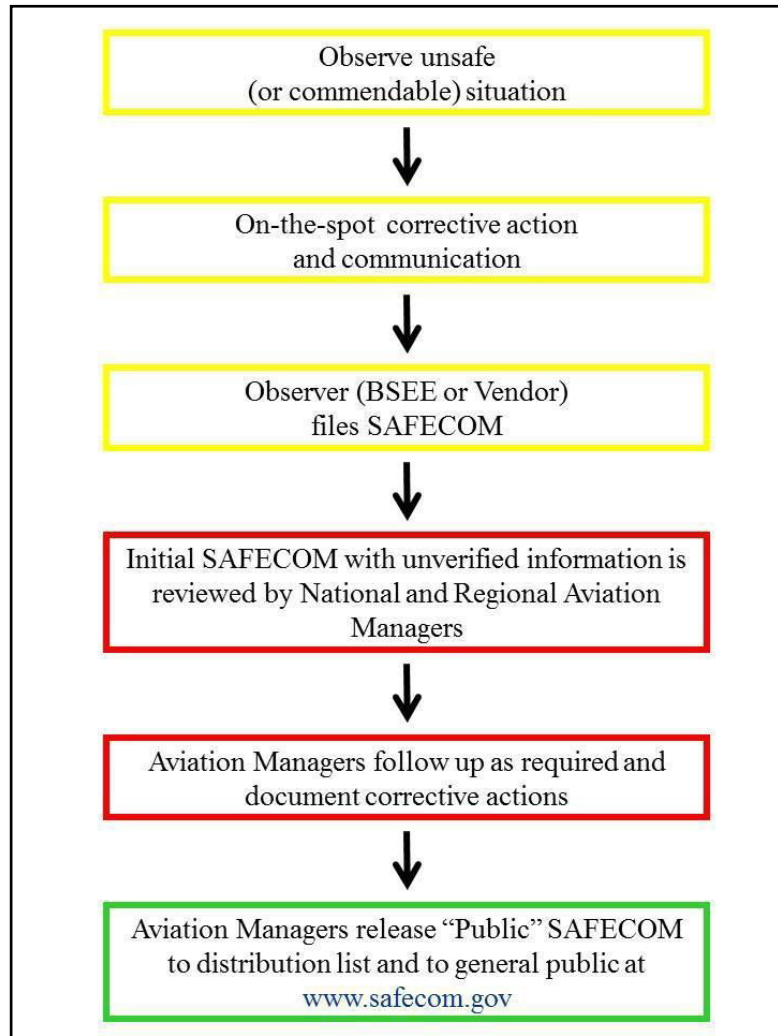


Figure 3. SAFECOM process.

Once a SAFECOM has been made public an email notification is sent to BSEE and vendor personnel who have previously requested to be on the SAFECOM distribution list. Anyone wishing to be on the SAFECOM distribution list should request access from their RAM/RASM. Public SAFECOMs are available to anyone at the SAFECOM website: www.safecom.gov (select "Search SAFECOMs in the left column).

If additional information is discovered after a SAFECOM has been made public, the RAM/RASM should be notified, and they will update the information in the SAFECOM system.

POINTS OF CONTACT:

Office of Aviation Services (OAS):

1. Keith Raley, Chief, Aviation Safety, Training & Program Evaluations, (keith_rale@ios.doi.gov), 208-433-5071.

2. OAS Aviation Safety Assistant/SAFECOM System Administrator, (krista.schultz@ios.doi.gov), 208-433-5070.
3. Kevin Fox, OAS Alaska Regional Director, kevin.fox@ios.doi.gov, 907-271- 3700.
4. Frank Crump, OAS Eastern Regional Director, frank_crump@ios.doi.gov, 770-458-7474.
5. Gene Bannister, OAS Western Regional Director, gene_bannister@doi.gov, 208-830-2275.

BSEE/OORP:

1. Andrew Wareham, National Aviation Manager, (andrew.wareham@bsee.gov), (c) 571-585-4770.
2. Michael Jordan, National Aviation Safety Manager, (michael.jordan@bsee.gov), (c) 907-382-7814.

Gulf of America Region (GOAR):

3. Eric Brewton, GOA Regional Aviation Manager, (eric.brewton@bsee.gov) (c)504-453-2892
4. Michael Hanson, GOA Regional Aviation Safety Coordinator, (michael.hanson@bsee.gov) (c) 504-677-6191.

Pacific OCS Region (POCSR):

5. Carl Lakner, POCSR Regional Aviation Manager, (carl.lakner@bsee.gov), 805-910-5384.
6. Lou West, POCSR Regional Aviation Safety Manager, lou.west@bsee.gov, 805-384-6365.

Alaska OCS Region (AKOCSR):

7. Michael Shank, Alaska Regional Aviation Manager, michael.shank@bsee.gov, 907- 334-5223, (c) 907-351-2053.

Helicopter Underwater Egress Training (HUET) with Compressed Air – Emergency Breathing System (CA-EBS)

Overview:

Aviation plays an essential role in BSEE’s ability to conduct our OCS mission, but flying offshore comes with inherent risks. One way we can minimize those risks to our employees and our mission is by being properly trained. HUET provides an individual with the skills necessary to coordinate the evacuation and successfully egress from a helicopter involved in a water landing and safely await rescue.

BSEE policy requires Helicopter Underwater Egress Training (HUET) with Compressed Air – Emergency Breathing System (CA-EBS) for all employees considered BSEE Routine Offshore Travelers (defined below). This policy applies to BSEE employees whether they are flying in a BSEE-contracted or cooperator aircraft (i.e. U. S. Coast Guard, National Guard, etc.). BSEE HUET policy also applies to any non-BSEE personnel (i.e. other Government Agency personnel, media, contractors, etc.) flying in a BSEE contracted aircraft.

The Offshore Petroleum Industry Training Organization⁸⁸ (OPITO) supports the offshore oil and gas industry by developing standards for training and providing audits to ensure that their training standards are continually met. BSEE aviation managers have monitored HUET courses for several years and fully support adopting the HUET (which meets or exceeds OPITO standards), Tropical T-HUET, or Cold-Water Survival HUET courses as applicable for their regions/units.

Policy:

1. Alaska Region will take a cold-water survival HUET with CA-EBS course approved by their senior management, or, the Alaska Regional Director in the Regional Aviation Management Plan (RAMP). Completion of an approved commercial water egress training (BSEE Cold Water Survival) will be annotated in their IAT training records as an External Course with the A-312EC status.⁸⁹
2. BSEE’s Gulf of America and Pacific Regions may take either T-HUET or cold-water HUET courses.
3. Completion of an approved cold water HUET course is an acceptable alternative to the T-HUET course. However, completion of the T-HUET course may not be used in lieu of an approved cold water HUET course

⁸⁸ OPITO is an Industry-owned not-for-profit organization that exists solely to service the needs of the Oil and Gas Industry. OPITO is employer led in all aspects of what it does, therefore all standards development activities are at the behest of industry employers. The standards are driven by the needs of employers to help create a safe and competent workforce

⁸⁹ BSEE personnel working or traveling over water temperatures that are likely to be less than 50°F will be equipped and trained for cold water survival. Cold water survival training should provide personnel with the knowledge, skills, and techniques necessary to increase survival following aircraft ditching emergencies.

Responsibilities:

BSEE employees who fly offshore are responsible for complying with all requirements specified in this policy.

Each manager and/or supervisor who utilizes aviation resources is required to ensure all mission associated aviation operations are conducted in a safe, efficient, and environmentally sound manner. More specifically, responsibilities are delegated as follows:

The **Regional Directors (RDs)** have the approval authority for HUET waivers.

1. The **BSEE NAM** is responsible for maintaining BSEE's HUET policy and will provide a technical review before the request for equivalency is presented to the RD for approval authority for HUET equivalencies.
2. **RAMs/RASMs** are responsible for monitoring the HUET programs within their region and to consider requests for HUET equivalency.
3. **Managers and Supervisors** whose employees utilize aviation resources must:
 - a. Comply with the regulations, policies, and guidelines for providing aviation safety training and personal protective/aviation life support equipment.
 - b. Ensure that identified personnel receive and complete HUET before being allowed to fly offshore.
 - c. Ensure employees request A-312 equivalency (A-312E, or A-312EC as applicable) upon completion of HUET with CA-EBS training.
 - d. Track their employees' trips offshore to determine the frequency of HUET training.
4. **Employees** will upload their HUET course completion certificates to the IAT database (www.iat.gov). A step-by-step guide that explains how to upload the HUET certificates is located at https://www.iat.gov/help/equiv/equivalency_guide.asp. After the employee uploads their HUET certificate OAS Training staff will review whether that training is equivalent to A312 and if so, will grant A312 equivalency (A-312E, or A-312EC). This allows HUET training to be tracked in the IAT system.

Procedures:

Who needs to take HUET with CA-EBS? HUET is mandatory for all BSEE employees who are considered BSEE Routine Offshore Travelers as defined below.

New BSEE employees who are expected to fly offshore more than 4 times a year **must successfully complete HUET with CA-EBS prior to flying offshore or within 30 days after** their report date. Extensions of this timeframe (for new employees only) may be approved in writing by the Regional Director but may not exceed 30 days.

Employees who find that during their employment with BSEE they need to travel offshore more than 4 time per year will take the appropriate IAT, HUET, and CA-EBS training as soon as possible, but prior to their 5th flight offshore in that 12-month period.

If an oil and gas operator's written policy requires more frequent HUET than established in this policy, the more restrictive requirement will apply to those BSEE employees flying in their aircraft.

Passengers: In regard to aviation training requirements BSEE recognizes two categories of passengers: Visitors/BSEE Non-Routine Offshore Travelers, and BSEE Routine Offshore Travelers.

1. Visitors & BSEE Non-Routine Offshore Travelers:

- a. **Visitors** are defined as non-BSEE personnel who are not expected to fly on BSEE aircraft more than 4 times per year (e.g., VIPs, other Government Agency personnel, media, contractors, etc.).
- b. **BSEE Non-routine offshore travelers** are defined as BSEE personnel who are not expected to fly on BSEE aircraft more than 4 times per year (e.g. Regional and Headquarters staff)
- c. Visitors and BSEE non-routine offshore travelers do not have HUET or other aviation training requirements. However, they must receive a safety briefing from the pilot and are encouraged to take HUET and CA-EBStraining.

2. BSEE Routine Offshore Travelers: BSEE employees who fly 5 or more times per year are required to complete initial HUET before flying offshore and complete a full refresher HUET course every 4 years.

After a BSEE Routine Offshore Traveler completes the HUET and CA-EBS courses four times they will, with their Regional Director's approval, have the option to participate in a modified HUET/CA-EBS curriculum every other 4-year cycle. While participating in the full range of HUET/CA-EBS activities is encouraged, individuals must complete the academic training every four years.

Individuals may elect to participate in:

- A. Academic training for CA-EBS only when HUET is current; or,
- B. Academic and swimming portion; or,
- C. Academic, swimming, and the Modular Egress Training Simulator (METS) without inversion.

The individual's request to participate in less than the full HUET/CA-EBS training, and the Regional Director's approval, will be documented in writing.⁹⁰ The individual will submit their request for waiver through their chain of command to the RAM/RASM who will coordinate with the NAM/NASM. The request will be routed to the RAM/RASM and NAM/NASM for concurrence or non-concurrence and will be provided to the Regional Director for approval. The RAM/RASM will provide the Regional Director's decision to the NAM/NASM, and the waiver will be maintained in the individual's training records. Requests should be submitted no later than 90 days prior to the expiration date of the current HUET/CA-

⁹⁰ See Appendix E.2 for a sample request format.

EBS training. If approved, the waiver will expire four-years from the expiration date of the last completed training. Contact the RAM/RASM for a copy of the approved/disapproved waiver requests. All approved waivers shall be submitted into IAT.

Following a modified HUET/CA-EBS cycle the employee must complete the full HUET/CA-EBS program on the next 4-year cycle

Additionally, Regional Directors, or their approved designee, may grant a temporary extension of no more than 30 days to allow personnel to complete their HUET requirements. BSEE Routine Offshore Travelers typically include:

- A. Inspectors, series 1801.
- B. Field Engineers, series 0881.
- C. Petroleum Engineering Technicians, series 0802.
- D. Supervisory Inspectors, series 1801.
- E. Senior District Engineers, series 0881.
- F. Scientists/Environmental/Operational Analysts, series 0301.

Credit for HUET/CA-EBS courses completed prior to being hired by BSEE. Newly hired BSEE employees may request credit for HUET courses they completed in the 4 years prior to being hired by BSEE.

Review process to give credit for HUET/CA-EBS courses completed prior to employment by BSEE:

Newly hired BSEE employees requesting credit for HUET/CA-EBS courses that meet or exceed OPITO requirements completed prior to being hired by BSEE will present their HUET/CA-EBS course completion certificate to their supervisor and request credit. The Supervisor should coordinate with the RAM/RASM to ensure training meets BSEE's requirements and is input into IAT.

Consequences of Not Completing HUET: A BSEE employee who does not complete the classroom training and/or minimum in-water requirements in accordance with this procedure is not permitted to fly offshore. Successful completion is defined as participating in the combination of classroom training and a minimum number of simulated in-water exercises as defined by the OPITO curriculum. Managers/Supervisors may allow employees who do not successfully complete initial or refresher HUET/CA-EBS to retake the training. BSEE employees who do not maintain the HUET/CA-EBS currency requirements established in this policy shall not be assigned to offshore flights and may, on a case-by-case basis, be subject to personnel actions including reassignment to another position that the employee is qualified to perform.

Note: Training providers may require a declaration of fitness prior to training.

Appendix E.2

BSEE - Request for Modified Helicopter Underwater Egress Training (HUET) with Compressed Air – Emergency Breathing System (CA-EBS)

Modified HUET/CA-EBS Training Curriculum Application Employee

Name: _____ **Office/Section:** _____

To comply with the requirements outlined in the National Aviation Management Plan (Section 5. Aviation Training) for Helicopter Underwater Egress Training, I am requesting your approval to utilize a modified HUET/Compressed Air Emergency Breathing System (CA-EBS) training program. I have the skills necessary to coordinate the evacuation and egress from a helicopter involved in an emergency water landing.

I am considered a BSEE Routine Offshore Traveler since my position description and or job duties require offshore travel, and I fly 5 or more times per year. The most recent dates of this training are as follow:

1st HUET/CA-EBS training date: _____, 2nd HUET/CA-EBS training date: _____
 3rd HUET/CA-EBS training date: _____, 4th HUET/CA-EBS training date: _____

I am requesting approval to participate in (please check the appropriate box):

- Academic training for HUET and CA-EBS only
- Academic and swimming portion with CA-EBS
- Academic, swimming (with CA-EBS), and Modular Egress Training Simulator (METS) without inversion

I understand that after this HUET/CA-EBS training, I must complete the full HUET/CA-EBS program on the next 4-year cycle or as directed in the waiver.

Employee Signature: _____ Date: _____

Supervisory Concurrence:

| | <u>Name</u> | <u>Signature</u> | <u>Approve/Disapprove</u> |
|--|-------------|------------------|---|
| 1 st Level Supervisor | | | <input type="checkbox"/> Concur/ <input type="checkbox"/> Non-Concur |
| 2 nd Level Supervisor | | | <input type="checkbox"/> Concur/ <input type="checkbox"/> Non-Concur |
| District Manager | | | <input type="checkbox"/> Concur/ <input type="checkbox"/> Non-Concur |
| Regional Aviation Manager/Safety Mgr. (RAM/RASM) | | | <input type="checkbox"/> Concur/ <input type="checkbox"/> Non-Concur |
| National Aviation Manager/Safety Mgr. (NAM/NASM) | | | <input type="checkbox"/> Concur/ <input type="checkbox"/> Non-Concur |
| Regional Director | | | <input type="checkbox"/> Approve/ <input type="checkbox"/> Disapprove |

Note: A copy of the completed and signed Modified HUET/CA-EBS Training Curriculum Application shall be forwarded to the appropriate RAM/RASM and the NAM/NASM. The final approved copy will be uploaded into the requester's IAT Training Records

Risk Assessment Matrix

| Risk Assessment Matrix | | | PROBABILITY | | | | | |
|------------------------|------------------|--|---|-----------------------------------|--|--|---|---|
| | | | Frequency of Occurrence Over Time | | | | | |
| | | | A | B | C | D | E | |
| | | | Frequent (Continuously experienced) | Likely (Will occur frequently) | Occasional (Will occur several times) | Seldom (Unlikely; can be expected to occur) | Unlikely (Improbable; but possible to occur) | |
| SEVERITY | Effect of Hazard | Catastrophic (Death, Loss of Asset, Mission Capability or Unit Readiness) | I | EH | EH | H | H | M |
| | | Critical (Severe Injury or Damage, Significantly Degraded Mission Capability or Unit Readiness) | II | EH | H | H | M | L |
| | | Moderate (Minor Injury or Damage, Degraded Mission Capability or Unit Readiness) | III | H | M | M | L | L |
| | | Negligible (Minimal Injury or Damage, Little or No Impact to Mission Readiness or Unit Readiness) | IV | M | L | L | L | L |
| | | | Risk Assessment Levels | | | | | |
| | | | EH=Extremely High H=High M=Medium L=Low | | | | | |

See [Air Force Pamphlet 90-803](#) for a detailed discussion on managing risk and the use of this Risk Assessment Matrix

Operational Risk Management Worksheet

| DEPARTMENT OF THE INTERIOR | | | | | | | | | | | | | | |
|---|--|----------------------------|---|----------------------------|--|---|--|--|---|---|---|----|---------------|---------------|
| OPERATIONAL RISK MANAGEMENT WORKSHEET | | | | | | | | | | | | | | |
| 1. Organization and Location | | | | | | 2. Page 1 of xx | | | | | | | | |
| 3. Operation / Task | | | | 4. Beginning Date: Open | | 5. Ending Date: Open | | 6. Date Prepared 9/28/2011 | | | | | | |
| 7. Prepared by (Name / Duty Position) | | | | | | | | | | | | | | |
| 8. Identified Risk: | | 9. Initial Risk Assessment | | | 10. Control Measures Developed for Identified Risks: (Specific measures taken to reduce the probability of risk occurrence.) | | | 11. Assess the Residual Risk | | 12. How to Implement the Controls: (Include SOP's, references, etc.) | 13. Track & Control: (Continuous Leader Checks, Buddy System, etc.) | | | |
| (Be Specific) | | L | M | H | VH | (Be Specific) | | | L | M | H | VH | (Be Specific) | (Be Specific) |
| | | | | | | | | | | | | | | |
| 14. Remaining Risk Level After Control Measures Are Implemented: (CIRCLE HIGHEST Remaining Risk Level) | | | | LOW (Employee) | | MODERATE (Supervisor/Branch Chief Equivalent) | | HIGH (District Manager Equivalent) | | VERY HIGH (Regional/State/Director or Administrator Equivalent) | | | | |
| 15. RISK DECISION AUTHORITY: (Approval/Authority Signature Block) (If Initial Risk Level is Moderate, High or Extremely High, brief Risk Decision Authority at that level on Controls and Control Measures used to reduce risks. NOTE: if the person preparing the form signs this block, the signature indicates only that the appropriate risk decision authority was notified of the initial risk level, control measures taken and appropriate resources requested; and that the risk was accepted by the decision authority.) | | | | | | | | | | | | | | |
| _____ (Signature) | | | | | | | | | | | | | | |

See the [NWCG Standards for Helicopter Operations](#) for a detailed discussion on managing risk and the use of this worksheet.

Special Use Risk Assessment – Airborne PASP



This risk assessment is specifically intended for use when a Point-to-Point flight plan changes to a Special Use Mission. For example, when you must divert to conduct a low-level reconnaissance of an oil spill, sheen, or incident.

| BSEE Special Use Risk Assessment (Airborne PASP) | | | | |
|---|--------------------|-----------------------------------|---|---|
| Risk Factors & Values | 0 | 1 | 2 | Your assessment of the Risk (0-2 / <i>No Go</i>) |
| Flight Plan | Ops Normal | Divert | Unplanned Deviation | |
| Ceiling | >1000' | <1000' but >600' | <600' <i>No Go</i> | |
| Visibility | >3 nm | --- | <3 nm <i>No Go</i> | |
| Weather Trend | Stable / Improving | --- | Deteriorating | |
| Wind Conditions | 0-20 kts | >20 kts but < 30 kts | >30 kts <i>No Go</i> | |
| Sea State | 0-2 | 3 | 4 or greater | |
| Enroute Altitude | >500' AGL | --- | <500' AGL | |
| Air Temperature | --- | --- | Risk of Icing <i>No Go</i> | |
| Water Temperature | >70°F (21°C) | > 70°F (21°C) but <60°F (16°C) | <60°F (16°C) ≤60°F (16°C) (<i>No Go</i> <i>(in GOMR for Single Engine A/C)</i>) | |
| Time in Duty Day | --- | >8 hrs. but < 14 hrs. | > 14 hrs. <i>No Go</i> | |
| Type of Special Use Mission | --- | Vessel Landing Recon or Low-Level | Mountainous | |
| Pilot Fatigue (Flt Hrs.) | <8 hrs. | --- | >10 hrs. 2 Pilot A/C >8 hrs. 1 Pilot A/C <i>No Go</i> | |
| Pilot Mission Experience with BSEE | >2 yrs. | 1-2 yrs. | <1 yrs. | |
| Initial Total Risk (0-26 / <i>No Go</i>) | | | | |
| Describe additional risks and mitigation measures: | | | | |
| | | | | |
| Residual Risk | Risk Level | | Approval Level | |
| 0-12 | Low | | Mission Chief (MC) | Date: |
| 13-18 | Medium | | District Manager | Pilot: |
| 19 or greater | High | | Regional Director | MC: |

A SAFECOM will be completed when a mission changes from a Point-to-Point flight to a Special Use Mission. A completed Airborne PASP must be attached to the SAFECOM. If needed, contact your RAM/RASM for questions and or a fillable PDF version of the Airborne Project Aviation Safety Plan (Airborne PASP). For reference: OPM-06.

Pilot Briefing

The Pilot Briefing must include the following items:

- How to safely approach/leave the aircraft.
- Securely stowing all loose items/equipment in both the cabin and baggage compartment.
- Aviation Life Support Equipment to include CA-EBS (for passengers qualified to use).
- Location and use of all Safety Equipment for use in an emergency to include the emergency locator transmitter (ELT), life rafts, and any other survival equipment, etc.
- Crew resource management (CRM) procedures. How and when to alert the pilot to hazards (birds, other aircraft, helideck obstacles) and when to remain quiet (i.e. sterile cockpit procedures).
- Smoking (including electronic cigarettes and personal vaporizers) is prohibited in or around BSEE aircraft. Passengers shall be briefed on when, where, and under what conditions smoking is permitted.
- Verification of Hobbs meter reading before and after flight. If the Hobbs meter is out of service or not installed, the clock time will be used to account for flight time instead of the Hobbs meter.

Note: Electronic cigarettes and personal vaporizers are not allowed in checked or gate-checked baggage. They must be declared to the pilot and may (at the pilot's discretion) be stowed in carry-on baggage, or on your person, during flight. However, the use and charging of e-cigarettes and personal vaporizers is prohibited onboard all flights

| | |
|--|---|
| <p style="text-align: center;">Five Steps to a Safe Flight</p> <ol style="list-style-type: none"> 1. Pilot/Aircraft Data Card - Approved & Current 2. Flight Plan/Flight Following Initiated 3. PPE in Use When Required 4. Pilot Briefed on Mission & Flight Hazards 5. Crew & Passenger Briefing to include: <ul style="list-style-type: none"> - Aircraft Hazards - Seat Belt & Harness - ELT & Survival Kit - First Aid Kit - Gear & Cargo Security (Not Under Seats) - Fire Extinguisher - Fuel & Electrical Shutoff - Oxygen Equipment - Emergency Egress - Smoking | <p style="text-align: center;">Remember!</p> <p>To report an aircraft accident call: 1-888-4MISHAP (1-888-464-7427)</p> <p>File a SAFECOM to report any condition, observance, act, maintenance problem, or circumstance which has potential to cause an aviation-related accident.</p> <p>Anyone can refuse or curtail a flight when an unsafe condition may exist.</p> <p>Never let undue pressure (expressed or implied) influence your judgment or decisions. Avoid mistakes, don't hurry!</p> |
|--|---|

OAS-103/PFS 5700-16 (07/18)

BSEE Mission Lead – Checklist

Unless otherwise designated by the RD, the most senior BSEE inspector onboard the aircraft will assume the role of Mission Lead (ML). The ML will maintain a working knowledge of the DOI and BSEE National and Regional aviation policies and general understanding of aircraft and aircrew capabilities and limitations. The ML will:

Before the Mission

Assist in the pre-mission planning and safe execution of the mission. This includes understanding the mission to include:

1. Stop locations: _____
2. Nearby facilities: _____
3. Routes: _____
4. Refueling stop locations: _____
5. Potential concerns/hazards: _____

Pilots and aircraft are properly carded for the mission(s) to be conducted

DOI requirements such as a PASP or mitigation via the Regional Aviation Management Plan for Special Use activities are complied with before special use activities are conducted (e.g., reconnaissance missions, low-level flights, vessel landings, and mountainous operations)

A copy of the current aviation contract is available on the aircraft to be viewed by the pilot or passengers (paper or electronic)

Ensure each BSEE passenger has functional Aviation Life Saving Equipment (ALSE)/Survival Equipment. (e.g., Fire-resistant Clothing, Boots, CA-EBS System, Personal floatation vest with Emergency Locator Transmitter (ELT), Flight helmet with functional avionics, and Extreme Cold Weather gear if required (gloves, boots, immersion suites, etc.)).

Pilot provided a pre-flight briefing per the specific contract and applicable CFR and OAS requirements. (See NAMP Section 3. Aviation Safety and *5 Steps to a Safe Flight* card below).

BSEE passengers have reviewed the vendor’s Emergency Breathing System (EBS) training (or video), and the pilot must specifically brief the passenger(s) on EBS procedures for the flight.

Hobbs meter reading before the flight departs. Notes: _____
If the Hobbs Meter is out of service or not installed, the clock time will be used to account for flight time instead of the Hobbs Meter.

Pandemic or other health-related protective measures are in place and enforced as required

Pilot is aware of any potential Hazardous Materials (HAZMAT) before the flight. HAZMAT examples include Compressed gases and liquids; Flammable liquids and solids; Oxidizers and organic peroxides; Toxic materials; Corrosives; etc.

All equipment is properly stowed, and all doors secured.

During the Mission

Collaborate with the pilot in:

- In-flight emergency duties of ML and passengers
- Communicate immediately to the pilot any observed condition, observation, act, problem, or circumstance that has the potential to cause an aviation-related mishap or accident.
- If the mission deviates from the planned flight, such as from a Point-to-Point flight to a special use mission, coordinate with the pilot to complete a Airborne PASP Risk Assessment. The ML should always carry a copy of the *Special Use Risk Assessment – Airborne PASP* (NAMP Appendix F.3)

After the Mission

Collaborate with the pilot to verify and accurately complete documentation related to the flight. Verify the pilot properly documented the passenger information and Hobbs meter readings.

Notes: _____

Report any conditions, observations, acts, problems, or circumstances that could have caused aviation-related mishaps or accidents to the pilot and via SAFECOM. Note: *SAFECOM submissions may be anonymous.*

Ensure an Airborne PASP Risk Assessment is attached to the related SAFECOM(s)

| | |
|---|---|
| <p style="text-align: center;">Five Steps to a Safe Flight</p> <ol style="list-style-type: none">1. Pilot/Aircraft Data Card - Approved & Current2. Flight Plan/Flight Following Initiated3. PPE in Use When Required4. Pilot Briefed on Mission & Flight Hazards5. Crew & Passenger Briefing to include:<ul style="list-style-type: none">- Aircraft Hazards- Fire Extinguisher- Seat Belt & Harness- Fuel & Electrical Shutoff- ELT & Survival Kit- Oxygen Equipment- First Aid Kit- Emergency Egress- Gear & Cargo Security (Not Under Seats)- Smoking | <p style="text-align: center;">Remember!</p> <p>To report an aircraft accident call: 1-888-4MISHAP (1-888-464-7427)</p> <p>File a SAFECOM to report any condition, observance, act, maintenance problem, or circumstance which has potential to cause an aviation-related accident.</p> <p>Anyone can refuse or curtail a flight when an unsafe condition may exist.</p> <p>Never let undue pressure (expressed or implied) influence your judgment or decisions. Avoid mistakes, don't hurry!</p> |
|---|---|

Sea States and Float Limitations

Discussion. When a helicopter makes a forced (uncontrolled) or a precautionary (controlled) emergency landing offshore there are several factors that influence how long the aircraft will float and remain upright to allow the occupants to safely egress. Prominent among those factors are the condition of the floats, the wave height, wave steepness and wind.

A European Aviation Safety Agency (EASA) study, *Helicopter ditching and water impact occupant survivability*⁹¹, (March 23, 2016) states “Helicopters have a natural instability when floating on the water with a tendency to capsize and remain inverted due to their high center of gravity in relation to their center of buoyancy...”

The aircraft-mounted floats on all BSEE contracted helicopters are rated to sea state 4. [FAA Advisory Circular 29-2C](#) defines sea state 4 as “moderate seas” with a significant wave height of between 4-8 feet and wind speed of 17-21 knots.

BSEE’s Pacific Region, and to a lesser degree, the Gulf of America Region, experience wave heights above sea state 4 often enough to warrant an understanding and mitigation of those risks.

When the sea state exceeds the float limitation(s) the risk of the helicopter capsizing increases and the time available to egress before capsizing decreases.

Environmental. HeliOffshore, an international association focused on the safety of the offshore helicopter industry, published a study⁹² in 2016 that determined wave steepness poses a greater risk to helicopter stability than the previous metric of significant wave height alone.

That study used readings from meteorological stations associated with the major offshore oil fields around the world, two of which are in the Gulf of America (Galliano and Brazoria). The HeliOffshore report does not provide wave data for the California coastal area.



Figure 1. Location of Galliano and Brazoria meteorological stations.

⁹¹ See EASA Notice of Proposed Amendment 2016-01, Helicopter ditching and water impact occupant survivability

⁹² HeliOffshore (www.helioffshore.org) Wave Climate Steepness Analysis for Helicopter Safe Operations

HeliOffshore findings indicate that BSEE helicopters operating in the Gulf of America seldom experience the wave height (H_s) and/or wave steepness (S_s) that are likely to result in a helicopter with operable floats capsizing immediately following a controlled landing.

The HeliOffshore study does not cover BSEE's Pacific Region operations. However, data from NOAA's [Harvest Southeast buoy station 46257⁹³](#), at the northern end of the Pacific Region's area of operations, shows that for more than one-third of the year BSEE operates over sea states greater than 4 which exceed the manufacturer's recommended maximum for the aircraft floats⁹⁴.

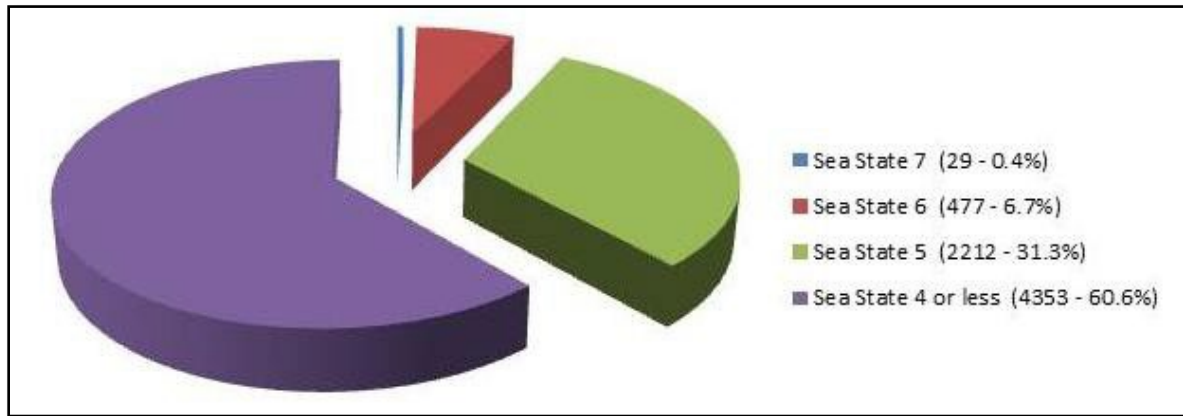


Figure 2. Summary of 2016 sea state data for Harvest Southeast buoy station 46257 (0700-1700)⁹⁵⁹⁶⁹⁷⁹⁸

In 2016 the Harvest Southeast station recorded 7071 readings between 0700-1700. The **average wave height** was 7.94 feet (**sea state 4**), and the highest significant wave height was 25.3 feet. The data shows that the highest sea states occur during the winter between January and March and the calmest seas occur in the summer months between June and August.

Equipment. BSEE contracts require all helicopters to be equipped with emergency pop-out floats and life raft systems⁹⁹ but do not stipulate what sea state the floats must be rated for. All floats on BSEE-contracted helicopters in the Gulf of America and Pacific Regions are rated for sea state 4.

Figures 3-6 show the normal (stowed) configuration of the floats, the floats inflated, the external life raft stowed, and the life raft inflated.

⁹³ Station 46257 was selected because the northern sector of BSEE's Pacific Region commonly experiences the highest waves.

⁹⁴ The data for the Harvest Southeast buoy station during normal duty hours in 2016 is depicted in chart 1

⁹⁵ Sea state 4 = 4-8 feet

⁹⁶ Sea state 5 = 8-13 feet

⁹⁷ Sea state 6 = 13 -20 feet

⁹⁸ Sea state 7 = 20-30 feet

⁹⁹ BSEE floats comply with NTSB recommendation A-07-87 for "externally mounted life rafts large enough to accommodate all occupants." BSEE also complies with NTSB recommendation A-07-88 which requires all flight crew (pilots) have a "personal flotation device equipped with a waterproof, global-positioning-system-enabled 406 MHz personal locator beacon, and one other signaling device, such as a signaling mirror or strobe light."



Figure 3. Normal float configuration



Figure 4. Floats activated on Bell 407.

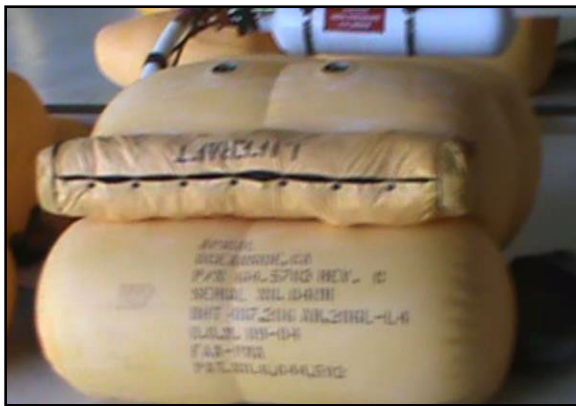


Figure 5. External life raft stowed



Figure 6. External life raft deployed.



Figure 7. Floats and raft deployed



Figure 8. Test of float system deployment

Dart Aerospace manufactures the floats for the Bell 407, Leonardo 109 and 119, and the Airbus AS-350. A Dart technical representative stated that the floats on all BSEE helicopters are designed for a maximum sea state 4 and meet the requirements of FAA AC 29-2C¹⁰⁰.

¹⁰⁰ AC 29-2C - Certification of Transport Category Rotorcraft

Helicopter Float Limitations and Mitigation Strategies.

The consensus opinion of BSEE aviation service providers and the USCG is that floats rated to sea state 4 are the most economically feasible solution given testing and weight issues for the size helicopters operated by BSEE.

A Coast Guard representative said that the float system isn't expected to keep a helicopter upright for an extended period of time regardless of the float rating and that the purpose of the float system is to give the occupants the time to get out of the helicopter and into the life rafts.

The Coast Guard also uses a systems approach to mitigate the risks through **training** (HUET¹⁰¹ and SWET¹⁰²) and **equipment** (floats, rafts, life vests, CA-EBS¹⁰³, and EPIRBs¹⁰⁴). BSEE currently employs each of those mitigation techniques except for the SWET.

BSEE contracts currently limit environmental factors such as ceilings, visibility, and winds, but do not address sea states.

Conclusion. The research cited above indicates that if a helicopter is forced to land in the water, and if the landing is controlled, and if the floats remain inflated and attached, the helicopter's high center gravity will, in time, cause the helicopter to roll to an inverted position.

The time available to safely egress from the helicopter and get into the life raft decreases as the wave steepness, wave height, and wind speed increase. The following mitigation strategies can be employed to reduce the risk of personnel becoming trapped in an inverted helicopter.

1. Risk Mitigations and Approval:

a. Preflight.

i. Prior to the first flight of the day, and throughout the day as necessary, the pilot should use National Weather Service (NWS) and/or National Oceanic and Atmospheric Administration (NOAA) information to evaluate the meteorological and environmental conditions that will affect the planned route of flight. This will include wave height, wave steepness (if available), water temperature, winds, visibility, cloud ceilings, etc.

ii. If sea states 5 or 6 (waves 8 feet or greater) would be encountered during the planned flight BSEE personnel, in coordination with the pilot, should consider altering the route or

¹⁰¹ Helicopter Underwater Egress Training (HUET) – Academic and practical (in water) training to teach helicopter crew and passengers how to escape and survive after a helicopter ditching offshore. BSEE requires the OPITO T-HUET or cold water HUET initially and every 4 years for BSEE routine and BSEE non-routine offshore travelers.

¹⁰² Shallow Water Egress Trainer (SWET) – A SWET trainer is generally a single-person trainer and is not currently used by BSEE.

¹⁰³ Compressed Air Emergency Breathing Systems (CA-EBS) – Regional Directors may develop CA-EBS programs for their Regions in accordance with the policy in Section 3.

¹⁰⁴ Emergency Position Indicating Radio Beacon (EPIRB) - EPIRBs alert search and rescue services in the event of an emergency by transmitting a distress signal via satellite to the nearest rescue co-ordination center. BSEE contracts require the pilot's flight vest be equipped with an EPIRB

changing the destination to avoid the areas of higher sea states.

iii. For each flight where sea states 5 or 6 will be encountered an operational risk assessment shall be conducted and approved by BSEE management prior to the flight. It is recommended that the risk management worksheet located in the BSEE NAMP Appendix Section F or equivalent be used.

iv. Flights in areas of sea state 7 are prohibited.

b. Risk Approval Level.

i. Sea state 4 or lower (waves less than 8 feet). The mission risk approval level remains unchanged.

A. Sea state 5 (waves 8-13 feet). The mission risk approval level is the Regional Director. Requests to operate over areas of sea state 5 will be documented on the Risk Assessment Worksheet stating the justification for accepting the additional risk. The request and worksheet will be routed through the District Manager to the Regional Director for approval.

B. Sea state 6 the mission risk approval level is the BSEE Director. Requests to operate over areas of sea state 6 will be documented on the Risk Assessment Worksheet stating the justification for accepting the additional risk. The request and worksheet will be routed through the District Manager and Regional Director to the BSEE Director for approval.

c. Pilot's preflight briefing should include the sea states (wave height) and winds expected to be encountered during that flight.

d. During an aircraft emergency.

i. Passengers will follow the pilot's instructions (whether over land or water).

ii. After landing delay exiting the aircraft until the rotor blades are stopped (whether over land or water).

iii. For water landing get out of the helicopter and into the life raft as soon as safely practical. The helicopter is designed to be in the air, not the water. It has a high center of gravity and is very likely to tip over or invert.

iv. Comply with your HUET, CA-EBS, and sea survival training.

e. Training. For flights where sea states 5 or greater will be encountered all passengers, (including visitors) must be current with HUET and CA-EBS.

SEA STATE CODE

(WORLD METEOROLOGICAL ORGANIZATION)

| Sea State Code | Description of Sea | Significant Wave Height | | Wind Speed |
|----------------|--------------------|-------------------------|--------------|------------|
| | | Meters | Feet | Knots |
| 0 | Calm (Glassy) | 0 | 0 | 0-3 |
| 1 | Calm (Rippled) | 0 to 0.1 | 0 to 1/3 | 4-6 |
| 2 | Smooth (Wavelets) | 0.1 to 0.5 | 1/3 to 1 2/3 | 7-10 |
| 3 | Slight | 0.5 to 1.25 | 1 2/3 to 4 | 11-16 |
| 4 | Moderate | 1.25 to 2.5 | 4 to 8 | 17-21 |
| 5 | Rough | 2.5 to 4 | 8 to 13 | 22-29 |
| 6 | Very Rough | 4 to 6 | 13 to 20 | 28-47 |
| 7 | High | 6 to 9 | 20 to 30 | 48-55 |
| 8 | Very High | 9 to 14 | 30 to 45 | 56-63 |
| 9 | Phenomenal | Over 14 | Over 45 | 64-118 |

- Notes:
- (1) The Significant Wave Height is defined as the average value of the height (vertical distance between trough and crest) of the largest one-third of the waves present.
 - (2) Maximum Wave Height is usually taken to be 1.6 x Significant Wave Height; e.g., Significant Wave Height of 6 meters gives Maximum Wave Height of 9.6 meters.
 - (3) Winds speeds were obtained from Appendix R of the "American Practical Navigator" by Nathaniel Bowditch, LL.D.; Published by the U.S. Naval Oceanographic Office, 1966.

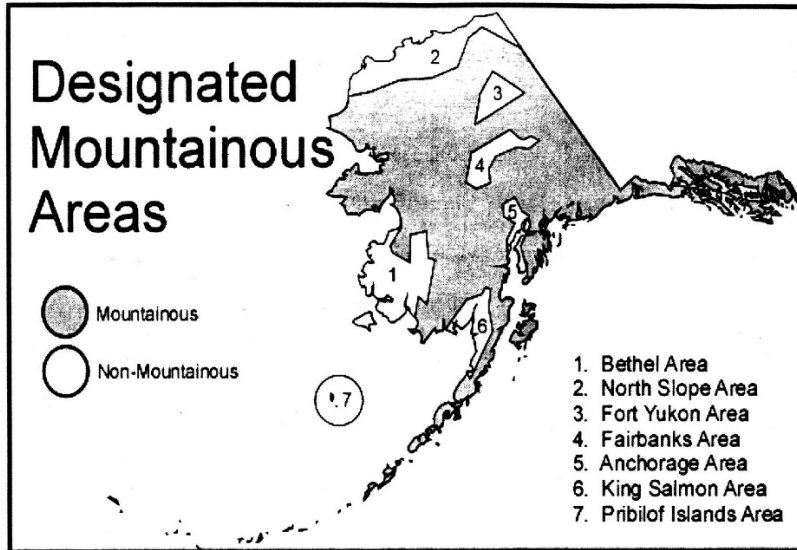
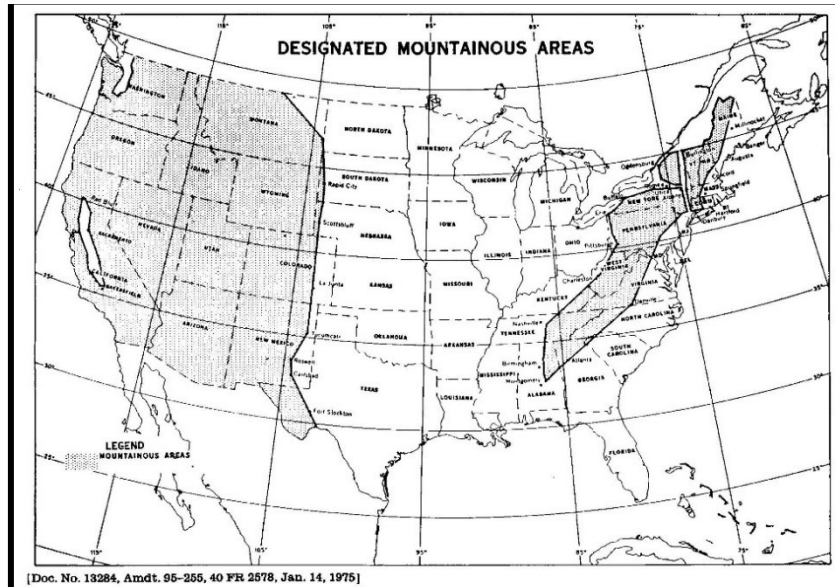
FIGURE AC 29.801-1

Figure 9 – Sea State Information from FAA AC 29-2C

For reference purposes Sea State information from FAA AC 29-2C is provided in figure 9 above.

Designated Mountainous Areas

Discussion. The FAA uses [14 CFR Part 95 Subpart B](#) (Designated Mountainous Areas) to describe those area within the United States where special rules apply due to mountainous terrain. Those areas are defined by latitude/longitude coordinates and by maps (below).



Aerial Hazard Maps

Discussion. The Office of Aviation Services (OAS) Aviation Program Evaluation (APE) explained their expectation for aerial hazard maps as follows:

- A. A low-level flight¹⁰⁵ hazard map (of the Bureau's choosing) is required for all areas in which the Bureau will be conducting low level aviation operations.
- B. Bureaus determine the needs specific to their operations and project areas.
- C. Aerial hazard maps will include the date(s) of revisions or update.
- D. If during an OAS APE the evaluator determines that no low-level operations are being conducted then an aerial hazard map is not required. OAS considers even one-time low-level operations to meet the requirement for an aerial hazard map.
- E. Hazards that should be identified on aerial hazards maps include but are not limited to:
 - a. Military Airspace – Warning Area (WA), Restricted Area (RA), Military Operations Area (MOA), Alert Area (AA), Prohibited Area (PA), Military Training Routes (MTRs), Controlled Firing Areas (CFA), Slow Routes (SR), Aerial Refueling Routes (ARs) and Low Altitude Tactical Navigation (LATN) Areas.
 - b. Airspace – Class B/C/D and National Security Areas
 - c. Airports/airstrips – public and private, military
 - d. Parachute, hang glider, rocket, model airplane operating areas
 - e. Towers over 200 feet. Other towers as locally determined significant
 - f. Wires – Major transmission lines, other lines determined locally as significant (wires crossing – canyons, rivers, lakes, near airports)
 - g. Areas of historic wildlife concentrations (birds)
 - h. Areas of known hazardous atmospheric tendencies that differ from the surround area (high/turbulent winds, downdrafts, frequent fog)

Note: Many, but not all, of these hazards are noted on VFR Sectional Aeronautical Charts.

¹⁰⁵ Low level operations are defined in [OPM-29](#) as flights below 500 feet above the surface.

FATALITY/SERIOUS INJURY NOTIFICATION GUIDE

Section I

The following information will provide some guidelines for preparing and completing fatality/serious injury notifications. The notification process needs to be done quickly and with the utmost sensitivity when an employee fatality or serious injury occurs. As the agency representative you are expected to be sensitive, courteous, sympathetic, and helpful toward the next of kin during the notification. Your presence is designed to demonstrate that the agency is genuinely concerned with its personnel and their families.

Each notification is unique as a result of the individuals and circumstances surrounding the death or serious injury and will garner different reactions. Your alertness to the needs of the family will assist in maintaining a rapport with next of kin at the time of their greatest need. Your personal action and words in this sensitive task will reflect on the agency's image as well as instill confidence in the agency with the survivors. District Managers are usually responsible to make the notification; however, other personnel may be called to assist in this task.

No guide can cover all situations that could arise during a notification. This guide is intended to highlight the key duties and responsibilities of the notification team members and ease some of the anxiety often experienced when an individual is called upon to personally notify the deceased or missing member's family. Since no two situations are ever the same, remember that nothing can substitute for common sense, good judgment and sensitivity when making death or serious injury notifications.

Selection of Notification Officers

The Agency Administrator/District Manager or a person designated by agency leadership is the appropriate individual to make a notification and must be accompanied by at least one other person. Depending upon the situation, a coworker, close friend of the deceased or injured, a chaplain or other member of the clergy, or a law enforcement officer may be appropriate.

Notification should always be made by at least two or even three people and always in person. It is a good idea to consider taking separate cars in case one person needs to pick up a family member who is not home or perhaps accompany a family member to the hospital.

Preparing for the Notification

Key information will need to be gathered prior to making a fatality/serious injury notification, such as:

- The circumstances surrounding the death or injury (be clear what is fact and what is not verified), information on the survivors, medical status if the employee is injured, where the injured/deceased person is right now.
- Verify the address of the next of kin. Decide ahead of arrival who will speak first.
- If notification must be made at the next of kin's workplace, ask for a supervisor and a quiet private room to talk with the next of kin.

- If notification is made at the hospital, the same rules apply. Find a quiet private place for the notification and next of kin's questions and reactions.
- Bring Next of Kin Follow-up Worksheet with you. (See page E-9.)

Determining Primary Next of Kin

Refer to the Emergency Notification Information form that should have been completed by the employee. (See Emergency Notification Information, Appendix A). If not available, determine the primary next of kin. The following order is usually the order to use in notifying the primary next of kin.

- Spouse
- Parents
- Adult children
- Brothers and sisters, to include stepsiblings and those acquainted through adoption
- Grandparents
- Persons granted legal custody of the individual by a court decree or statutory provision
- Other relatives in order of relationship to the individual according to civil laws
- If no other persons are available, the county coroner or medical examiner will provide information on who can officially act on the behalf of the deceased.
- The most important issue here is to make absolutely sure that the correct persons are notified.

REMEMBER: Family relationships can be very complicated. Fiancés and significant others, whether or not they live with the injured or deceased person, are not legal next of kin. If you are aware of such an individual, ask the primary next of kin if they want to call/visit the significant other.

Inability to Locate the Primary Next of Kin

If the next of kin is not home, contact neighbors, the police department or local postmaster for information on the next of kin's location (work, out of town, etc.). Take care not to disclose (other than a family-related emergency) the purpose of your contact except to the next of kin. If the next of kin's absence is temporary, you may await their return or go in search of them as appropriate. If the next of kin is out of town and not expected to return shortly, determine their exact location. If it is within reasonable distance, attempt to contact them in person. If not, immediately contact the nearest Agency Administrator to the next of kin's physical location, brief them and request notification actions.

Secondary Next of Kin

If primary next of kin is not available, contact the secondary next of kin as identified on the Emergency Notification Information sheet.

First Visit Notification

The first visit will be very difficult and may present new uncomfortable feelings with many varied reactions from each surviving family member/survivor. Remember to be professional, demonstrate empathy and listen carefully. When notifying the next of kin, be yourself. This is not easy; be as natural as possible in speech, manner, and method of delivery. The following are suggested approaches with the family in this first visit:

Identify yourself to the next of kin. Example: "I am [AA title] and this is [name]."

Once you arrive at the residence and have identified yourself, confirm the identity of the next of kin. For example, "Are you Sam Brown?"

As soon as most families of public safety professionals see you, they will know something is wrong. Ask to be admitted into the house, and ask them to sit down.

Never make any notification on the doorstep of the house!

Verbally relate to the next of kin in your own words the information that you have. Always use the victim's name.

For example:

"The Director of the [Agency] has asked me to express his/her regret that your (relationship; husband/wife/son/daughter [name]_____) died/was killed in (city/state) on (date). (State the circumstances). Our deepest sympathy to you and your family in your tragic loss."

Another statement which may be needed is:

"The Director of the [Agency] has asked me to express his/her regret that your (relationship; husband/wife/son/daughter_____ [name]_____) has been reported missing/injured in (city/state) since (date). (State the circumstances)."

Injury: [Name of victim] is now at (name) hospital/treatment center. If you would like to go there now we can help make arrangements.

Missing: When we receive more information we will let you know immediately. We know this is a very difficult time for you and will try to help in any way we can."

Do not drag on with the process.

Communication

- The persons making the notification should be in professional attire or BSEE Inspector uniform.
- The first visit should be brief and in private. The main concern is to answer questions and meet the demands and requests from the next of kin. A private meeting will cut down on the confusion that can occur with too many people in the room.
- Confirm the next of kin's address and obtain telephone numbers for future contact.
- Listen: Your alertness to the needs of the next of kin at this time will help maintain a good rapport with the next of kin. Keep notes for later visits with the next of kin. They will be invaluable when reviewing what was said or done and to ensure all requests and commitments have been fulfilled.
- Offer to call immediate family members, friends or clergy who are available to come and support the family.
- Make sure your first visit is as inconspicuous as possible without calling undue attention to your visit by neighbors.
- Use the word died or killed. Do not down-play with “passed away” or “was lost.”
- Inform next of kin that they will be contacted by an agency family liaison within 24 hours to assist them with benefits paperwork and other arrangements.
- Verify that all children have been correctly identified.
- Leave names and phone numbers for the family to reach you, the chaplain, or the family liaison. Make sure they can find you.
- Gather information to complete the Next of Kin Follow-up Worksheet. (See page E-9)

Do not promise anything that cannot be delivered.

DON'T in the Notification Process

- Do not notify the primary next of kin by telephone.
- Do not call for a prior appointment to making the initial personal notification.
- Do not hold your notes or a prepared speech in hand when making notification.
- Do not disclose your message to neighbors or other persons to have the next of kin to call you.
- Do not use code words, acronyms, or terms which the next of kin may not understand.
- Do not hurry words, speak as naturally as possible.
- Do not make statements like, “I know how you feel.” or “I know what you’re going through.”
- Do not physically touch the next of kin in any manner unless there is shock or fainting. Summon medical assistance immediately, if necessary. Limit your discussion to information provided for the notification.
- Do not use your prior experiences or personal conjecture.
- Do not speculate on specific questions relating to the victim’s activity when they were killed or injured.
- Most decisions regarding cemetery, funeral director, the type of funeral wanted will not be discussed in the first visit. (The family will need time to think.)
- Never make a promise that is not in your power to keep.
- Do not make a statement or relay information to the next of kin unless you have verified the facts. Relaying false information, conflicting or misleading details regarding the fatality incident can be embarrassing to all parties involved. When you are uncertain about the answer to a question, reply that you do not know but will find out. Collect the facts before you respond and always follow through, but use caution on giving too much detail. Verify with the NTSB what information can be shared.

Do not discuss matters that you are not qualified to discuss.

Do not take the victim's personal effects on the first notification.

Reaction

Upon learning of the death or serious injury of a loved one, individuals may experience symptoms of shock such as tremors and a sudden decrease in blood pressure. Shock is a medical emergency and help should be requested immediately.

The family may want to lash out at the agency or person representing the agency that brings the bad news. Later they may feel that the bearer of bad news did not provide enough assistance or that the person was callous and non-caring. If this problem is encountered, remember it is not personal and it is important to call on the family again.

Before leaving, arrange for a time and location to contact the family the next day. Allow the next of kin time to react and offer your support; and if needed, take them to the hospital, or mortuary. Let them determine if they want to see the deceased.

Grieving family members go through different phases of grief and each react in their own unique way. Some factors that affect stress reactions are the intensity of the event (e.g., violent death vs. heart attack), the next of kin's ability to understand what is happening, and their equilibrium.

Below are some examples of reactions:

- Shock, followed closely by denial
- Numbness, inability to follow through or focus
- Panic, emotional release, mostly irrational
- Physical/somatic distress: sleepless, sighing
- Overwhelming loneliness
- Depression
- Guilt, recollection of things done and not done for the deceased
- Hostility/resentment toward the agency, or even God who "allowed" it
- Confusion, brought on by disruption of established routines
- Denial: Next of kin continually denying the death. They might repeat "there must be a mistake."
- Anger: Next of kin lashes out at the notifying official or the agency, the decedent, or themselves
- Negotiation: One normally sees this reaction when a family member is dying. Either the injured person or next of kin negotiates with God for extra time.
- Depression: Next of kin does not care about anything or anybody.
- Acceptance: Next of kin accepts the death and starts to rebuild their lives.

Grief recovery is a long-term process. It takes continued contact and understanding by supporters to get through this period.

Injured Person

One of the first questions the next of kin will ask is where their loved one is located and how do they arrange to see them. It is important to verify the location treating the injured individual or the status of the remains before arriving for the first visit. In cases of serious injury, immediately arrange for transportation of next of kin to the medical facility.

Remains of the Deceased

Often, remains of the deceased are not immediately recoverable or not readily accessible. Be alert to this concern, and answer the questions with care. Also be prepared to answer questions about the possibility of viewing the remains. Remember to use the victim's name.

Normally, remains of the deceased are not available until 24 to 36 hours after an autopsy. This needs to be well communicated to the family. Remains may be delayed for medical reasons, criminal investigations or for proper travel documentation.

The family may want to travel to the site to come home with the remains of the deceased.

Follow-up on the status of the remains and keep the next of kin informed.

Do not wait for the next of kin to ask the status.

Personal Effects

Personal effects should be gathered from the incident site (once authorized by the NTSB) and/or the home unit immediately. Items should not be delivered until later, perhaps days later when the family can deal with it. The items should be delivered in a clean unmarked box. All clothes should be cleaned, made presentable or disposed of at a later date. Anticipate delays due to accident or criminal investigations.

Follow-Up Contact

The Agency Administrator/notifier should make contact as previously agreed upon to check on next of kin's welfare. Key points include the following:

- Expressing concern
- Offering assistance
- Answering questions, particularly unresolved questions from first visit (e.g., visiting the site, travel arrangements to hospital (if a distant location), when remains may be returned)
- Allowing next of kin time to talk
- Follow up on promises and obligations

Staying in touch with next of kin is an important responsibility, sometimes this can last years.

Official Notification to Coworkers

Take care of family first but do not neglect the notification of coworkers who may have had close relationships with deceased or seriously injured employee(s). The same guidance and sensitivities apply as with notifying the family. It is essential that this be done in person and not by voice mail or e-mail.

- Efforts will be made to notify employees at the current workstation and prior workstation, if applicable.
- Notification of family members must never be delayed pending coworker notification.
- Consideration should be given to temporarily relieving affected coworkers from duty.
- Ensure employees are afforded access to CISM, EAP, or other counseling as appropriate.
- Continue to monitor employees' well-being and provide appropriate follow-up.
- Provide opportunity for employees to attend funeral(s)/memorial(s). Many agencies provide administrative leave for this purpose.

Notification for Members of the Public or Contractors

When victim is a member of the public, notification should be made by law enforcement. If the victim is an employee of a contractor, notification should be made directly to the contractor's home office (refer to contract specifications).

Intentionally Left Blank

Next of Kin Follow-Up Worksheet

This form is to be filled out at the time of notification and retained by the notifier to provide information about the surviving family members and their wishes.

Name of next of kin:

Person providing information (if different):

Address of next of kin:

Community:

Zip Code:

Telephone: Home

Work

Cell

Relation to the deceased:

Name of funeral home to which the body of the deceased should be sent:

If the next of kin has no preference in funeral homes, would they like the medical examiner to choose one? Yes No

Do any next of kin wish to see the body of the deceased?

Yes No Will decide later

Are there any special items that might have been in the possession of the person who died (such as jewelry or a donor card)? (Identify as best possible.)

List:

Others to be contacted by notifier (other kin, unmarried partners, roommates, etc.):

Name: _____ Phone: _____

Name: _____ Phone: _____

Persons contacted by notifier to provide support to the next of kin:

Name: _____ Phone: _____

Name: _____ Phone: _____

Signature of the notifier:

Date

Intentionally Left Blank

FAMILY LIAISON

Section II

The family liaison is critical in facilitating communication between the agency and the family. The family liaison must be capable of ensuring that agency needs are met while providing assistance to families. This balancing act occurs in an emotionally charged atmosphere that can be stressful to the liaison. Managers should be mindful of selecting the appropriate person to act as family liaison. Select one family liaison per family but consider the need for other individuals to assist.

Considerations for Selecting Family Liaison(s):

- Try to have local liaisons, if possible.
- The family liaison should be available to the family within the first 24 hours.
- Being a family liaison is a long-term commitment that will often impact work. Family liaisons can work with families for years.
- Give consideration to identifying a pair of employees to serve as family liaisons. This will provide a backup contact and allow family liaisons to brief each other.
- Carefully weigh the pros (immediate rapport/trust) and cons (emotional involvement lack of objectivity) of assigning a family liaison who is a friend of the family.
- Select a steady, level-headed individual who is a good listener and communicator and will likely maintain their objectivity.
- A family liaison must be willing to take on the job, with an understanding of the emotional and time demands involved. Allow the selected liaison the opportunity to decline the assignment.

Preparations for the Family Liaison

- Prepare yourself physically, mentally, and emotionally before visiting the family.
- Wearing a uniform or professional attire may be appropriate for the initial visit.
- Have another person accompany you on your first visit; establish his/her role.
- Anticipate questions and be prepared. Keep an ongoing record of activities so you can remember to follow up on all requests.
- Do not assume you know what the families and survivors want...ASK. Do not burden the family with unnecessary requests or demands. Try to ask 'yes' or 'no' questions when decisions are required.

- Be prepared to meet the family at other locations, such as hospitals, helicopter/ambulance shuttle points and other public areas.
- Coordinate with other family liaisons in the event of multiple fatalities or serious injuries. Consider scheduling daily conference calls or meetings.

Communicating With Families

This section is a summary of key principles that are useful for communicating effectively with next of kin and other family members.

The first principles are for responding to emotion. Strong emotional responses by the next of kin can be expected and may be very helpful to long-term acceptance and readjustment.

Important points are LISTEN and DO NOT ARGUE. “Listening” is different from “hearing”—people hear with their ears, but listen with their minds. No matter what the family says, do not argue. It will not help and usually makes the situation worse.

Negative information and high-stress situations tend to make people defensive. Almost any information can be presented either negatively or positively.

Telling people what to do and starting sentences with the word “you” are common triggers for defensiveness. Defensiveness can also be reduced by avoiding general statements and dealing instead with specific needs.

The key factor to giving complicated information is breaking it into small pieces. Do not assume that the information has registered or has been understood. The guideline in this section can save a lot of misunderstanding and future problems.

Assist the family in establishing achievable goals. Some examples may be arrangements for funerals, memorials, meeting with benefits coordinator, etc. Goal-setting is a valuable tool for avoiding problems and keeping communication open. A long-term family representative assignment can lead to over dependence on the part of the next of kin and a dread of letting go of a relationship. Goal setting helps to keep the process focused on the end point of the assignment. A final meeting to officially end the assignment is usually helpful for both the family representative and the next of kin.

Follow-up Contacts

The family liaison should encourage the next of kin to begin funeral arrangements, with consideration given to the return of the remains, desires of the family, when travel arrangements can be made for family members, and agency logistics.

The family liaison in coordination with human resource specialists may need to help the family complete the forms and processing for:

- Office of Workers' Compensation Programs (OWCP)
- Social Security Administration
- Veteran's Administration (if applicable)
- Agency benefit claims (e.g., 401K, life insurance)

Stay in touch with family. Many times family and friends will care for the immediate needs of the bereaved well, but after a few days this support often disappears especially days after services are held. Would-be supporters might feel that a grieving person would rather face their loss alone. This is the time when the family liaison and supporters are needed the most and must stay in touch more than ever before. Provide families with access to support programs and resources such as Employee Assistance Program (EAP) and encourage networking with other affected families and coworkers.

PREPARING FOR AN AIRCRAFT ACCIDENT INVESTIGATION TEAM: ACTIONS TO BE TAKEN BY THE LOCAL UNIT

Section III

Secure the Site

Upon completion of the rescue and medical assistance, the scene must be secured. This may be done by law enforcement; however, it may be done by any responsible person. The scene must remain secure until released by the FAA or NTSB Investigator in Charge (IIC). By contrast, OAS has the authority to retain control of aircraft wreckage after release by the FAA or NTSB. Methods to secure the site:

- Ropes
- Barrier tape
- Cones
- Signs
- Flashing lights
- Posted guards

Do not move any items at the scene. Do not walk around the scene unless it is necessary for rescue or medical assistance. Nothing should be removed from the scene without permission from the FAA or NTSB IIC.

Evidence must be preserved at the scene. Photograph the scene (video or stills) if evidence could be lost before the accident investigation team arrives, such as by rainstorm or wave action/erosion.

Autopsies

Ask your local law enforcement officer or team representative to provide a liaison to the county medical examiner or coroner. Access to emergency (911) logs and police reports may be needed.

Witness Statements

Identify witnesses for accident investigation team interviews and make sure they stay in the area. If that is not possible and witnesses need to be released, have them write, date, and sign a statement before they leave. Use the following procedures.

Separate the witnesses and have them write statements in their own words. Witness statements should be in the witness's own handwriting or typed by them on a computer. The witness statement should include:

- Name, work address, and phone number of the witness
- Time and location of the events
- What attracted the witness's attention to the accident
- Description of the sequence of events leading up to accident
- Environment (weather, lighting, temperature, noise)
- Positions of people, equipment, and material, as well as the witness
- What has been moved, repositioned, turned off or on, or taken from the scene
- What actions the witness took at the accident site
- Other witnesses or involved people (include names if known)

Critical Incident Stress Management

Determine need for, and level of, Critical Incident Stress Management (CISM) and implement accordingly. Advise Serious Accident Investigation Team (SAIT) of CISM actions taken.

Accident Investigation Team Administrative Support

The FAA/NTSB/OAS investigation team will need the following:

- A person to serve as a local unit liaison including phone numbers and fax numbers. (The liaison should not be directly or indirectly involved in the accident or the notification/NOK support).
- Lodging/meeting place for the investigation team (including private interview room). Coordinate with the OAS IIC.
- Office supplies as requested
- Documentation support (at the discretion of the team leader).

Evidence Collection

Collect all or as much of the following applicable items as possible:

- Radio logs (written and recorded)
- Dispatch logs (occupant emergency plans)
- Maps, AFF Data
- Job Hazard Analyses/Risk Assessment
- Safety briefings
- Team briefings
- Employee training records (IAT & HUET)
- Medical examination records
- Work capacity test results
- Qualifications/certifications (including red cards)
- Work/rest (timesheets) for at least two pay periods (current and before the accident)
- Equipment maintenance records
- Equipment performance tests
- Inspection documents
- RAWs (remote automated weather system information)
- Weather (forecast/conditions)
- Incident action plans/personnel lists
- Delegation(s) of Authority
- MOU/agreements
- Specifications/drawings
- Press releases
- Autopsy/toxicology report
- Death certificate
- 911 log
- Witness statements
- Internal policies/guidelines
- Tailgate safety session documentation
- Unit's safety plan (NAMP, RAMP, PASP, CIM)

DO NOT collect evidence at the scene unless it is in danger of disappearing. Try to contact the OAS, FAA, or NTSB investigator if you think it is necessary to remove evidence from the scene.

Contacts

Designate someone to provide the following:

Family liaison – The purpose of the family liaison is to maintain open lines of communication between the agency and the family. The liaison will provide the family support, assistance, and information during the crisis situation.

Public Affairs Officer (PAO) – If there is significant media interest; contact the agency PAO for assistance.

GLOSSARY

Section IV

Agency Administrator (AA)

Managing officer of an agency, division thereof, or jurisdiction having statutory responsibility for incident mitigation and management. Examples: NPS Park Superintendent, BIA Agency Superintendent, USFS Forest Supervisor, BLM District Manager, FWS Refuge Manager, State Forest Officer, Fire Chief, Police Chief. *See also:* Line Officer.

Casual Employee or Hire

A person hired and compensated under the Pay Plan for Emergency Workers.

Crisis Communication Coaches

Agency employees who have actual experience dealing with a critical incident and are qualified as incident information officers.

Critical Incident

A fatality or other event that can have serious long-term adverse effects on the agency, its employees and their families, or the community.

Critical Incident Stress Management

An adaptive short-term helping process that focuses solely on an immediate and identifiable problem to enable the individual(s) affected to return to their daily routine(s) more quickly and with a lessened likelihood of experiencing post-traumatic stress disorder.

Defusing

This is an informal session held immediately following the incident, within 24 hours. It is peer support led, and focuses on initial venting of feelings and stress education.

Delegation of Authority

A statement provided to Incident Commander by the agency executive delegating authority and assigning responsibility. The delegation of authority can include objectives, priorities, expectations, constraints and other considerations or guidelines as needed. Many agencies require written delegation of authority to be given to incident commanders prior to their assuming command on larger incidents.

Employee Assistance Program (EAP)

An agency-contracted program that provides employees and their families' access to a variety of counseling and other support services in certain situations.

Family Liaison

The primary contact between the agency and the victim's family.

Incident Command System (ICS)

A standardized on-scene emergency management concept specifically designed to allow its user(s) to adopt an integrated organizational structure equal to the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries.

Incident Management Team (IMT)

The incident commander, and appropriate general and command staff, assigned to an incident.

Line Officer

Managing officer, or designee, of the agency, division thereof, or jurisdiction having statutory responsibility for incident mitigation and management. *See also:* Agency Administrator.

Office of Workers' Compensation Programs (OWCP)

The Federal office, under the Department of Labor, charged with administering the Federal Employees' Compensation Act, which authorizes medical care and compensation for periods of disability for Federal employees who sustain traumatic injuries and occupational diseases in the performance of duty.

Peer Support

Employees or individuals trained in peer counseling CISM process, including CISD and defusing.

Tort

The Agency Federal Tort Claims Act is the avenue a private individual has to file a claim against an employee of the Federal government or the Federal government in general.

ACRONYMS Section V

| | |
|------|---|
| AD | Administratively Determined |
| AAR | After Action Review |
| BIA | Bureau of Indian Affairs |
| BLM | Bureau of Land Management |
| BPA | Blanket Purchase Agreement |
| CISM | Critical Incident Stress Management |
| DOI | Department of the Interior |
| EAP | Employee Assistance Program |
| EFF | Emergency Firefighter |
| FAA | Federal Aviation Administration |
| FEMA | Federal Emergency Management Agency |
| FOIA | Freedom of Information Act |
| FS | U.S.D.A. Forest Service |
| FWS | U.S. Fish and Wildlife Service |
| HRSP | Human Resource Specialist |
| ICS | Incident Command System |
| IMT | Incident Management Team |
| MOA | Memorandum of Agreement |
| MOU | Memorandum of Understanding |
| NFFF | National Fallen Firefighters Foundation |
| NPS | National Park Service |
| OSHA | Occupational Safety and Health Administration |
| PIO | Public Information Officer |
| OWCP | Office of Workers' Compensation Programs |
| PO | Post Office |
| SSA | Social Security Administration |
| USDA | United States Department of Agriculture |
| USDI | United States Department of the Interior |
| WFFF | Wildland Firefighter Foundation |

SOURCES OF ADDITIONAL INFORMATION

Section VI

This is a partial list of information and/or sites that may be helpful in your respective situation. You are encouraged to become familiar with these sites, obtain these documents, and any others as needed.

- Interagency Incident Business Management Handbook and Supplements (www.nwcg.gov/pms/pubs/pubs.htm)
- BLM Employee Casualty Guide for Managers and Supervisors (www.blm.gov/nhp/efoia/nhrmc/2000/IB/HRIB2000-108.pdf)
- Local Unit Emergency Operating Plans Wildland Firefighter Foundation (Family Liaison and LODD Tool Kit) (www.wffoundation.org)
- National Fallen Firefighters Foundation (Handling LODD) (www.firehero.org/)
- Department of Justice (Public Safety Officer Benefits Program) (www.ojp.usdoj.gov/BJA/grant/psob/psob_main.html)
- Geographic Area Coordination Centers (www.nifc.gov/nicc/)
- U.S. Fire Administration (www.usfa.dhs.gov)
- International Critical Incident Stress Foundation (www.icisf.org/)
- Interagency Standards for Fire and Fire Aviation Operations (Red Book) (www.nifc.gov/policies/red_book.htm)
- Accident Investigation Resources (www.nifc.gov/safety/accident_resources.htm)
- NWCG Safety and Health Working Team (www.nwcg.gov/team/shwt/index2.htm)