

EMERGENCY RESPONSE PLAN BEST PRACTICES

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Introduction

The purpose of this document is to help USAIG policyholders maximize their readiness to respond in the event of an aircraft mishap or other emergency. The insights compiled herein are drawn from our Claims Representatives' decades of experience assisting operators through the aftermath of aircraft accidents. Additionally, reviewing hundreds of Emergency Response Plans (ERPs) and participating in ERP exercises with our policyholders has exposed us to a wide range of ideas and approaches for meeting emergency response challenges. We've had the opportunity to see best practices in action firsthand, and also note areas where organizational planning sometimes overlooks important considerations. Emergency Response Planning deals with issues many of us would rather not think about, and it's important not to let that be a barrier to being fully prepared. ERPs are sometimes referred to as something "we hope to never need," but most organizations find that systemically reviewing and optimizing their ERP yields practical day-to-day benefits beyond just preparing for a contingency. An effective emergency response requires smooth cross-functioning between various people and departments in an organization. An ERP review helps to make sure emergency roles are distributed logically and keeps the plan synchronized with organizational and societal changes. Exercising an ERP tends to clarify employee expectations, build new synergies, improve efficiency, and keep related company policies aligned. Most importantly, our experience leads us to conclude there is a strong linkage between organizational safety culture and emergency response preparedness. It may seem counterintuitive—at least until you stop and think about it—but operators with the most complete and well thought out ERPs tend to be the least likely to need to use them. We don't believe that's a coincidence.

We hope this information proves helpful to ERP development or refinement efforts, and we stand ready to assist our policyholders with their emergency response planning. Additionally, we welcome and value feedback and suggestions regarding this resource. Please email us at safety@usaig.com with questions or comments.

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1. Processing Initial Notification

The ERP must account for the fact that an emergency call can come at any time, to any place in the organization. The goal is to minimize the potential for an emergency call to be mishandled, or for the internal response to be delayed. General best-practice is to identify the preferred node in the organization to receive and process emergency information in a systemic way, and take steps to make it the most likely place to receive such a call by listing that phone number prominently in public directories, on flight plans, etc. Mechanisms should be in place to steer notification that comes in elsewhere to the preferred processing point. For instance, if a dispatch desk is identified as the best place to process emergency information, people in other work centers could be instructed (and phones in their areas outfitted with simple instructions) to forward any emergency calls to the dispatch desk. Planning must also account for events outside of normal working hours and minimize the chance for a person who is not familiar with the organization to have difficulty reporting an emergency at any hour. A job aid or other means with ample note-taking space should be available to guide any person taking down emergency information through a systemic process, presenting relevant questions to ask the caller in a logical order. Some operators find it beneficial to have several versions of an emergency data form for different potential types of emergencies they could face (e.g., aircraft incident, bomb threat, inflight medical distress, etc.). The initial notification process should incorporate a confirmation aspect to limit vulnerability to hoaxes, but it should be balanced with the organization's needs and not unduly delay passing emergency reports upward to relevant decision makers. Finally, it is recommended that guidance on what to do next (or a prioritized list of who to call) be closely incorporated with, or placed directly on, the emergency data form. The person taking the information down may have never imagined themselves in that role, or may be emotionally distressed by the information. Make the process as straightforward and clear as possible, with minimal need for independent decisions or cross referencing other company directories and systems to successfully take in emergency information and deliver it to the next step in the process.

- A. Is/are the preferred node(s) to process emergency information in the organization identified?
- B. Are all places likely to receive an emergency call (e.g. central public number listed for company that appears in phone directory search, number listed on flight plan, etc.) set up to either process such info or steer an emergency call to a processing point efficiently?
- C. Are adequate provisions in place for reliable notification 24/7/365?
- D. Is there a suitable job aid or data form for capturing relevant information and guiding what an initial report taker must do next?
- E. Is the process set up to capture all relevant information in a logical, prioritized manner (most important first—in case disconnected) and get a callback number early in the transaction?
- F. Is there sufficient room provided on the form(s) to jot down info in an organized fashion?
- G. Is the process for taking down emergency information easily accessed, clear and sufficiently detailed that an employee unfamiliar with the process, if pressed into the role, could likely follow it to successful completion?
- H. Is there a process for secondary validation of emergency information that does not unduly delay further action?
- I. Does the plan indicate how people are trained on what to do if they receive an emergency call, and how they are kept aware of their responsibilities?
- J. Does the plan discuss initial notification drills & validation, including the frequency for such drills?

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2. ERP activation

The decision to activate the ERP will trigger a series of steps that shift the organization from normal operations posture to emergency response footing. This decision has considerable impact because it will substantially disrupt normal activities and may evoke a range of emotions and curiosity across the workforce. The plan should specify who has the authority to activate the ERP and account for sufficient alternate decision makers in case the primary person is unavailable. Depending on the nature of the operation, plans may incorporate the option to activate a partial (or limited) response for situations that do not merit a full-scale response. Once a decision to activate the ERP is made, a method to efficiently pass information internally is needed to alert and stand up the Emergency Response Team (ERT). It's generally best to work in parallel rather than series: instead of having six people called and individually apprised as to what's going on, develop ways to efficiently gather all (in person or virtually using a conference line) and brief the situation once. Most organizations identify a preferred location for an Emergency Operations Center (EOC) at which the ERT will convene. It's also sensible to identify a process to initially alert and direct ERT members onto a conference call for an initial awareness briefing and, potentially, to sustain connectivity as they make their way to the EOC. The plan should specify the assigned people and roles for the ERT and incorporate alternates for situations when primary members are not available.

- A. Does plan specify who has authority to activate ERP and are sufficient alternates specified?
- B. Does the plan delegate authority for activating the plan to a level that allows for timely response?
“A false start is better than a late start.”
- C. Is an Emergency Response Team (ERT) defined & suitably staffed? (Block diagram is encouraged.)
- D. Is an efficient, dependable process in place to rapidly alert ERT members and form them into a team?
 - Process to be used (phone, email, text emergency call system activation etc.)
 - Message to be relayed in the activation. Options include;
 - just notification that the ERP has been activated and preset instructions should be followed.
 - alternatively, may contain factual information and scenario-specific instructions.
 - Action to be taken upon receipt of ERP activation (dialing into a pre-set conference call, meeting in a specific location, joining a video conference, etc.)
- E. Have suitable logistics been pre-considered for EOC resources and location to convene ERT?
- F. Does ERP discuss how are ERT members are trained / kept aware of their responsibilities?
- G. Does plan discuss how/frequency for ERT activation drills and validation?

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3. Initial Actions

While many response actions are managed through checklists or the deliberate direction of the ERT, it is prudent to set up a number of initial actions to begin automatically when the ERP is activated. Issues worth considering for this are steps that impact the preservation of life and property and help control access to manifest information about a mishap flight. Either or both may need rapid action, potentially in less time than it takes to brief and stand up the ERT. The organization will want to confirm everything possible is being done to protect or rescue its people and property, and is also ethically bound to help limit risk to first responders and others. Establishing communications with the primary on-scene response agency and passing an accurate count of persons aboard, plus information about any unique cargo or aircraft hazards, are urgent concerns. Word that there's been an incident will propagate quickly, and people will be fiercely curious to know who was involved. If the organization loses the ability to properly manage the release of that information, the emergency response will be destabilized. If there are on-demand means employees or others can use to see trip schedules and manifests (e.g., a call-in recording, computer/web access, or even a white board in a widely accessible location) someone must be assigned to take quick action to embargo them from spurious, prying eyes. Other concerns that may merit automatic actions are initiating a temporary ground stop for all company operations and enacting extra security measures at base(s) of operations and other locations. The key benefit of having automatically-triggered actions in the ERP is that one decision (to activate the ERP) puts in motion a pre-arranged set of important initial steps that are performed autonomously by people who are empowered by the ERP, saving time and freeing response leaders to focus on unique aspects of the situation.

- A. Is primacy placed on confirming sufficient and best available lifesaving & protective actions are being taken at the scene?
- B. Are there steps assigned to rapidly share key information to assist and minimize risk to first responders? (e.g., # souls on board*, HAZMATs/weapons carried, any special aircraft hazards)
- C. Is there systemic consideration whether an open / persistent hazard that could threaten others is implied (e.g., fluid contamination, common maintenance issue affecting other aircraft, organized sabotage)? Such a situation could compel an early awareness report to be made to stakeholders outside the operator's organization, such as law enforcement, FAA, fueling vendor, etc.
- D. Are time-critical initial actions suitably distributed and configured so they will occur without unduly demanding extra time or intervention from key decision makers?

* Confirming number of souls on board rapidly is vital to responder safety—responders will typically press search and rescue—often risking own safety & expending resources—until they are sure all persons are accounted for.

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4. Manifest and Emergency Contact Info

A 100% confirmed-accurate manifest of all crew and passengers aboard a mishap aircraft, along with the emergency contact directive for each of those persons, are vital needs of the ERT leader. Gathering, validating (to the extent possible) and delivering this information to the ERT should be priority steps in the early stage of the response. When confirming the manifest, it's important to procedurally check for any updates if there is any chance crews may have messaged in to report picking up extra or deleting non-showing passengers at departure or intermediate stops. In the ideal case, very soon after the ERP is activated the ERT leader knows with certainty who was on board the mishap aircraft, who specifically each of those persons has directed be notified in case of an emergency, and current contact information for those emergency contacts. Armed with this, the ERT leader can confidently engage next steps. Without it, moving forward is difficult and fraught with risk of missteps. Meeting the ideal case is substantially aided if there are highly reliable routines in place for day-to-day management of manifests and emergency contact information. On the other hand, if up-to-date crew emergency contact directives are not kept on file, or if emergency contact information is not confirmed to be on file or collected from passengers before flights, or if policies are not in place and consistently followed to ensure any manifest changes are relayed to a responsible party on the ground before every flight leg, there will be uncertainty regarding who might be involved in the incident. In that case, considerable detective work may be needed, despite the pressure of the moment, before the ERT leader can proceed.

- A. Does the plan prioritize generating a 100% verified manifest?
- B. Is manifest control established? (given to appropriate parties, protected from unauthorized release)
- C. Does the plan state how a specific emergency contact/phone number will be identified for each person on manifest?
- D. Is a process in place for regular collection, updating and validation of emergency contact information for flight crews?
- E. Is a process in place to collect emergency contact directives from passengers (e.g., on file similar to crews for recurring passengers) and reliably collected pre-flight for other passengers to the best extent practical.

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5. Records Handling

A chain of custody must be quickly established over all relevant records pertaining to the mishap crew, aircraft, and planned operation. The employment and training records of the crew, the maintenance and servicing records for the aircraft, and the flight plan and dispatch paperwork for the mishap trip are examples of original documentation that should be placed under locked control without any alteration. If computer-based records are used, steps should be triggered to secure external access to relevant files and archive them in a secure and unaltered state. The ERP should specify who is to collect documents (often several people since the items may be controlled by different departments), where they will be centrally collected into locked storage, and who will assume custody and retain access. It is recommended that working copies be made before originals are signed-for and locked down by the assigned custodian. If records access is provided to anyone upon request (e.g., mishap investigators or regulatory agencies) it is recommended that access be controlled by a legal department or one preassigned person. If off property transport of records is requested it is recommended that the operator allow copies to be made by the requester, or offer to provide certified copies made in their presence, so that originals can be retained in locked storage by the operator. Whether copies or originals are provided, a signed receipt noting the titles of all documents provided, releaser, recipient, and date of receipt should be retained for any records released.

- A. Does plan identify specifically what company records will be locked down and who will gather them?
- B. Are a specific collection point and custodian (by name or position) assigned to establish a chain of custody for records?
- C. Are provisions in place to secure / control access to relevant electronically stored records?
- D. Does the plan encourage retaining original records if possible and engaging legal assistance if needed?
- E. Does the plan incorporate logging all documents released, with a signed receipt from recipients?

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6. Working with the NTSB and Other Governmental Authorities

The requirement to notify the NTSB of aircraft accidents and serious incidents is outlined in 49 CFR Part 830.5 – 830.6. A template drawn from this cite can be made to organize the information needed in an initial NTSB report. This can simplify the ERT leader's workload because once the completed form is reviewed and approved, the notification call can be delegated. If sufficient resources exist to supply a Party Representative, it's generally in an operator's best interest to request party status to an NTSB investigation of an accident in which it was involved. This can afford the operator a voice in the investigation. The NTSB accepts parties that can "lend technical expertise" to an investigation. The operator should express willingness and ability to do that, citing its firsthand familiarity with the aircraft, practices, maintenance, equipment and personnel involved. Selecting the operator's Party Representative is an important consideration. This person needs a blend of personal technical expertise, sufficient seniority to reach across the organization for additional information as needed, and the maturity and trust to speak for the organization. It's important to understand that the Party Representative effectively works for the investigation while it is ongoing and, depending on the complexity of the investigation, the organization may be without his or her services for a substantial period. The NTSB does not generally accept substitutions in the role of Party Representative once one is designated. For these reasons, it is best to pre-consider and list several candidates in the ERP so the process is simplified to matching the best fit for the situation among the pre-identified candidates. It is recommended that the operator have a policy (codified in the ERP and elsewhere as appropriate in company directives) that any employee called for an interview pursuant to a company-related investigation shall exercise the right to have company/legal representation present during the interview. This removes any implication an employee is hedging if they postpone an interview pending representation, because they can state truthfully that they are bound by company policy to have a representative present while being interviewed. The reference links supplied below access helpful information regarding the NTSB's Party process.

- A. Does ERP account for 49 CFR Part 830 requirements to notify NTSB?
- B. Is NTSB notification assigned with logical priority to an appropriate person?
 - This should be done timely, but not override immediate/critical actions.
- C. Does plan state operator's intent to request party status to an NTSB investigation?
 - If so, do resources appear to be sufficient and are several logical candidates identified?
- D. Does plan call for company/legal representation to be present at any interviews of flight crew or other employees by any governmental agency?

References:

https://www.nts.gov/legal/Documents/NTSB_Investigation_Party_Form.pdf

http://www.wilsonelser.com/writable/files/Legal_Analysis/anatomy_of_an_ntsb_accident_investigation_tobin_tochen_april_2013.pdf

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7. Stakeholder Communication

Many of the tasks in an ERP boil down to informing various stakeholders, in an appropriately professional and timely manner, about what has occurred and what the company is doing in response. While it is impossible for an ERP to consider the unique contexts of every emergency, there are some common stakeholder communication issues that merit consideration in most ERPs. Once communications to optimize safety of life and notify authorities are done, it is sensible to ensure early contact is made with the stakeholders that enhance or expand resources to deal with the situation, such as the insurer, family support, security, legal, public relations, human resources, senior executives, information technology managers, and other services providers that may be pre-identified in the ERP. In most cases, it makes sense for an operator other than a scheduled carrier to procedurally stand down (or cease) all flight operations temporarily if a major accident occurs—until such time that management can realistically assess the impacts, both human and material, to the further safety of its aviation capability. Having a stand-down directed in the ERP is freeing for company decision makers, because it relieves them of grappling with the decision to stand-down (or not) at an emotionally charged time after an accident. It also pre-alerts people throughout the organization's hierarchy to expect this, so the potential for it to come as a surprise or be misinterpreted as implying blame or a loss of trust are minimized. Efficiently enacting a stand-down typically requires steps to contact all away crews and instruct them to remain in place, and to expeditiously recall any airborne aircraft still in range of returning to base. It's best to avoid notifying airborne company crews specifically about the accident while in flight, and instead make provisions to reach those crews upon next landing and advise them to hold in place while the necessary logistics are arranged to recover passengers and crews by means other than native flight operations. The plan should specify who has the authority to grant case-by-case waivers to fly during the stand-down, and who will be the decision authority for how and when to resume operations.

- A. Does the plan logically prioritize informing aviation insurer and broker of situation with primary/back-up contact info?
- B. Does the plan state intent regarding stand-down of all operations in response to a significant mishap?
- C. Are informing/updating company employees who are not involved in mishap or on the ERT in a timely and appropriate manner considered?
- D. Is a logical process defined for notifying non-involved flight crews who are in flight or operating away from company bases?
- E. If contemplated, is contacting an emergency response support contractor logically prioritized with current contact info?
- F. Are corporate notifications outside the flight department (company executive, owner of managed aircraft, etc.) logically prioritized with current contact info?

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8. Emergency Contact (EC) Notification

The designated EC is often a close relative or acquaintance, although in the case of prominent public or business figures, the operator's proper course may be to notify a designated business manager or publicist, who will coordinate all further notifications for their associate. Notifying designated ECs of an accident and confirming the status of their involved relatives (or associates) is a difficult yet vital task that should begin as soon as it is reasonably certain that an aircraft has been involved in a mishap. Governing expectations are that the company will be compassionate and swift, and will share everything it knows openly with ECs without guessing or spinning the information. Actions will speak at least as loudly as words. If an EC learns of the situation through the grapevine before the company contacts them; or finds out the company delayed, withheld, or speculated on relevant information, the EC's worry and anguish will be intensified. Owing to charged emotions, a failure to meet those basic expectations can trigger in the EC a sense, true or not, that the company lacked compassion, was paralyzed by the situation, or displayed inept leadership during their time of need. The best case is that a mature and compassionate notifier, speaking on behalf of the company, establishes contact in as near real-time as possible and is the first to advise an EC of the accident, even if only scant details are known. The same company notifier continues to provide updates as facts emerge, and ultimately is the first to notify the EC of their relative's (or associate's) confirmed status and location once it is known with certainty. In today's connected world, planning for telephonic notification is a necessity. Having a roster of notifiers in the ERP who have been pre-briefed on company expectations for this task is also advised, because there will not be time to construct this capability ad hoc. Information passed should be limited to reasonably assured facts that are cleared for release to ECs by the ERT leader. The confirmed status of their relative (or associate) reported to ECs should be based only on reports directly attributed to a health care or governmental official (e.g., police, coroner, hospital). In cases where notification of a fatality must be made, it is best if the notifier is not a personal acquaintance of the EC or someone the EC will interact with later. Research indicates that the notifier can become psychologically associated with the distressing news in the EC's mind, which can affect the relationship long term. This implies it is unwise for a company principle or other person, who will later lend condolence and support, to perform fatality notification. It is best if a notifier in such a case can, once the difficult news is delivered, transition further care of the EC to designated family assistance representatives and fade from continuing interaction. The ERP should outline what process will be used to assign notifiers to ECs and how authorization regarding what specific information and when to pass it will flow from the ERT leader to notifiers.

- A. Does plan specify who is authorized to approve the content and timing of notifications to ECs?
- B. Does plan designate who will communicate with ECs for notification?
- C. Does plan avoid the use of the term "next of kin"? ("Emergency Contact" is preferable.)
- D. Does plan call for establishing contact and initial awareness for ECs as soon as reasonable?
 - Does plan incorporate providing a call-back number for ECs?
- E. Does plan call for keeping ECs consistently updated until status is confirmed?
- F. Are appropriate processes defined to notify & transition EC to family assistance if confirmed status is determined to be undergoing medical treatment, and in the case of fatalities?
- G. Does the ERP specify how EC notifiers are trained and kept aware of their role?
 - Notifiers may be internally trained or contracted with 3rd party vendor
- H. Does plan require confirmation of death from an appropriate (e.g., governmental) source before treating that information as repeatable for notification to ECs.

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9. Family Assistance (FA)

Family assistance refers to the range of actions the company will take over time to console and support families impacted by the accident. The specific services will vary per the situation and may continue long past emergent measures, but there are several considerations that should be addressed in the ERP. Once emergency contacts are notified of the confirmed status of their relative (or associate) the families of persons injured or killed in the accident should ideally be connected with family assistance representatives who are empowered to help with the myriad of confronting needs. The organization may need to accomplish this transition within hours after a mishap, so the ERP should address basic elements. Insurance coverage typically contains provisions for FA expenses and the ERP should account for and integrate that support, along with additional internal resources, to lay out an initial approach to FA expenditures. This empowers appropriate company representatives to deliver services seamlessly in the early aftermath of an accident without delays or the implication of “red tape.” The ERP should specify who is designated to oversee provision of family assistance services and identify where families will call to coordinate their needs. Contract providers are available for a wide range of family assistance services ranging from grief counselling to transport and disposition of remains and personal effects. The best ERPs list contact information for retained or pre-vetted sources of contract services it would consider activating. The need for family members to travel to the vicinity of the accident can be anticipated, so it makes sense for the ERP to set out, at least in general terms, who (by relation or number of persons per mishap aircraft occupant) will be provided company-funded travel and what modes (e.g., charter, commercial air) the company would use. What the company will provide regarding ground transportation and hotel accommodations are also logical considerations to address in the ERP. It is recommended that supported families not be booked into the same hotel used by the accident investigators. It may also be respectful to use separate accommodations and meeting times for families of survivors and those of persons killed, as their emotional states will differ greatly. It may prove advisable to set up a temporary FA center at the company (if family members will gather there), at a hotel near the accident site, or in some cases both. The best ERPs lay advance groundwork regarding who would be tasked to support FA center(s) and what company facilities could best serve this purpose if needed.

- A. Does the plan specifically identify the FA leader and other appropriate FA representatives?
- B. Does the plan provide supported families a central contact that will help them obtain needed services?
- C. Does the plan convey that the extent of FA resources available through insurance coverage is understood and applied to FA services it will make available?
- D. Does the plan sufficiently anticipate the need for family members to travel to the vicinity of an accident and outline travel modes it plans to use?
- E. Are provisions considered for setting up a family assistance center?
- F. Does the plan consider keeping family members’ accommodations separate from mishap investigators, and further consider separation, to the extent practical, between families of the deceased and families of the injured?

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10. Public Affairs

Any organization would prefer to deal with an accident privately and focus all effort internally, but aviation mishaps tend to deny that option by rapidly gaining significant public and media attention. The pressure is intensified if the accident involves prominent public figures, injures people on the ground, or generates secondary public impacts like halting airport operations or disrupting normal routines or services for many people. The company must expect and plan to interact with the media and public in the ERP. Such interaction's effect on brand reputation is a key concern, but it's equally important to remember that all employees, including the extended families of persons directly affected by the accident, will see public reports about the accident. News stories are often interpreted to signal the degree to which the company is in control, and the extent to which integrity is governing its response. The ERP should specifically identify who has the authority to approve public statements for release and list authorized spokespeople. It should trigger a reminder to all other employees to follow company policy regarding media interaction or to politely refrain from public statements, refer media calls to a specified location, and avoid social media commentary on the accident. Regardless of whether the intent is to proactively make a public statement or take a response-to-inquiry approach, the company is simply unprepared for any public interaction until an approved statement is readied. The goal should be to minimize time spent in that unprepared posture. The ERP should outline a process to quickly generate a basic public statement that acknowledges an accident and have the appropriate internal channels approve it for release. Having a draft statement template that is familiar to all who may need to use and approve it standing by in the ERP is highly recommended. It is also suggested that the ERP contain explicit guidance to avoid statements that imply causation, blame or present details not yet supported by investigation in any public statements made before the NTSB party process stands up. Unintended messaging through company web and social media profiles is an additional concern. Such layouts often convey a "best of times" tenor that may be inappropriate under the circumstances, and it may be prudent to have an efficient means to simply take them offline until there is time to systemically check for any issues of concern before resuming live status. Finally, the ERP should indicate the company's plan for communicating internally with its own employees about the accident, including any guidance on timing and methods it plans to use.

- A. Does the plan specify who is authorized to approve the content and timing of press releases or company statements?
- B. Does the plan reinforce existing internal guidelines directing only certain individuals to have contact with media?
- C. Is guidance provided to all personnel on how to handle / specifically where to direct media inquiries?
- D. Does the plan illustrate a process that will enable an acknowledgement / just-the-facts statement to be authorized and ready rapidly, thus avoiding a "no comment" response to media inquiry?
 - If a pre-scripted template (recommended) is used, is there evidence it has been approved or pre-socialized with the person / department that must ultimately approve it for release?
- E. Does plan consider temporary controls on info accessible via IT-networks for public / employees?
- F. Does the plan contain guidance regarding social media posts?
- G. Does the plan provide direction regarding notification of and communication with internal employees?

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11. Company Representative(s) at an Accident Scene

Inflight emergency procedures bring order to chaotic circumstances by focusing effort and delivering the needed steps in clear and prioritized fashion. Crewmembers from a mishap aircraft who are able-bodied at an accident scene will benefit greatly from having similarly clear priorities outlined to help calm their minds and logically guide them through what to do next. Priority is usually placed on directing actions to account for and safeguard involved persons and ensuring needed response agencies have been alerted. Making a direct report to a company supervisor is clearly a high priority, as is establishing contact with the on-scene response leader. Other potential topics to consider are documenting the situation through notes and photos, and making lists of agencies that are on scene and names of witnesses or other persons involved. Guidance should also reiterate company policies regarding statements to authorities and the media. Whatever guidance the company provides, it should be concise and readily accessible; kept on the crewmember's person if possible. Some operators place emergency response steps on smartphones or print them as cards for wallets or affixing to ID card lanyards. Many ERPs discuss a company 'go-team' traveling to the mishap site, but it's worth examining whether that's feasible with available resources. Are there people with relevant experience and seniority, beyond those needed for critical ERT functions at the home EOC, to dispatch to the scene? Anyone sent may be out of touch and unable to assist while in transit, potentially during vital early hours of a response. When they get to the area, there may initially be little they can accomplish in person that could not be accomplished remotely. The notion of the operator's personnel walking and sifting through a crash site is somewhat unrealistic. Safety and accident scene integrity protocols may preclude operator personnel from gaining access to the site until after primary investigators have concluded their work. If the operator becomes a party to the investigation (see Section 6 on page 8 above) its Party Representative may have on-site roles. Additionally, having company family assistance specialists near the scene may ultimately become prudent if families are traveling there. Planning to dispatch a go team quickly may be sensible if resources permit, but if not, it may be more appropriate to focus on staffing and executing ERT functions as competently as possible, and methodically assign people with specifically-needed competencies to travel as needs arise. In sum, rapidly dispatching a team of company personnel to an accident scene is not a hard and fast ERP requirement. Any plan for how (or whether) to do it must be realistic in light of the operator's resources. If the operator plans to deploy a go-team, the ERP should indicate who is on call for specific team roles, cache needed equipment in a ready-to-go state, and provide a list of functional expectations to guide the team's initial actions when it reaches the area.

- A. Does plan include a concise checklist / guidance for able-bodied crew at incident site?
 - Is it deployed in a way to be readily accessible to crewmembers?
- B. Does the intent to send (or not send) a go team appear reasonable considering available resources?
 - Should not overly deplete resources to staff and run ERT.
- C. If company go team is planned for:
 - Are relevant roles identified and people on call to fill them?
 - Are functional expectations listed to guide team's initial actions on arrival?
 - Is proper go-team equipment maintained and kept current?

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12. International Considerations

There are differences to be considered when responding to an aircraft mishap outside of the United States. Rule of law, social customs, security and time zone differences all present additional concerns. Language differences can challenge even basic communications. At planned destinations, people intending to meet the aircraft or passengers who speak the local language may be helpful resources to assist with initial communications. If a mishap occurs at a tech stop where neither passengers or crew speak the local language, and there isn't a party with a vested interest in the aircraft or its occupants meeting the aircraft, the challenge is greater. Rule of law differs around the world, in some cases significantly from the US. Outside the US, UK and Canada, legal norms may comparatively increase the possibility of criminal charges and detainment of the crew and passengers. It may be necessary to quickly retain the services of local counsel. It is recommended that sources of legal representation for frequently-visited international destinations be pre-vetted and preferred sources and contact information be listed in the ERP. In-house or retained lawyers, even if they are not experienced in aviation, may be helpful with initial response and their contact information should be listed in the ERP. Insurers maintain contact with a cadre of lawyers and solicitors around the world, so early notification of the insurer can help facilitate timely legal assistance. Security for both personnel and the aircraft may present additional concerns. It is suggested that operators who frequently visit locations known to be crime or security hot spots research and consider affiliating with a professional worldwide security provider, and list such connections in the ERP. In accordance with ICAO, the NTSB often functions as an accredited representative to a foreign nation's mishap investigation, but it does not lead or administer a party system for mishap investigations outside of the US. For this reason, the processes in use and an operator's access to the investigation may differ significantly from what can be expected in the US. Local social norms may compel modifying reaction or public statements in response to a mishap as well, especially if the local reaction tends toward anger or territorialism more than empathy for the situation. In locations where the operator is unfamiliar or lacks a significant corporate presence to aid in responding, the best initial source of assistance is the US Department of State. The nearest US Embassy or Consular Office should be able to provide advice and local information, help with basic security considerations, and facilitate communication with proper governmental entities.

- A. Does the plan include contact information for the US embassy in countries that are frequent stops? Does the plan reference to the USDOS webpage for quick look up of information; <https://www.usembassy.gov/>
- B. Does the plan include local contact information for company assets in country (if available) for frequent international destinations?
 - Or reference to those that have this information.
- C. If the operator has considerable exposure to international operations, does the ERP contain information and contact information for pre-vetted security firms with appropriate reach?
 - Such as Securitas or G4S.
- D. Does the ERP emphasize early contact with the insurer to bring early assistance and additional resources to bear?
- E. Are suitable provisions in place to receive and process a mishap call 24/7 and account for coverage of international operations that may be taking place in distance time zones?

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13. ERP Layout

The ERP codifies company intent and governs its overall approach to emergency response as a connected element of broader company policy. A key benefit to developing an ERP is making the appropriate doctrinal decisions while not under the duress of an emergency. That said, when an emergency strikes ERT members and others supporting the response won't have time or urge to delve into the theory and doctrinal aspects of the plan. What they'll need most urgently are concise 'what-do-I-do-next' guiding tools—usually set up as checklists. It is recommended that the plan be arranged with things the operator expects to be needed first placed up front. Finding the emergency notification data form as the very first thing seen on opening the ERP; followed by concise guidance on who to alert; flowing next into checklists that guide vital initial actions, is more sensible than needing to page into the appendices of a sizeable document looking for these items. The doctrinal portions of the plan and record of revisions are best suited for placement toward the rear of the layout, available when needed for reference but not distracting attention from what's likely to be needed first in a pressure situation. Each ERT position should have a checklist of items to perform, and there may be additional checklists set up, either for specific functions within the organization or readily assignable by the ERT to whoever is best positioned for the tasks at the time. As checklists are developed, items should be prioritized logically, worded in a manner that is sufficiently detailed yet clear enough for anyone who might need to fill the role, and set up with ample space to collect notes, phone numbers, time-of-completion, and the host of things responders may need to jot down. The distribution of tasks should be carefully considered to avoid overloading any member, which could impede the response. The best ERPs are designed to rapidly get initial tasks flowing in parallel fashion—multiple people accomplishing different things simultaneously—and avoid overloading the ERT leader, whose capacity to gain and manage the big picture will be compromised if assigned an unrealistic volume of tasks to manage.

- A. Are “need first” items (e.g. notification forms, etc.) at the front of plan?
- B. Are doctrinal/theory portions of the plan that apply to all involved stakeholders reasonably placed toward the rear of the layout to be readily accessible, but not distract a user from locating more time-critical elements?
- C. Does the plan contain contact information that is complete and up to date?
- D. Does plan address the full relevant scope of incidents the operation may face (aircraft mishap, bomb threat, kidnapping or hijack, passenger / crew medical emergency, etc.)
- E. Are “missing aircraft” contingency actions specified in the plan to avoid “uncertainty-paralysis”?
- F. Are tasks organized into checklists and grouped logically for assignment to stakeholders?
- G. Are needed task explanations and contact info efficiently integrated on ERP checklists?
- H. Do forms and checklists have adequate space for noting status of the actions and taking notes?
- I. Are tasks assigned with sufficient depth of personnel to avoid loss of function from overtasked members?
- J. Is configuration management established on the ERP so all will reliably use only the current version if needed?

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14. Abbreviations

EC – Emergency Contact

ERP – Emergency Response Plan

ERT – Emergency Response Team

FA – Family Assistance

FAA – Federal Aviation Administration

ICAO – International Civil Aviation Organization

IT – Information Technology

NTSB - National Transportation Safety Board

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