

Department of the Interior Departmental Manual

Effective Date: 07/27/2011
Series: Aviation Management
Part 352: Aviation Safety
Chapter 2: Aviation Program Evaluations

Originating Office: National Business Center

352 DM 2

2.1 **Purpose.** This Departmental Manual chapter establishes policy and procedures for the oversight, conduct, tracking, and associated management of aviation program evaluations.

2.2 **Authority.** This policy is established in accordance with provisions of Department Manual 112 DM 10 and 352 DM 1, "Aviation Safety Program." The Federal Managers Financial Integrity Act (Public Law 97-255) establishes specific requirements for agency heads to establish management controls safeguarding against waste, fraud, and mismanagement. Office of Management and Budget Circular A-123, "Management Accountability and Control," prescribes appropriate management controls as an integral part of the cycle of planning, budget, management, and auditing. Federal Management Regulation (41 CFR 102-33) "Management of Government Aircraft" establishes Federal aviation management practices including evaluation, review, and reporting on various aspects of aviation programs. The Interagency Committee for Aviation Policy (ICAP) agreement of January 2000 established common aviation safety standards and guidelines that require program evaluations for all ICAP member agencies.

2.3 **Introduction.** Aviation program evaluations are conducted via a systematic process for analyzing and reporting information with regard to the aviation programs at all levels of the Department of the Interior. It is an essential means of providing feedback related to the operations, process, and outcomes of aviation programs with a focus on program enhancement. This quality assurance system assesses the safety of aviation services provided, ensures efficiency in the management of complex resources, and provides a means for sharing best practices.

2.4 **Policy.** Bureau Managers are responsible for aviation program performance and attaining established standards.

A. **Objectives.** Interior's aviation program evaluations will be conducted in each of the bureau's geographic units (Region, State, Area, etc.) that use aviation resources. Evaluations should occur on a 5-year interval and assess processes commensurate with controlling costs, mitigating adverse aspects of aviation operations, and to evaluate outcomes. Followup contacts will occur on 1-year intervals following the evaluation to document program enhancements.

B. Goals. Department-level Aviation Program Evaluation goals are:

(1) Evaluations will be conducted in a manner that is objective and independent of internal bureau inspections, audits, and controls while minimizing the duplication of efforts.

(2) Reliable and timely information will be obtained, maintained, reported, and used for decision making.

(3) Management and program deficiencies are recognized and corrective actions are promptly recommended.

(4) Findings and recommendations are monitored for corrective action and bureaus are encouraged to pursue program enhancements.

(5) Best practices are identified and shared with all aviation programs through the evaluation/oversight process.

2.5 Responsibility.

A. National Business Center (NBC), Aviation Management Directorate (AMD). The NBC AMD Associate Director shall, with bureau participation, establish evaluation criteria for and provide leadership in the conduct of aviation program management and aviation program evaluations within the Department (352 DM 1.6A). It is the responsibility of the Aviation Program Evaluation Specialist to develop and maintain an independent assessment program commensurate with Departmental policies, goals, and objectives.

B. Bureau. Bureau Aviation Managers are responsible for coordination with the Bureau Regional/State/Area Directors and the NBC AMD for the conduct of timely program evaluations, facilitating program enhancements, and followup.

C. Managers. Managers at all levels in NBC AMD and the bureaus have the responsibility for implementing prescribed management controls, participating in and/or supporting evaluations of their program, and for leading efforts toward aviation program enhancement.

2.6 Evaluation Process.

A. Planning. The following procedure will be followed in planning, conducting, reporting, and monitoring phases of the evaluation program system.

(1) The Aviation Program Evaluation Specialist will coordinate with the Bureau Aviation Manager and the NBC AMD Regional Director on team membership and itinerary. Team composition should include the NBC AMD Regional Director and the Bureau National Aviation Manager or their designated representative. The Aviation Program Evaluation

Specialist will maintain the final decision on team composition and/or support services as necessary.

(2) NBC AMD may fund the team's transportation while in the field. The bureau is responsible for coordinating transportation requirements with the Aviation Program Evaluation Specialist. Team members/advisors are responsible for the cost of their transportation from their home office to the site of the management briefing and their return home.

(3) The NBC AMD Associate Director will provide initial correspondence for evaluation coordination/scheduling to the Bureau Regional/State/Area Director in the geographical area where the aviation evaluation is to be conducted. A courtesy copy will also be sent to the Bureau Director.

B. Program Scope and Outcomes. The Aviation Program Evaluation Specialist will collect data representing the last 5 years' accident/incident occurrence, safety communiqué (SAFECOM, www.safecom.gov) participation, aircraft use in hours and dollars, and other data found to be relevant to program performance and outcomes. Copies will be sent to evaluation team members and the Bureau Aviation Manager prior to the evaluation.

(1) The Bureau Aviation Manager is responsible for dissemination of the aviation evaluation criteria to each unit being visited by the team.

(2) The bureau should provide copies of reports from internal evaluations or similar studies for the team to review prior to its field visit. The team may review field unit aviation plans and/or safety plans when available.

C. Conduct. Bureau Regional/State/Area Directors and staff shall be briefed in person, by telephone, or by e-mail prior to and after completion of the field evaluation. The Aviation Program Evaluation Specialist will brief the NBC AMD Associate Director in closing. The team should visit aviation support facilities (helibases, airports, retardant bases, dispatch centers) as time permits, which may include cooperating or interagency facilities. General areas of assessment will include the following:

(1) Administration. Quality controls and outcomes may be assessed in the following categories:

(a) Management and Organization. Evaluate the effectiveness of management practices, internal guidance processes, controls, and organization structure.

(b) Needs Assessment. Assess the efficiency and effectiveness of aviation resources being used or immediately available to a program.

(c) Economic Evaluation. Evaluate the costs and outcomes of program expenditures where possible. This may consider cost comparisons among the available procurement alternatives (in-house, contract, rental, relative to the A-76).

(d) **Customer Satisfaction.** Customers provide feedback about the extent to which the services rendered have met the bureau's expectations.

(2) **Operations.** Assess operations to determine if they are functioning as intended by management. Evaluate procedures used for compliance with FARs and DMs. This may be conducted as a short-term response to safety concerns, as an operational risk assessment, or to review procedural issues of immediate concern.

(3) **Safety.** Analyze bureau accident prevention activities, accident history, and participation in the DOI Aviation Mishap Information System. Identify trends within the program that may precipitate mishaps.

(4) **Training.** Review bureau aviation user training records to determine if employees involved in the use or control of aviation resources are receiving an appropriate level of aviation safety training.

(5) **Security.** Aviation security is considered a key element of each bureau aviation program. In accordance with 352 DM 5, "Aircraft and Aviation Facility Security," aircraft and aviation facility security will be assessed for compliance in accordance with policies and procedures designed to safeguard DOI owned or controlled aircraft against theft and associated misuse by terrorists or individuals engaging in other criminal activity. The *Field Reference Guide for Aviation Security for Airport or other Aviation Facilities* (AAF) will be utilized for compliance (available at the NBC AMD Web site www.nbc.gov/amd).

D. **Findings and Recommendations.** Findings will be accompanied by recommendations for aviation program enhancement with recommended assignments to bureau or NBC AMD offices. The bureau and NBC AMD are responsible for facilitating personnel assignments for corrective actions. Team findings and recommendations will be provided in writing to the Bureau Aviation Manager and the appropriate NBC AMD office manager. The final report will include findings, recommendations, and due response dates. The final report will be developed by the Aviation Program Evaluation Specialist in coordination with the Bureau Aviation Manager and appropriate NBC AMD Regional Director/Division Chief, with recommended assignments, and will be forwarded from the NBC AMD Associate Director to the Bureau/State/Area/Regional Director, as appropriate.

E. **Follow-up Action.** The appropriate bureau and NBC AMD office manager is requested to respond in writing to the NBC AMD Aviation Program Evaluation Specialist, within 60 days of receipt of the final report, describing the proposed plan of action and milestones to address the recommended program enhancements. The Aviation Program Evaluation Specialist will coordinate with the Bureau Aviation Manager to track recommendations and target dates for follow-up in each geographic area evaluation. The Aviation Program Evaluation Specialist will document enhancements resulting from the aviation evaluation process.

2.7 **Recognizing and Reporting Deficiencies.** Commensurate with the requirements of

OMB Circular A-123, the Department is required to report material weaknesses in management controls. The DOI Management Control Program prescribes a system for bureaus to identify and report these weaknesses. The NBC AMD and bureaus will facilitate the reporting of material weaknesses in aviation management practices, commensurate with the direction established in the referenced program.

A. Definitions.

(1) A program deficiency is an issue that may identify any concern related to the safe, effective, and efficient operation of an aviation program such as:

(a) An item that is contrary to the appropriate policy requirements of the Departmental Manual (DM) 350-354 series, Federal Aviation Regulations (FARs), or interagency agreements.

(b) An item that compromises safety, risk management, or accident prevention.

(c) An item that unnecessarily hampers or delays the accomplishment of the assigned mission or causes an unjustified increased cost to the Government.

(d) An item contributing to the waste, fraud, or mismanagement of aviation funds, programs, or resources.

(2) A material weakness is an unresolved program deficiency that:

(a) Is substantially and/or essentially below the standard established by the Department or in the Code of Federal Regulations (CFR).

(b) Has not been corrected within a reasonable amount of time and effort.

(c) Is subsequently designated by the NBC AMD Associate Director as a problem significant enough to report outside the agency.

(d) Requires a judgment by senior management as to the relative risk and significance of the deficiency to the Department. Reporting outside the agency is only recommended after a reasonable period of time has elapsed and all available resources have been exhausted in an effort to correct the deficiency.

B. Reporting Deficiencies. Bureau Managers and employees should identify deficiencies and enhancements as a result of their operational management controls. Safety deficiencies may also be reported to the Aviation Mishap Information System via a SAFECOM (www.nbc.gov/amd). A program deficiency observed during the course of an aviation program evaluation will generally be reported if it is, or should be, of interest to the next level of

management. Less significant and site-specific operational concerns may also be reported for the bureau's internal use, but may not require further reporting or tracking.

2.8 Program Enhancements. Bureau Managers and NBC AMD Regional Directors/Division Chiefs are responsible for taking timely and effective action to implement recommended enhancements. One year from the time of notification is generally considered sufficient time to resolve issues that do not require "out-year" fiscal planning and approval (In comparison, management must make a decision regarding Inspector General (IG) audit recommendations within a 6-month period and implementation of IG recommendations should be completed within 1 year, to the extent practicable). A determination should be made when sufficient corrective actions have been taken and desired results have been achieved. The NBC AMD Aviation Program Evaluation Specialist should be notified when a program enhancement effort comes to closure.