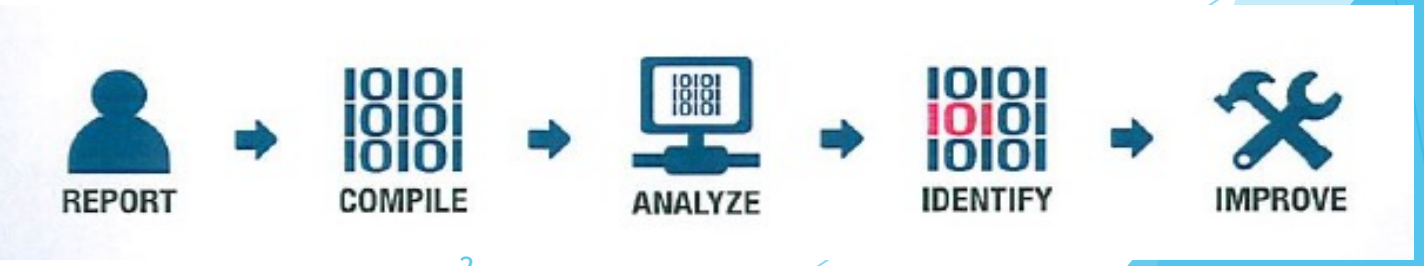
Just Culture and VSRP

Purpose

"A VSRP is an integral part of a *positive, vibrant safety culture* and provides a confidential, non-punitive mechanism for employees to report safety events and problems. VSRPs use *employee input* to *identify* leading indicators and significant safety concerns or issues, operational deficiencies, non-compliance with regulations, deviations from company policies and procedures, and potential safety events. In this way, *VSRPs help improve safety awareness throughout the NAS.*"



Watershed Event – TWA 514

- CFIT, impacted Mt. Weather, VA, killing 92 passengers and crew on December 1, 1974
- Similar incident six weeks earlier not reported to other airlines for fear of enforcement action.

Origin of Voluntary Aviation Safety Reporting Systems

- NASA Aviation Safety Reporting System (ASRS)
  - Established in 1976 in response to TWA 514 crash at IAD.
  - Voluntary Participation
  - Confidentiality Protection through de-identification
  - Non-punitive
- Over 1,522,091 reports submitted through Feb 2018.
- Over 5,200 Safety Alert Messages issued.
- Unless involving an accident, ATSAP reports may be automatically shared with ASRS.

Why Voluntary Reporting Programs Work

- When organizations want to learn more about the occurrence of events, the best approach is simply to ask those involved
- People are generally willing to share their knowledge if they are assured that their identities will remain protected and are assured there will be no reprisal
- There are fewer disciplinary or legal concerns
- A properly constructed *confidential*, *voluntary*, *non-punitive* reporting system can be used to safely share information
- Confidential reporting systems have the means to answer the question *why* - why a system failed, why a human erred
- Incident/event data are complementary to the data gathered by other monitoring systems

ASRS_PrgmBriefing2010.pdf

Characteristics of Positive Safety Culture

"Organizations with a positive safety culture are characterized by communications founded on mutual trust, by shared perceptions of the importance of safety, and by confidence in the efficacy of preventive measures."

Characteristics of Positive Safety Culture

"… a pervasive emphasis on safety that promotes an

- inherently questioning attitude,
- resistance to complacency,
- a commitment to excellence, and the
- fostering of personal accountability and
- corporate self-regulation in safety matters."

Beliefs About Safety

To Err is Human

To Drift is Human

Risk is everywhere

We must manage in support of our values

We are all accountable

Beliefs About Safety

- Our desire to accomplish more (causing us to drop perceptibly less important tasks.)
- Our fading perception of risk as we become increasingly comfortable and competent with the task at hand.
- Reinforced by “successful” repetition
- Reinforced by Culture

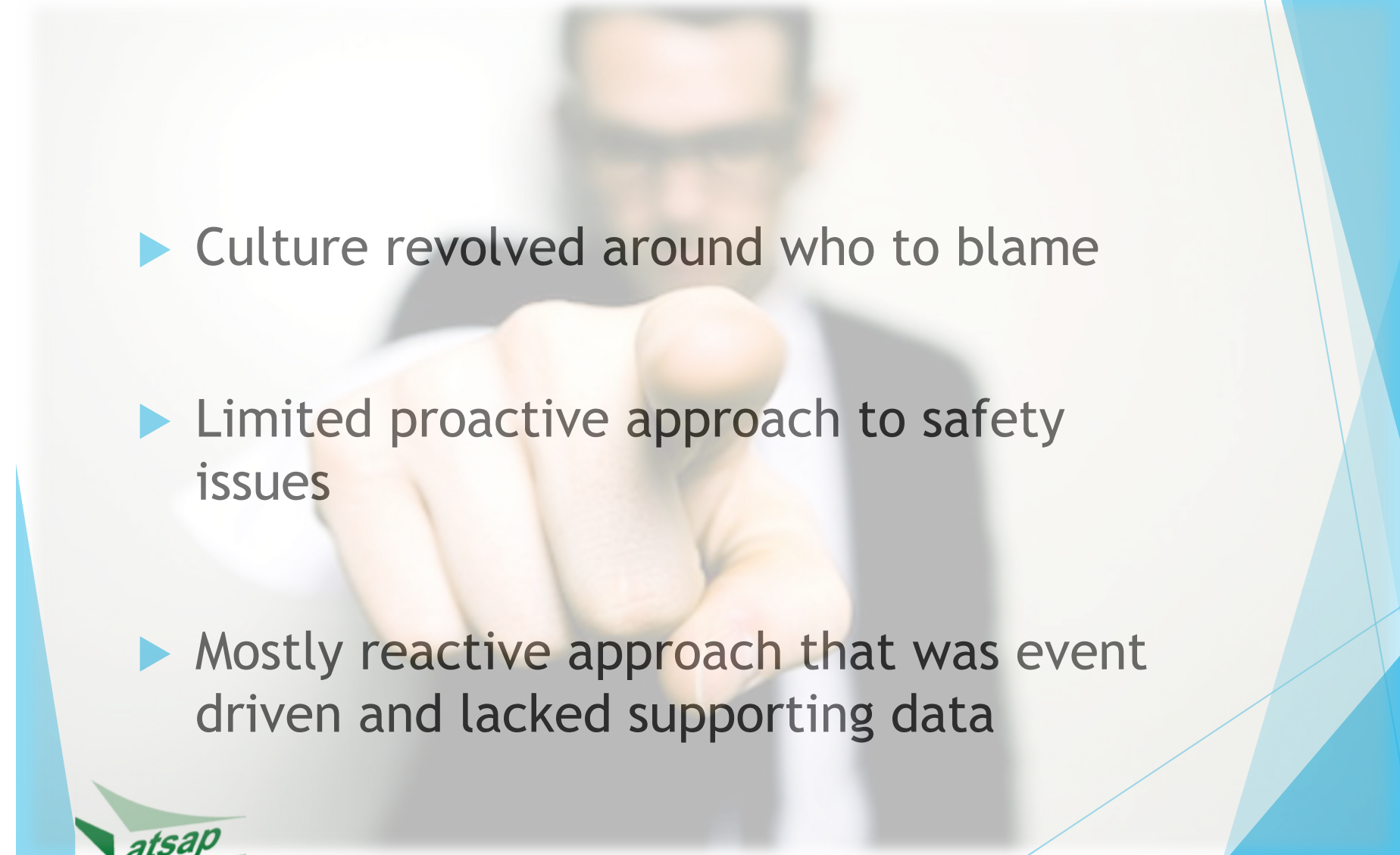
What is ATSAP?

- Air Traffic Safety Action Program (ATSAP) is the non-punitive Voluntary Safety Reporting Program (VSRP) for ATC personnel. It is:
  - Based on Aviation Safety Action Programs (ASAPs) in place at many airlines for use by their pilots, cabin crew, mechanics, and dispatchers
  - Defined in FAA Order 7200.20B and the ATSAP Memorandum of Understanding (MOU)

Goals

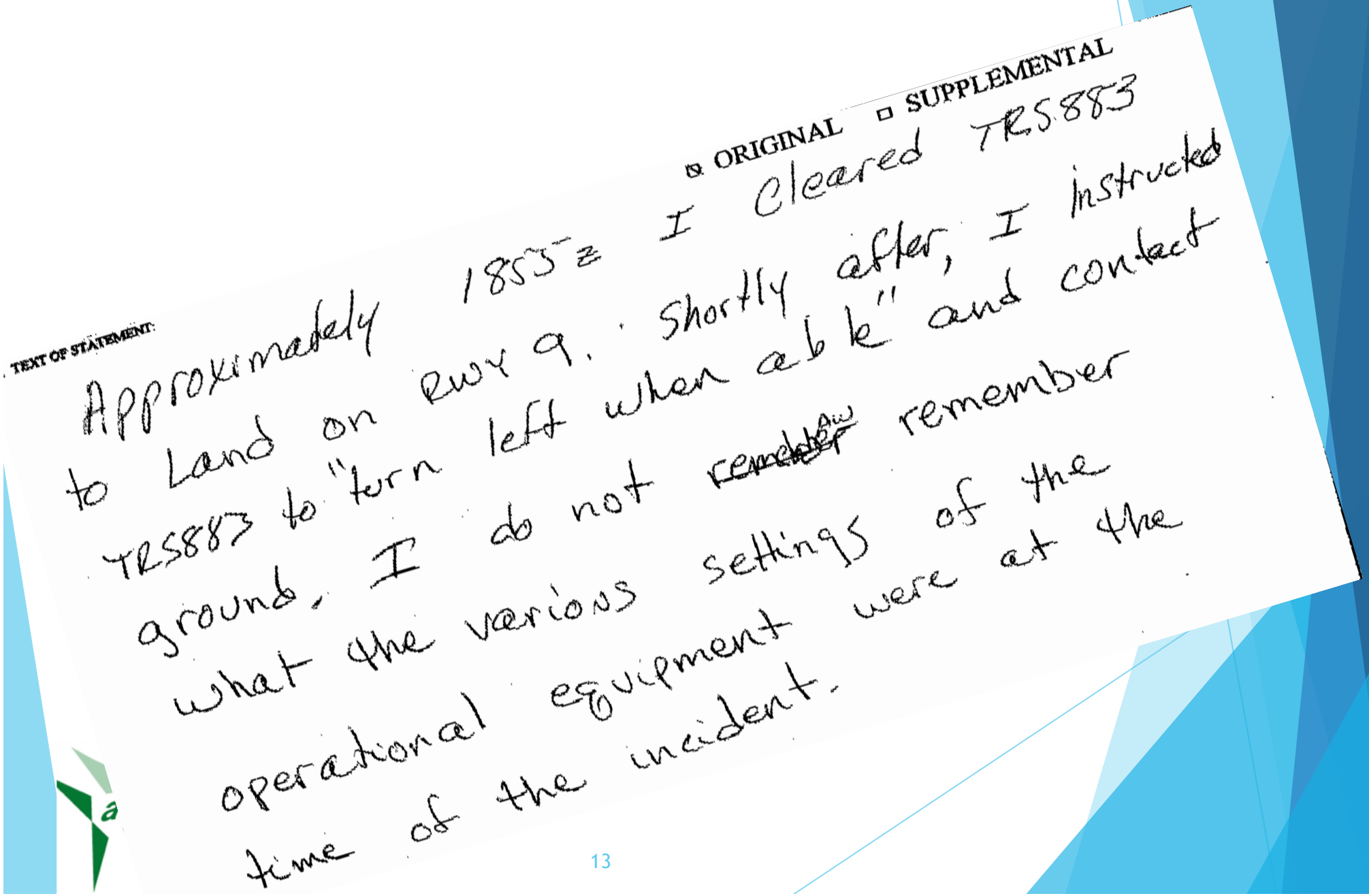
- Change from compliance-based mode of error management to voluntary, participatory investigation programs
- Encourage reporting in order to gather as much data as possible
- Administer individual and systemic corrective action appropriately to serve the best interests of safety

Where we were before ATSAP…



- Culture revolved around who to blame
- Limited proactive approach to safety issues
- Mostly reactive approach that was event driven and lacked supporting data

Where we were before ATSAP…



☒ ORIGINAL ☐ SUPPLEMENTAL

TEXT OF STATEMENT:

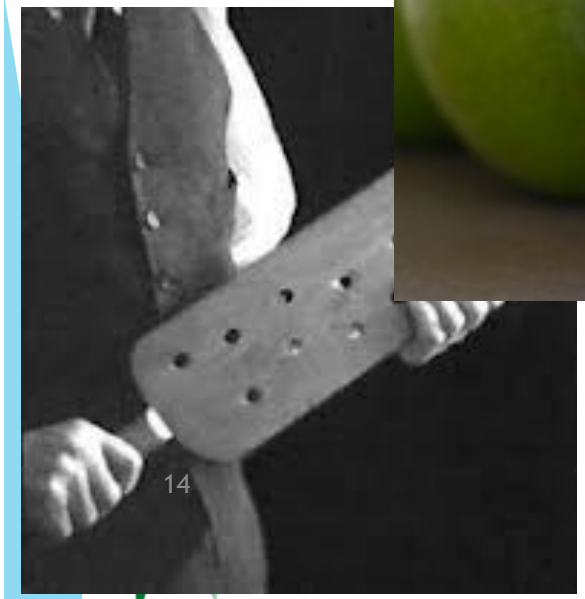
Approximately 1853Z I Cleared TRS883 to Land on Rwy 9. Shortly after, I instructed TRS883 to "turn left when able" and contact ground. I do not ~~remember~~ remember what the various settings of the operational equipment were at the time of the incident.

Decertification

Discipline

SCI

OSI



ASRS Protections were revoked

Where Are We Now...

NARRATIVE

I assumed the LC position at approximately [redacted]. It was an extremely slow day due to a Winter Storm Warning for most of Michigan. When I took the position the ground controller had all of the three runways. I had none. I sat down and waited for any aircraft to call. About [redacted], I surveyed [redacted], via the Ohmite, arriving from the NW. I wondered as he headed toward the Ostermeadow for rwy 9. I knew the aircraft was too high and too close for the ILS to rwy 9. I watched as the radar controller vectored the aircraft north through the final, turned them on a downwind and then turned south to join the approach. I followed the aircraft on final until he checked in with me. I cleared the aircraft to land on rwy 9. I tried to look for the aircraft through the heavy snow that was falling and I caught a brief glimpse of him around his touchdown point, then he disappeared into the snow. I waited until I thought he would have slowed and I instructed him to turn left and contact ground control. The aircraft responded and contacted Ground Control. When the aircraft contacted the ground controller she looked at me and asked if someone had landed. It was then that I realized I did not have Runway 9.

DETECTION

When the ground controller asked if someone had landed, I realized that I did not have the runway. We all knew at that time that an event had occurred.

REACTION

Once the event was identified, both I and the ground controller where taken off positions. We were asked by the supervisor to listen to the recordings and fill out an incident report.

SUGGESTION

Before [redacted] was a place to ADW, one procedure was to combine the Local Control and Ground Control positions in the tower during inclement weather were occurred. Radar would be worked from the Ohmite in the tower. This configuration would have one person controlling the runways and the same person clearing the aircraft for arrival and departure. The reflection on the runway would help where Local was talking to an aircraft, so they too had a better idea of what was going on. With the radar controller sitting next to the Local Controller coordination was much faster and easier, it was a true team effort. Everyone knew what each other was doing. I believe this is the safest and most efficient way to avoid runway incidents. I do not recall ADW having any runway incidents using this procedure.

[redacted] was [redacted] ADW from combining positions. Now we are required to staff a Local and Ground controller in the tower. Radar and Data controllers in the TRACON between [redacted], [redacted], whenever there are at least 5 positions, for emergencies. During hazardous weather ADW is wired exceedingly slow. Being split four ways increases coordination considerably and makes it much easier for a controller to become distracted due to inactivity. This is not the first runway incident at ADW that I feel has been caused by this procedure.

Where are we now?

- ATSAP led the way to introducing a new culture within the ATO
- ATSAP became the foundation to a new way of doing business
- Current safety processes are collaborative, supported by MOUs and negotiated Orders
- Safety processes are built off the successes of ATSAP
- Numerous issues identified by ATSAP and other collaborative ATO safety programs
- A "Just Culture" looks to address the underlying reason(s) for issues rather than to assign blame
- Slowly and steadily moving towards a proactive approach to addressing safety issues through ATSAP, RAP, QC processes, PFS, LSCs, Top 5, Recurrent Training, etc.

VSRP Principles

TRUST

CONFIDENCE

CONSENSUS

COLLABORATIVE

Different VSRPs

- ATSAP (Air Traffic Controllers, AK FSS, TMU and Facility SSS)
- TSAP (Technical Operations Specialists covered by the CBA, not including Flight Inspection or Mission Support)
- ATSAP-X (Engineers, Architects, Aviation Technical Specialists (series 2186), SC SSS and FPT)
- SAFER-FCT (Federal Contract Towers ASAP)
- AVS VSRP

Who Can Use ATSAP

- All ATO personnel directly engaged in and supporting air traffic services are eligible to use ATSAP. It applies only to events and/or problems that occur while personnel are acting in that capacity.

When Should Non-Managers Use ATSAP

- You should submit reports if you are involved in, observe, or identify an operational safety problem, or experience a safety-related event.
  - Reports must be submitted electronically
  - Reports must be initiated within 24 hours after becoming aware of a possible non-compliance
  - Reports must be completed within 72 hours
  - Note- not all reports follow the 24hr rule. For further details on timelines reference ATSAP MOU

What to Report

In short, anything you feel is a potential safety risk to the NAS.

When Should Non-Managers Use ATSAP

- Submission of an ATSAP report does not exempt you from making appropriate notifications when you determine an occurrence involved national security or the immediate safety of a flight
- **Submission of a VSRP report satisfies non-management employees' requirement to report according to this directive except when the employee providing air traffic services determines that pilot actions affected the safety of operations.** When such a determination is made, pilot actions must also be reported as an MOR

When Should Non-Managers Use ATSAP

- When acting in a management role, such as Controller-In-Charge (CIC), you must report in accordance with FAA Order 7210.632. You also may file an ATSAP report. Additionally:
- If you observe a developing situation, you must take action to correct the situation
- Submit MORs for events reported to you
- ATSAP satisfies your requirement to report as CIC when:
  - You are directly involved in the occurrence
  - You observe an occurrence, but are unable to correct the situation

What to Report

➢ Safety Problems

Safety problems are issues at a local, regional, or national level. They are not normally related to individuals and may be determined to be systemic. May include, but not limited to:

- Poor airport signage or markings
- Unsafe policies or procedures
- Equipment, software, or automation problems
- Unclear publications used to provide ATC services
- Traffic management initiatives that don't address sector needs
- Airspace configuration
- Human factors (Fatigue, Distractions)
- Staffing issues that impact the safety of the NAS
- Inadequate training practices

What to Report

- **Safety Events**

Events are the result of an actual or potential loss of required separation, or other situations that degrade safety within the NAS, and occur during the provision of ATC services.

- When an individual is involved in, observes, or identifies an operational safety hazard/problem, or experiences a safety-related event.
- A single event can involve multiple individuals.

What to Include in your Report

- When an individual observes a safety problem or experiences a safety-related event, he or she should note the problem or event and **describe it in enough detail so that it can be evaluated by a third party.**
- Information should include
  - Callsigns
  - Date/Time
  - Detailed Narrative and Recommendation
  - Any other relevant information

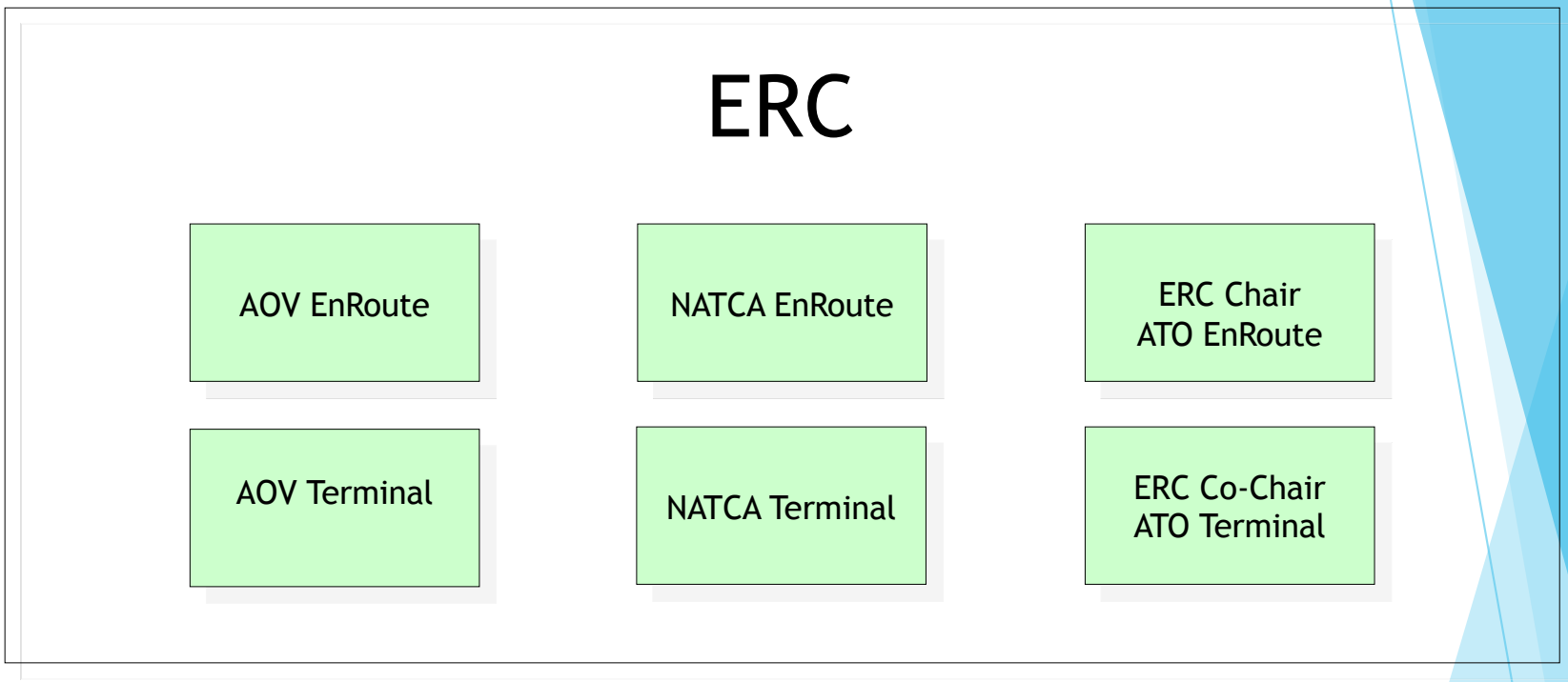
ATSAP Structure and Processes

The ERC

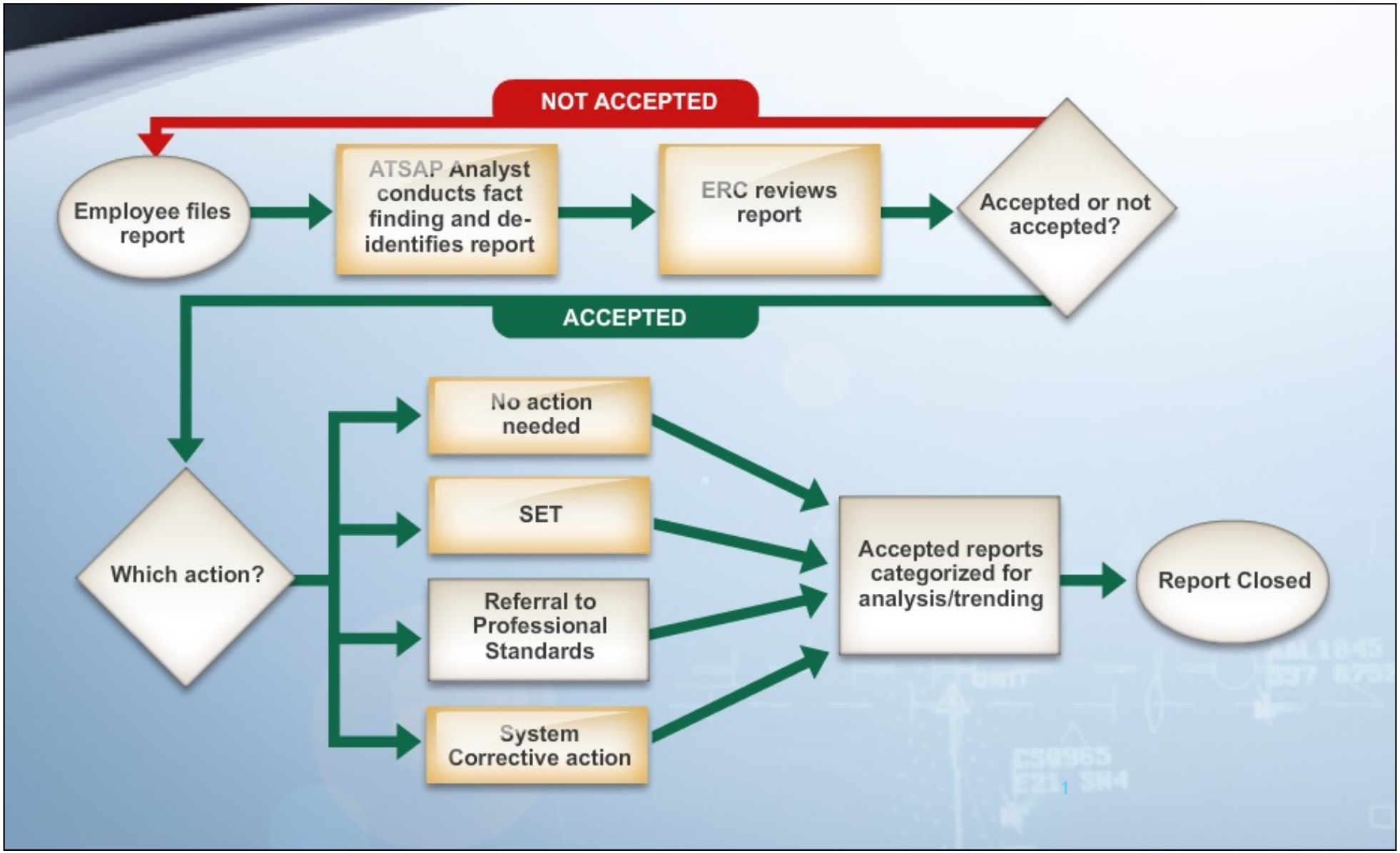
- The Event Review Committee (ERC) reviews all submitted ATSAP reports.
- ERC representatives consist of:
  - A member of FAA's Air Traffic Organization (ATO) management
  - A NATCA representative
  - A member of FAA's Air Traffic Safety Oversight Service (AOV)

The First ATSAP ERC Meeting

ATSAP Structure



Lead Analyst | NATCA Analyst | ATO Analyst | Contract Analyst


NOT ACCEPTED
Employee files report
ATSAP Analyst conducts fact finding and de-identifies report
ERC reviews report
Accepted or not accepted?
ACCEPTED
Which action?
No action needed
SET
Referral to Professional Standards
System Corrective action
Accepted reports categorized for analysis/trending
Report Closed

Reasons a Report is *NOT* Accepted

- Noncompliance that is not inadvertent, and that involves gross negligence (Reckless Behavior)
- Timeliness
- Substance abuse
- Controlled substances
- Alcohol
- Intentional falsification
- Criminal activity
- Not a safety event (or not enough information to determine the safety event)

Possible ERC Actions

- No Action Needed
- Skill Enhancement Training
- Professional Standards Referral
- Information Share to the Facility
- Corrective Action Request

Possible ERC Actions

No Action Needed

- Report is accepted and closed
- No further action taken by ERC at this time
- Report is still used for Data collection
  - May be tracked for further action
  - May be used as supporting data to identify regional/national safety issue

AIR/CAR Dashboard

1 2 3 4 5 6 7 8 9 10 20

ID	Issue Name	Issue Status	Group	AIR	CAR
254	ZSU ECAR Communication Line Unreliable	OPEN	EASTERN-ERC		
269	Radio Controlled (RC) Drone Activity	OPEN	EASTERN-ERC		
271	CPC/TMC Staffing	OPEN	WESTERN-ERC		
279	Glider Operations	OPEN	AAT		
281	Electronic Strip Bay (OASIS)	OPEN	WESTERN-ERC		
287	VOR Decom	OPEN	AAT	AIR-2015-004 VOR Decom	
290	Special Instrument Flight Procedures	OPEN	EASTERN-ERC	AIR-2013-022 <WSA> (Special Instrument Flight Procedures)	
337	Distraction - Job Related (2014 TOP 5)	OPEN	ProgramOffice		
338	Combining/De-combining Positions/Sectors (2014 TOP 5)	OPEN	ProgramOffice		
339	Aircraft Identity Not Maintained (2014 TOP 5)	OPEN	ProgramOffice		
340	Position Relief Briefing (2014 TOP 5)	OPEN	ProgramOffice		
341	Weather Dissemination (2015 TOP 5)	OPEN	ProgramOffice		
342	Surface Memory Aids (2015 TOP 5)	OPEN	ProgramOffice		
359	Automated Information Transfer (AIT)	OPEN	CENTRAL-ERC		
369	FLM "Cross-Aisle" Supervision	OPEN	CENTRAL-ERC		
374	Hearback/Readback (Non Altitude Related)	OPEN	CENTRAL-ERC		
375	A388 Hold Short	OPEN	AAT	AIR-2015-009 A388 Hold Short	
377	Speed Below Class B Airspace	OPEN	AAT	AIR-2015-010 Speed Below Class B	CAR-2016-006 SFO RNAV Procedures and Class B Airspace
383	Wind Sensor Location	OPEN	CENTRAL-ERC		CAR-2015-021 Wind Sensor Location
385	Outdated FAA Pubs-RWY APCH Hold Short	OPEN	AAT		CAR-2015-016 Outdated FAA Pubs-RWY APCH Hold Short

1 2 3 4 5 6 7 8 9 10 20

Possible ERC Actions

Skill Enhancement Training (SET)

- Individually focused education and training designed to address an identified qualification issue of an employee in a skill or task
- The intent is to *Instruct to Proficiency*, not punish an individual
- Final Acceptance of the Report based on successful completion of SET as determined by the ERC

Possible ERC Actions

Referral to Professional Standards

- Some examples of Professional Standards issues
  - Individual Conflicts that could benefit from informal dispute resolution
  - Recognizing and identifying exceptional performance
  - Ineffective operating methods/techniques
  - Conduct that could lead to discipline
  - Recognizing actions that enhance the standing of the profession
- If a submitter accepts ERC recommendation of Professional Standards, the ERC will forward the report to the Professional Standards National Workgroup to work the issue

Possible ERC Actions

Information Share to the Facility

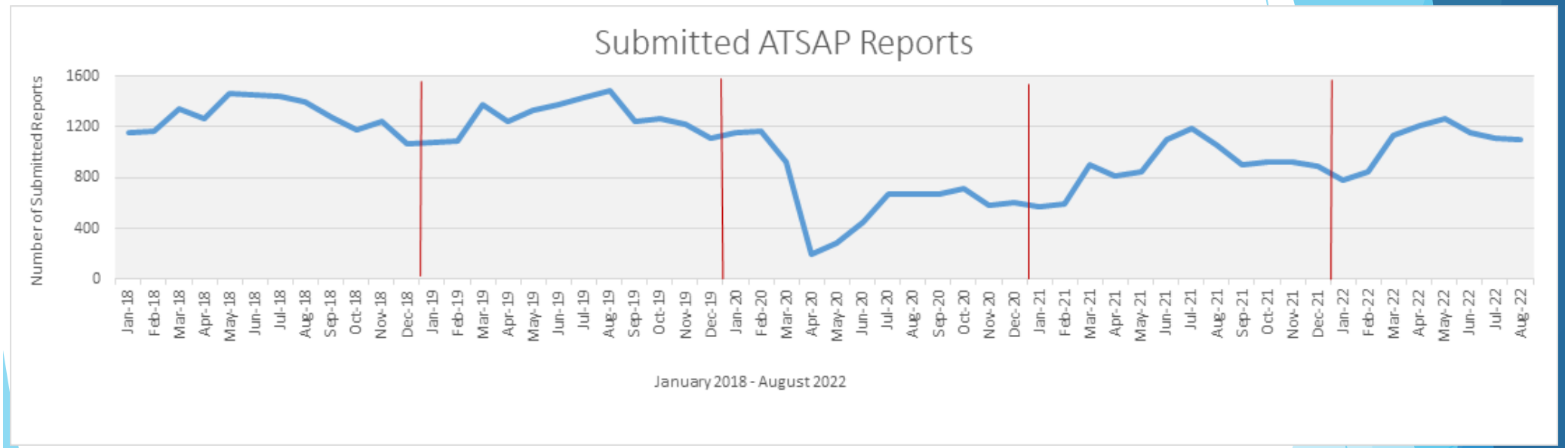
- Permission to share from the submitter
- Report is shared to the ATM and Facrep for additional information or possible mitigations
- At this point possibly resolved and closed
  - Submitter usually told what was done to fix the issue
- If facility can not resolve it, may be elevated to a CAR

Possible ERC Actions

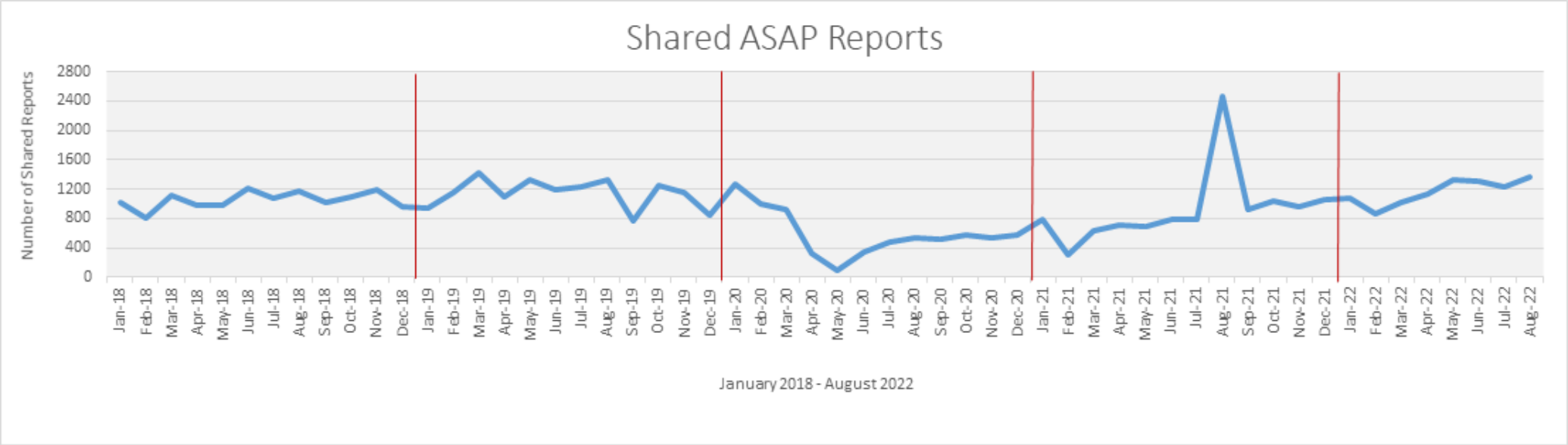
Corrective Action Request (CAR)

- Developed by the ERC
- Approved by the ATSAP Program Office
- Once approval is received, the CAR is assigned to a management and NATCA Point of Contact for action and resolution

ATSAP DATA



Monthly ATSAP Reporting



- CISP began in 2011 with 3 airline partners. In FY12, 2 additional airlines were added for a total of 5.

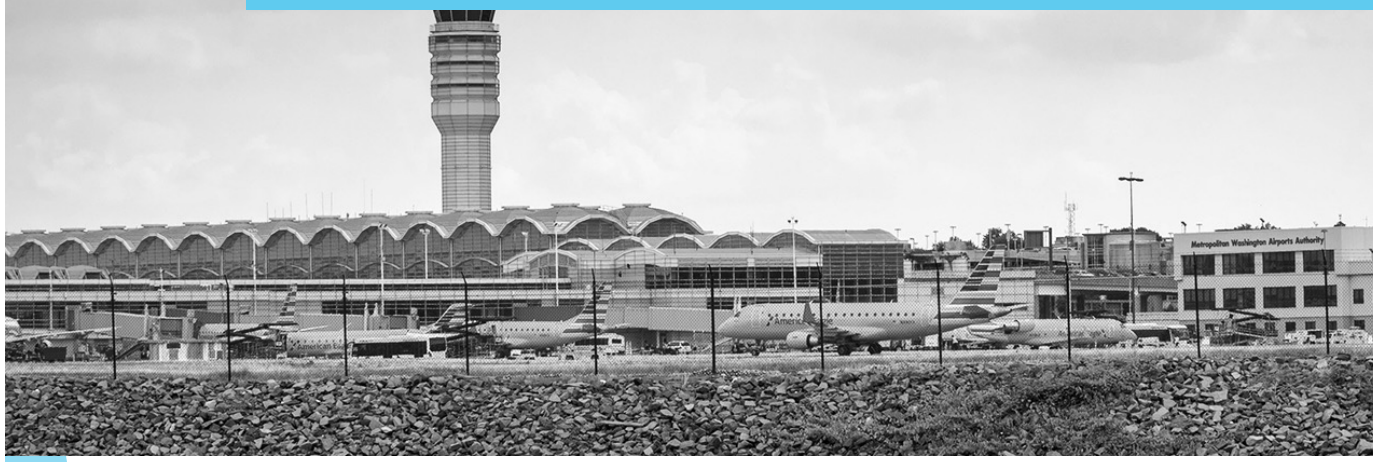
- *The above graph is truncated for spacing.

USES OF ATSAP DATA

- **Trends and Analyses**
- SAFE Discussion Sheets
- ATSAP Alert Bulletins
- CARs
- Partnership for Safety

Narrative statements are broken down into data points to identify unsafe policies and procedures.

- Trends are reported to stakeholders in the FAA and the aviation industry.
- De-identified reports may be shared with all employees in newsletters and safety reports.



USES OF ATSAP DATA

- **Trends and Analyses**
- SAFE Discussion Sheets
- ATSAP Alert Bulletins
- CARs
- Partnership for Safety

Safe Discussion Sheets

- Analysts look for trends they are seeing through reporting
- Monthly **face-to-face** discussion facilitated by a member of the LSC (or other mutually agreed upon personnel)
- Must be attended by all operational personnel
- Includes National content provided by National PFS team in addition to local safety issues
- Assignment uploaded and tracked in CEDAR by National PFS team

USES OF ATSAP DATA

- Trends and Analyses
- **SAFE Discussion Sheets**
- ATSAP Alert Bulletins
- CARs
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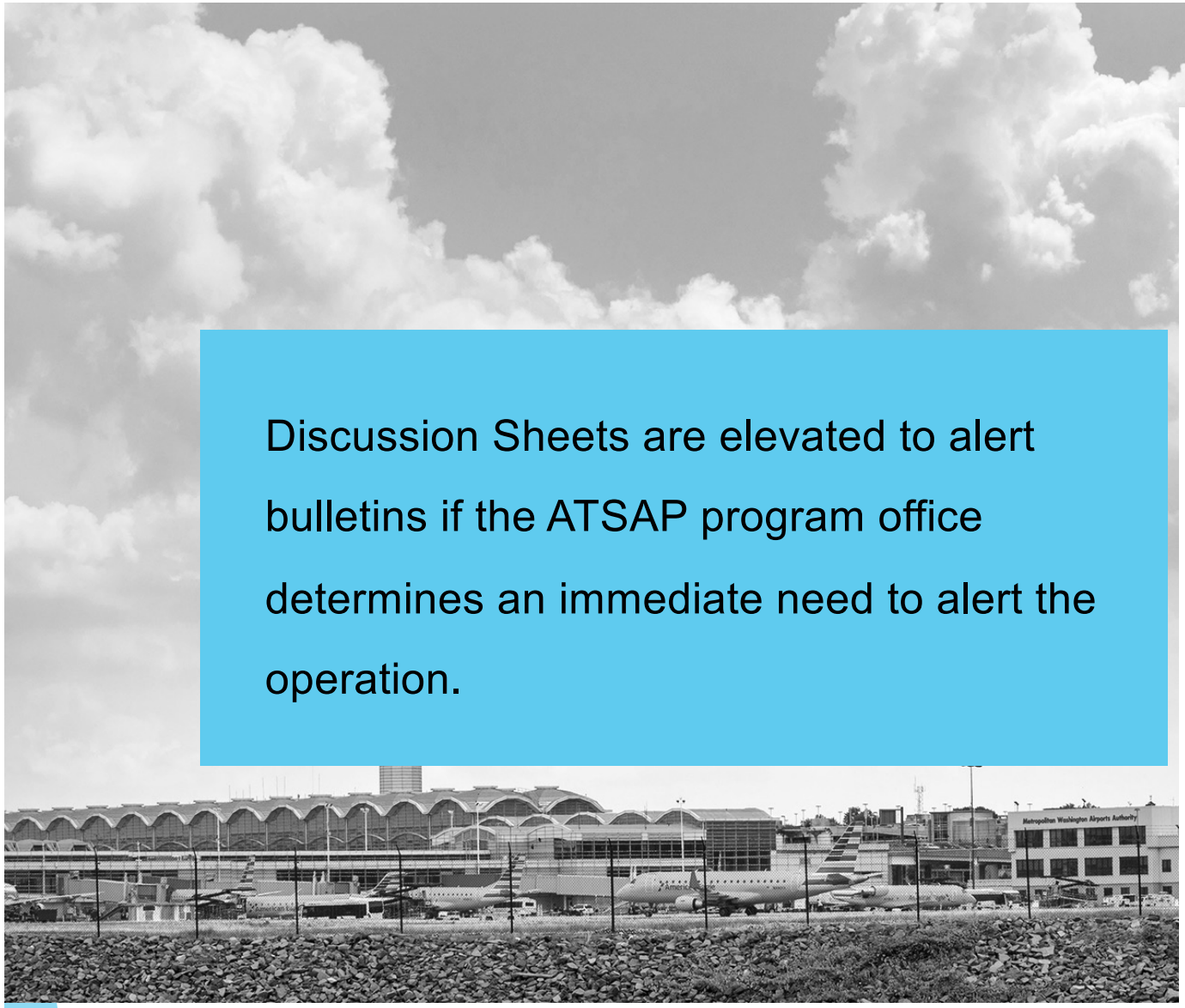


Discussion Sheets are elevated to alert bulletins if the ATSAP program office determines an immediate need to alert the operation.

USES OF ATSAP DATA

- Trends and Analyses
- SAFE Discussion Sheets
- **ATSAP Alert Bulletins**
- CARs
- Partnership for Safety

CARs request corrective action plans from an organizational unit or facility. The responsible facility must provide:

- The root cause of the problem
- A detailed action plan for correcting the problem
- Interim actions to temporarily mitigate risks while implementing a permanent action plan
- Dates of completion for all actions

USES OF ATSAP DATA

- Data Trends and Analyses
- SAFE Discussion Sheets
- ATSAP Alert Bulletins
- **CARs**
- Partnership for Safety

USES OF ATSAP DATA

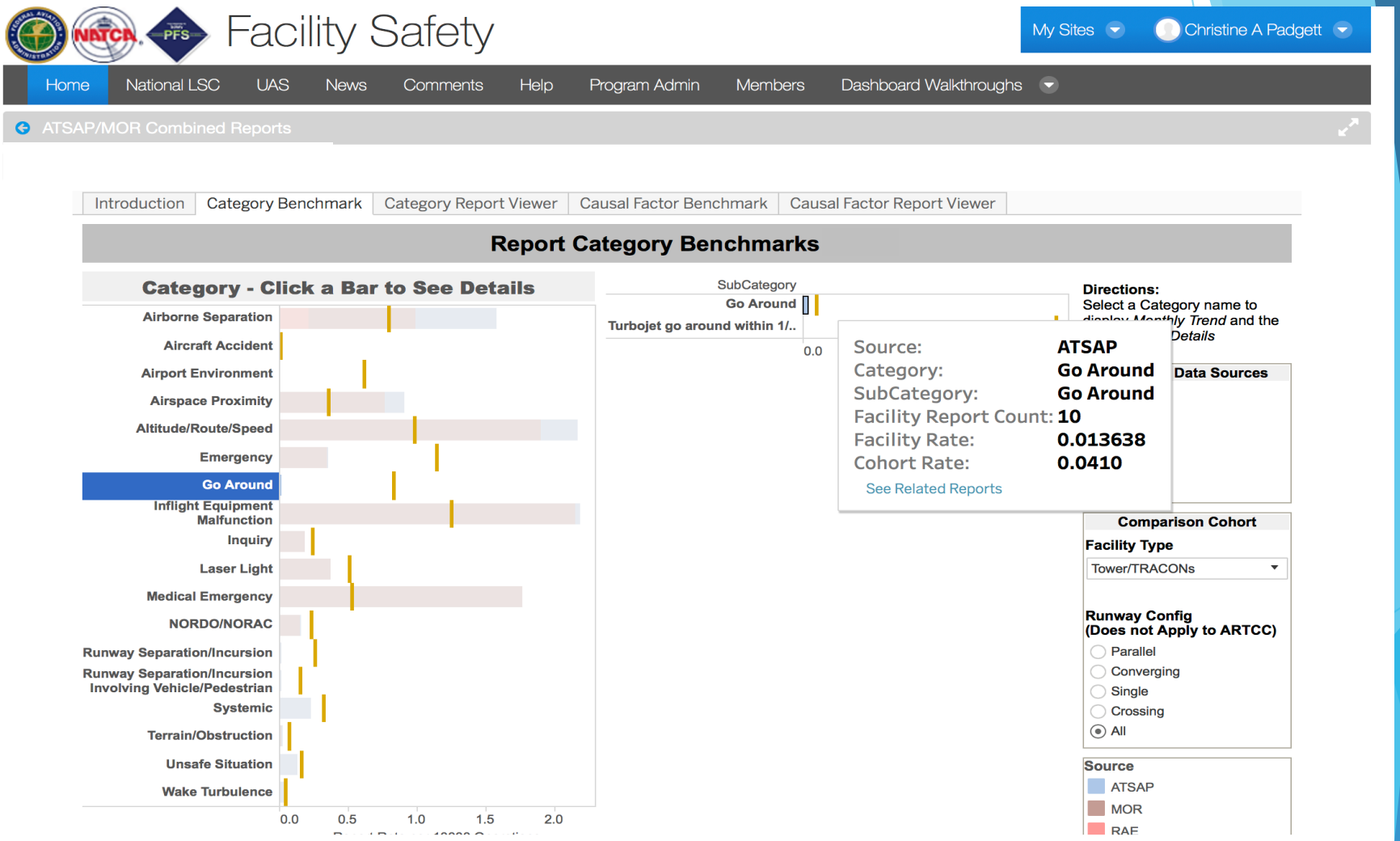
- Data Trends and Analyses
- SAFE Discussion Sheets
- ATSAP Alert Bulletins
- CARs
- **Partnership for Safety**

Partnership for Safety:

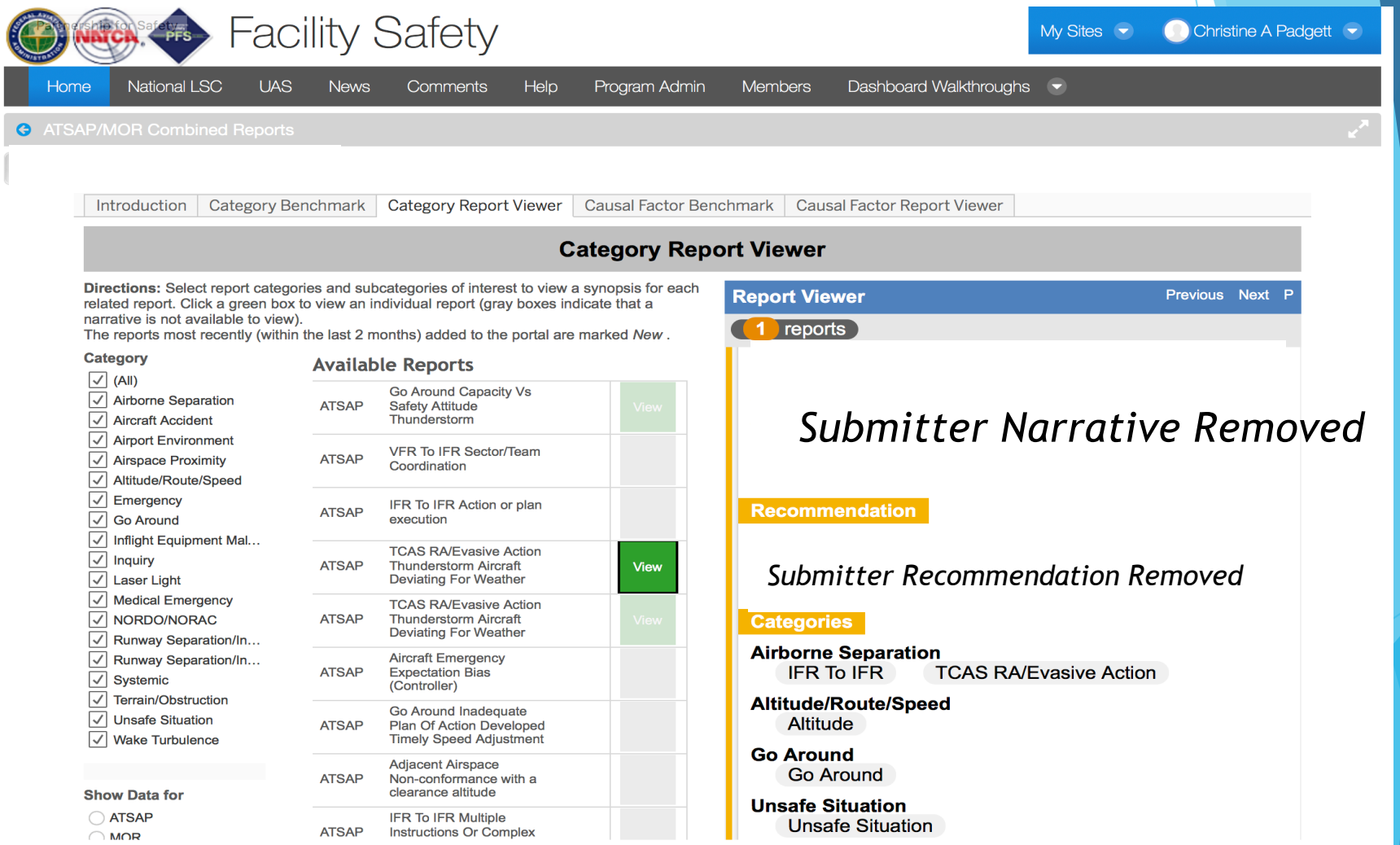
•Facilitates the identification and mitigation of safety issues through the use of collaborative local safety councils (LSC)

•Provides safety data to experts at the local level through the Safety Data Portal

Safety Data Portal LSC



Safety Data Portal LSC



ATSAP USAGE DATA

201,188 reports have been accepted into ATSAP as of 9/18/2022

Q3 2022

Q3 FY2022, the ATSAP ERCs reviewed 3,632 reports, of which 73% detailed safety events and 27% detailed safety problems.

Additional items resulting from this time period:

- 4 CARs issued
- 3 ATSAP Information Requests (AIRs)
- 49 ATSAP Positives
- 3 CISP Positives
- ATSAP shared 1,256 reports with the CISP partners and the CISP partners shared 4,350 reports with ATSAP (5,606 reports in total).

Benefits of ATSAP

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- Confidentiality
- Identifies Safety Issues
- Supports Safety Culture
- Protect Non-Punitively
- Shares Information

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- **Confidentiality**
- Identifies Safety Issues
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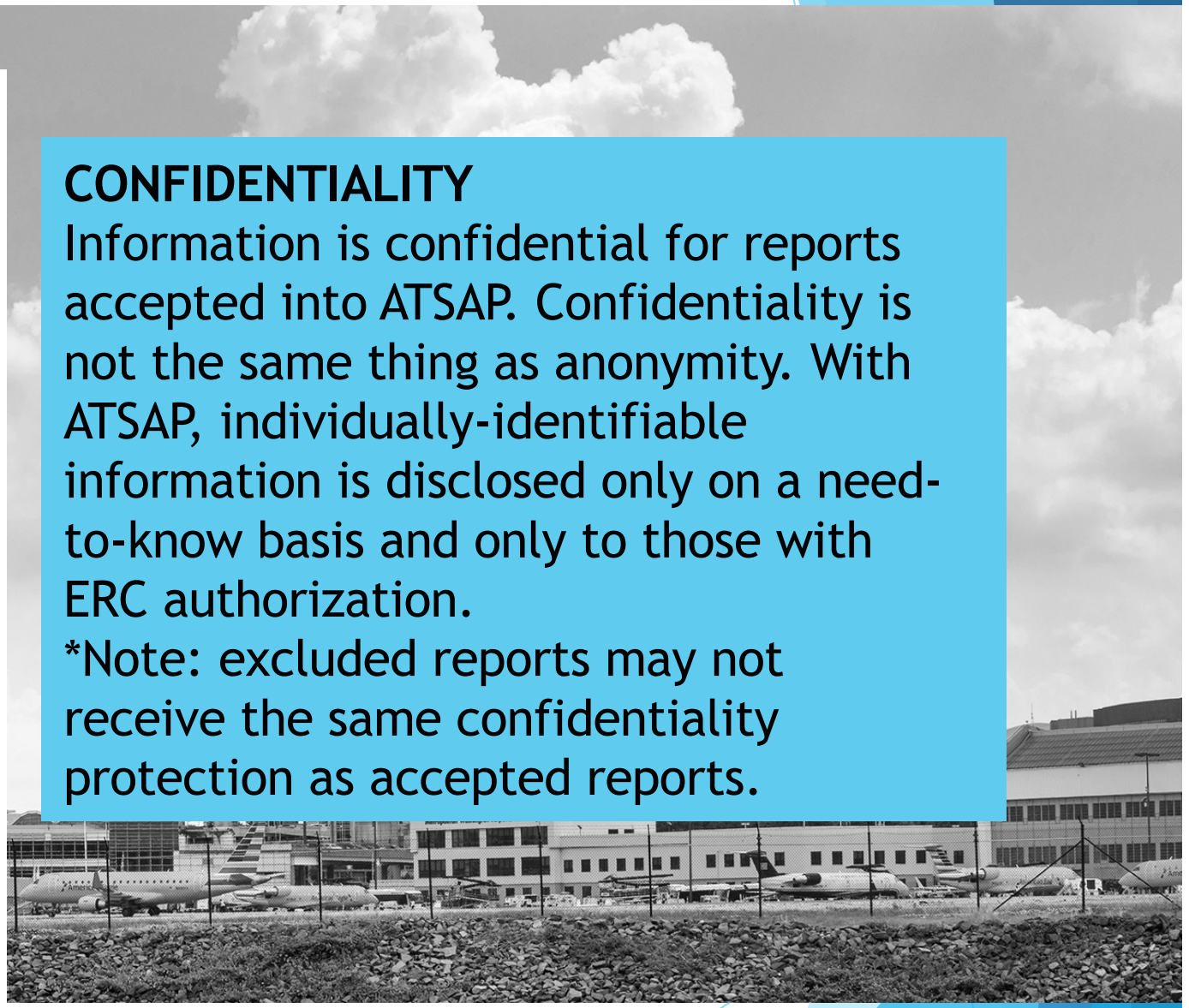
CONFIDENTIALITY

Information is confidential for reports accepted into ATSAP. Confidentiality is not the same thing as anonymity. With ATSAP, individually-identifiable information is disclosed only on a need-to-know basis and only to those with ERC authorization.

*Note: excluded reports may not receive the same confidentiality protection as accepted reports.



Benefits of ATSAP

- Confidentiality
- **Identifies Safety Issues**
- Supports Safety Culture
- Protect Non-Punitively
- Shares Information

IDENTIFIES SAFETY ISSUES
ATSAP data is used to identify and proactively mitigate safety risks from the NAS.

Benefits of ATSAP

- Confidentiality
- Identifies Safety Issues
- **Supports Safety Culture**
- Protect Non-Punitively
- Shares Information

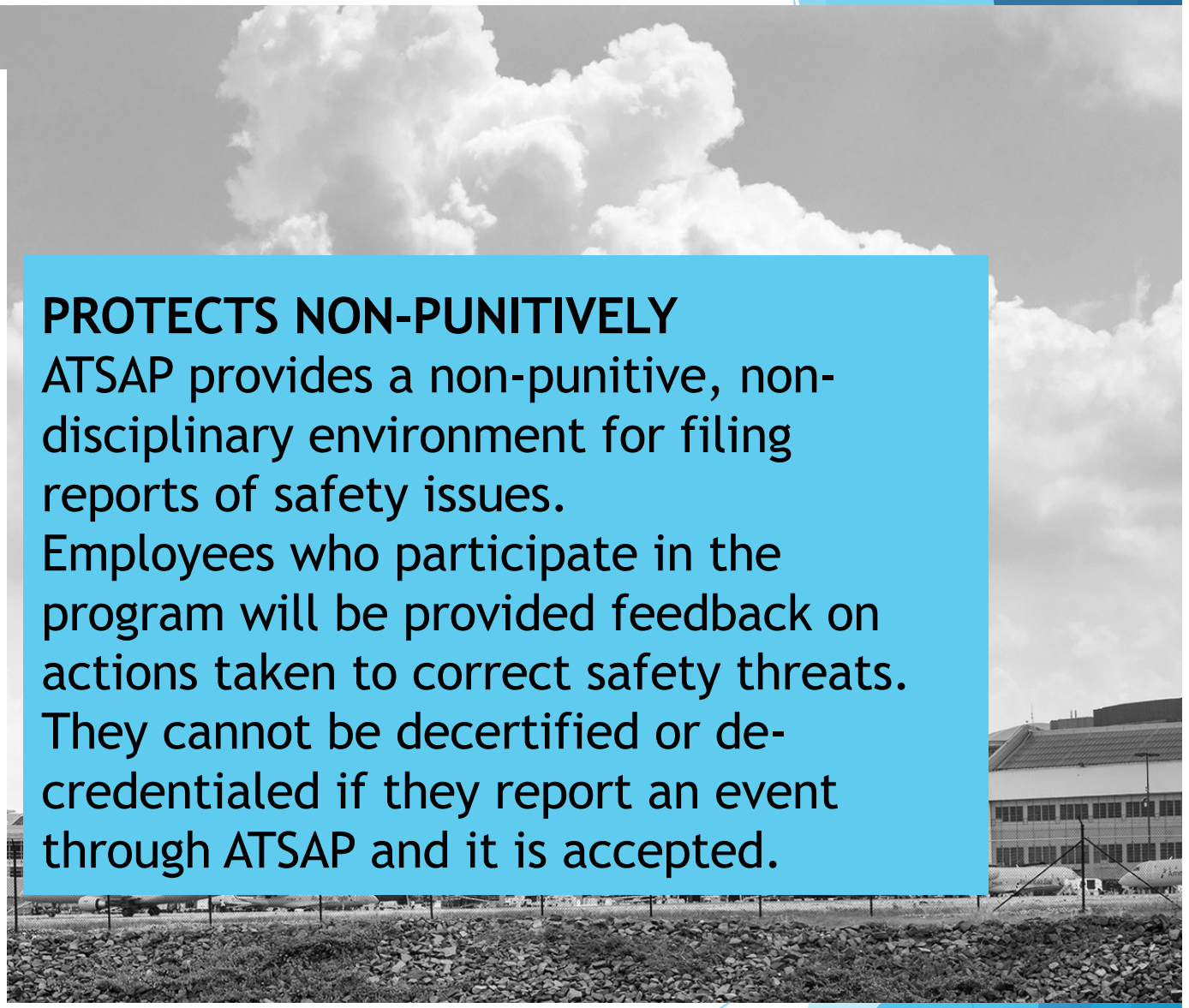
SUPPORTS SAFETY CULTURE

ATSAP and other VSRPs are foundational to a healthy safety culture. Positive safety cultures:

- Have good reporting
- Value learning from reports
- Are just and informed

Benefits of ATSAP

- Confidentiality
- Identifies Safety Issues
- Supports Safety Culture
- **Protect Non-Punitively**
- Shares Information



PROTECTS NON-PUNITIVELY

ATSAP provides a non-punitive, non-disciplinary environment for filing reports of safety issues.

Employees who participate in the program will be provided feedback on actions taken to correct safety threats.

They cannot be decertified or de-credentialed if they report an event through ATSAP and it is accepted.

Benefits of ATSAP

- Confidentiality
- Identifies Safety Issues
- Supports Safety Culture
- Protect Non-Punitively
- **Shares Information**

SHARES INFORMATION

The Confidential Information Sharing Program (CISP) allows for sharing and analysis of information collected through ATSAP and participating airlines' ASAP programs. Merging perspectives of controllers and pilots are critical to understanding the causal factors of events.

Additionally, controllers may forward their reports to the Aviation Safety Reporting System (ASRS). ASRS de-identifies and analyzes reports for vital aviation safety data. This data is given to a wider audience outside the FAA.