

NTSB Family Assistance Regulation for Air Carriers: Evaluating Plan Comprehensiveness

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Recently, The U.S. Department of Transportation fined Asiana Airlines \$500,000 for failing to adhere to the Foreign Air Carrier Support Act following the crash of Asiana flight 214 in San Francisco on July 6, 2013. This was the first time that the Department has levied a fine in relation to the 1997 act, and its 1996 domestic counterpart, the Airline Disaster Family Assistance Act.

The Department of Transportation¹ docket indicates that Asiana failed to adhere to the regulations through three distinct violations.

1. Failure to “possess and implement a plan for publicizing a reliable, toll-free telephone number and staff to take calls to such number from families of passengers involved in aircraft accident.”
2. Failure to “notify the families of passengers involved in an aircraft accident ‘as soon as practicable after the foreign air carrier has verified the identity of a passenger’.”
3. Failure to “commit sufficient resources to carry out the [family assistance] plan.”

This incident vividly demonstrates the need for air carriers to not just agree that they will abide by the act, but that they actually have the resources in place to ensure they are able to carry out the family assistance support that is required.

Ensuring Compliance with Federal Legislation

The Aviation Disaster Family Assistance Acts of 1996 and 1997 indicate that all air carriers flying in or out of the United States have a fundamental responsibility for family notification and all aspects of victim and family logistical support. These acts, along with subsequent amendments, were revised in December 2008 to form The Federal Family Assistance Plan for Aviation Disasters. Within the Plan, there are seven Victim Support Tasks (VSTs) that identify the response requirements assigned to participating organizations. VST 2 is assigned to the air carrier, stating that it must be able to provide assurance to the National Transportation Safety Board (NTSB) that it has the ability to comply with each of the items identified.

¹ <http://www.dot.gov/briefing-room/us-department-transportation-fines-asiana-airlines-not-adhering-family-assistance-plan>

Some of the tasks within VST 2 include:

- The carrier must notify the NTSB of an incident including the place the incident occurred, the flight number, station pairs, passenger demographics, and whether the flight is domestic or international. In addition, they must supply the NTSB with contact information for the persons responsible for the airline's humanitarian response, manifest reconciliation, and family notification process. Finally, the airline must provide name, telephone number and location of the facility designated as the Family Assistance Center (FAC) and Joint Family Support Operations Center (JFSOC).
- The NTSB must be provided with a reconciled copy of the passenger manifest in a timely manner.
- The air carrier must provide a reliable, publicized toll-free telephone number with sufficient capacity to handle the high volume of calls an incident of this type is likely to generate.
- The air carrier must provide timely notification to family members. Also, the air carrier must provide notification to family members prior to releasing information to the public.

Many carriers, especially international carriers with few employees located within the United States, rely on external vendors to provide many of the necessary and required services within The Federal Family Assistance Plan for Aviation Disasters. Some carriers do not fully comprehend the amount of resources that may be needed to properly assist families and victims and do not adequately prepare for the unlikely possibility that one of their aircraft will experience an accident like this.

Effective Planning is Vital

An aviation crash is a devastating event for any sized carrier. What can make the difference between continuing to operate or simply ceasing to exist can be the time, resources and preparation a carrier puts into planning and practicing response activities. It can depend on whether the carrier simply agrees to abide by the Airline Disaster Family Assistance Act and Foreign Air Carrier Support Act or, if the carrier actually puts the time and effort into identifying the resources that will be needed and working with those teams to ensure that the family assistance support will be available should the worst possible event occur.

The response to an aviation disaster needs to be immediate. This means organizations need to have plans in place before an incident occurs. Waiting until after an event occurs to identify the necessary resources is a recipe for disaster.

Furthermore, having a theoretical plan in place that has not been tested in real time also can be disastrous. It is vital that a carrier has verifiable resources and procedures in place before an incident occurs. Successful carriers test those resources regularly and constantly drill the procedures required to facilitate this operation.

Some of the procedures that should be tested regularly are:

- **Notification.** What procedures are in place to quickly and efficiently notify key stakeholders when an incident occurs? Some organizations still rely on a phone-tree type notification system. This can slow down the notification process to such an extent that the process is not fully completed until hours post-incident. This will assuredly cause delays that can never be made up. Organizations should invest in a capable mass notification system that notifies all stakeholders simultaneously and provides vital information at once.
- **Manifest reconciliation and transmission.** An often overlooked step is the collection and verification of complete information on the passengers and crew on board a flight. The NTSB will require timely transmission of this information. If an outside vendor is used to provide call center and on-site services, there must be procedures in place to quickly and safely transmit manifest information as that information will be needed to accurately triage incoming calls to identify family members among the thousands of unrelated calls that the event will generate. Deciding which format will be used to present the data also is vital. If the information is sent via fax or electronically as a PDF file, there will be a delay when that information is re-formatted into one that can be easily uploaded to a database. Working this out with the vendor in advance is a necessary step in the preparedness process.
- **Call center activation.** There will always be a certain amount of time needed for the activation of call centers following an incident. An Interactive Voice Response (IVR) menu will need to be decided upon and approved by the carrier before the call center can begin taking calls. Deciding on a general IVR script in advance will save precious minutes after an incident. Have the correct people who are responsible for this approval been identified ahead of time? Often, a carrier will want IVR options for families needing information, future passengers making or cancelling reservations, employees seeking information and the media looking for more information. These contact numbers should be identified in advance.

- **Vendor capabilities.** Does the vendor actually have the capabilities they claim to have? Verify the depth of their capabilities before committing to that vendor. Have they responded to similar incidents before? It is important to drill with that vendor to identify how the services will be activated and how the vendor will coordinate with the carrier's resources. What communication channels have been identified to facilitate clear communication? Who will be the point person at the carrier headquarters and on-site?

The FEI Difference

An accident such as the crash of Asiana flight 214 generates a huge volume of telephone calls within a very short period of time. FEI, a leading provider of crisis management and family assistance services to the airline industry, has responded to many airline incidents, and our experience shows a typical volume of more than 3,000 calls per hour in the initial hours following an accident. This amount can vary depending on the culture of the individuals represented in the crash, the number of fatalities or if injuries occurred.

In our current environment of a 24-hour news cycle and the pervasiveness of social media, those calls will begin immediately. Most reservations call centers do not have adequate staffing to cope with that kind of increase. Furthermore, many reservations call center agents lack the training and experience to handle the distressed calls that an accident such as this will generate. An important consideration in deciding whether or not to use internal staff is the impact that a critical event will have on staff. Many carriers have decided that they do not want to subject their staff to the stress of working with families who are experiencing shock and profound grief.

Studies have shown that families of aviation crash victims typically wish to send between three and five family members to an accident site. For a plane with 291 passengers like Asiana flight 214, that means between 873 and 1455 family members will need to be flown to the accident site, housed, and accompanied by trained Family Assistance Representatives (FARs). FEI typically assigns two or three FARs to each family while they are on-site. At a minimum, that would require 582 FARs for this incident.

Many international carriers do not have that capacity of representatives in the countries to which they fly. Even if they were to fly representatives from their home country, that kind of commitment places a huge burden on the carrier's ability to maintain continuity of operations. When you factor in the emotional toll that such an assignment may take on employees who have neither the training nor the experience, it becomes clear outside assistance is needed.

FEI's family assistance services allow airline staff to better focus on incident management and recovery efforts while FEI addresses the human dimension of the incident. FEI FARS are highly experienced in providing direct services and logistical support on site to survivors, survivor families, and victim families affected by a mass disaster. They are also specifically trained to provide necessary emotional support to families of these individuals, eliminating the likelihood for untrained and underprepared airline staff to experience long-term psychological impact as a result of working with traumatized individuals.

Since 1979, FEI has responded to hundreds of critical incidents involving our customers. A leader in preparedness, mitigation, response, and recovery, FEI integrates behavioral health expertise, emergency management experience, and technology to offer specialized services that address the human dimensions of crisis management and business continuity. In addition to providing intervention in the aftermath of natural disasters and workplace violence, FEI has provided assistance to thousands of victims as a result of domestic and international terrorism events. In particular, FEI offers unique and specialized crisis management services for the aviation industry, in addition to many others.

FEI partners with you to protect and enhance your workforce effectiveness and organizational resiliency. We offer flexible solutions for the full spectrum of your workforce resilience goals, from EAP and wellness to crisis preparedness and management. We leverage our proven resources, compassionate experts and robust network to improve your employees' focus, empower your managers and prepare you to handle the unthinkable crisis, so that you can maintain a healthy, resilient organization.