

## Appendix 6

### PILOT ASSESSMENT PROCESS

There are two ways a pilot assessment process (PAP) can be requested:

1. Pilot-requested assessment process – any NPS pilot may request a PAP to evaluate the potential for the pilot to benefit from additional training or to mitigate a serious safety or operational concern the pilot may have. The request will be routed through the regional aviation manager to the national aviation manager.
2. Service-requested PAP – to determine fitness for duty of a National Park Service pilot or pilot trainee, a service-requested PAP is based on identification of a serious safety concern, an accident, an incident with potential, or an employment- or performance-based concern that indicates that an employee is unfit to pilot NPS aircraft. This process can be initiated through the regional aviation manager to the national aviation manager.

#### Scope

The PAP is an administrative, fact-finding proceeding conducted to ensure all information relevant to a pilot's qualifications are reviewed and evaluated in a knowledgeable, fair, and impartial manner.

1. During the proceeding, working group members must consider only factual information and avoid conjecture, and they must conduct the PAP and develop recommendations in a closed session.
2. The PAP working group must consider the pilot's credentials, experience, basic flying skills, and the potential for the pilot to benefit from additional training.
3. The PAP working group may only consider and record factual information; hearsay or information that cannot be corroborated may not be considered or recorded.

#### Convening the Pilot Assessment Process

The national aviation safety manager, national aviation manager, or designee may convene a PAP. The convening official selects panel members.

Working group membership and selection – The PAP must provide fair and impartial evaluation. The convening official must ensure that working group members have not had involvement with any of the issues leading to the working group. The preponderance of the working group members must be fully qualified federal pilots.

1. The working group members must be composed of at least two Department of the Interior pilots, one of whom will be an NPS employee, and one line officer of at least the superintendent level.
2. Technical experts and consultants may advise the working group but will not be voting members.
3. The convening official shall not serve as a member of the working group.
4. The pilot being evaluated may request a representative to ensure that the pilot receives a fair and impartial evaluation.
5. When working group members suspect probable cause exists for an adverse action related to the pilot's conduct or performance, an employee relations specialist must be appointed as a non-voting member. In this situation, the working group will be the primary investigating body, and the employee relations specialist will take statements, as appropriate, and assemble documents to create a case file. The working group's recommendations must become part of the case file.
6. The official convening the PAP will appoint one voting member to act as chair.

#### Timeliness of the Working Group

1. Determination to convene – The determination to convene the PAP will occur no later than 30 days after receipt of a serious safety concern or pilot request.

2. Convening the PAP – Convene the PAP at the earliest practical date but no later than 30 working days from appointment of the working group.
3. Pilot notification – Notify the pilot in writing that a PAP has been convened. This notice of intent must include:
  - a. Information relative to the reason(s) for convening the PAP, including allegations and/or references;
  - b. The time when the pilot is directed to appear before the working group (negotiated with the pilot's supervisor);
  - c. The location of the meeting;
  - d. Instructions for acknowledgment of the notification;
  - e. Information regarding the pilot's right to present evidence and documentation in support of the pilot's cause.

### **Operating Procedures of the Working Group**

The chairperson of the working group must conduct the working group in accordance with the established procedures and timelines.

1. Evaluation preparations – Prior to convening the working group, the chairperson:
  - a. Specifies the time and place where the PAP will convene. The chairperson must make arrangements for a location consistent with the gravity of the situation and considering the travel requirements of all parties.
  - b. Accommodates reasonable requests from the pilot for information relative to the case, and evaluates requests for working group delays.
2. Working group proceeding – The chairperson:
  - a. Convenes the working group.
  - b. Explains the purpose of the working group to all parties.
  - c. Defines evaluation processes and procedures.
  - d. Conducts the evaluation in an orderly manner.
  - e. Ensures that the pilot is allowed to represent the pilot's case.
  - f. Ensures that findings of the working group are factual and fully supported by evidence.
  - g. Makes sure that all recommendations are made within the confines of the working group's authority.
  - h. Adjourns the working group.
3. Post-evaluation duties – Within 45 days, the chairperson ensures that the final report is completed and accurate and that all members review and sign the report.

### **Working Group Recommendations**

The working group will prepare and provide a written report containing their recommendations to the convening authority, who has responsibility to relay it to the appropriate NPS officials.

1. PAP report recommendations – Recommendations of the PAP must be consistent with the relevant findings supporting one of three outcomes:
  - a. Retain the status as a NPS pilot at a level to be determined,
  - b. Additional training required, or
  - c. Disqualification from flight status as an NPS pilot.

The recommendation to disqualify should be based on:

- i. Incidents or actions that clearly demonstrate willful or wanton disregard for established rules, regulations, or procedures, or deviation in judgment as related to accepted flight practices;

- ii. Or a finding by the working group that the pilot is unable to safely perform pilot duties for the NPS at any level appropriate to the pilot's position description.
2. Minority report – In the event of disagreement among the working group members, a minority report may be prepared that clearly states the scope of the disagreement(s), findings, and recommendations. Members supporting the minority opinion must be identified in the report.
3. Results of PAP – The recommendations of the PAP working group will be jointly discussed and resolved between the NPS regional director and the national aviation manager.