

NPS CONCESSION RISK MANAGEMENT PROGRAM SAMPLE

PURPOSE

This document has been prepared as an educational and resource tool for National Park Service (NPS) concessioners to assist them in developing and administering a documented Risk Management Program (RMP) in accordance with their concession contract and RMP standards for National Park Service Concessioners.

This RMP sample is for a fictitious SCUBA diving concession operating under a Category II contract in a fictitious park. Black text highlights each RMP elements as defined in the NPS standards.

Example RMP text and tables are marked in blue.

NOTICE

This RMP is a sample only. The sample information provided is for illustration only and any may not be accurate or complete. It does not constitute a complete reference to Federal, State or local laws, regulations or ordinance or policy requirements. Relying on the information contained in this sample does not guarantee contractual compliance or protect a concessioner legally.

Concessioners are independently responsible for developing an own RMP appropriate to their operation and that meets all legal requirements contractual requirements and provides for the safe operation of the concession.

RMP ELEMENT 1 – RISK MANAGEMENT PROGRAM SCOPE

The concessioner must establish and maintain an RMP appropriate for the activities, size, and complexity of the operation.

Risk Management Program Scope. This documented Risk Management Program (RMP) is developed in accordance with the Wonder Water Dives (WWD) concession contract with the National Park Service (NPS) (CCWOWA004-16), specifically Operating Plan Section 6.2. The RMP complies with NPS RMP standards.

WWD is committed complying with applicable laws and regulations and NPS risk management standards and contract requirements and to the extent reasonably possible, providing safe operations for WWD employees, customers, NPS employees, and others. This RMP describes the program that WWD has established to meet these commitments.

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RMP ELEMENT 2 – RESPONSIBILITY AND ACCOUNTABILITY

The concessioner must establish the organizational structure, personnel roles and responsibilities, and resources needed to effectively implement the RMP.

RMP Responsibilities. The General Manager (GM) of WWD is the designated Safety Officer. The GM is responsible for overall development, implementation, and monitoring of this RMP. All WWD employees are responsible for complying with applicable laws and regulations, NPS requirements and company policies and procedures.

In addition to these general responsibilities, the GM is also responsible for all land-side operations including gear maintenance and tank filling practices. On the water, boat captains are responsible for crew and client safety. Dive masters are responsible for safe SCUBA practices in the water. Table 1 lists specific assignments.

Table 1 – WWD Safety Assignments

Personnel	Area	Description
GM (Safety Officer) Sandy Shore	Office	RMP development and Implementation
		Regulatory Reporting
		Land-side Gear maintenance
		Compressor - Tank filling
Boat Captain Tug Shipman	Office	Docking
	Vessel	Vessel Operation
		Mooring
Dive Masters Bob Diver Cindy Seaworthy	Dive	Dive entries & exits
		Diving
	Dock	Securing Equipment (e.g., tanks & weights)
		Assisting passengers & gear on and off vessel

All employees are held accountable to ensure everyone follows safe and compliant practices. Performance relative to their safety responsibilities is a part of each employee's annual review. In addition, the GM is responsible for the results of the NPS RMP evaluation.

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RMP Element 3 – Training and Qualifications

Personnel must be competent to perform the tasks assigned to implement the RMP.

Training and Qualifications. Wonder Water Dives has the following certification and training requirements to ensure safe operations:

Table 2 – WWD Safety Training and Qualifications

Personnel	Description	Frequency
Training:		
All staff	RMP awareness	Annual
	Safety Chats	Monthly
	Emergency plans	Annual
Applicable Staff	Standard Operating Procedures	Annual
Certifications:		
Boat Captain	USCG captain's license	Renewed annually
Dive Masters	DM or higher certification	Nationally recognized certifying agency
	Gas blender certification	Renewed 5 years
	Oxygen administration certification	Renewed 2 years
	First Aid	Renewed 2 years
Clients	Open Water Diver or higher	Nationally recognized certifying agency

Certifications are tracked copies are maintained in the WWD Office. Training logs are completed to track WWD participation. These logs are filed in the WWD office.

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RMP Element 4 – Documentation and Operational Controls

The concessioner must establish and maintain plans and procedures to manage operations and emergencies associated with its RMP. The number and complexity of these plans and procedures will depend on the size and complexity of the concessions operation. Some plans and procedures may be required by Applicable Law or the contract.

Documentation and Operational Controls. This RMP is developed and maintained by GM.

WWD also has documented standard operating procedures (SOPs) and emergency plans to ensure safe operations. SOPs are listed in Table 3; emergency plans are listed in Table 4. The SOPs and emergency plans are developed and updated by the GM as necessary in collaboration with applicable WWD personnel. The SOPs and emergency plans are maintained in the applicable WWD safety file on board each vessel and in the office with master hardcopies and electronic versions in the WWD GM’s office. SOPs and emergency plans are dated to ensure currency.

Other RMP documentation includes: personnel certification and training records; regulatory reports; inspection logs and corrective action reports; accident investigation and corrective action reports; vessel registration, radio licenses, and other RMP-related correspondence. These are maintained by the GM in the WWD office as well as on-board vessels as applicable.

Table 3 – WWD Safety Standard Operating Procedures

Area	Title/Description	Version Date	Responsibility
Vessel:	Getting on and off the boat from land		Captain/mate/dive staff
	Getting on and off the boat at sea – entry and exit procedures while wearing SCUBA gear		Captain/mate/dive staff
	Dive flag protocols		Captain/mate/dive staff
	Anchoring, mooring & docking		Captain
	Boat maintenance (see also EMP)		Captain/mate
	Captain’s logs		Captain
Dive:	Dive brief – includes safety equipment, no dive gloves or spear fishing, buddy system, underwater safety signals, wildlife interactions		Dive staff
	Client Health/Seasickness/First Aid		Dive staff/mate
	Securing tanks & weights		Dive staff/mate
	Tank filling		GM/dive staff
	SCUBA gear maintenance		Dive staff

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Table 4 – WWD Emergency Plans

Area	Title/Description	Version Date	Responsibility
<i>General</i>	Hurricane		GM
	Emergency Action		GM
<i>Vessel:</i>	Vessel Fire Response		Captain/GM
	Vessel Sinking/Abandon Ship		Captain/GM
	Unexpected weather		Captain/GM/NPS
	Hurricane		GM/NPS
	Fuel Spill Response		GM/Captain/mate
<i>Dive:</i>	SCUBA incident		Dive staff/captain
	Wildlife accident		Dive staff/captain
<i>Office/Dock:</i>	Building Evacuation		GM
	Fire Prevention		GM

RMP ELEMENT 5 - COMMUNICATION

The RMP must be effectively communicated internally to concession employees, and externally to park personnel, visitors, and to other parties that could be involved in the RMP.

RMP Communication. The RMP is available to staff in the GM’s office. Employees are briefed on the RMP and associated SOPs and emergency plans thorough annual and monthly training programs.

Electronic copies of the RMP are provided to WOWA Concessions who provide them to the Chief Ranger’s Office and Park Dispatch. The GM briefs WOWA Concession personnel annually regarding the WWD RMP during the annual RMP evaluation as well as during other check-in meetings.

RMP topics covering vessel, dive and natural hazards are communicated to visitors by boat (captain or mate) and dive briefs (dive staff). Visitors also sign a NPS-approved Acknowledgement of Risk form.

RMP ELEMENT 6 - REPORTING

As part of its RMP, the concessioner must develop and implement procedures for reporting internally within the concession organization, and externally to the park and other regulatory agencies.

RMP Reporting. WWD internal RMP reporting will be completed by the GM with information provided by captains and dive staff as appropriate. WWD will complete all required reports to regulatory agencies, NPS contract stipulated reports including the annual RMP, and any imminent danger or serious incident investigation reports. Table 5 lists key WWD safety reports.

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Table 5 – WWD RMP Reports

Report	Recipient	Reporter	Frequency	Copy to NPS
External Reports				
Certificate of Vessel Inspection	USCG	GM/Captain	Annual	Yes
OSHA 301 Forms	OSHA	GM	Each Reportable Injury/Illness	No
OSHA 300 Form	OSHA	GM	Annual	No
OSHA 300A Form	OSHA	GM	Annual	Yes
Imminent Danger Serious Accident Reports	NPS	GM	As they Occur	Yes
RMP	NPS	GM	Initial and Annual	Yes
Other Regulatory Agency Reports	Applicable Agency	GM	As they Occur	Yes
Internal Reports				
Dive accidents	WWD	GM	As they Occur	Yes

RMP ELEMENT 7 – INSPECTIONS AND CORRECTIVE ACTION

Concessioners must develop and implement safety inspection processes to identify risk management issues. Inspections must be conducted by persons trained and capable of recognizing and evaluating the applicable aspects of the operation. Inspections may be conducted for the concessioner by a qualified third party. Concessioners must also develop and implement a process for abating deficiencies identified through their inspection processes or by any regulatory agency.

Inspections and Corrective Action. WWD has instituted an internal inspection program to ensure compliance with regulations and a safe environment. Inspection schedules are maintained to ensure inspections are conducted as required and include frequency, inspector’s name, findings, and date completed. Daily visual inspections of the vessel, SCUBA gear and tanks will not be recorded unless deficiencies are found.

Deficiencies are ranked based on their severity as imminently dangerous, serious, and minor. Deficiencies are recorded and are reported to the GM. Imminently dangerous and serious deficiencies must be reported to the GM immediately. All deficiencies corrected as soon as possible. The GM will set corrective action timeframes. Imminently dangerous and serious deficiencies may require that operations be shut down until the issue is corrected.

The WWD equipment, facilities and operations are also subject to external inspections. These include USCG vessel inspections, NPS periodic inspections and dive tank inspection for certification.

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Table 6 below lists the key WWD internal and external inspections.

Table 6 – WWD Safety Inspections

Inspection	Inspector	Frequency	Requirements	Documentation
External Inspections				
Vessel inspection	USGS	Annual	USGS	USGS Report
Periodic Operational Performance Inspection	NPS	Semi-annual	10-DIV (NPS)	Periodic Inspection Report
RMP Evaluation	NPS	Annual	10-RMP	RMP Evaluation Report
Fire Extinguisher Hydrostatic Testing	Contractor	Annual	NFPA	Receipt and Extinguisher Tags
Office Fire Suppression System Test	Contractor	Annual	NFPA	Report
Vessel Fire Suppression System Test	Contractor	Annual	NFPA	Report
SCUBA Tank Hydrostatic Test	Contractor	Every 5 yrs.	DOT	Receipt; tank stamp
Internal Inspections				
Vessel (Daily) (See also EMP)	Mate	Daily	Internal Checksheet	Deficiency Record; Inspection Log
Vessel (Monthly)	Captain	Monthly	Internal Checksheet	Completed Check Sheet
Dive Equipment (Daily)	Dive Master	Daily	Internal Checksheet	Deficiency Record; Inspection Log
Dive Equipment (Monthly)	Dive Master	Monthly	Internal Checksheet	Completed Check Sheet; Inspection Logs
SCUBA Tank Visual	Dive Master	Annual	DOT	Tank Sticker; Inspection Log
Compressor	Dive Master	Monthly	Internal Checksheet	Deficiency Record; Inspection Log
Office (See also EMP)	GM	Monthly	Internal Checksheet	Deficiency Record; Inspection Log
Dock (See also EMP)	Captain	Daily	Internal Checksheet	Deficiency Record; Inspection Log

RMP ELEMENT 8 – EMERGENCY INCIDENT INVESTIGATION AND ABATEMENT

Concessioners must develop and implement procedures to address accidents/incidents as part of its RMP.

Emergency Incident Investigation and Correction. All emergency incidents such major vessel or dive equipment failures or accidents, and all client or employee injuries are reported to the GM.

Incidents are investigated and abatement based on timeframes that consider the issue and its severity. At minimum, all incidents are reviewed by the GM and Captain.

WWD classifies incidents based upon their severity as defined in NPS standards. Serious

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incidents are reported to the park and serious incident investigations are conducted in coordination with the NPS.

RMP ELEMENT 9 – MANAGEMENT REVIEW

Concessioners must conduct a management review of the RMP at least annually to ensure its continued suitability, adequacy, and effectiveness. This review should consider performance against internal indicators such as health and safety goals and objectives. The review must also consider program failures that occurred during the year. The RMP must be modified to reflect any necessary changes to address any program gaps required.

Management Review. WWD is committed to maintaining and improving its RMP.

The GM annual reviews the RMP to ensure that it is current, that the RMP and associated procedures are effective and that any annual objectives for improvement were met. Included in this review is an analysis of internal and external inspection results, incident reports, WWD procedural changes, and other input.

The GM makes any necessary changes to the RMP based on this analysis and submits the updated RMP to the park for review and acceptance. The GM also updates and SOPs or Emergency Plans to reflect necessary improvements or changes.

The GM orients staff on the updated RMP and SOPs and Emergency Plans through the WWD training program.

RMP ELEMENT 10 – OTHER CONTRACT REQUIREMENTS

In addition to the requirements outlined for other RMP elements, the concession contract may have additional risk management requirements in the contract, operating, or maintenance plans that are *de facto* standards.

Other Requirements. Wonder Water Dives is a member of Divers Alert Network as required in the contract.

RMP ATTACHMENTS

The concessioner may opt to attach documentation such as training logs, SOPs and emergency plans, inspection forms and reports to the RMP.