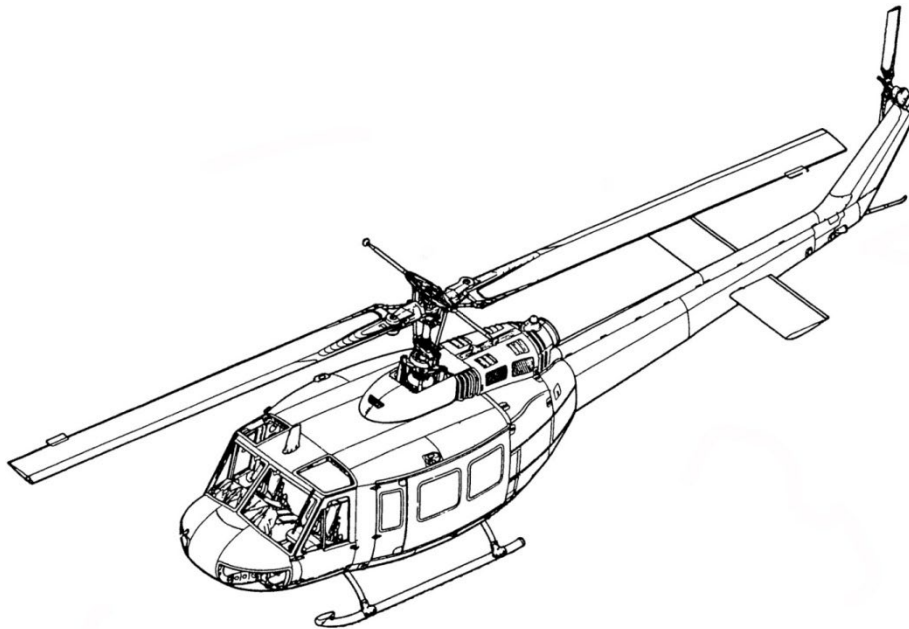


**MT DNRC**  
*Air Operations*



**Safety Management System  
Guide**



MT Dept. of Natural Resources and Conservation  
P. O. Box 201601  
Helena, MT 59620  
(406) 444-0747

INSERT SIGNED LETTER  
SEE APPENDIX A FOR DRAFT LETTER

DEPARTMENT OF NATURAL RESOURCES  
AND CONSERVATION

Forestry Division • Fire Protection Bureau  
2705 Spungin Road, Missoula, MT 59804-3195 Phone: (406) 542-4300 Fax: (406) 542-4217



GREG GIANFORTE, GOVERNOR

1539 ELEVENTH AVENUE

STATE OF MONTANA

DIRECTOR'S OFFICE: (406) 444-2074  
FAX: (406) 444-2694

PO BOX 201601  
HELENA, MONTANA 59620-1601

Date: October 14, 2021

To: Air Operations Personnel

The 2021 Air Operations Safety Management System Guide is approved, and all content is now in effect.

This guide is designed to further a strong aviation safety culture within the Air Operations program.

The 2021 Air Operations Safety Management System Guide documents the Air Operations leadership's intent and describes authority, roles and responsibilities, and procedures for the implementation and maintenance of the Air Operations Safety Management System.

Chuck Brenton  
Aviation Section Supervisor  
406-444-0747

A handwritten signature in cursive script, appearing to read "Chuck Brenton".

## List of Effective Pages

Insert Latest revision pages; dispose of superseded pages.

On a revised page the portion of the text and illustration affected by the latest technical revision is indicated by a black vertical line. Revised pages without a black vertical line are because of text shifting from page to page or non-technical corrections.

<b>Revision #</b>	<b>Date</b>	<b>Status</b>	<b>Subject</b>	<b>Pages Affected</b>
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# CHAPTER 1

## INTRODUCTION

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### 1-0. General.

The purpose of this guide is to document the Safety Management System developed by the Montana Department of Natural Resources and Conservation, Air Operations Section (Air Ops).

### 1-1. Scope.

The Air Operations Safety Management System (SMS) is a system designed to manage and control the risks involved with the Air Operations program.

The Air Operations has a long and enviable safety record with a strong “Safety Culture”. The safety program consists of multiple written safety programs and is driven by dedicated safety minded professionals. The SMS enhances the Air Operation Safety Program by formalizing and further promoting safety as an integral part of the operation.

The following are a few of the programs supplemented with the SMS program:

1. Air Operation 1500 Safety Standards.
2. Air Operations Maintenance Safety Program
3. FAA Safety Procedures and Compliance
4. Air Operations Lockout Tagout Program
5. Air Operations Hazardous Communications Program
6. Montana Safety Culture Act
7. Department’s Safety Program

### 1-2. Applicability.

The SMS covers all aviation related operations conducted by Air Operations personnel. This guide is to be used by all Air Operations personnel in compliance with the SMS requirements.

**Note the SMS process is not intended to apply to tasks not related to aviation operations.**

### 1-3. SMS Fundamentals.

The Federal Aviation Administration (FAA) mandates airlines, operating under a FAA Part 121 certificate, to develop and implement an SMS. These programs are not required for small operators but may be voluntarily implemented. The FAA has published Advisory Circular AC 120-92B for guidance with implementing a SMS program. Reference: [https://www.faa.gov/regulations\\_policies/advisory\\_circulars/index.cfm/go/document.information/documentid/1026670](https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentid/1026670) Note the advisory circular is not regulatory in nature and explicitly states it is not the only means of compliance. It should also be noted, a small operator or Public Use operator cannot fully meet the FAA Part 5 rules because of the technical issues with not operating under a Part 121 Certificate. As stated in the Advisory Circular, the intent is for the SMS to be tailored to each unique operator while complying with the core principals of Part 5. The Air Operations SMS program meets the intent of the FAA rule.

1. The SMS is primarily a decision-making process designed to proactively identify and address safety concerns within aviation operations. It is structured around four components: safety policy, safety risk management (SRM), safety assurance (SA), and safety promotion. A brief description of these components is provided below.
2. **Safety Policy.** Safety policy is where the objectives, responsibilities, and standards are set and assigned. It is also where management conveys its commitment to the program.
3. **Safety Risk Management (SRM).** The SRM component provides a decision-making process for identifying hazards and mitigating risk. The SRM component is the organization's way of fulfilling its commitment to consider risk in their operations and to reduce it to an acceptable level.
4. **Safety Assurance (SA).** The SA provides the necessary processes to ensure the organization's system is meeting its safety objectives and that mitigations, or risk controls, developed under the SRM are working.
5. **Safety Promotion.** The last component, safety promotion, is designed to ensure that employees have a solid foundation regarding their safety responsibilities, the organization's safety policies and expectations, reporting procedures, and a familiarity with risk controls. Training and communication are the two key areas of safety promotion.

### 1-4. Definitions.

1. *Hazard* means a condition that could foreseeably cause or contribute to an aircraft accident as defined in 49 CFR 830.2.
2. *Risk* means the composite of predicted severity and likelihood of the potential effect of a hazard.
3. *Risk control* means a means to reduce or eliminate the effects of hazards.

4. *Safety assurance* means processes within the SMS that function systematically to ensure the performance and effectiveness of safety risk controls and that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
5. *Safety Management System (SMS)* means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk controls. It includes systematic procedures, practices, and policies for the management of safety risk.
6. *Safety objective* means a measurable goal or desirable outcome related to safety.
7. *Safety performance* means realized or actual safety accomplishment relative to the organization's safety objectives.
8. *Safety policy* means the certificate holder's documented commitment to safety, which defines its safety objectives and the accountabilities and responsibilities of its employees regarding safety.
9. *Safety promotion* is a combination of training and the communication of safety information to support the implementation and operation of an SMS within an organization.
10. *Safety Risk Management* means a process within the SMS composed of describing the system, identifying hazards, and the analyzing, assessing and controlling of risk.
11. *System* means an integrated set of constituent elements that are combined in an operational or support environment to accomplish a defined objective. These elements include people, hardware, software, firmware, information, procedures, facilities, services, and other support facets.

#### **1-5. Contact Information.**

For information on the Air Operations SMS, contact the Departments Aviation Program Manager at (406) 444-0747.

## CHAPTER 2

# SAFETY POLICY

---

### 2-0. General.

As stated in the introduction, the Safety Management System, is a system designed to manage and control the risks involved with the Air Operations program. This chapter defines the safety performance objectives, assigns roles and responsibilities, allocates resources and defines management's commitment to managing safety throughout the program.

### 2-1. Document Control and Maintenance.

1. The Safety Management System Guide master copy will be kept in the Accountable Executive's office and made available to all personnel. Electronic copies will also be made available to all personnel.
2. The Accountable Executive has the overall responsibility for the maintenance of the SMS Guide and shall routinely review the document to ensure it remains relevant.
3. It is the Accountable Executive's responsibility, or designee, to affect any changes to this guide and to record those changes in the revision status log. The log must contain the revision history, and each revision must contain the revision number, status, subject, section or page# affected by the revision. Further, an updated approval letter must be signed and inserted into the document.
4. The Accountable Executive shall notify all Air Operations employees of any changes to the document.



## **2-2. Safety Policy Statement.**

Management of the Air Operations program recognizes the benefit of incorporating a SMS program into the existing safety programs and are committed to its success. The following lists the driving principles behind the SMS program:

1. Proactively manage the risks involved and to reduce those risks to a level as low as reasonably practical.
2. Commit to developing, implementing, improving, and maintaining the SMS program.
3. Commit the necessary time and resources to ensure its success.
4. Clearly define the roles and responsibilities.
5. Promote a healthy safety culture with leadership, training, and support.
6. Encourage reporting of hazards and issues.
7. Discourage unacceptable behavior, activities, and conditions.
8. Comply with all applicable regulatory and agency specific requirements.
9. Develop and maintain an emergency response plan for emergency situations.
10. Document and communicate the program throughout the organization.

## **2-3. Roles and Responsibilities.**

The roles and responsibilities of Air Operations personnel are defined in the following paragraphs and are further defined throughout this guide as necessary.

### **1. Accountable Executive.**

The Air Operations Section Supervisor (Chief Pilot) is the designated Accountable Executive for the SMS program. Responsibilities of the Accountable Executive are as follows:

- a. Has the ultimate responsibility for safety management within the organization.
- b. Ensure that the SMS is properly implemented and performing in all areas of the organization.
- c. Develop and sign the safety policy.
- d. Designate sufficient management personnel and define their roles and responsibilities.
- e. Communicate the safety policy throughout the organization.
- f. Regularly review the safety policy to ensure it remains relevant and appropriate to organization.
- g. Regularly review the safety performance of the organization and direct actions necessary to address substandard safety performance.

## **2. Members of Management.**

The following personnel have been designated as managers under the SMS program:

- a. Air Operations Rotary-Wing Supervisor (Helicopter Safety Pilot)
- b. Air Operations Fixed-Wing Supervisor (Fixed-Wing Safety Pilot)
- c. Air Operations Maintenance Supervisor

All managers must use the SMS processes in managing their area of operational responsibility, to include the following:

- a. Coordinate implementation, maintenance, and integration of the SMS throughout the organization.
- b. Facilitate hazard identification and safety risk analysis.
- c. Monitor the effectiveness of safety risk controls.
- d. Ensure safety promotion throughout the organization.
- e. Regularly report to the accountable executive on the performance of the SMS and on any need for improvement.

## **3. Employees.**

All employees have the following responsibilities:

- a. Make themselves aware of the company's safety policies, as well as the processes, procedures, and tools relevant to their responsibilities.
- b. Report safety hazards.
- c. Have a duty and responsibility to follow the organization's processes and procedures.

## **2-4. Designation and Responsibilities of Required Safety Management Personnel.**

In the event of an emergency, the Accountable Executive may delegate authorities as necessary. In the event the Accountable Executive is unavailable, the Air Operations Rotary-Wing Supervisor (Helicopter Safety Pilot) may assume the Accountable Executive's responsibilities if necessary.

In the event of an aircraft accident or incident the agency Aircraft Crash, Search and Rescue Guide should be consulted. Members of management should assist where their area of operational responsibility is involved.

## CHAPTER 3

# SAFETY RISK MANAGEMENT

---

### 3-1. Safety Risk Management Overview.

Safety Risk Management (SRM) is the core process within the SMS. This section defines the decision-making process required to assess tasks performed by Air Operations personnel. The goal is to utilize the process in identifying any risks involved with the performance of the task and, if necessary, to act appropriately to reduce or mitigate those risks down to an acceptable level, thereby reducing the risk of an incident or accident.

The significant concepts regarding safety risk management discussed throughout this section can be summarized as follows:

1. Make identifying and addressing safety concerns a deliberate and conscious act.
2. There is no such thing as absolute safety, particularly in aviation where it is not possible to eliminate all safety risks.
3. Safety risks must be managed to a level as low as reasonably practicable.
4. Safety risk mitigation must be balanced against:
  - a. Time;
  - b. Cost;
  - c. Difficulty of taking measures to reduce or eliminate the safety risk.

The following is a list of the essential steps in the risk management process:

1. Analyze the system.
2. Identify hazards.
3. Assess hazards.
4. Implement controls for any hazards with unacceptable risk.

### **3-2. Applicability.**

Safety Risk Management decision-making process must be applied to the following:

1. Implementation of new systems.
2. Revision of existing systems.
3. Development of operational procedures.
4. Identification of hazards.
5. Identification of ineffective risk controls through the safety assurance processes.
6. Need to deviate from normal procedures.
7. Any other situation where Goals and Risks are not clearly defined.

Once a system or task has been assessed through the SRM process and incorporated into normal procedures, the requirements of the SRM are no longer applicable on a routine basis. However, if one of the requirements listed above becomes applicable the process must be repeated.

### **3-3 Emergencies.**

When a person experiences an emergency, or believes a situation exists that would create an emergency, he/she may take any action he/she deems appropriate to assure the safety of those involved. The incident must be reported to the appropriate manager or to the Accountable Executive.

### **3-4 Organizational Decision Making.**

The SRM decision-making process must be applied at all levels of the organization for the SMS to function properly. It is essential that all employees participate in the decision-making process at the level appropriate to their roles and responsibilities to include the following:

1. Ensure tasks are conducted within the limits of the programs level of acceptable risk.
2. Recognize risk and changing conditions which may cause operations outside of normal procedures.
3. Exercising judgment on how to eliminate or reduce hazards to lessen the overall risk.
4. Accept no unnecessary risk.
5. Recognize and act upon extreme risk situations with a NO – GO decision.

6. Recognize when the process requires managements involvement and acceptance of risk. Making risk decisions at the appropriate level establishes clear accountability. Even High-risk tasks may be undertaken when there is a clear understanding of the benefit to the operation.
7. These basic decision-making principles must be applied before any anticipated job, task, or mission is performed for the first time.
8. Those accountable for the success or failure of a mission must be included in the risk decision process.
9. Supervisors at all levels must ensure subordinates know how much risk they can accept and when they must elevate the decision to a higher level.

### **3-5 System Analysis and Hazard Identification.**

The System Analysis and Hazard Identification is simply the process of learning as much as possible about a given system, or task, with the goal of identifying potential safety concerns with the task. In its simplest terms, the goal with this process is for experienced personnel, subject matter experts (SME) and appropriate levels of management to learn as much as possible about the task being performed to identify what can go wrong under normal and abnormal conditions.

This process must adapt to the situation but need only be as complicated as is necessary to identify potential hazards of the task being analyzed. For example: When introducing a new aircraft to the fleet, a detailed in-depth review will be required to identify concerns of many different systems such as operations, maintenance, training etc. However, only the elements of the systems involved need be addressed when a change in procedures is required or when a need to operate outside of existing normal procedures is required. For example: When an unusual mission is requested, such as hauling concrete for a construction project, only those specific factors involved with the mission need be part of the analysis such as a description and intent of the mission, terrain, local weather, potential effects on the aircraft, rigging, support crews etc.

Using the worksheet contained in Appendix B will assist with, and document, the analysis process. Refer to Chapter 6 for the documentation requirements.

### **3-6 Deleted.**

### 3-7 Risk Assessment and Mitigation.

Risk Assessment is the process of determining what the potential impacts are when conducting a task while exposed to an identified hazard. The results of this assessment are used in determining whether a task may be conducted or not. If not, implementation of procedures, to reduce the risk to an acceptable level, may be possible. Where mitigation of risk isn't possible, the task may still be performed, when in the best interest of the department, if the identified risk is accepted by personnel at the appropriate levels.

The intent of this process is to use the information learned, in the previous analysis and identification steps, to make an informed speculation as to what could happen and how severe the impacts could be if the task was conducted with the known risk. This is the assessment part of the equation. A matrix is then applied to determine if the risk is acceptable or whether the risk is severe enough to warrant mitigation or approval by management to operate or perform the task.

For each identified risk, perform the following steps:

1. The assessment process. Using information gained by personnel in the previous System Analysis and Hazard Identification steps, employees and/or managers involved must answer the following questions for each identified hazard:
  - a. If you operate with the identified hazard, what is the likelihood of an accident occurring? Where:
    - i. **Remote**, means an accident is unlikely to occur.
    - ii. **Potential**, means there is an elevated chance an accident could occur.
    - iii. **Probable**, means an accident is likely to occur.
  - b. If an accident does occur, what is the potential severity of any resulting injuries or damage? Where:
    - i. **Minor**, means that the results of an accident are not likely to be significant or serious.
    - ii. **Significant**, means an accident would probably cause significant damage or injuries.
    - iii. **Catastrophic**, means an accident would likely result in a momentous tragic event potentially with a loss of life.

c. Use the following matrix to determine the level of the risk (Risk Level):

Likelihood	Severity		
	Minor	Significant	Catastrophic
Remote	Low	Low	Medium
Potential	Low	Medium	Medium
Probable	Low	Medium	High

2. The mitigation and acceptance of risk process. Depending on the classification of the Risk Level, mitigation, or acceptance of risk by management, may be required as follows:

- a. **Low.** For risks classified as Low, no action is required.
- b. **Medium and High.** For risks classified as Medium or High, mitigation of the risk must be attempted by at least performing the following:
  - i. Pursue ways to minimize the risk, such as a different flight path, delaying flight for better weather, downloading weight, using a different aircraft or tool, etc.
  - ii. Implement procedures designed to reduce the risk if necessary.
  - iii. If necessary, seek suggestions or input from management or other experienced employees.
- c. **Medium.** For operations with risks classified as Medium which cannot be mitigated, employees may conduct the mission or task but must be performed with a heightened sense of caution.
- d. **High.** Operations with risks classified as High must be approved by the Accountable Executive or the Rotary-Wing Supervisor, if the risks cannot be mitigated to a lower risk level.

Example situations where a Risk Assessment Worksheet should be completed:

1. For a deviation from normal procedures, an unusual mission, maintenance ferry flight, recovery of an aircraft using a crane or other unusual equipment or procedures, etc.
2. Implementation of a new system or process, a new aircraft model added to the fleet, night operations, a new aircraft wash system or Heli-cart, etc.
3. Implementing a change to an existing procedure, a change to a training procedure, or a change to equipment as in the external load connectors, etc.

## CHAPTER 4

# SAFETY ASSURANCE

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### **4-0. Safety Assurance Overview.**

The Safety Assurance process ensures the safety program is functioning properly and effectively. The assurance process is designed to monitor and assess the performance of the system while providing continuous improvements as necessary.

### **4-1. Safety Performance Monitoring, Measurement and Assessment.**

Monitoring, measuring and assessment of the performance of the safety program is essential to the overall performance of the safety program.

The managers identified in Chapter 2 are responsible for accomplishing the following procedures pertinent to managing their area of operational responsibility.

1. Monitoring of the operational processes and environmental conditions is performed by the managers as they perform their duties and is simply the act of continually reviewing the operational processes looking for anything of safety significance. Managers should monitor and accomplish the following as they perform their duties:
  - a. Monitor, analyze, assess, evaluate, and audit existing operational processes for compliance with safety protocols, effectiveness of the processes, changes in the working environment and for indications of new or changing hazards or other safety concerns.
  - b. Continually monitor and evaluate the effectiveness of risk controls previously established and identify and ineffective measures.
  - c. Monitor, review, and analyze internal Air Operations forms and documents, Federal Aviation Administration data, U.S. Forest Service data, and any other relative safety documents for safety concerns that may be relevant to the Air Operations program.
  - d. Investigate incidents and accidents that occur and determine if corrective actions are required.
  - e. Investigate reports of non-compliance with established safety protocols.
  - f. Maintain a list of potential issues and hazards to monitor for as long as they remain relevant.



#### **4-2. Employee Reporting Procedures.**

Employees are encouraged to report any safety concerns to their immediate supervisor or directly to the Accountable Executive. However, an employee may report the safety concern confidentially to the department's safety representative.

#### **4-3. SMS Assessment and Audits.**

The Accountable Executive must routinely require an audit and assessment of the SMS program to determine if the safety program performance is meeting the Air Operation's safety objectives. The audit and assessment of the SMS program should:

1. Be performed jointly by the accountable managers and include other knowledgeable personnel as deemed necessary.
2. Evaluate the SMS program to ensure the requirements of paragraph 4-1 are being complied with.
3. The Accountable Executive must:
  - a. Generate, or delegate, a report of the results of the audit and assessment.
  - b. Review the report.

#### **4-4. Performance Corrections and Continuous Improvements.**

The SMS program is designed to be continuously updated by implementing improvements as necessary. When addressing any safety concerns resulting from the monitoring, assessment or audit process, the following must be performed:

1. The Accountable Executive must review the reported safety concerns and recommendations and initiate corrective actions as necessary.
2. The Safety Risk Management procedures contained herein must be utilized when making corrections and improvements.

## CHAPTER 5

# SAFETY TRAINING AND PROMOTION

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### 5-0. Overview.

Proper training and promotion of the SMS program is necessary for the SMS program to function properly and efficiently.

### 5-1. Training, Competencies and Communication.

Using in person or online training, email or website communications, or other appropriate methods, managers identified in Chapter 2 are responsible for meeting the following requirements pertinent to managing their area of operational responsibilities.

1. Ensure employees are aware of the SMS policies, processes, and tools that are relevant to their responsibilities.
2. Provide training to ensure employees attain and maintain the competencies necessary to perform their duties relevant to the operation and performance of the SMS.
3. Convey hazard information relevant to the employee's responsibilities.
4. Explain why safety procedures have been introduced or changed.

## CHAPTER 6

# DOCUMENTATION

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### **6-0. Overview.**

The documentation requirements for the SMS program includes this guide, described in Chapter 1, and the record requirements listed below.

### **6-1. Safety Risk Management.**

1. The Risk Assessment Worksheet is to be used to document the assessments required by the Risk Management procedure.
2. The managers, identified in Chapter 2, are responsible for retaining the forms pertinent to managing their area of operational responsibility.
3. Such records must be retained for as long as the control or mitigation remains relevant to the operation.

### **6-2. Training and Communication.**

1. A record of all training provided each employee must be retained for as long as the individual is employed by the department.
2. All communications required, per Chapter 5, must be retained for a minimum of 24 consecutive calendar months.

### **6-3. Safety Assurance and Audits.**

1. The results of the safety assurance processes must be retained for a minimum of 5 years.

## **APPENDIX A**

### **Approval Letter**

---

A letter, containing the following, or similarly worded statement, is to be signed by the Accountable Executive in accordance with FAR Part 5.21 and placed into the guide following the document cover. This procedure is to be repeated following any revision to the guide.

Date: October 14, 2021

To: Air Operations Personnel

The 2021 Air Operations Safety Management System Guide is approved, and all content is now in effect.

This guide is designed to further a strong aviation safety culture within the Air Operations program.

The 2021 Air Operations Safety Management System Guide documents the Air Operations leadership's intent and describes authority, roles and responsibilities, and procedures for the implementation and maintenance of the Air Operations Safety Management System.

Chuck Brenton  
Aviation Section Supervisor  
406-444-0747

## APPENDIX B

### Risk Assessment Worksheet

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The Risk Assessment Worksheet is to be used to document the risk assessments performed in accordance with paragraph 3-2. Refer to Chapter 6 for document retention requirements.

Complete the worksheet as follows:

1. Enter the date, name and title of the person preparing the worksheet.
2. Enter a description of the mission, project, or system.
3. Perform the following steps for each identified hazard:
  - a. Enter a description of the hazard.
  - b. Enter the initial Risk Level determined in accordance with paragraph 3-7. See the excerpt from para 3-7 below.
  - c. Enter a description of any mitigation efforts taken.
  - d. Re-establish the Risk Level after applying the mitigation efforts and enter the results.
4. Enter additional notes as necessary.
5. Form is to be signed and dated by the person approving the mission or system.

For each identified risk, perform the following steps:

1. The assessment processes. Using information gained by personnel in the previous System Analysis and Hazard Identification steps, employees and/or managers involved must answer the following questions for each identified hazard:
  - a. If you operate with the identified hazard, what is the likelihood of an accident occurring? Where:
    - i. **Remote**, means an accident is unlikely to occur.
    - ii. **Potential**, means there is an elevated chance an accident could occur.
    - iii. **Probable**, means an accident is likely to occur.
  - b. If an accident does occur, what is the potential severity of any resulting injuries or damage? Where:

- i. **Minor**, means that the results of an accident are not likely to be significant or serious.
- ii. **Significant**, means an accident would probably cause significant damage or injuries.
- iii. **Catastrophic**, means an accident would likely result in a momentous tragic event potentially with a loss of life.

Use the following matrix to determine the level of the risk (Risk Level):

Likelihood	Severity		
	Minor	Significant	Catastrophic
Remote	Low	Low	Medium
Potential	Low	Medium	Medium
Probable	Low	Medium	High

- 2. The mitigation and acceptance of risk process. Depending on the classification of the Risk Level, mitigation, or acceptance of risk by management, may be required as follows:
  - a. **Low**. For risks classified as Low, no action is required.
  - b. **Medium and High**. For risks classified as Medium or High, mitigation of the risk must be attempted by at least performing the following:
    - i. Pursue ways to minimize the risk, such as a different flight path, delaying flight for better weather, downloading weight, using a different aircraft or tool, etc.
    - ii. Implement procedures designed to reduce the risk if necessary.
    - iii. If necessary, seek suggestions or input from management or other experienced employees.
  - c. **Medium**. For operations with risks classified as Medium which cannot be mitigated, employees may conduct the mission or task but must be performed with a heightened sense of caution.
  - d. **High**. Operations with risks classified as High must be approved by the Accountable Executive or the Rotary-Wing Supervisor if the risks cannot be mitigated to a lower risk level.

<b>Risk Assessment Worksheet</b>		
Date:	Prepared By:	Title:
System or Project Description / Mission Objective		
<b>Hazard</b>	<b>Mitigation</b>	
Initial Risk Level:	Mitigated Risk Level:	
Initial Risk Level:	Mitigated Risk Level:	
Initial Risk Level:	Mitigated Risk Level:	
Initial Risk Level:	Mitigated Risk Level:	
Additional Notes:		
Date:	Approved by / Name and Title:	Signature:
Use additional pages if necessary.		Page _____ of _____