

ACSF Audit Lessons Learned

By Lindsey McFarren

Let me start by admitting that I am one of the individuals that helped create this audit standard. Let me also quote a wise man who once said, “We didn’t start the fire.” The industry itself—that’s you—has become increasingly frustrated with the endless parade of standards and audits. There are standards for pilots, standards for aircraft, standards for operators, and most come with a catchy name and logo. The good news is the goal of the ACSF Industry Audit Standard, which is to finally create ONE audit for all Part 135 operators, might actually come to fruition. The bad news is that the audit standard is hard. It’s not impossibly hard. It’s you-will-definitely-have-a-safer-more-efficient-operation-but-you-will-work-your-tail-off hard.

In addition to being on the initial audit standard working group, I’m now an auditor and safety consultant. ACSF policies wisely prohibit me from acting in both capacities for a single operator, but I’ve performed both auditing and consulting tasks for different operators.

This year marks the second year of the Air Charter Safety Foundation (ACSF) Industry Audit Standard (IAS). More than 20 operators have now undergone an audit based in the IAS, and I have participated in several of those audits and assisted other operators in audit preparation. I’ve learned quite a bit about the audit process and am happy to share those experiences with operators considering the audit.

Steps to a Happy Audit

First, if you would like to complete the ACSF IAS Audit, plan ahead. Depending on your operation’s current documentation, implementation of safety plan, and other characteristics, you might need six or more months to prepare. Operators with very detailed documentation and relatively mature safety programs might need only several weeks to prepare for the audit, but others could require much longer. Obtain the operator pre-audit checklists, available for free at www.acsf.aero, and ask your staff members to help complete the checklists. This initial review will help you identify significant gaps in your documented and implemented policies.

Second, consider outside help. Sometimes it is better to have an objective third party assist you with the pre-audit checklists, but you aren’t entirely off the hook. Consultants are also likely to ask you to complete the checklists before they visit your operation. It is one thing for a consultant to review a company’s manual and complete the checklists for the operator. A very different perspective is obtained by having operators complete their own lists, revealing where they think they stand. A consultant is not only a good option for your gap analysis, but also for helping you develop and implement a plan

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for closing those gaps with a reasonable chance of success. (Be sure to use a safety consultant who has received training on the ACSF standard. The audit firms listed on ACSF’s website have several individuals who are trained on this standard.)

Third, don’t just check the box. If you find gaps in your operation when you complete the pre-audit checklists (and you will), don’t just add a paragraph to your GOM or SOPs that “Operator X follows industry best practices for fatigue countermeasures to ensure adequate crewmember rest and alertness when operating across multiple time zones.” (See ACSF IAS 2.3.5.) The auditor will know if you copy and paste from the standard without reasonable attempts at implementation. (That’s a real example; I can’t make this stuff up.) The standard should serve as guidance but is not an acceptable means of compliance if the material is just regurgitated and not appropriately implemented.

If a consultant helps develop manuals or other documents to meet the ACSF standard, don’t just

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put the documents on the shelf and consider yourself ready. The standard repeatedly asks two questions: “Is the policy documented?” and “Is the policy implemented?” Although a consultant can assist in implementation, unless you plan to have them on-site for several months, know that *you* as the operator must ultimately ensure implementation.

Fourth, don’t panic. No operator—let me repeat, *no operator*—will complete this audit on the first attempt. There is no such thing as a first-time pass. If an auditor has no findings following an ACSF IAS audit, ask ACSF for your money back. You didn’t have an attentive, thorough auditor. Operators have 120 days to submit and complete a corrective action plan to address findings from the audit. If you used a consultant to prepare, give him or her a call and ask for help with the corrective action plan. If you didn’t use a consultant before, you might consider calling one now to help develop and complete your corrective action plan. Pay attention to your timeline because operators that do not successfully complete their corrective action plan in those 120 days will have to start the process all over again.

One Particular Pitfall

In working with these aircraft operators, I have found one section of the audit standard to be particularly confusing for aircraft operators, Section 1: Corporate Organization and Management. This section contains the standards related to an operator’s safety management system (SMS) and clearly many operators have difficulties with those standards, but this Safety Watch column has featured SMS principles in the past and these are not the standards I’d like to discuss here.


Rather, I’d like to focus on Section 1 Part 1.0 Management System and Part 2.0 Documentation and Records Management. The first misunderstanding about these two subsections is that the standards contained in them apply only to the flight department of the operation. This misconception is understandable, as the majority of the standards in Section 1 are assessed by the Flight Operations auditor. But the standards in Section 1 actually apply to the *entire* organization, not just the flight department. Therefore, an organizational chart from your General Operations Manual (GOM) that starts with “Director of Operations” at the top is likely to be insufficient to meet the requirements. Similarly, recordkeeping procedures for flight manifests and other flight department documents are only a

partial solution to the audit standards in Part 2.0 Documentation and Records Management. Records related to human resources, accounting, and other departments of your business should also be addressed. Apply this logic to each standard in Section 1, and you’ll more accurately see where your business stands.

So how do you comply with these standards? Well, it’s like eating an elephant: you start one bite at a time. Operators with experience with ISO (the International Organization for Standardization) will likely have an easier time meeting the standards in this section because ISO focuses so heavily on corporate policies, procedures, and documentation. In fact, one of the first possible steps to take to meet Section 1: Corporate Organization and Management is to develop a corporate policies and procedures manual. This manual should apply to *all* employees, not just individuals with flight-related duties. In other words, it should not be a copy of your GOM or GMM. Look at it this way: If your employees all pooled together to play the lottery, actually won, and never showed up for work again, how would anyone else know how to run the show?

Sit down and think about your business from nuts to bolts, or assign one person from each department to do this. For example, get someone from human resources to think about the employment process. How is a job posted or advertised? How are individuals interviewed and selected? What checks have to be conducted before the person joins the company? How do they eventually “separate” (government speak for “quit”), or how are they terminated? Do this with each department. Does it take time? Yes. Will your business be better for it? Absolutely.

Even the Best Can Get Better

To date, operators that have undergone the ACSF audit consider it to be a very valuable but challenging experience. Don’t wait for a customer to request or demand you complete the audit; get a copy of the operator pre-audit checklist now and start comparing your operations to the standard. Even the best-organized flight department is likely to need to improve documentation of corporate policies and practices! You stand a much better chance of success if you close any gaps in your operation over a period of time instead of rushing to prepare in just a few weeks. 

Lindsey McFarren is president of McFarren Aviation Consulting. She can be reached at lindsey@mcfarrena-aviation.com or (703) 445-2450.