

Appendix B – Safety Risk Management Decision Memoranda (SRMDM) Coordination and Signatures

When proposing a change to the NAS, a preliminary safety analysis must be performed. If the preliminary safety analysis indicates the change will not introduce risk into the NAS, documentation supporting the conclusion, a brief reasoning/motivation for the change, and rationale for not requiring further SRM analysis, should be presented in a *Safety Risk Management Decision Memorandum* (SRMDM).

a. SRMDMs are required to have a minimum of three signatures – one from the Facility or Support Manager² responsible for the change (change proponent) and one from a management official preferably from outside the facility. If the Change Proponent is a Facility Manager or Support Manager, then the District Manager will provide the second signature. The third signature will be through Central Safety Assurance Group (SAG). By signing the SRMDM, the Change Proponent and/or Manager certify that the proposed change will not adversely affect safety or introduce risk into the NAS. The third signatory functions in a quality assurance capacity, endorsing both the preliminary safety analysis and the SRM decision process.

b. Electronic copies of finalized SRMDMs along with source material must be forwarded to the Facility's/District's respective Support Specialist in the Operations Support Group (AJV-C1). The OSG will review SRMDMs from a technical perspective and forward to the Safety Assurance Group (SAG) who will review the memorandum from an SRM process perspective. The SAG will, if necessary, return comments to the OSG for a consolidated response to the originating Facility/District office.

c. SRMDMs are to be maintained in the local Facility/District SRM File for a period equivalent to the lifecycle of the change. Finalized (signed) SRMDMs are to be uploaded and available on the ATO-T Knowledge Sharing Network (KSN) at: <https://ksn.faa.gov/km/teams/atotsms>.

d. A copy of all signed SRMDS will be sent to the Central Safety Assurance Group (SAG). The preference will be in electronic scanned format, along with an electronic file copy of the final word processed SRMDM.

² ATO Terminal Managers are required to complete Course 10603, Introduction to Safety Management Systems, and Course 66000001, The Manager's Role in Safety Risk Management, prior to approving an SRMDM.

Appendix C – Safety Risk Management Document (SRMD) Coordination and Signatures

Safety Risk Management Documents (SRMDs) initiated by Facility/District offices are coordinated and routed based on level(s) of risk and mitigation(s) required to control the risk. Risk is assessed in accordance with the ATO SMS Manual³ with level of risk determined as **High, Medium, or Low**.

1. Initial High Risks⁴ – The SRMD must be coordinated and routed through the following offices:

a. Terminal Facility/District Manager. The Initiating Facility will coordinate/route SRMDs through the Terminal District Office. The District Office SRM Point of Contact (POC) will review and then will coordinate/route to the Operations Support Group (OSG). If the District Office is the initiator, then the District Office will coordinate with and route SRMDs to the OSG. As soon as practicable, the facility/district manager should notify the Safety Assurance Group (AJV-C1) of the proposed change and the associated initial high risk hazard (HRH).

b. Operations Support Group (AJV-C2). The OSG will review SRM documents from a technical perspective and forward to the Safety Assurance Group (SAG). The SAG will review the documents from a Safety Risk Management process perspective and if necessary provide comments and/or recommendations to the OSG. The SAG and OSG jointly will coordinate through Terminal Airspace, Procedures, and Safety Groups (AJT-28) for AOV approval of initial HRH mitigations. SRMDs which meet requirements established in the ATO SMS Manual and have received AOV concurrence throughout each SRM phase identified in Safety Oversight Circulars (SOC) 07-02 and/or SOC 07-05, will be forwarded to the Director of Central Terminal Operations. The SAG and OSG member reviewing the SRM document will indicate by signing they have reviewed and are in concurrence with the contents, SRM processes, and format of the document. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments.

c. Director, Central Terminal Operations (AJT-C). Reviews SRM document, indicating approval and by signing a memorandum (requesting approval) addressed to the Director, Terminal Safety and Operations Support Office (AJT-2).

d. Terminal Safety and Operations Support Office. The Terminal Airspace and Procedures Group (AJT-22) will review and indicate concurrence through signature prior to forwarding to the Director, Terminal Safety and Operations Support Office (AJT-2) for approval/signature (see example *Initial High Risk* signature page at Appendix).

³ See ATO SMS Manual, Chap 3: Safety Risk Management, for risk level definitions and determination process

⁴ ATO is required to obtain AOV approval for mitigations of initially identified high-risk hazards (HRH). For NAS changes involving initial high risk, Facility/District Offices should notify the Safety Assurance Group (AJV-C1). The Safety Assurance Group will coordinate with Terminal Airspace and Procedures Group (AJT-28) for AOV concurrence at predetermined phases during the SRM process. Offices should refer to Safety Oversight Circulars (SOC) 07-02 and 07-05 for additional guidance on initial HRHs.

e. Safety Management System/Safety Risk Management Office (AJS-2). The Director, ATO SMS/SRM Office (AJS-2) reviews the SRM document, indicating concurrence through signature on the approval line.

f. Air Traffic Safety Oversight (AOV). All high risk hazard mitigation(s) must be approved by AOV prior to implementing a change to the NAS. The Director, Air Traffic Safety Oversight (AOV-1) indicates approval of initial high risk mitigation(s) by providing a *Mitigation Approval Signature* on the SRMD Signature Page.

g. Vice President, Terminal Services (AJT-0). Initial high risk(s) that has/have been mitigated to medium or low, can only be accepted at the Vice President level.

2. Medium/Low Risks – SRMD Risk Acceptance will be within the Facility/District Manager level however, the SRMD approval must also be obtained from the Central Terminal Director and review by the Central Service Center for review and concurrence prior to implementation of the proposed change. The Central Service Center, Operational Support Group (OSG), Safety Assurance Group (SAG), and in select cases the Planning a Requirements Group (PRG) are required to review the SRMDs, monitor and track mitigation of all medium risk hazards throughout the lifecycle of the change or until risk is mitigated to low.

a. Terminal Facility/District Manager. The Initiating Terminal Facility will coordinate/route through the District Office. The District Office SRM POC will review and then will coordinate/route to the Central Operations Support Group (OSG), AJV-C2. If the District Office is the initiator, then the District Office will coordinate/route through the OSG.

b. Operations Support Group (AJV-C2). The OSG will review the SRM documents from a technical perspective and forward to the Safety Assurance Group (SAG), AJV-C1. The SAG will review the documents from a Safety Risk Management *process* perspective and if necessary, provide comments and/or recommendations to OSG. OSG will combine SAG comments and/or recommendations with their own and provide a consolidated response to the Facility/District Office. The SAG and OSG member reviewing the SRM document will indicate by signing they have reviewed and are in concurrence with the contents, SRM processes, and format of the document. SRMDs which meet requirements established in the ATO SMS Manual will be forwarded for approval to the Director, Central Terminal Operations. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments.

c. Director, Central Terminal Operations (AJT-C). Reviews SRM document, indicating approval and by signing and attaching a memorandum (requesting approval) addressed to the Director, Terminal Safety and Operations Support Office (AJT-2).

Facility/District Manager. Facility/District Manager accepts medium and low risk(s) resulting from terminal airspace and procedural changes (see example *Medium/Low Risk Hazards* signature page at Appendix F).

3. Medium/Low Risks: New Waiver Requests that do not affect separation minima - New waivers are those waivers that constitute the first of a kind or when the location or equipment is changed or modified, or resubmissions of waivers for a specified period of time (e.g., Fly-Ins, Air Shows, etc). SRMDs associated with requests for waivers that do not affect separation minima must be coordinated and routed through the following offices:

a. Terminal Facility/District Manager. The Terminal initiating Facility will coordinate/route through the District Office. The District Office SRM POC will review and then will coordinate/route to the Central Operations Support Group (OSG), AJV-C2. If the District Office is the initiator, then the District Office will coordinate/route through the OSG.

b. Operations Support Group (OSG), AJV-C2. The OSG will review the SRM documents from a technical perspective and forward to the Safety Assurance Group (SAG), AJV-C1. The SAG will review the documents from a Safety Risk Management *process* perspective and if necessary, provide comments and/or recommendations to OSG. OSG will combine SAG comments and/or recommendations with their own and provide a consolidated response to the Facility/District Office. The SAG and OSG member reviewing the SRM document will indicate by signing they have reviewed and are in concurrence with the contents, SRM processes, and format of the document. SRMDs which meet requirements established in the ATO SMS Manual will be forwarded for approval to the Director, Central Terminal Operations. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments.

c. Director, Central Terminal Operations (AJT-C). Reviews Waiver Request along with SRM document, and indicates approval and by signing a memorandum (request for approval) addressed to the Director, Terminal Safety and Operations Support Office (AJT-2).

d. Terminal Safety and Operations Support Office. The Terminal Airspace and Procedures Group (AJT-22) will review the SRMD and indicate concurrence (through signature) prior to forwarding to the Director, Terminal Safety and Operations Support Office (AJT-2). Upon approval by AJT-2, new waivers that do not affect separation minima may be implemented by the initiating Facility/District without further approval by ATO-S. The Director, Terminal Safety and Operations Support Office (AJT-2) will approve/disapprove the waiver via memorandum, to the Director, Central Terminal Operations (AJT-C)

e. Facility/District Manager. Facility/District Manager accepts medium/low risk(s) resulting from new waivers to terminal airspace and procedures which do not affect separation minima (see example *Medium/Low Risk: New Waiver Requests not affecting Separation Minima* signature page at Appendix G).

4. Medium/Low Risks: New Waiver Requests affecting separation minima - New waivers affecting separation minima will require ATO-S as well as AOV approval. SRMDs associated with requests for waivers affecting separation minima must be coordinated with the following offices:

Terminal Facility/District Manager. The Initiating Facility will coordinate/route through the District Office. The District Office SRM POC will review and then will coordinate/route to the Central

Operations Support Group (OSG), AJV-C2. If the District Office is the initiator, then the District Office will coordinate/route through the Operations Support Group (OSG).

a. Operations Support Group (OSG), AJV-C2. The OSG will review the SRM documents from a technical perspective and forward to the Safety Assurance Group (SAG), AJV-C1. The SAG will review the documents from a Safety Risk Management *process* perspective and if necessary, provide comments and/or recommendations to OSG. OSG will combine SAG comments and/or recommendations with their own and provide a consolidated response to the Facility/District Office. The SAG and OSG member reviewing the SRM document will indicate by signing they have reviewed and are in concurrence with the contents, SRM processes, and format of the document. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments. SRMDs which meet requirements established in the ATO SMS Manual will be forwarded for approval to the Director, Central Terminal Operations. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments.

b. Director, Central Terminal Operations (AJT-C). Review SRM document and indicates approval and by signing a memorandum (request for approval) addressed to the Director, Terminal Safety and Operations Support Office (AJT-2).

c. Terminal Safety and Operations Support Office. The Terminal Airspace and Procedures Group (AJT-22) will review the SRMD and indicate concurrence (through signature) prior to forwarding to the Director, Terminal Safety and Operations Support Office (AJT-2) for signature.

d. Safety Management System/Safety Risk Management Office (AJS-2). The Director, ATO SMS/SRM Office (AJS-2) reviews the SRM document and indicates approval by signing the approval line. AJS-2 will coordinate and submit the waiver request to AOV for review.

e. Air Traffic Safety Oversight Office. Air Traffic Safety Oversight (AOV) indicates approval of new waivers affecting separation minima by forwarding a memorandum stating consent. The SRM document is returned to ATO-S for routing back to the Facility/District Office.

f. Facility/District Manager. Facility/District Manager accepts medium/low risk(s) resulting from new waivers to terminal airspace and procedures affecting separation minima (see example *Medium/Low Risk: New Waiver Requests Affecting Separation Minima* signature page at Appendix H).

5. Medium/Low Risks: Waiver Renewals not affecting Separation Minima - Existing waivers are those waivers in effect prior to March 14th, 2005 and accepted by AOV as being part of the NAS baseline. SRMDs associated with requests for waiver renewals not affecting separation minima must be coordinated with the following offices:

a. Terminal Facility/District Manager. The Initiating Facility will coordinate/route through the District Office. The District Office SRM POC will review and then will coordinate/route to the

Central Operations Support Group (OSG), AJV-C2. If the District Office is the initiator, then the District Office will coordinate/route through the Operations Support Group (OSG).

b. Operations Support Group (AJV-C2). The OSG will review the SRM documents from a technical perspective and forward to the Safety Assurance Group (SAG), AJV-C1. The SAG will review the documents from a Safety Risk Management *process* perspective and if necessary, provide comments and/or recommendations to OSG. OSG will combine SAG comments and/or recommendations with their own and provide a consolidated response to the Facility/District Office. The SAG and OSG member reviewing the SRM document will indicate by signing they have reviewed and are in concurrence with the contents, SRM processes, and format of the document. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments. SRMDs which meet requirements established in the ATO SMS Manual will be forwarded for approval to the Director, Central Terminal Operations. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments.

c. Director, Central Terminal Operations (AJT-C). Reviews the SRM documentation and indicates approval and by signing a memorandum (request for waiver renewal) addressed to the Director, Terminal Safety and Operations Support Office (AJT-2).

d. Terminal Safety and Operations Support Office. The Terminal Airspace and Procedures Group (AJT-22) review the waiver renewal SRMD and indicate concurrence (through signature) prior to forwarding to the Director, Terminal Safety and Operations Support Office (AJT-2) for signature. Upon approval by AJT-2, waiver renewals not affecting separation minima may be implemented by the initiating Facility/District without further approval by ATO-S or AOV. The Director, Terminal Safety and Operations Support Office (AJT-2) will approve/disapprove the waiver renewal via memorandum, to the Director, Central Terminal Operations (AJT-C).

e. Facility/District Manager. Facility/District Manager accepts medium/low risk(s) resulting from renewal of waivers to terminal airspace and procedures which do not affect separation minima (see example *Medium/Low Risk: Waiver Renewal Requests not Affecting Separation Minima* signature page at Appendix I).

6. Medium/Low Risks: Waiver Renewals that affect separation minima - Renewals to existing separation minima waivers require ATO-S approval and AOV acceptance. SRMDs associated with requests for renewal of separation minimal waivers must be coordinated with the following offices:

a. Terminal Facility/District Manager. The Initiating Facility will coordinate/route through the District Office. The District Office SRM POC will review and then will coordinate/route to the Central Operations Support Group (OSG), AJV-C2. If the District Office is the initiator, then the District Office will coordinate/route through the Operations Support Group (OSG).

b. Operations Support Group (AJV-C2). The OSG will review the SRM documents from a technical perspective and forward to the Safety Assurance Group (SAG), AJV-C1. The SAG will review the documents from a Safety Risk Management *process* perspective and if necessary, provide

comments and/or recommendations to OSG. OSG will combine SAG comments and/or recommendations with their own and provide a consolidated response to the Facility/District Office. The SAG and OSG member reviewing the SRM document will indicate by signing they have reviewed and are in concurrence with the contents, SRM processes, and format of the document. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments. SRMDs which meet requirements established in the ATO SMS Manual will be forwarded for approval to the Director, Central Terminal Operations. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments.

c. Director, Central Terminal Operations (AJT-C). Reviews waiver SRM document and indicates approval and by signing a memorandum (request for approval) addressed to the Director, Terminal Safety and Operations Support Office (AJT-2).

d. Terminal Safety and Operations Support Office. The Terminal Airspace and Procedures Group (AJT-22) will review the waiver SRMD and indicate concurrence (through signature) prior to forwarding to the Director, Terminal Safety and Operations Support Office (AJT-2) for signature.

e. Safety Management System/Safety Risk Management Office. The Manager, Safety Risk Management Group (AJS-22) will review the waiver SRM document and indicate concurrence by forwarding to the Director, ATO SMS/SRM Office (AJS-2) for approval and signature. AJS-2 will coordinate and submit the waiver request through ATO-S to AOV for acceptance.

f. Air Traffic Safety Oversight Office. The Air Traffic Safety Oversight Office (AOV) accepts renewals to existing separation minima waivers⁵, however, an AOV *Acceptance Signature* is not required on the SRMD Signature Page. The SRM document is returned to ATO-S for routing back to the Facility/District Office. AOV will initiate a separate memorandum, signed indicating concurrence or non-concurrence for the request.

Facility/District Manager. Facility/District Manager accepts medium/low risk(s) resulting from renewals to existing separation minima waivers (see example *Medium/Low Risk: Waiver Renewals Affecting Separation Minima* signature page at Appendix J).

7. Medium/Low Risks as a result of an IG, NTSB, AOV inquiry or High Visibility item. The SRMD should be coordinated with the following offices:

a. Terminal Facility/District Manager. The Initiating Facility will coordinate/route through the District Office. The District Office SRM POC will review and then will coordinate/route to the Central Operations Support Group (OSG), AJV-C2. If the District Office is the initiator, then the District Office will coordinate/route through the Operations Support Group (OSG).

b. Operations Support Group (AJV-C2). The OSG will review the SRM documents from a *technical* perspective and forward to the Safety Assurance Group (SAG), AJV-C1. The SAG will

⁵ AOV/ATO-S Memorandum of Agreement dated Jun 8th, 2005

review the documents from a Safety Risk Management *process* perspective and if necessary, provide comments and/or recommendations to OSG. OSG will combine SAG comments and/or recommendations with their own and provide a consolidated response to the Facility/District Office. The SAG and OSG member reviewing the SRM document will indicate by signing they have reviewed and are in concurrence with the contents, SRM processes, and format of the document. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments. SRMDs which meet requirements established in the ATO SMS Manual will be forwarded for approval to the Director, Central Terminal Operations. Should the change require involvement by the Planning and Requirements Group (PRG), the SRMD will be coordinated/routed to the PRG for their review and comments.

c. Director, Central Terminal Operations (AJT-C). Reviews waiver SRM document and indicates approval and by signing a memorandum (request for approval) addressed to the Director, Terminal Safety and Operations Support Office (AJT-2).

d. Terminal Safety and Operations Support Office. The Terminal Airspace and Procedures Group (AJT-22) will review the waiver SRMD and indicate concurrence (through signature) prior to forwarding to the Director, Terminal Safety and Operations Support Office (AJT-2) for signature.

e. Safety Management System/Safety Risk Management Office. The Manager, Safety Risk Management Group (AJS-22) will review the waiver SRM document and indicate concurrence by forwarding to the Director, ATO SMS/SRM Office (AJS-2) for approval and signature. AJS-2 will coordinate and submit the waiver request to ATO-S for acceptance.

f. Air Traffic Safety Oversight (AOV). The Safety Management System/Safety Risk Management Office (ATO-S) will determine whether the SRMD requires coordination with AOV.

g. Air Traffic Safety Oversight Office (AOV). The Air Traffic Safety Oversight Office (AOV) accepts renewals to existing separation minima waivers⁶, however, an *AOV Acceptance Signature* is not required on the SRMD Signature Page. The SRM document is returned to ATO-S for routing back to the Facility/District Office. AOV will initiate a separate memorandum, signed indicating concurrence or non-concurrence for the request.

Note: High visibility items include Land and Hold Short Operations (LAHSO), Simultaneous Convergent Instrument Approaches (SCIA), Taxi Into Position and Hold (TIPH), Simultaneous Dual/Triple/Quadruple Instrument Landing (ILS) Approaches, etc.

8. SRMD Signature Levels. The following signatures should be included on the SRMD signature page and while additional review/approval signature lines may be provided, these represent the *minimum* required signatures for documentation of high, medium, or low risk hazards.

⁶ AOV/ATO-S Memorandum of Agreement dated Jun 8th, 2005

Terminal signatures presume the other ATO Service Units are not required signatories. In the event the other Service Units or other Lines of Business are required for signature, their appropriate requirements/Directives must also apply as necessary.

Signatures required on the SRMD are dependent upon level of risk identified (See appendices E through J for Signature Page examples):

a. **High Initial Risk (Applicable for any SRMD with initial high risk).** See Figure C-1 for a flowchart depicting required signature levels for High Initial Risk.

(1) Reviewed by:

District Safety Risk Management Focal (SRM POC)
Terminal Facility Manager or Terminal District Support Staff Manager
Central Service Center Operations Support Group (AJV-C2)
Central Service Center Safety Assurance Group (AJV-C1)
Terminal Airspace and Procedures Group (AJT-22)
Terminal Safety Group (AJT-28)

(2) Approved by:

Director, Terminal Operations, Central Service Area (AJT-C)
Director, Terminal Safety and Operations Support (AJT-2)
Director, Safety Risk Management and Safety Management System (AJS-2)

(3) Risk Accepted by:

Vice President, Terminal Services (AJT-0)

b. **Medium /Low Risk (SRMD not associated with a waiver request).** See Figure C-2 for a flowchart depicting required signature levels for Medium/Low Risk.

(1) Reviewed by:

Central Service Center Operations Support Group (AJC-C2)
Central Service Center Safety Assurance Group (AJV-C1)

(2) Approved by:

Terminal Facility Manager or Terminal District Support Staff Manager

(3) Risk Accepted by:

District Manager (see Note)

Note: At the discretion of the District Manager, the Facility Manager has the authority to accept risk associated with Medium/Low Risk SRMDs. When the Facility Manager accepts risk, the SRMD must be approved by a trained SRM Focal assigned to the facility where the change is initiated.

c. **Medium /Low Risk (SRMD associated with a waiver request not affecting separation minima).** See Figure C-3 for a flowchart depicting required signature levels for Medium/Low Risk associated with waivers not affecting separation minima.

(1) Reviewed by:

District Safety Risk Management Focal (SRM POC)
Terminal Facility Manager or Terminal District Support Staff Manager
Central Service Center Operations Support Group (AJV-C2)
Central Service Center Safety Assurance Group (AJV-C1)
Terminal Airspace & Procedures Group (AJT-22)

(2) Approved by:

Director, Terminal Safety and Operations Support (AJT-2)

(3) Risk Accepted by:

Facility/District Manager

d. **Medium /Low Risk (SRMD associated with a waiver request affecting separation minima).** See Figure C-4 for a flowchart depicting required signature levels for Medium/Low Risk associated with waivers affecting separation minima.

(1) Reviewed by:

District Safety Risk Management Focal (SRM POC)
Terminal Facility Manager or Terminal District Support Staff Manager
Central Service Center Operations Support Group (AJV-C2)
Central Service Center Safety Assurance Group (AJV-C1)
Terminal Airspace & Procedures Group (AJT-22)

(2) Approved by:

Director, Terminal Safety and Operations Support (AJT-2)
Director, Safety Risk Management and Safety Management System (AJS-2)

(3) Risk Accepted by:

District Manager

e. **Medium / Low Risk (IG, NTSB, AOV inquiry or High Visibility items).** See Figure C-5 for a flowchart depicting required signature levels for Medium/Low Risk associated with IG, NTSB, AOV inquiry or High Visibility items.

(1) Reviewed by:

District Safety Risk Management Focal (SRM POC)
Central Service Center Operations Support Group (AJV-C2)
Central Service Center Safety Assurance Group (AJV-C1)
Terminal Airspace & Procedures Group (AJT-22)

(2) Approved by:

Terminal Facility Manager or Terminal District Support Staff Manager
Director, Terminal Safety and Operations Support Office (AJT-2)

Director, Management System/Safety Risk Management Office (AJS-2)

(3) Risk Accepted by:
District Manager