

American Airlines Maintenance and Engineering

MAINTENANCE EVENT ASSESSMENT AID (MEAA) POLICY FOR M&E

1. GENERAL

- A. The purpose of this policy is to describe the management action regarding the review of aircraft damage, incidents or an error event. The procedures delineated herein will be followed by an Event Review Panel (ERP) and an Event Review Board (ERB) convened for that purpose and where conducted by M&E. Aircraft accidents or potential accidents, as classified by the AA Safety, Security, and Environmental (SSE) Policy Manual, will be investigated as specified in that manual. The purpose of the Event Review Board (ERB) is to act upon the Recommendations submitted by the Event Review Panel (ERP).
- B. Event review under this policy is a two step process:
1. Step 1 An Event Review Panel (ERP) will be convened to thoroughly investigate the Root Cause of the event utilizing procedures established in the MEAA process. The ERP consists of people (one or more) from the related operational unit of the event under investigation.
 2. Step 2 Event Review Panel (ERP) Recommendations are provided to the Event Review Board (ERB) members for evaluation. ERB members are those individual decision makers (one or more) who will determine whether a Recommendation should be implemented.

2. POLICY

- A. It is M&E's policy to thoroughly review the following type of occurrences and to document the results of:
1. An Aircraft Maintenance related incident resulting in damage to aircraft or aircraft equipment necessitating repairs.
 2. Release of an aircraft, aircraft component or other aircraft equipment that is not in compliance with AA maintenance manuals or FAR requirements.
 3. Maintenance related operational problems (delays, cancellations, ground, and air interruptions) potentially caused by non-compliance with AA maintenance manuals or FAR requirements.
 4. Maintenance-related errors and violations as determined by Management and/or requested by the local investigating Manager/Supervisor using the Investigating Manager Checklist per the M&E Just Policy (see <http://me.aa.com/justpolicy/docs/justpolicy.pdf>).
 5. Line Maintenance and Stores Employee injuries will be investigated utilizing online Employee Safety Incident Investigation investigative tools. The investigative tools are located at the station E-City website.
 6. Base Maintenance Employee injuries will be investigated utilizing local Injury Review Board procedures.
- B. Action should be taken to conduct a prompt and thorough review to determine the Root Cause of the incident or error event. The review should determine all Contributing Factors leading to the incident or error event and result in a comprehensive set of Conclusions derived from the Contributing Factors of the incident or error event.

- C. The Event Review Panel (ERP) will make Recommendations (preventative action strategies) based on the investigation findings. The recommendations must adequately address all Contributing Factors of the incident or error event and may include clarification of manuals, training, communications, development of interdepartmental procedures or processes, or other actions considered appropriate as determined by the Event Review Panel (ERP).
- D. The Director of Maintenance will establish a core group of personnel responsible for conducting reviews. The core group members will be trained in Human Factors and Investigative Techniques.

3. RESPONSIBILITIES

A. Director of Maintenance

- 1. The Director of Maintenance will be responsible for the conducting MEAA Investigations per the Just Policy. MEAA Investigations will be conducted per the Just Policy by MEAA and Just Culture qualified Compliance Managers reporting to the Director of Maintenance. In some cases, the AA and/or TWU ASAP Event Review Committee representatives may conduct a MEAA investigation per the Just Policy.
- 2. The Director of Maintenance will determine the extent of training a certification that a MEAA and Just Culture qualified Investigator will possess, but will include at a minimum Human Factors Phases I and II, Investigative Techniques, Boeing MEDA training and Just Culture Training.

B. Operating Division

- 1. Operating Division heads (e.g., Vice President - Line Maintenance, Vice President - Base Maintenance, and Managing Director - Quality Assurance (QA)) have the responsibility to implement strategies to prevent recurrence of the same or similar incidents or error events.
- 2. It is essential that management at the location of the incident or error event recognize the responsibility to evaluate the Recommendations resulting from the Event Review process.

C. Quality Assurance

- 1. The Managing Director - QA, in coordination with the M&E Safety Manager, is responsible for ensuring that M&E corrective action Recommendations properly address the scope of the event and will be effective in preventing recurrence. When the Operating Division and the Managing Director - QA are unable to agree on suitable management actions, the Managing Director - QA will prevail, subject to appeal to the Vice President, Engineering and QA.

4. NOTIFICATION OF INCIDENT

- A. Prompt notification of the incident or error event by telephone, AMS and/or the Notification and Investigation Reporting (NIR) system (when aircraft damage is involved) is mandatory.

5. EVENT REVIEW PANEL (ERP)

- A. In some cases, the preliminary investigation may clearly establish that further formal review is not warranted and the incident may be investigated as deemed appropriate per the M&E Just Policy by the local station. In all other cases, following the foregoing initial action, an Event Review Panel (ERP) panel shall be convened to conduct a review of the incident or error event.
- B. When convened, the chairperson of the Event Review Panel (ERP) may select additional personnel as necessary to permit a thorough review of the incident or error event. If additional

personnel are selected to participate as members of the panel, they should have the necessary experience and background to assist in the determination of the Root Cause based on the evaluation of all Contributing Factors.

NOTE: TWU personnel may participate in the review but will not be considered part of the Event Review Panel (ERP).

- C. At least one of the Event Review Panel (ERP) members must have completed Human Factors and Investigative Techniques training.
- D. The ERP members must be impartial and cannot participate in any other reviews (i.e. 29F hearings) involving the same incident or error event.

NOTE: An understanding of the interaction between organizational, work group, and individual factors that may lead to an incident or error event will result in a better analysis of the incident or error.

6. CONDUCTING THE REVIEW

- A. The specific procedures for conducting a review will vary with the circumstances of the incident or error event and are to be established by the chairperson of the Event Review Panel (ERP).
- B. The Event Review Panel (ERP) investigation will be documented through the use of the Maintenance Event Assessment Aid (MEAA) process (<http://aamaintweb.aa.com/line/mrm/meaa/mrmform.asp>).
- C. These procedures may include the following as applicable:
 - 1. Identification of personnel involved in the incident and their qualifications
 - 2. Collection and review of all pertinent maintenance records
 - 3. Collection of copies and review of pertinent reference materials
 - 4. Discussions/interview notes from Preliminary Investigation
 - 5. Photographing of damage or location of the incident or error event
 - 6. Conducting an interview with the personnel involved in or witness to the incident with the purpose of obtaining all of the related facts. It is recommended that a list of questions be developed prior to the interviews to ensure that all relevant Contributing Factor/Root Cause areas are covered with each person interviewed. The interviews should be conducted as soon as possible.
 - 7. The ERP Chairperson will designate no more than one member of management to conduct interviews with personnel involved. No more than one management person will be present for employee interviews. No written statements will be taken during the interview process.
 - 8. For MEAA-Qualification training purposes only, a management person in MEAA-Qualification training may observe an interview process. In these cases, the observer must sign a Confidentiality Statement and the signed statement will reside in the MEAA file indefinitely.

NOTE: The Event Review Panel (ERP) investigation is non-punitive and completely confidential when conducted under MEAA guidelines. It is an in-depth review that includes questioning to clarify conditions or circumstances leading to the event. Information collected as part of the review will remain the property of the Event Review Panel (ERP) chairperson and will not be used to support disciplinary action against employees involved in the investigated incident/error.

NOTE: Information gathered under 29f may be transferred to the MEAA database for analytical purposes. All information will be de-identified.

- D. The Event Review Panel (ERP) investigation will include Contributing Factors and Conclusions revealed in the Root Cause analysis. This information will be the basis for developing Recommendations that will be submitted to the Event Review Board (ERB) for evaluation.
- E. As part of the root cause analysis, the quality standards for M&E personnel found in Section 02.01 should be reviewed. Consideration should be given to whether the incident or error event was based on individual recklessness as defined by the Just Policy and determined using the Just Culture Algorithm™. This determination will only be made by MEAA-qualified investigators and requires Director of Maintenance and TWU Safety of Flight and Compliance Coordinators concurrence per the M&E Just Policy. A de-identified synopsis of these conclusions should also be addressed in the Conclusions contained in the Event Review Panel (ERP) investigation.

7. EVENT REVIEW PANEL (ERP) REPORT

- A. A summary of the Event Review Panel (ERP) investigation will be documented through the use of the Maintenance Event Assessment Aid (MEAA) process (<http://aamaintweb.aa.com/line/mrm/meaa/mrmform.asp>). The completed report will contain all of the essential information regarding the incident or error event. Additional attachments to the report may include:
 - 1. Photographs
 - 2. Minutes of interviews conducted during the review
 - 3. Training records
 - 4. Copies of maintenance records or references
 - 5. Any other documentation relevant to the Event Review Panel (ERP) investigation
- B. The chairperson of the Event Review Panel will maintain possession of the completed ERP investigation report with all attachments. The ERP investigation report will be considered confidential and will not be used in any other forum.
- C. If the investigation reaches a determination of Reckless Behavior on the part of any employee involved in the error/incident, the investigation into contributing factors will continue. At the conclusion of the investigation, the report will be shared only with the Director of Maintenance, the TWU Safety of Flight and Compliance Coordinator and the ASAP ERC, as applicable. If the Director of Maintenance and the TWU Safety of Flight and Compliance Coordinator (or Director of Safety agreement is not reached) jointly ratify the reckless behavior identified in the investigation, all investigative details recorded in relation to the reckless behavior will remain confidential. The MEAA report and executive summary will only state the contributing factors identified on the MEAA form and associated recommendations as they relate to the reckless behavior identified. In these cases, the MEAA investigator will close the MEAA per the Just Policy and notify the Local Manager/Supervisor in charge of the Preliminary Investigation. The notification will simply state that the MEAA investigation has concluded and the Manager/Supervisor should continue the Preliminary Investigation under the guidelines of TWU CBA Article 29(f).

No information gathered within the MEAA or ASAP investigations will be used to support a case for corrective action. At this time, it is appropriate for the Local Manager/Supervisor to review all pertinent information collected during the Preliminary Investigation, including interview notes and

continue the investigation under Article 29(f) to collect for additional fact gathering as necessary. The Local Manager/Supervisor will coordinate with HR Ops when determining the appropriate level of disciplinary action to ensure consistency in the application of discipline.

NOTE: All information collected within the MEAA is protected for confidentiality. If reckless behavior is identified by the MEAA/Just Culture process, no record of facts gathered within the MEAA process to substantiate a determination of reckless behavior will be published in any format. No ERP Member will participate in any disciplinary-related discussions during or after the conclusion of the MEAA Investigation.

- D. If no reckless behavior has been identified, the report can only be shared using discretion with:
1. Director of Maintenance
 2. Members of the Event Review Panel (ERP) for the related investigation
 3. Managing Director – QA
 4. M&E Safety Manager
 5. Managing Director - Safety Operations
 6. Senior Station Management - Aircraft Maintenance
 7. Managing Director or Manager of Regulatory Affairs (in cases that involve FAA correspondence)
 8. ASAP Program Manager and TWU ERC Representative
- E. The final Event Review Panel (ERP) investigation summary will be documented through the MEAA process and submitted online to the M&E Safety/Maintenance Resource Management (S/ MRM) department for processing. S/ MRM will submit the ERP Recommendations to the proper Event Review Board (ERB) member for evaluation.
- F. The Recommendations should be comprehensive and encompass strategies to prevent recurrence of the same or similar incident or error event within the operating division. Recommendations may include, but are not limited to, the following:
1. Revision of manual policy/procedures
 2. Design improvement
 3. Procurement of tooling/testing/handling equipment
 4. Training
 5. Communication (MA, manual, bulletin)
 6. Coaching/Counseling of individuals identified as displaying At Risk Behavior
- G. Data obtained from MEAA reports is essential for risk management within M&E. Summary information should be routinely shared and reviewed with the CASS department and the CASS Surveillance group as part of the ongoing risk assessment effort. See Just Policy for Risk Management Process.

H. The Maintenance Event Assessment Aid (MEAA) online form can be found here (<http://aamaintweb.aa.com/line/mrm/meaa/mrmform.asp>)