

DEFENSE CONTRACT MANAGEMENT AGENCY

AIRCRAFT OPERATIONS 6090 STRATHMORE ROAD, BUILDING 54N RICHMOND, VA 23237

November 29, 2023

MEMORANDUM FOR RECORD

SUBJECT: DCMA-INST 8210-1D Pre-Flight Risk Management Clarification

REFERENCE: DCMA-INST 8210-1D, Contractor's Flight and Ground Operations,

February 6, 2023

The purpose of this memorandum is to clarify intent and provide general guidance for flight risk assessment and approval of contracted flights.

With the release of the new Combined Instruction, DCMA-INST 8210-1D, "Contractor's Flight and Ground Operations," (also known as AFI 10-220, AR 95-20, NAVAIRINST 3710.1H, COMDINST M130220.3B), there is an area that requires some clarification. This memorandum was coordinated with the Service waiver authorities. However, the clarifications made are general in nature. For questions on specific contract situations, follow the request for interpretation process in paragraph 3.3. The paragraphs for clarification are:

- **4.4.** Approved Flights. Flights approved by the GFR must be:
- 4.4.1. Conducted by current and qualified crewmembers and non-crewmembers (except as noted in paragraphs 4.12.1 and 4.12.7) in an approved flight area, route, and specified profile.
- 4.4.2. Performed according to an approved mission profile or test plan, and within applicable safety and engineering limitations. Experimental and engineering test flights require a specific test plan.

 Experimental test plans must be approved by:
- 4.4.2.1. The Aviation Engineering Directorate (Army),
- 4.4.2.2. IAW NAVAIRINST 3960.4C, "Project Test Plan Policy and Guide for Testing Air Vehicles, Air Vehicle Weapons, and Air Vehicle Installed Systems" (Navy),
- 4.4.2.3. Lead Developmental Test Organization (Air Force).
- 4.4.3. IAW approved Procedures.
- 4.4.4. Assessed for risk prior to each flight.
- 10.9.8.1. GFR approval is required for all flights under this Instruction. Flight approvals are requested through the use of DD Form 3062 or an alternate form approved by the GFR. Ideally, the GFR approves flight requests on the workday prior to the scheduled flight. This allows the GFR to evaluate the effects of all the factors (such as aircraft condition, weather, aircrew life stressors, etc.) which influence flight effectiveness and safety. GFRs must not authorize operations that are outside the scope of the contract. GFR approval of operations not allowed by the contract could create serious liability issues for both the

Government and the contractor. Ensure the contractor's RM program incorporates a flight risk assessment for each flight. The GFR must follow Service rules to ensure the appropriate approval level for elevated risk flights is accomplished. When aircraft operations are split between multiple locations and multiple GFRs, the GFRs will coordinate flight approvals.

There are two types of risk assessment and approval associated with contracted flights. First, each contracted flight requires an Operational Risk Management (ORM) assessment (para 4.4.4) and approval that is specific to that flight and assessed/approved on the day of the flight. This risk assessment in most cases is completed using an ORM worksheet. The ORM worksheet will assess the risk as low, moderate, or high (or extremely high (Army)). This worksheet is part of the Procedures and approved by the GFR. Paragraph 10.9.8.1 requires the GFR to follow Service rules to ensure the appropriate approval level for elevated risk flights. Therefore, for cases of elevated risk (moderate, high, or extremely high), the worksheet should direct the approval of the risk to the appropriate personnel based on Service Guidance. For most, the PIC will notify the GFR of the elevated risk, the issues that caused the elevated risk, and any mitigations put in place to reduce the risk. Once notified, the GFR must analyze the risk and mitigations, then approve or disapprove the flight. This step is in addition to the GFR approval of the flight via the DCMA Form 3062 process.

For USAF contracts, GFR approval of elevated risk meets the intent of USAF Service Guidance, AFMAN 11-202V3, AFMC Supplement Para 4.6.1.10.

4.6.1.10. (Added-AFMC) Risk Management (RM) Worksheets. All AFMC flying units will use an RM assessment worksheet to identify and manage risks associated with their flying mission. (T-2). The assessment worksheet will have four areas: human, mission, media, and machine. Each area will have command defined elements to include Human (crew rest, crew currency), Mission (complexity, risk level), Media (weather, time of day, level of IFR/VFR ATC traffic separation services provided), and Machine (aircraft MX factors), as well as elements defined and tailored at the unit level. (T-2). The worksheet will use a unit defined weighting/scoring system with a total that is used to determine the overall assessed risk for the flight. (T-2). Unit commanders will establish threshold criteria and the approval level for flights identified as elevated risk. At a minimum, the assessment will be reviewed by a government or military unit designated operations supervision authority other than the aircraft commander prior to execution of that sortie. (T-2). Worksheet data for all flights will be tracked and reviewed periodically by the FOA. (T-2).

For USA/USN/USCG contracts, the expectation is that medium would be approved by the GFR, high by the CMO Commander, and (Army only) extremely high by DCMA-AO.

The second aspect of risk assessment and approval is specific to experimental test flight operations. Per DCMA-INST 8210-1D, contracted flights that are experimental test flights require approved test plans IAW 4.4.2.

For USAF contracts, when the USAF LDTO is part of the AF Test Center (AFTC), moderate risk test plans and cards are approved at the applicable Operations Group (OG) Commander level. High risk test plans and cards are approved at the Test center Commander level but may be delegated to the applicable wing commander. When the LDTO is not part of the AFTC, the applicable OG/CC and Wing/CC will approve all test plans and cards. In a rare case where the LDTO is outside of the USAF, the GFR will submit the test plan / cards to the

equivalent group and wing commander levels as specified in DCMA-INST 8210-1D, AFMC Supplement.

2.10.3. (AFMC) Service guidance waivers and waivers to this instruction will be forwarded to AFMC/A3V for coordination. AFMC/A3 delegates waiver approval authority to AFMC/A3V where applicable and in alignment with Service and MAJCOM guidance. Once the need for the waiver has been re-validated, send a renewal request to AFMC/A3V for coordination/approval. Within Service Guidance, when the waiver authority has been delegated to OG/CC or WG/CC, the following is a commensurate level of approval within DCMA chains of command. Service Guidance waiver requests may be approved by the CMO/CC (if the governing publication waiver authority is listed as OG/CC) if the CMO/CC is a rated officer. If not, forward waiver requests as stated in paragraph 2.4.4 Service Guidance waiver requests may be approved by DCMA-AO (if the governing publication waiver authority is listed as WG/CC) if the DCMA-AO is a rated officer. If not, forward waiver requests as stated in paragraph 2.4.4 The GFR may approve any Service Guidance waivers that are at the unit commander level unless stated otherwise in DCMA INST 8210-1D or this supplement.

The DCMA-AO POC for this clarification is Mr. Michael Fludovich, 703-819-0647, michael.a.fludovich2.civ@mail.mil.

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Attachment(s): None

Link(s):

https://www.dcma.mil/Customers/Aircraft-Operations-Resource-Page/