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Federal Recordkeeping and Process Improvement at the Federal Aviation Administration

Shannon C. McNeal

Thesis submitted to the College of Engineering and Mineral Resources at West Virginia University in partial fulfillment of the requirements for the degree of

> Master of Science in Safety Management

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Department of Industrial and Management Systems Engineering

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Keywords: Federal Recordkeeping, Process Improvement Copyright 2009 Shannon C. McNeal

# ABSTRACT

Federal Recordkeeping and Process Improvement at the Federal Aviation Administration

# Shannon C. McNeal

The purpose of this study was to identify methods to improve the acquisition and the recordkeeping process of employee accident data at the Federal Aviation Administration. Two expert focus groups were utilized to discover the existing problems and to propose possible resolutions to the problems. The potential solutions were prioritized by each expert focus group with the use of an individual priority decision worksheet. Most of the potential solutions were feasible, low cost and could possibly be implemented within a year's time. An analysis of the data showed that the three most cost effective and feasible solutions to the data acquisition and recordkeeping process at FAA included an electronic system to submit the CA-1 form to the Office of Workers' Compensation at FAA, a general email inbox for CA-1 submission to FAA and expanding drop down menus of the current systems to give more detailed information.

# Acknowledgements

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My family, what would I do without you? Thank you for being there to read chapters, listen to me, and motivate me. Your unconditional love has gotten me to where I am today! A special thanks to my mother, father, and sister (Seana). Thank you for keeping me close to the greatest Support System whose grace and mercy gets me through every day.

This thesis could not have been completed without the support, encouragement, love, and prayers of my church families, colleagues from both Ohio University and West Virginia University, and the Federal Aviation Administration. Especially, Erial Ramsey, Jovan Hackley, and Tiffany Underwood who are the best friends I could ever ask for. Lastly, I would like to thank Dr. Diana Schwerha who encouraged me to pursue higher education at WVU. It was one of the best decisions I have made.

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#### **Chapter 1: Introduction**

#### 1.1 Background

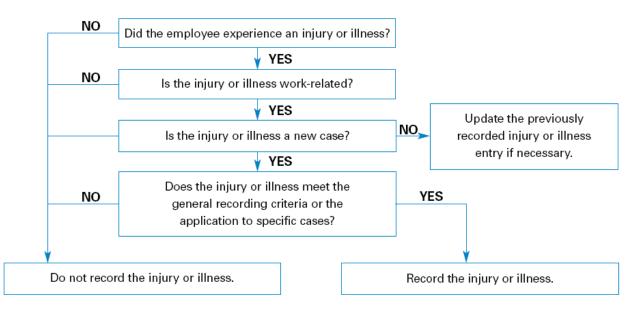
The Occupational Safety and Health Act of 1970 "requires the Secretary of Labor to produce regulations that require employers to keep records of occupational death, injuries, and illnesses" (OSHA, 2006, p. 1). These important records are used for several reasons. OSHA uses these statistics to measure its own performance among other things. According to Kydoniefs (1993), the OSHA recordkeeping system is the "foundation of BLS's [Bureau of Labor Statistics] statistical program" (p. 1) It was "developed to aid the Occupational Safety and Health Administration (OSHA) in setting standards, to assist safety and health officers in identifying hazardous operations, and to provide BLS and State agencies with uniform and reliable safety and health statistics" (Kydoniefs, 1993, p. 1). The Bureau of Labor Statistics (BLS) Annual Survey of Occupational Injuries and Illnesses is one of the major sources of occupational injury and illness data. Employers find this information useful as well to evaluate trends and injury type. The records can be used as a resource to provide justification for implementing a new occupational safety and health program in a facility, training for employees, or correcting a system or equipment. The OSHA recordkeeping rules required for federal agencies became effective January 1, 2005.

#### **OSHA Recordability**

A work related injury or illness meeting the general recording criteria mandated by OSHA in Section 1904.7 is "OSHA recordable." OSHA recordable means this incident

must be noted in the OSHA 300 A Summary for the establishment. The general recording criteria are injuries or illnesses resulting in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness or a significant injury or illness diagnosed by a physician or other licensed health care professional (OSHA, 2006).

Figure 1.1 is the decision tree OSHA recommends to determine if an injury or illness is work related.



#### Figure 1.1 OSHA Decision Tree

Source: *OSHA Recordkeeping Handbook*. (2006). Retrieved September 13, 2008, from <u>http://www.osha.gov/recordkeeping/handbook/index.html</u>

The days away must be counted starting with the day after the injury. When a

physician or other licensed health care professional suggests days away, each calendar

day must be counted whether the employee is scheduled to work or not. This means

weekends, holidays, vacation days and any other day off of work must be noted.

According to OSHA (2006), the number of days away can be "capped" at 180 days and seen as adequate.

Restricted duty is defined as when "a physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work" (OSHA, 2006, p. 48). These days are counted as well in its own section of the OSHA 300 log. A transfer to another job is defined as any occurrence when an employee is reassigned to another position. These days are counted in the same manner as the restricted duty days. One difference between restricted duty and transfer to another job is that the days counted stops if the job transfer becomes permanent.

Medical treatment is defined as "the management and care of a patient to combat disease or disorder" (OSHA, 2006, p. 50). It does not include visits to the doctors for observation or counseling, x-rays, blood tests, or first aid. The OSHA Recordkeeping Handbook (2006) gives a list of what first aid means for the purposes of Part 1904. This list is the following:

(A) Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);

(B) Administering tetanus immunizations (other immunizations, such as HepatitisB vaccine or rabies vaccine, are considered medical treatment);

(C) Cleaning, flushing or soaking wounds on the surface of the skin;

(D) Using wound coverings such as bandages, Band-AidsTM, gauze pads, etc.; or using butterfly bandages or Steri-StripsTM (other wound closing devices such as sutures, staples, etc., are considered medical treatment);

(*E*) Using hot or cold therapy;

(F) Using any non-rigid means of support, such as elastic bandages, wraps, nonrigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);

(G) Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).

*(H) Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;* 

(I) Using eye patches;

(J) Removing foreign bodies from the eye using only irrigation or a cotton swab;
(K) Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;

(L) Using finger guards;

(M) Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or

(N) Drinking fluids for relief of heat stress. (p.50)

Every case in which an employee becomes unconscious in a work-related injury must be recorded no matter how long they are unconscious. According to OSHA (2006), a significant diagnosed injury or illness is a "work-related case involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum. [It] must always be recorded under the general criteria at the time of diagnosis by a physician or other licensed health care professional" (p. 51).

#### **Worker Compensation**

Federal Employees' Compensation Act (FECA) is managed by the Office of Workers' Compensation Programs (OWCP) under the U.S. Department of Labor. FECA is the "law which provides benefits for civilian employees of the United States who have suffered work-related injuries or occupational diseases. These benefits include payment of medical expenses and compensation for wage loss" (DOL, 2007, p. 4). This worker compensation law is a no-fault agreement between employer and employee. FECA also provides vocational rehabilitation services. Additionally, it provides payment for dependent of employees who die from work-related injuries or diseases. Once employees recover from their injuries whether fully or partially must return to work. All civilian employees are covered under FECA not matter if they are full time or part time or how long they have worked for the government.

According to the Department of Labor (DOL, 2007), when an employee seeks to receive Workers Compensation benefits, "the employee must provide medical and factual evidence to establish five basic elements:

1. The claim was filed within the time limits set by the FECA;

2. The injured or deceased person was an employee within the meaning of the FECA;3. The employee actually developed a medical condition (or damaged a prosthesis) in a particular way;

4. The employee was in the performance of duty when the event(s) leading to the claim occurred; and

5. The medical condition found resulted from the event(s) leading to the claim"(p. 11).

A fact of injury is established by showing the employee actually suffered an injury or illness. Two factors involved are:

"(a)Did an incident occur at the time and place and in the manner claimed? This is determined on the basis of factual evidence, including statements from the employee, the supervisor, and any witnesses. An injury need not be witnessed to be compensable.

(b) Is a medical condition present which may be related to the incident? This is determined on the basis of the attending physician's statement" (DOL, 2007, p.12).

Performance of duty is established when the injury or illness occurs to the employee while performing a duty at the workplace during work hours. Breaks and lunches on workplace premises are included. Transport to and from work is not considered performance of duty unless travel specified in the employee's duties. In order to establish a causal relationship, "a medical connection between the injury and the condition found must be shown, based entirely on medical evidence provided by physicians who have examined and treated the employee" (DOL, 2007, p. 13). Any other opinion including information from medical articles is not accepted. Only the Department of Labor OWCP has the authority to accept or deny a claim.

Since the criteria for OSHA Recordability and OWCP Compensability are very different, there is much confusion by managers needing to record data accurately, and then establish data-based policy for FAA internally. For example, the worker compensation definition of medical condition is very broad and might not involve time away from work. OSHA definitions on the other hand, forces almost exclusively on time away from work. OSHA data would include fatal, work related injuries but the Worker compensation data would not record these most egregious cases.

#### **1.2 FAA Background**

The Federal Aviation Administration administers a broad range of employee safety and health programs. After being included in the OSHA recordkeeping requirements in 2005, it become important for FAA to record mishap data to direct program efforts at highest risk, highest cost, or highest injury probability.

When a mishap involving personal injury, death or property damage occurs to employees of the Federal Aviation Administration (FAA), the injured employee fills out a required Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation form also known as a CA-1. This is the form the employee must fill out for worker compensation and returned to U.S. Department of Labor's Office of Workers Compensation Programs (OWCP) by way of FAA. The CA-1 is necessary for the worker to receive continuation of pay. The employee or a representative completes this form. Then, the employee's direct manager or supervisor must review the statement

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regarding the alleged injury to add or refute details and sign off. The supervisor must complete the remainder of the form and send it to the OWCP for the FAA.

The manager or supervisor must then complete the FAA Mishap Report form which is referred to as the 3900-6. The 3900-6 is the form used for the OSHA 300 log. This form is necessary for the supervisor to give details of the incident. The present procedure at FAA is a 3900-6 form is filled out by hand and then the information is typed into the Safety Management Information System (SMIS). This information is input either by the manager or an administrative officer. As of June 31, 2008 it was discovered by Shannon McNeal, FAA intern, per request of her supervisor that the 3900-6 form is only completed about 54% of the time when a CA-1 is filled out. Both forms must be filled out accurately and returned quickly if the data is to be useful in spotting trends and controlling losses and establishing policy at FAA.

Each month the Employee Safety Performance (ESP) team crosschecks all cases to see if a 3900-6 has been filed for each CA-1. This process is done manually by looking at both excel spreadsheets and matching names. For the cases when both forms are filed, OSHA recordability must be determined by the ESP team member over the particular month. If all the information is clear and logical and presented in a reasonable time frame, the process is complete. Most cases result in only the CA-1 being filed. The ESP team must call every supervisor requesting they file a 3900-6. This number could be up to sixty cases per month. Since the team has to do this, they are usually about six to eight months behind. It is difficult to know if the supervisor can remember every detail after this much time has lapsed. Another problem is the information such as telephone

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numbers, location of mishap, etc is not being submitted accurately on the 3900-6 form. The team then has to search for the person through the employee database to receive this information and hand-enter the data, delaying the process and making trends because of the necessary time lag and only then can the OSHA recordability can be determined. Figure 1.2 is a flow chart of employee accident/mishap data.

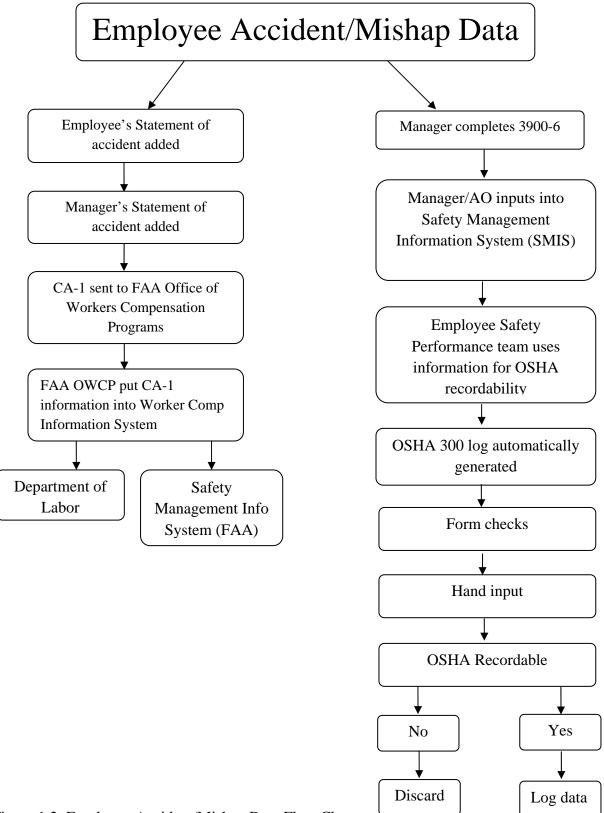


Figure 1.2: Employee Accident/Mishap Data Flow Chart

AHP-500 is comprised of two sides. One side is the Workers Compensation team also known as OWCP at FAA. The OWCP at FAA provides support and receives all occupational injury and disease claims. This group ensures the information is prepared correctly in order to submit the claims to the United States Department of Labor's Office of Workers Compensation Programs. OWCP at FAA also maintains the worker compensation records for the FAA.

All data are necessary for ESP to provide policy recommendations and oversight for employee occupational safety and health program as required in various laws including OSHA regulations, FAA Executive Orders and Departmental Policies. This ESP group also has initiated various projects concerning a wide range of occupational safety and health problems. ESP provides assistance with program safety evaluations, workplace safety inspections, workstation assessments, general safety advice, mishap reporting and investigations, and a host of other services. Their goal is to assist in providing a safe and healthful workplace so that all employees go home every day in the same condition as they arrived and the basic tool to make these decisions is data from the 3900-6 and the Ca-1.

### **1.3 Objectives of the Research**

The objective of this research project was to conduct a literature review on how other organizations and industries have made recordkeeping more efficient by improving their data collection processes. A second objective was to conduct a pair of expert focus group sessions to discuss the issues with receiving accurate, timely, and meaningful information the CA-1 and the 3900-6. From the sessions, analyze the data received and give a

prioritized list of possible solutions to improve the data collection process for these important data instruments. The third objective was to make recommendations to ESP so the data process can be improved, and the safety and health trends spotted earlier.

# **1.4 Benefits of the Research**

The benefit of this research is to assist the FAA find solutions to increase accuracy, timeliness, and meaningfulness of the recordkeeping data to facilitate the identification of risks and risk analysis. Additionally, this research would benefit other federal agencies including state agencies by assisting them find solutions to do the same.

#### **1.5 Hypothesis**

Through experience and talking with managers at the FAA, the researcher hypothesizes that training, timeliness, representativeness, and accuracy are the issues with the CA-1 and 3900-6 processes that can be improved by the use of the "expert focus-group" techniques employed in this research.

# Training

The FAA currently does not have formal training for the CA-1 such as course or training module. There is training module for the 3900-6 available on the FAA online learning system called eLMS. This training for frontline FAA managers gives a broad overview of occupational safety for FAA including the 3900-6 form. A section on eLMS gives the pupil a scenario in which they must complete a 3900-6 form. Currently, this section does not allow the pupil go beyond a certain question on the form.

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# Timeliness

The 3900-6 form is not being submitted in a timely manner. This form usually has to be requested by ESP who currently has an eight month lag time.

# Representiveness

The information for the 3900-6 should be submitted without opinion or bias. The recorded data should simply represent the facts of the incident.

# Accuracy

In some cases, managers are being asked to remember the exact details of an accident they never witnessed. They need to know how to ask questions to get information in a way that has high conformance between event and data. It is difficult to gauge the accuracy of this information.

#### **Chapter 2: Literature Review**

#### **2.1 Problem Statement**

There are two required forms for accidents at FAA the Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation, CA-1, and the FAA Mishap Report, 3900-6. When an accident occurs, the employee initiates process for the CA-1. The manager initiates the FAA Mishap Report form.

There are several issues surrounding the 3900-6 and CA-1 processes. Managers are not aware of OSHA recordability and OWCP compensability requirements. The CA-1 is always filed for Worker Compensation. There is usually minimal lag time between the accident and the time the CA-1 is completed by the employees. Conversely, the 3900-6 is only filed 54% of the time when a CA-1 form is completed. Another issue is that the Employee Safety Performance team is usually 8 months behind on requesting form FAA designates the 3900-6 form. It is difficult to track trends in real time with this lag time and delays may actually mask emerging trends. Additionally, near misses are not being recorded. Without accurate, timely, and representative accident data, the ESP at FAA has to base its safety program on good intentions alone. The data should be able to affect policy directly. ESP handles recordkeeping and OSH policy so the responsibility for data improvement lies with them. The goal of this study is to survey expert CA-1 and 3900-6 users for improvements to the data collection system relative to their two data forms.

#### 2.2 Possible Problems Caused by Inaction or Delay

There are many problems which are caused by inaction or delay. One of the issues at the FAA is data quality. The research has shown data quality to be an issue at a wide range of facilities and organizations such as commercial vehicle crash data and law enforcement. Basic data is the building block of policy. "Accident data are the tools of the trades for data customers such as law enforcement, highway safety programmers, local police departments, and traffic engineers who are all interested in reliable and valid accident data. They know that safety or engineering countermeasures shouldn't be built on good intentions alone" (Winn and Bucy, 1997, p.2).

Many industries have issues with their OSHA log capturing all of the accidents and injuries. In 1992, Parks et al found that 1984-1987 OSHA logs were unsuccessful to document between 20% and 80% of occupational cumulative trauma disorders recorded in other data sources for the employees of an automobile manufacturer in unions.

Research shows *a combination of sources* can demonstrate when cases are not recorded in the OSHA log. In this case, "incident rates calculated from medical record data in two of the [three large automobile] plants were 4-5 times greater for acute trauma and 68-93 times greater for cumulative trauma disorders of the upper extremities than those coded from the OSHA 200 log" (Fine, 1991, p. 429). Multiple sources can ensure all or at least most cases recorded are recorded in the OSHA log.

Oakley believes a safety system should be looked at like "the 'patient,' whereby we must identify the location and timing for measuring 'leading indicators,' which must be

captured by some mechanism. Once this data is obtained, we have an opportunity to proactively act on the information, and prevent 'illness' in the system. This is equivalent to early detection and intervention" (Oakley, 2004, p. 3).

# **2.3 Potential Solutions to Policy Changes**

In the case of commercial truck data in West Virginia, Winn, Bucy, and Klishis showed problems with management understanding its role; with data definitions; with police officer training; and with delays in data delivery.

"Improving the quality, (that is, the precision, timeliness, accuracy and completeness of traffic accident data) contributes immensely to the ability of these data customers to make correct historical interpretations of events, predict the future, and measure the effectiveness of past programs" (Winn and Bucy, 1997, p.2).

The form modification is one possible solution to policy changes. In the study done by Sorock et al (1997), "the key to the success of these studies is the combination of narrative data with comprehensive coding of both the nature and cause of injury. Without the numeric codes to target cases for study, analysis of narrative data can be laborious and time-consuming" (p.118). With more information or training to help ensure accuracy, the data can be more meaningful. Management must understand and affect the safety culture of the organization. "The employee is only part of a large system comprised of policies, procedures, practices, machinery, materials, work environment, etc. This system is ultimately under management's control (Carder, 1994, p.1).

## **Chapter 3: Methods**

#### 3.1 Design

The basic method selected was expert focus groups. "Focus group research involves organized discussion with a selected group of individuals to gain information about their views and experience of a topic. Focus group interviewing [is] suited for obtaining several perspectives about the same topic" (Gibbs, 1997, p. 1). The use of a focus group is justified when "the explicit use of group interaction [will] produce data and insight that would be less accessible without the interaction found in a group" (Morgan, 1988).

Two focus group sessions were conducted for this research project. The major objectives of these expert focus groups were to discover the issues with this process currently and gain insight on solutions.

# **Institutional Review Board**

Prior to any focus group formation, West Virginia University (WVU) requires its students and employees to obtain permission when collecting data from humans. WVU's Institutional Review Board (IRB) had to review and approve all aspects of the interaction with human subjects including advertisement and recruitment. The IRB protocol is included here as Appendix A. There was no IRB review process required for FAA.

## Survey

A survey was prepared by the researcher and delivered as a qualifying tool for the prospective focus group participants. This survey evaluated previous experience with the 3900-6 and/or CA-1 process. By giving the survey before the actual focus group sessions, prospective participants were allowed to prepare their thoughts for the actual expert focus group session.

# **Instructions to Participants Focus groups**

In order to recruit participants, an email generated from Shannon McNeal, FAA intern, was sent to approximately forty AHP-500 safety points of contact, administrative assistants, and managers from the different regions asking them to participate as an unpaid volunteer and to ask if experienced fellow employees would like to participate as well. In this message, the qualifications were listed.

In order to qualify for the focus groups, participants were required to be employed by the Federal Aviation Administration for a minimum of three years. These participants had to be managers, supervisors, safety points of contacts (POCs) or any other FAA employees who would have normally filled out the FAA Mishap Report form (3900-6) and/or the Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation (CA-1 form) or employed who were charged with OSHA and Workers Compensation recordkeeping. (Both forms are included under Appendix B.) It was mandatory for the Western United States participants to have access to a computer and telephone for about three hours since a face to face focus group meeting was not possible. Prospective participants were informed that there was no penalty for those who chose not to participate. Participants of this focus group could quit this study at any time. They were not required to answer all questions. The surveys would be kept confidential.

# 3.2 Subject Selection

Focus group #1 (Eastern Focus Group, or EFG) was volunteer, unpaid FAA employees with an average of seven years employment with FAA. This group of seven members was from the regions in the Eastern United States (EFG) which included New England and Eastern regions as far west as the Mississippi River. A second Western United States focus group (WFG) also consisted of volunteer, unpaid FAA employees, and had an average of ten years with FAA. The WFG was made up of 5 members from the United States regions west of West Virginia, which included the Southern, Great Lakes, Central, Southwest, Northwest Mountain, Western-Pacific, and Alaskan regions. See Figure 3 for the divisions of the FAA regions.



Figure 3.1: FAA Regions Map from the FAA Regions and Center Operations (ARC)

# **Exclusions to Participation in Focus Group**

The survey prior to the focus group session was used to exclude individuals who had no experience with the 3900-6 or the CA-1 form. One such person was excluded.

#### 3.3 Methods

# Eastern Focus Group Session (EFG)

For the EFG, a 1-hour meeting was held in the FAA Headquarters located at 800 Independence Avenue SW, Washington DC 20591. First in this session, participants had a conversation facilitated by pre-written questions provided by the researcher. There was no time limit for responding to each question. Next, the group members discussed the successes, issues, and concerns with the 3900-6 and CA-1 forms and process. Then, participants told the facilitator what could be done to improvement could be made. Then, solutions were suggested and put on list on a poster board. Finally, participants were then asked to complete an individual priority decision worksheet. The focus group questions are included under Appendix C.

# **Costs and Implementation Timeline**

Cost estimates will be made from discussions between the researcher and FAA management using research results. Implementation timeline will be created the same.

# Western Focus Group Session (WFG)

The WFG meeting was held by web conferencing in order to eliminate travel costs for all parties. Web conferencing was arranged via *Gotomeeting.com*. WFG participants were informed by the use of the Lotus Notes meeting scheduling program the logistics of the meeting. In this notification, participants were told the website address and other pertinent information in order to access the meeting. First in this online session, conversation was facilitated by pre written questions asked by the researcher. There was no time limit for each question. Next, all responses to questions were typed in real time by the researcher and seen by all parties. As solutions were suggested, they were typed in real time and added to a separate list seen by all. Then, this list and the individual priority decision worksheet were e-mailed to the participants. Finally, the participants completed the worksheets and sent it back to the researcher. A complete set of subject instructions is provided in Appendix D.

# **Methods for Generating and Prioritizing Potential Solutions**

The suggestions for improvement were made by focus groups and recorded by Shannon McNeal, FAA intern, and placed into three categories (timeliness, training, forms) by the participants. Then, the suggestions were ranked by participants. Both expert groups were strongly encouraged by Shannon McNeal at the end of the meeting to make a priority decision by imagining they had a dollar's worth of nickels. On a worksheet, they were to allocate as much of their dollar as they wished to a given solution by writing down the "dollar value" for that solution. By summing across participants, solutions were thus "valued" by the amount of money at the end of the meeting. The suggestion valued most by the group would have the most imaginary nickels given to it.

#### 3.4 Definitions

<u>3900-6</u>- is also known as the FAA Mishap Report form. The 3900-6 must be filed by managers in order to have information to generate the OSHA 300 log the Federal Aviation Administration.

<u>Accuracy</u> – the exact details of an incident.

<u>CA-1</u>- also known as the Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation form. It is the form employees must file when seeking worker compensation.

<u>EFG</u>- is also known as Eastern Focus Group. This is the acronym used the expert focus group with participants in the Eastern United States.

<u>ESP</u>- stands for Employee Safety Performance. ESP to provide policy recommendations and oversight for employee occupational safety and health program as required in various laws including OSHA regulations, FAA Executive Orders and Departmental Policies. <u>FAA</u>- the Federal Aviation Administration is responsible for the safety of civil aviation. <u>OWCP</u>- the Office of Workers Compensation Programs is the title of the offices who handle worker compensation claims at the Department of Labor, Federal Aviation Administration and other federal agencies. The OWCP at FAA provides support and receives all occupational injury and disease claims.

<u>Representative</u>- a simple statement of facts without opinion or bias.

<u>Timeliness</u>- in this case, refers to receiving information with one month of the injury. <u>User friendly</u>- refers to size of font where larger is better; intuitive definitions of data points; and logical flow of data points. <u>WFG</u>- is also known as Western Focus Group. This is the acronym used the expert focus group with participants in the Western United States.

#### 3.5 Limitations

Research shows there are several limitations when using focus groups. In 1997, Gibbs noted "the individual interview is easier for the researcher to control than a focus group in which participants may take the initiative" (p. 2). "Focus groups can be difficult to assemble" (Gibbs, 1997, p. 4).

There were several artificial constraints. There was small number of focus group members [n=EFG(5) + WFG(7)=12]. It was difficult to recruit participants because there is a very small number of potential participants who work these forms and deal with the recordkeeping at FAA.

Like many government agencies at the time, the FAA was experiencing spending freezes and budget cuts. This eliminated travel covered by the agency. This in turn limited the potential participants for the Eastern expert focus group. Finally, these results may not generalize to other agencies beyond FAA, or to state agencies that collect worker compensation or use the OSHA 300 since the departments have different policies and practices which govern data collection.

# **Survey Questions**

All survey questions are located in Appendix D.

#### **Chapter 4: Results**

#### **4.1 Results of the Qualifying Survey**

The thirteen questions in the qualifying survey ensured all participants either generated data or used data from the CA-1 or 3900-6 forms, so qualified participants were familiar with FAA's internal data process. Analysis revealed one potential participant was not suited to go to the expert focus group phase because there was no exposure in the daily working process. The voluinteer participant was thanked and excused.

# **4.2 Eastern Expert Focus Group Session Results**

#### **CA-1 General Discussion**

Analysis shows that the methods in which people submit the CA-1 form varies. There is apparently confusion on the best way to submit these forms whether via fax or email with respect to employee or employer privacy issues. The experts who input this data would prefer the form to be faxed. However, on occasion, employees in the focus group scan the form and email it. Experts say that this can be problematic if the person over the case is not in the office when it is submitted. This can delay the short time in which the form should be submitted to the Department of Labor. Sometimes the employees in the FAA Headquarter facility walk the form into the FAA Workers Compensation office. This practice is seen as acceptable. On occasion, the employee submits the form through the United States Postal Service. This method delays the process significantly.

#### "Helpful Information" Discussion

The Eastern expert focus group was asked what "helpful information" could be given to the potential CA-1 filers in order to improve the process. The group agreed they would not feel comfortable with FAA giving them any information prior to any injury simply because it artificially would increase the number of forms filed. One participant stated "filing a CA-1 report is a right, not a requirement." Ultimately, the group believed any information they give would be like coaching a person on how to get "45 paid workfree days" and would increase claims significantly. The group as a whole believed a briefing for only managers would be more beneficial to explain the data need and process was fully. The group said when people call for help, the helpful information they are given is to make sure there are signatures, dates, and cover sheet when faxed. Added information would allow the program assistants to know what facility to contact in case the contact information was not accurate.

# WCIS Discussion

The group believed it would be beneficial to all interested parties if the Workers Compensation Information System (WCIS) could "talk" to the Worker Compensation tracker and to the Safety Management Information System as well. Currently, these three systems have different codes for injuries. For OSHA recordkeeping, once the information has been extracted from what is input into the SMIS system, there is no way of being notified if the information has been updated or changed for accuracy on WCIS or the Workers Compensation tracker.

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#### **3900-6 Discussion**

Analysis revealed that there are several issues currently with the electronic form for the 3900-6. On occasion, there is not a choice for a specific common injury such as a laceration or abrasion. Additionally, there are codes the filer must know or at least know where to locate the data. This can lead to more inaccuracy since the form cannot be submitted without certain fields being completed so the user is forced to guess. Also, the form cannot be saved to allow the filer to return to the form once they have all the information needed. The Eastern group agrees it would be helpful to train the administrative officers who fill out this form; to supply code definitions; to supply more complete instructions. Solutions from the Eastern focus group in shown in Table 4.1.

#### **4.3 Western Expert Focus Group Session Results**

#### **CA-1 Discussion**

As revealed by the Eastern expert focus group, the method in which people submit their CA-1 forms varies. Some of the members agreed the time frame in which a form must be submitted to management and subsequently to FAA's OWCP works well and is timely. The information from the OWCP in FAA (AHP-500) flows logically, according to this analysis but the CA-1 does not flow well.

The Western expert focus group was asked what "helpful information" could be provided to the potential CA-1 filers in order to receive accurate information. The group agreed informing employees which fields on the form are mandatory before submitted would be very helpful.

## **3900-6 Discussion**

The Western expert focus group believed the 3900-6 should be accessible as an electronic form. They were pleased the SMIS system gives instant updates, but the group had a few problems with the submission process. The codes and injury types required to submit the form are not easily available. When the 3900-6 data is used, the data is not always accurate because management must estimate the number of days the employee will miss in order to submit the form. At the time of completion, management has no idea how long the employee will be out or the extent of treatment they will have to receive. They are again forced to guess. Solutions from the Western focus group in shown in Table 4.2.

#### 4.4 Possible Solutions Across Groups, with Discussion

This section is a discussion of all the possible solutions from both expert focus groups. Solutions were categorized under the following categories: Submission Process; Form Modification; Information/Training; and System Modification. The disaggregated results from each expert focus group are presented at the end of this chapter.

#### **Submission Process**

# Make Faxing the CA-1 Forms the Only Option

The Program Assistants for the Workers Compensation group would prefer faxing be the only option. (See Table 4.3) With this method, cases can be handled in a timely manner no matter who is present at work. The assistants noted the office is having is people scanning and emailing their CA-1 forms to only the Program Assistant in which they spoke. This system can work well when that Program Assistant is at work. However, if that Program Assistant has to miss work for any reason, this delays the already narrow timeline in which these forms must be submitted. If the forms are faxed, whoever is working that day will have the ability to retrieve the form, input, and submit the CA-1 form.

#### General electronic mailbox accessible to all people who could possibly handle the case

Currently, there is confusion in the field on how to submit the CA-1 form with adherence to the various privacy regulations. There have been a growing number of people who do not feel comfortable faxing any private information. Thus, the managers have been scanning and emailing their signed forms. An electronic general electronic mailbox accessible to all people who could possibly handle the case could solve this problem. See Table 4.3.

# **Form Modification**

# An electronic version of the CA-1 form to allow for accuracy

Presently, the participants of both groups revealed in the analysis that the CA-1 form is filled out by hand the majority of the time. This can lead to input inaccuracy due to poor handwriting or simply not having enough room to complete the thought in the space provided. Regardless of the cause, this adds to lag time in submitting the CA-1 form, and so Program Assistants must call the filer in order to correct this information. Analysis reveals that lag time is added if the name of the employee and/or their phone number is inaccurate or written sloppy. If this form only has an electronic version, people without computer and/or internet access would not be able to submit their form. The expert focus group discussed having kiosks or stations set up to allow electronic submission similar to the Internal Revenue Service and United States Treasury. See Table 4.3.

#### Combine CA-1 and 3900-6

Since both forms need almost the same information, it was suggested by each expert group to combine the forms. They groups believed it will cut down on confusion of which form needed to be filled out. It would also give the Workers Compensation and Safety group the best information in one place instead of two. See Table 4.3.

#### Expand Drop-Down Menus for CA-1

On occasion, the drop- down menus on the Workers Compensation Information System (WCIS) do not have an option for an accurate description for an accurate description of the injury. The Program Assistants would like more options added to these menus in order to give more useful information to those charged with recordkeeping. See Table 4.3.

#### Expand Drop- Down Menus for 3900-6

The 3900-6 has the same issues as the CA-1according to the analysis of data. The best description in the menus provided is not always given for the injury. However with the 3900-6, the people filling out the form may not have to perform this task as frequently and thus forget definitions. It was suggested by both EFG and WFG groups that the drop-down menus also have a brief description of certain codes. See Table 4.3.

#### Simplify the 3900-6 Form

According to the data analysis, altering the 3900-6 form is possible because it is an FAA form. However, there is no apparent consensus of how to simplify from the expert focus group. This solution was added by one the focus group participants on their worksheet with no discussion from the group. See Table 4.3.

#### Linking the WCIS and SMIS Systems

Currently, the type codes used for WCIS are not the same as the type codes for SMIS. This means injuries are seen differently in each system. A difference causes issues when the two have to be compared for recordkeeping sake. Thus, it was suggested to use the same type codes for both systems.

#### Electronic CA-1 forms

The Western expert focus group agreed that an electronic form would increase accuracy of information submitted. It would also increase timeliness of submission not only to the OWCP staff at FAA but to DOL as well, according to the data analysis. See Table 4.3.

#### **Information/Training**

#### Clarification of medical treatment for 3900-6

According to the data analysis, filers are not aware of the definition of "medical treatment". Selecting it from the drop down list does not mean or ensure that the filer knows the particular definition of medical treatment or whether it fits the instance.

#### Better explanation of what each form is used for (CA-1, CA-2, 3900-6)

Currently, groups indicated that there is a great deal of confusion on which form is to be filed for a certain situation. CA-1 is for work-related injuries. The CA-2 is for work-related illnesses. The 3900-6 is for mishap reporting. The 3900-6 is the only form required to be filed when an accident occurs. It was suggested that information on which from to use be given to, at the least, the administrative officers and managers.

#### Training on SMIS and 3900-6 for Administrative Officers

In most cases, the administrative officers (AO) submit the 3900-6 form into the Safety Management Information System (SMIS). This system can be challenging if not used on a regular basis according to the data analysis. Filling the 3900-6 can be difficult if the filer does not know the various codes necessary to complete the form. One solution put forward by both groups was to train the administrative officers in SMIS and how to complete the 3900-6 form.

#### Need to Know Who Ask For Help

Managers and employees who have never filed out the CA-1 form do not know who to contact when they need assistance according to the data analysis. This suggestion calls for better publicity of whom to ask for help when question do arise. See Table 4.3.

#### Give Administrative Officers More Information on CA-1 process

When a CA-1 form is given to an employee, the Administrative Officer (AO) is usually the provider of the form. Thus, most of the questions regarding this form are returned to the AO of them even though the AO may or may not have the answer. The Western expert focus group discussed giving the Administrative Officers more information as how the CA-1 process works. This would allow them to be better equipped to answer questions employees have. See Table 4.3.

#### Informing employees which fields are mandatory before submitted forms

According to the analysis, currently the CA-1 form is filled out by hand and sent to the OWCP within FAA for the FAA to type up and submit as a "hard copy." This practice allows employees to skip fields on the form when they do not have the information needed. This can be a problem when the OWCP team member is attempting to input data from the form in which key detail is missing.

#### Clarification of codes for supervisors for 3900-6

According to the analysis, there is confusion of what the codes and the types of injuries mean and where their explanations can be located. The fields for these codes and injury types are mandatory and forms cannot be submitted without this information. Since supervisors and managers may have to complete the 3900-6 form, information on codes and definitions should be readily available. See Table 4.3.

#### Require filer to describe the kind or type of medical treatment for 3900-6

The analysis revealed that for OSHA recordability, OSHA provides strict definitions in its technical document, Parts 1904 and 1952 of Title 29, *Code of Federal Regulations*, determine whether the action taken was considered a medical treatment or first aid. Requiring the filer to describe the kind or type of medical treatment for 3900-6 would give clarify using the form. In turn, it would also hopefully reduce the number of telephone calls the Employee Safety Performance team will have to make to determine OSHA recordability for various cases. This would increase the timeliness of trend analysis.

#### **System Modification**

#### Send notification to managers to update estimates of days and changing facts for 3900-6

Analysis revealed that when a 3900-6 is filed, it is usually within a few days of the accident. During discussion, it was learned that managers give an estimate of days the injured employees may miss. The managers are expected to update the actual number of days missed. However, most do not. The Western expert focus group recommended having SMIS send a notification to managers to update estimates of days lost and changing facts for 3900-6.

	% of Budget
Electronic System/ Form (Including a kiosk)	40.7%
General Inbox for CA-1 Submission	17.9%
Fax Only for CA-1	9.3%
Expand Drop Down Menus for CA-1	14.3%
Training on SMIS and 3900-6 for Administrative Officers	3.6%
Expand Drop Down Menus for 3900-6	3.6%
Simplify the 3900-6 Form*	10.7%
Total	100.0%

Table 4.1 Eastern Focus Group Results

	% of Budget
Need to know who ask for help -Mgt and employees	2.50%
Give AO more information on CA-1 process	2.50%
Electronic CA-1 forms	8.75%
Combine CA-1 and 3900-6	36.25%
Better explanation of what each form is used for	7.50%
Inform of fields mandatory before submitted	2.50%
Linking the WCIS and SMIS systems (Use same type codes)	11.25%
Send a notification to managers	11.25%
Clarify codes for 3900-6	2.50%
Clarify medical treatment for 3900-6	3.75%
Describe kind of medical treatment for 3900-6	11.25%
Total	100.00%

Table 4.2 Western Focus Group Results

	% of Budget
Submission Process	
General Inbox for CA-1 Submission	11.36%
Fax Only for CA-1	5.91%
Form Modification	
Electronic System/ Form (Including a kiosk)	25.91%
Combine CA-1 and 3900-6	13.18%
Expand Drop Down Menus for CA-1	9.09%
Simplify the 3900-6 Form*	6.82%
Linking the WCIS and SMIS systems (Use same type codes)	4.09%
Electronic CA-1 forms	3.18%
Expand Drop Down Menus for 3900-6	2.27%
Information/Training	-
Describe kind of medical treatment for 3900-6 /	
Clarify medical treatment for 3900-6	5.45%
Better explanation of what each form is used for	2.73%
Training on SMIS and 3900-6 for Administrative Officers	2.27%
Need to know who ask for help -Mgt and employees	0.91%
Give AO more information on CA-1 process	0.91%
Clarify codes for 3900-6	0.91%
Inform of fields mandatory before submitted	0.91%
System Modification	
Send a notification to managers	4.09%
TOTAL	100.00%

Table 4.3 Combined Focus Group Results

#### **Chapter 5: Discussion/ Conclusion**

#### 5.1 Discussion of Possible Solutions with Implementation and Cost Estimates

This study has identified and prioritized some solutions to improve the efficiency and effectiveness of the safety recordkeeping process at the Federal Aviation Administration. These solutions are presented in Tables 4.1, 4.2, and 4.3. This section will discuss the *implementation* and *cost feasibility* for each solution presented by the groups. Cost estimates for suggestions are in Table 5.1 and a suggested management plan is included in Figure 5.1and it shows an approximate number of days needed to take to complete each possible solution. It is assumed that any employee will allot four hours per day to a given task in Figure 5.1.

The highest possible solution ranking from the focus groups was to create a general electronic mailbox accessible to all people who might possibly handle the case. (See Table 5.1.) This would alleviate the problem of claims sitting in one individual team member's inbox in the event of an absence from the office. As of February 2009, the OWCP at FAA has been piloting this technique primarily to accommodate the Eastern Region facilities who recently came under the Headquarter jurisdiction. The researcher suggests that a general inbox for Eastern claims be further analyzed to decide feasibility for all regions. The researcher also suggests the OWCP at FAA makes a formal policy decision on how they would prefer forms be submitted (e.g. fax or email; both methods could possible option.) However, employees, in turn, need to be aware of the way this office would like to the information sent.

For the implementation of this (or any) solution, additional "ramp up" time should be considered based on the method of announcement. An "all hands" memorandum is a memo sent out by the highest executive in the organization. In this case, it would be the FAA administrator if it is a FAA-wide priority. This memo would have to be written and sent up the chain of command until it reaches the administrator, and would take weeks to accomplish. Once each person in the chain reviews the memo, it is sent back to its originator for corrections. Another method of announcement is the broadcast message. It is an email to every FAA employee and contractor with a FAA email address. The message has to be sent to a certain email inbox which reviews the content and then send the message out.

Both focus groups agreed that an electronic version of the CA-1 with definitions on the form itself would increase accuracy of the information submitted. The electronic form would reduce lag time due to poor handwriting or not having enough room to complete the employee's statement but other models are available. For example, the United States Department of Labor website has an electronic form of the CA-1 that can be filed out, printed, signed, and submitted. While it is known that not all FAA employees have access to a computer at the time of injury, if the electronic version of the CA-1 form is adopted, the FAA would have to determine how to provide access to all.

There has been discussion at FAA regarding creating an electronic CA-1 form that would input directly to the Workers Compensation Information System (WCIS). In this plan, management would only be granted access to this system since all have access to a computer. There are many employees who do not have access during work hours. This means management would have to input both statements into the form and submit it. Employees would not be granted access to the WCIS system the number of people privy to this private information for security reasons.

Additionally, since a great number of FAA employees are in bargaining units (unions), this could change their assignment of duty. This would force both parties to renegotiate the contracts of all employees. The Eastern focus group discussed having kiosks or computer stations set up to allow electronic submission similar to the Internal Revenue Service and United States Treasury. These kiosks would need a screen, keyboard, access to the internet, and a printer. The average cost for one with such capabilities is \$2,600 per *futuretouchtech.com* but this does not take into consideration maintenance. The FAA would have to decide how many facilities would need this option.

If it is decided to simply the form create an electronic submission process for the CA-1, this could take approximately 96 man hours per discussions with information technology personnel. The system support would have to research, create code, and test the new system. Once the system is created, AHP-500 would have to review for discrepancies. Once any errors are corrected, the system would "go live" or be available for employee use. An announcement would need to be sent via a memo from the Administrator or broadcast message that a new submission process is under way.

The focus groups discussed several modifications to WCIS and SMIS. It was generally agreed by group members that the drop down menus for the CA-1 and 3900-6 do not always have the best available definitions or options for a particular injury. (See Table 4.3.) By expanding the menus and giving more options and definitions, both OWCP and ESP could gain more accurate data and do it faster. However, these systems are maintained by different support organizations. Therefore, the time and cost must be counted twice in Table 5.1. Before either process has begun, the FAA must decide whether they wish to link the WCIS and SMIS systems. This would dictate how to enhance the menus. In this process, all the appropriate information must be gathered such as more descriptive medical codes, definitions, and so forth. This information must be sent to the respective system IT support. Once the systems are completed, the drop down boxes would be reviewed by AHP-500. Upon their approval, the system would go live. An announcement would have to be made of the change by way of broadcast message or "all hands" memo. Those costs are represented in Table 5.1 and a timeline is suggested in Figure 5.1.

Combining (merging) the CA-1 form and the 3900-6 form was also discussed. The researcher recognizes that similar information is needed for both forms and this may reduce some confusion in the field. Various members of management agree the forms should be independent since they serve different purposes. Since the purpose of the 3900-6 is to assist the FAA in tracking trends, all accidents and near misses should be recorded. This would not be possible if the forms were combined, this suggestion is not feasible according to discussions with FAA management. However, the researcher believes linking WCIS and SMIS by using the same type codes would assist AHP-500 when comparing data for recordkeeping sake. The process of linking these systems would require information submitted to one system output to the other. AHP-500 would have to decide if SMIS would feed into WCIS or vice versa. The support staff would have to be aware of which type codes are related. They would have to research, create the computer code, and perform tests. Then, AHP-500 would have to review and approve. Those costs are represented in Table 5.1 and a timeline is suggested in Figure 5.1.

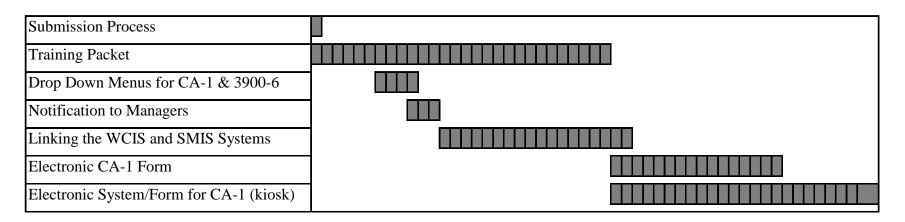
The data also suggest that an informational pamphlet be created to assist filers with the CA-1 and 3900-6. This packet could have all the information the focus groups suggested. Managers and administrative officers would receive a better explanation of what each form is used for and their processes. It would also inform them who the appropriate contact is for assistance. The packet would explain which fields are mandatory on the CA-1 form. The packet could also go through the 3900-6 form giving an explanation on each code, types of injury, and medical treatment. It would be a more economical solution to formal training. The research would suggest the online training currently available be corrected and enhanced for practice. This informational packet would most like be created by AHP-500 or their contract support. The researcher assumed this would be produced in house for the cost estimate. The forms would need to be reviewed and researched. All the information would be gathered. Then, the developer would have to go to step by step in the process in order to discover the areas needing better explanation and provide details. Once the training has been completed, AHP-500 would have to review and approve the training. Finally, the training would be sent out to interested parties such as management and administrative officers. This would take months since this is not the only duty the developer would have on a daily basis. Costs appear in Table 5.1 and a timeline is suggested in Figure 5.1.

The Western focus group recommended having SMIS send an email notification to managers to update estimates of days missed by the employee and changing facts, such as actual medical treatment, for 3900-6. This would reduce the number of calls ESP makes for each month. The notification could ask the major questions asked when managers are called. Costs appear in Table 5.1 and a timeline is suggested in Figure 5.1.

Based on the expert group discussions, the researcher suggests that any future recommendations be forwarded to the appropriate organizations and individuals in FAA who have the responsibility for the safety of their employees and the authority to implement these recommendations.

		Man-hours	unit	\$/unit	Cost Estimate
Submission Process					
General Inbox for CA-1 Submission	Inbox Creation	2.00	hour	50.00	100.00
Fax Only for CA-1	Fax Already Setup	0.00	hour	50.00	0.00
Form Modification					
	Study	32.00	hour	50.00	1600.00
	E system	64.00	hour	52.00	3328.00
Electronic System/ Form (Including a kiosk)	Kiosks		machine	2600.00	0.00
Expand Drop Down Menus for CA-1		14.00	hour	52.00	728.00
Linking the WCIS and SMIS systems (Use same type codes)		72.00	hour	52.00	3744.00
Electronic CA-1 forms		64.00	hour	52.00	3328.00
Expand Drop Down Menus for 3900-6		14.00	hour	52.00	728.00
Information/Training				_	
Describe kind of medical treatment for 3900-6 /					
Clarify medical treatment for 3900-6		24.00	hours	50.00	
Better explanation of what each form is used for		8.00	hours	50.00	400.00
Training on SMIS and 3900-6 for Administrative Officers		24.00	hours	50.00	1200.00
Need to know who ask for help -Mgt and employees		8.00	hours	50.00	400.00
Give AO more information on CA-1 process		8.00	hours	50.00	400.00
Clarify codes for 3900-6		24.00	hours	50.00	1200.00
Inform of fields mandatory before submitted		16.00	hours	50.00	800.00
TOTAL TRAINING		112.00	hours	350.00	5600.00
System Modification					
Send a notification to managers		10.00	hours	52.00	520.00
Announcements					
All hands memo from administrator process	Review process	40.00	hours	50.00	2000.00
Broadcast message	Email Sent	4.00	hours	50.00	200.00

Table 5.1: Cost Estimates of Feasible Possible Solutions



Each square represents a one day assuming work on this project 4 hours/day

Figure 5.1: Suggested Management Plan

#### 5.2 Conclusions

The researcher concluded that the members of both focus groups worked with the 3900-6 and/or CA-1 process regularly. Therefore, the researcher concluded the results were given by true experts. While the number of participants was necessarily small, their expert opinions were true and accurate representations of all experts at FAA.

The researcher also concluded that the expert focus group was a valuable and valid method to gather data on improving data collection at FAA. The method gave detailed insight on the subject. The researcher also concluded that the method clearly showed there is confusion in the "field" regarding the difference between OSHA recordability and Workers Compensability reporting; that the in-person Eastern expert focus group meeting allowed the participants to be more comfortable with each other. The Western expert focus group style was web conferencing and the researcher concluded that the method also was valid and effective. In fact, for the WFG, although most participants were using a new kind of conference technology for the first time (web conferencing), the researcher concluded this method was particularly beneficial in that it prevented the participants from talking over each other as they otherwise might on the telephone. or even in person. Additionally, web conference participants could clearly see all responses to the question as typed in real time by the researcher. This allowed for instant corrections to ensure all answers were accurate and represented the sentiment correctly.

#### **5.3 Future Research**

One recommendation of future research for this study is to hold another focus group in a year to assess if the potential solutions are prioritized in the same fashion. This could give insight on whether the plans currently in action were successful. A feasibility study should be performed on kiosks for accident reporting. Second, FAA could contact the IRS and U.S. Treasury OWCP for more information on their existing kiosk systems. Finally, since the focus groups did not discuss how to simplify the 3900-6, a study should be performed to decide how simply this form and yet still receive all the information required to track trends.

#### 5.4 Summary

A research project was conducted to identify shortcomings and opportunities for improvements in data collection at FAA. An "expert focus group" method was judged to be sufficiently useful, although with certain limitations offered, to produce a set of ranked possible solutions. Among possible solutions, the most highly ranked, cost-feasible solutions over both groups were, first, an electronic system to submit the CA-1 form to the Office of Workers' Compensation at FAA; second, a general email inbox for CA-1 submission to FAA and third, expanding drop down menus of the current systems to give more detailed instructions, definitions or other information to the form user. Others are listed in the tables but were less potentially viable not feasible or judged not cost-effective.

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Appendices

Appendix A: IRB Protocol



## **Expedited - IRB Protocol - Exemption**

To:	Winn, Gary
From:	WVU Office of Research Compliance
Date:	Wednesday, February 11, 2009
Subject:	No action required
Tracking #: Title:	H-21453 Federal Recordkeeping and Process Improvement at the Federal Aviation Administration

The above-referenced study was reviewed by the Institutional Review Board and was granted exemption on 2/11/2009 in accordance with 45 CFR 46.101(2).

While no action is required on your part, the IRB made the following findings:

This research study was granted an exemption in accordance with Research that involves educational tests, survey procedures, interview procedures or observation of public behavior [45 CFR 46.101(2)]. If you have questions please refer to the IRB website.

This protocol was reviewed using the following: Exemption Checklist (210r)

The following documents have been approved and validated for use in this study and are available in the BRAAN system:

Cover Letter Internet Ad

Thank you.

Board Designee: White, Barbara

Letter Sent By: White, Barbara, 2/11/2009 1:55 PM

Once you begin your human subject research the following regulations apply:

1. Unanticipated or serious adverse events/side effects encountered in this research study must be reported to the IRB within five (5) days.

2. Any modifications the study protocol or informed consent form must be reviewed and approved by the IRB prior to implementation.

3. You may not use a modified informed consent form until it has been approved and validated by the IRB.

Appendix B: CA-1 and 3900-6 Forms

U.S. Department of Labor Employment Standards Administration Office of Workers' Compensation Programs

Employee: Please complete all boxes Witness: Complete bottom section 16 Employing Agency (Supervisor or Cor					
Employee Data				14111	
1. Name of employee (Last, First, Middle	)			2. Social Secu	urity Number
				1	- here and a second
3. Date of birth Mo. Day Yr.	4. Sex Male Female	5. Home telephone	6. Grade as o date of inju		Step
7. Employee's home mailing address (Ind	clude city, state, and ZIP code)			and the second sec	s Iusband en under 18 year
Description of Injury					
9. Place where injury occurred (e.g. 2nd	floor, Main Post Office Bldg., 12	2th & Pine)			
10. Date injury occurred Mo. Day Yr.	a.m. 11. Date of this Mo. Day	Cherry and a second	ation		
13. Cause of injury (Describe what happe	ened and why)				
			a	Occupation co	de
14. Nature of injury (Identify both the inju	ry and the part of body, e.g., fra	acture of left leg)	b.	Type code	c. Source code
				WCP Use - NO	I Code
beyond 45 days. If my claim	t was not caused by my willful i cal treatment, if needed, and th COP) not to exceed 45 days an	misconduct, intent to injure myself ne following, as checked below, wh nd compensation for wage loss if d e continuation of my regular pay sl	or another person, no ile disabled for work: isability for work conti	nues	
b. Sick and/or Annual Leave I hereby authorize any physician or h desired information to the U.S. Depar This authorization also permits any of	tment of Labor, Office of Worke	ers' Compensation Programs (or to	o its official representation		
Signature of employee or person a			Date		
Any person who knowingly makes ar as provided by the FECA or who know remedies as well as felony criminal p	ny false statement, misrepreser wingly accepts compensation t rosecution and may, under app	to which that person is not entitled propriate criminal provisions, be pu	is subject to civil or a unished by a fine or in	dministrative	
Have your supervisor complete th Witness Statement	e receipt attached to this for	m and return it to you for your re	ecords.	est 220	
16. Statement of witness (Describe what	you saw, heard, or know abou	t this injury)		and an and the later of the second	
Name of witness	Signati	ure of witness		Date sign	ed
Address	City		State	ZIP Code	

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Official Supervisor's Report: Please of	complete information request	ed below:			
Supervisor's Report 17. Agency name and address of reporti	ng office (include city, state, and	d zip code)			OWCP Agency Code
					OSHA Site Code
	and a first state of the second			ZIP Code	
18. Employee's duty station (Street addr	ess and ZIP code)				
19. Employee's retirement coverage	CSRS FERS	Other, (identify)			
20. Regular work hours From: a.m. 1	a.m.	. Regular work schedule S	un. Mon. Tues	s. Wed.	Thurs. Fri. Sat.
22. Date Mo. Day Yr. of Injury	23. Date Mo. Day notice received		Date Mo. Day topped vork	Yr. Time:	a.m. p.m.
25. Date Mo. Day Yr. pay stopped	26. Date Mo. Day Y 45 day period began	r.	27. Date Mo. D returned to work	bay Yr.	a.m.
28. Was employee injured in performanc	ce of duty? Yes No	(If "No," explain			
					<u> </u>
29. Was injury caused by employee's wi	Ilful misconduct, intoxication, or	intent to injure se	If or another? Yes	(If "Yes," expla	in) No
	na shakati sa shakati na k				
30. Was injury caused 31. Nam by third party?	e and address of third party (Inc	clude city, state, a	nd ZIP code)		
Yes No					
(If "No," go to					
item 32.)					
32. Name and address of physician first	providing medical care (Include	city, state, ZIP c		33. First date medical ca received	Mo. Day Yr.
				34. Do medica	al Yes No
				reports sh employee disabled f	is
35. Does your knowledge of the facts ab	oout this injury agree with statem	nents of the empl	oyee and/or witnesses?	Yes	No (If "No," explain)
		and the second sec			
36. If the employing agency controverts	continuation of pay, state the re	ason in detail.		37. Pay rate	
				when emp	bloyee stopped work
Signature of Supervisor and Filing In	structions			J \$.	Per L
<ul> <li>38. A supervisor who knowingly certifies may also be subject to appropriate fee</li> </ul>	to any false statement, misrepre	esentation, conce	alment of fact, etc., in re	espect of this cla	im
I certify that the information given ab knowledge with the following exception		nployee on the re	verse of this form is true	e to the best of n	ny
Name of supervisor (Type or print)					
Signature of supervisor			Date		
Supervisor's Title			Office phone		
	No lost time and no medical expo No lost time, medical expense in Lost time covered by leave, LWC First Aid Injury	curred or expect	ed: forward this form to (	cal folder (SF-66 OWCP	3-D)

Form CA-1 Rev. Apr. 1999

## Instructions for Completing Form CA-1

Complete all items on your section of the form. If additional space is required to explain or clarify any point, attach a supplemental statement to the form. Some of the items on the form which may require further clarification are explained below.

Employee (Or person acting on the employees' behalf)

#### 13) Cause of injury

Describe in detail how and why the injury occurred. Give appropriate details (e.g.: if you fell, how far did you fall and in what position did you land?)

#### 14) Nature of Injury

Give a complete description of the condition(s) resulting from your injury. Specify the right or left side if applicable (e.g., fractured left leg: cut on right index finger).

#### Supervisor

At the time the form is received, complete the receipt of notice of injury and give it to the employee. In addition to completing items 17 through 39, the supervisor is responsible for obtaining the witness statement in Item 16 and for filling in the proper codes in shaded boxes a, b, and c on the front of the form. If medical expense or lost time is incurred or expected, the completed form should be sent to OWCP within 10 working days after it is received.

The supervisor should also submit any other information or evidence pertinent to the merits of this claim.

If the employing agency controverts COP, the employee should be notified and the reason for controversion explained to him or her.

#### 17) Agency name and address of reporting office

The name and address of the office to which correspondence from OWCP should be sent (if applicable, the address of the personnel or compensation office).

#### 18) Duty station street address and zip code

The address and zip code of the establishment where the employee actually works.

#### 19) Employers Retirement Coverage.

Indicate which retirement system the employee is covered under.

#### 30) Was injury caused by third party?

A third party is an individual or organization (other than the injured employee or the Federal government) who is liable for the injury. For instance, the driver of a vehicle causing an accident in which an employee is injured, the owner of a building where unsafe conditions cause an employee to fall, and a manufacturer whose defective product causes an employee's injury, could all be considered third parties to the injury.

#### 32) Name and address of physician first providing medical care

The name and address of the physician who first provided medical care for this injury. If initial care was given by a nurse or other health professional (not a physician) in the employing agency's health unit or clinic, indicate this on a separate sheet of paper.

**Employing Agency - Required Codes** 

#### Box a (Occupation Code), Box b (Type Code), Box c (Source Code), OSHA Site Code

The Occupational Safety and Health Administration (OSHA) requires all employing agencies to complete these items when reporting an injury. The proper codes may be found in OSHA Booklet 2014, "Recordkeeping and Reporting Guidelines.

#### 15) Election of COP/Leave

If you are disabled for work as a result of this injury and filed CA-1 within thirty days of the injury, you may be entitled to receive continuation of pay (COP) from your employing agency. COP is paid for up to 45 calendar days of disability, and is not charged against sick or annual leave. If you elect sick or annual leave you may not claim compensation to repurchase leave used during the 45 days of COP entitlement.

#### 33) First date medical care received

The date of the first visit to the physician listed in item 31.

36) If the employing agency controverts continuation of pay, state the reason In detail.

COP may be controverted (disputed) for any reason; however, the employing agency may refuse to pay COP only if the controversion is based upon one of the nine reasons given below:

- a) The disability was not caused by a traumatic injury.
- b) The employee is a volunteer working without pay or for nominal pay, or a member of the office staff of a former President;
- C) The employee is not a citizen or a resident of the United States or Canada;
- d) The injury occurred off the employing agency's premises and the employee was not involved in official "off premise" duties;
- e) The injury was proximately caused by the employee's willful misconduct, intent to bring about injury or death to self or another person, or intoxication;
- f) The injury was not reported on Form CA-1 within 30 days following the injury;
- 9) Work stoppage first occurred 45 days or more following the injury;
- h) The employee initially reported the injury after his or her employment was terminated; or
- The employee Is enrolled in the Civil Air Patrol, Peace Corps, Youth Conservation Corps, Work Study Programs, or other similar groups.

### OWCP Agency Code

This is a four-digit (or four digit plus two letter) code used by OWCP to identify the employing agency. The proper code may be obtained from your personnel or compensation office, or by contacting OWCP.

#### Benefits for Employees under the Federal Employees' Compensation act (FECA)

The FECA, which is administered by the Office of Workers' Compensation Programs (OWCP), provides the following benefits for job-related traumatic injuries:

- Continuation of pay for disability resulting from traumatic, job-related injury, not to exceed 45 calendar days. (To be eligible for continuation of pay, the employee, or someone acting on his/her behalf, must file Form CA-1 within 30 days following the injury and provide medical evidence in support of disability within 10 days of submission of the CA-1. Where the employing agency continue's the employee's pay, the pay must not be interrupted unless one of the provision's outlined in 20 CFR 10.222 apply.
- (2) Payment of compensation for wage loss after the expiration of COP, if disability extends beyond such point, or if COP is not payable. If disability continues after COP expires, Form CA-7, with supporting medical evidence, must be filed with OWCP. To avoid interruption of income, the form should be filed on the 40th day of the COP period.
- (3) Payment of compensation for permanent impairment of certain organs, members, or functions of the body (such as loss or loss of use of an arm or kidney, loss of vision, etc.), or for serious defringement of the head, face, or neck.

- (4) Vocational rehabilitation and related services where directed by OWCP.
- (5) All necessary medical care from qualified medical providers. The injured employee may choose the physician who provides initial medical care. Generally, 25 miles from the place of injury, place of employment, or employee's home is a reasonable distance to travel for medical care.

An employee may use sick or annual leave rather than LWOP while disabled. The employee may repurchase leave used for approved periods. Form CA-7b, available from the personnel office, should be studied BEFORE a decision is made to use leave.

For additional information, review the regulations governing the administration of the FECA (Code of Federal Regulations, Chapter 20, Part 10) or pamphlet CA-810.

#### **Privacy Act**

In accordance with the Privacy Act of 1974, as amended (5 U.S.C. 552a), you are hereby notified that: (1) The Federal Employees' Compensation Act, as amended and extended (5 U.S.C. 8101, et seq.) (FECA) is administered by the Office of Workers' Compensation Programs of the U.S. Department of Labor, which receives and maintains personal information on claimants and their immediate families. (2) Information which the Office has will be used to determine eligibility for and the amount of benefits payable under the FECA, and may be verified through computer matches or other appropriate means. (3) Information may be given to the Federal agency which employed the claimant at the time of injury in order to verify statements made, answer questions concerning the status of the claim, verify billing, and to consider issues relating to retention, rehire, or other relevant matters. (4) Information may also be given to other Federal agencies, other government entities, and to private-sector agencies and/or employers as part of rehabilitative and other return-to-work programs and services. (5) Information may be disclosed to physicians and other health care providers for use in providing treatment or medical/vocational rehabilitation, making evaluations for the Office, and for other purposes related to the medical management of the claim. (6) Information may be given to Federal, state and local agencies for law enforcement purposes, to obtain information relevant to a decision under the FECA, to determine whether benefits are being paid properly, including whether prohibited dual payments are being made, and, where appropriate, to pursue salary/administrative offset and debt collection actions required or permitted by the FECA and/or the Debt Collection Act. (7) Disclosure of the claimant's social security number (SSN) or tax identifying number (TIN) on this form is mandatory. The SSN and/or TIN), and other information maintained by the Office, may be used for identification, to support debt collection efforts carried on by the Federal government, and for other purposes required or authorized by law. (8) Failure to disclose all requested information may delay the processing of the claim or the payment of benefits, or may result in an unfavorable decision or reduced level of benefits.

Note: This notice applies to all forms requesting information that you might receive from the Office in connection with the processing and adjudication of the claim you filed under the FECA.

Receipt of Notice of Injury		
This acknowledges receipt of Notice of In (Name of injured employee)		
Which occurred on (Mo., Day, Yr.)		
At (Location)		
	n et en son en	
Signature of Official Superior	Title	Date (Mo., Day, Yr.)
	57	

3. Date of Incident (e.g. mm/dd/yyyy)	4. Day of Week	5. Time o	f Incident (e.g. hh:mm)	6. Shift	7. OSHA Recordable
8. CA-1 Submitted	9. CA-2 Submitted		10. Region of Inciden	11. WCIS Case No.	12. Facility Type (of incident)
Yes No Unknown	Yes No	Unknown	_		Other
13. Location ID (of incident)	14. General Location of			15. Specific Location	of Incident
				• • • • • • • • • • • • • • • • • • •	
16. On Premises 17. Mishar	Category	18 Date	Management Notified	of Incident (if different fr	rom date of incident)
	Galegory	TO. Date	Management Notified (		
II. Injury/Illness Information					
19. Description of Injury/Illness					
20. Nature of Injury/Illness Codes				21. Anatomical Locati	on of Injury/Illness
22. Type of Injury/Illness Codes			0.1		
			Other		
23. Source of Injury/Illness Codes					
			Other		
24. Total Days Lost					
Begin Date Er	iding Date	#	by		
25. Total Restricted/Job Transfer	Days				
Begin Date En	ding Date	#	by		
26. Medical Treatment by Health	Care Professional	27. Fat	ality 28.	Date of Death (e.g. mm/de	d/yyyy) 29. CA-6 Submitted
Yes No			res No		Yes No
30. Backfill Overtime (Estimated D	ollar Cost of replacing w	vorker)	31. Number of e	stimated hours or back	fill overtime
and sub-in-ing, it is no subsets to an in the sum of the comparison of the subsets that a subset in an					
III. Property/Vehicle Data					
32. Description of Damage					
en proception d'antage					
33. Types of Damage Codes					34. FAA Property Damage
			Other		Yes No
35. Non-FAA Property Damage	36. Property Damage	Cost	37. Vehicle Damage	38. Vehicle Dama	ge Cost
Yes No		1.1159.2003	Yes No		

41. Vehicle License Number

58

42. State

44. Vehicle Operator Job Series Number

39. Vehicle Make

First

43. Vehicle Operator Name

40. Vehicle Model

Last

MI

IV.	Personnel Data								常的		
45.	Employee Name	0.000		974 <u>88</u> 19609	Contraction of the second	a aent	CECHINES, SHOULD	46. Sex			47. Date of Birth (e.g. mm/dd/yyyy)
	First	MI	Last					Ma	ale	Female	
48.	Cost Center		49. Emp	loyee	Routing N	umt	er (AEE-,	XXX)			50. Region
51.	Line of Business/Staff Of? ce				52. Job	Seri	es Numbe	er			53. Employee Category
	Office										
54.	Facility Type for OSHA 300	Othe	r				55. Locat	tion ID for (	JSH	A 300	
56.	General Job Task						57. Speci	fic Job Tas	k		
58.	and the second state of the se		s Employe		Occupation	n	60. Name First	e of Employ	yee'	s First-Line Sup MI	ervisor Last
61.	Supervisor's Telephone Number (e	.g. xxx-	xxx-xxxx)			oro		present at I	time	of incident	
v	Investigation Data	10.25	<b>的新闻的</b> 在1	10.000							
1.00		. Inve	estigation	Repor	t Number	转影				65. Date Re	oort Prepared <i>(e.g. mm/dd/yyyy)</i>
66										67 Witness	Phone Number (e.g. xxx-xxx-xxxx)
0,000	Name of Witness First		MI		Last					07. Witness	Filone Number (e.g. AA-AAA AAAA)
68.	City/State/Zip				69. Nai Fir		of Second	l Witness		MI	Last
70.	Second Witness Phone Number (e	e.g. xx	(X-XXX-XXX	x)	71. Sec	cond	Witness	City/State/	Zip		
73.	Recommendations (Summary of in	nvestig	gator's rec	comme	endations)						
	Actions Taken to Prevent Recurre	nce (L	ist action:	s taker	n and date	cor	npleted)				
VI.	Submitter Information	THE R			tore as				S-		
75.	Mishap Report Prepared By (if not the First		MI		ast					Job Series Nur	
77.	Job Title	78.	Routing N	umber	(e.g. AEE-X	XX)	<sup>9</sup> 79. Tele	ephone Nu	mbe	f (e.g. xxx-xxx-xxxx)	80. Date of Report (e.g. mm/dd/yyyy)

Appendix C: Focus Group Questions

# Focus Group Questions

What in the CA-1 process is working well?

What could be done to improve the CA-1 process of filling out forms? What could be done to improve the CA-1 process of submitting forms? What could be done to improve the process of using CA-1 information? What could be done to make the CA-1 process more user-friendly? What useful information could we provide to make filling out the CA-1 forms easier? What useful information could we provide to make imputing the CA-1 easier? What useful information could we provide to make using information from the CA-1 easier? What in the 3900-6 process is working well? What could be done to improve the 3900-6 process of filling out forms? What could be done to improve the 3900-6 process of submitting forms? What could be done to improve the process of using 3900-6 information? What could be done to make the 3900-6 process more user-friendly? What useful information could we provide to make filling out the 3900-6 forms easier? What useful information could we provide to make imputing the 3900-6 easier? What useful information could we provide to make using information from the 3900-6 easier? Appendix D: Subject Instructions

A research study is being conducted by holding a focus group regarding the process for submission of 3900-6 forms and the CA-1 submission process. This entails filling out, filing, and using the data from the 3900-6 and CA-1 forms and the process. The purpose of this study is an information gathering for the thesis of a West Virginia University Graduate Intern, Shannon McNeal, working with the Employee Safety Performance team (AHP-500). Your participation is requested. If this is not applicable to you, please forward this to people who you believe can participate.

There will be two focus groups- one on the East Coast and one on the West Coast. Criteria for selection of focus group participants include:

• Be employed by the Federal Aviation Administration at a minimum of three years.

• Be managers, supervisors, safety points of contacts (POCs) or any other FAA employees who would have to fill out the 3900-6 form and/or the CA-1 form out in past and people who are charged with the recordkeeping.

• West Coast participants must have access to a computer and telephone for about three hours.

The East Coast focus group session will be held on this Wednesday from 1:00 pm until 4:00 pm EST.

The West Coast focus group session will be held on next Wednesday from 1:00 pm until 4:00 pm EST.

We thank you for your consideration. Please note: there is no penalty for those who chose not to participate. Participants of this focus group may quit this study at any time. They are not required to answer all questions. The surveys will be kept confidential.

For more information, please contact Shannon McNeal at

or	

The focus group will be held by:	
Shannon McNeal,	, AHP-500 &
Dr. Gary Winn,	WVU Industrial
Engineering	

West Virginia University's Institutional Review Board has acknowledgement of this study on file.

Shannon C. McNeal, Industrial Engineer West Virginia University Safety Intern Employee Safety Performance Team - AHP-500 Safety

Thank you for interest in my research.

Attached is a survey I would like for you to fill out prior to the East Coast focus group session will be held on this Wednesday from 1:00 pm until 4:00 pm EST in Room 5C in FOB 10A.

When you open the file, it will appear as a new document. Please save your survey as: Recordkeeping Survey E.

Remember there is no penalty for those who chose not to participate. Participants of this focus group may quit this study at any time. They are not required to answer all questions or stay for the entire focus group session. The surveys will be kept confidential.

If you have any questions, please feel free to call me at \_\_\_\_\_\_ or email at

West Virginia University's Institutional Review Board has acknowledgement of this study on file.

W

Federal Recordkeeping at the FAA Survey\_Shannon McNeal\_FORM.dot

Shannon C. McNeal, Industrial Engineer West Virginia University Safety Intern Employee Safety Performance Team - AHP-500 Safety

Focus group participants,

This is a friendly reminder that the East Coast focus group session will be held on this Wednesday from 1:00 pm until 4:00 pm EST in Room 5C in FOB 10A.

### Please email me your surveys if you have yet to do so.

Please note: there is no penalty for those who chose not to participate. Participants of this focus group may quit this study at any time. They are not required to answer all questions. The surveys will be kept confidential.

If you have any questions, please contact Shannon McNeal at

The focus group will be held by:	
Shannon McNeal,	, AHP-500 &
Dr. Gary Winn,	۶, WVU Industrial Engineering

West Virginia University's Institutional Review Board has acknowledgement of this study on file.



Federal Recordkeeping at the FAA Survey\_Shannon McNeal\_FORM.dot Shannon C. McNeal, Industrial Engineer West Virginia University Safety Intern Employee Safety Performance Team - AHP-500 Safety

Thank you for interest in my research.

Attached is a survey I would like for you to fill out prior to the West Coast focus group session will be held on this Wednesday from 1:00 pm until 4:00 pm EST. I will email you with more information regarding the phone number and website.

When you open the file, it will appear as a new document. Please save your survey as: Recordkeeping Survey W.

Remember there is no penalty for those who chose not to participate. Participants of this focus group may quit this study at any time. They are not required to answer all questions or stay for the entire focus group session. The surveys will be kept confidential.

If you have any questions, please feel free to call me at \_\_\_\_\_\_ or email at

West Virginia University's Institutional Review Board has acknowledgement of this study on file.



Federal Recordkeeping at the FAA Survey\_Shannon McNeal\_FORM.dot Shannon C. McNeal, Industrial Engineer West Virginia University Safety Intern Employee Safety Performance Team - AHP-500 Safety

GoToMeeting Invitation- Recordkeeping Focus Group Wednesday from 2pm to 4pm Remember this is Eastern Standard Time.

1. Please join my meeting. https://www2.gotomeeting.com/join/404981825

2. Use your microphone and speakers (VoIP) - a headset is recommended. Or, call in using your telephone.

Dial 312-878-0207 Access Code: 404-981-825 Audio PIN: Shown after joining the meeting

Meeting ID: 404-981-825

GoToMeeting® Online Meetings Made Easy<sup>TM</sup>

Attached is a worksheet to be filled out at the end of the focus group. I will explain and answer any questions during the conference.

Please email this back as soon as possible. Thank you,

Shannon



Focus group Handout.xls Shannon C. McNeal, Industrial Engineer West Virginia University Safety Intern Employee Safety Performance Team - AHP-500 Safety

# Federal Recordkeeping at the FAA Survey

Please read each question carefully. Circle the answer that best corresponds with your opinion and explain in detail. Please do not put your name on this survey. Thank you for your time.

1. Have you	filled out	t a CA-1	form?	If no,	go to	question 5.
Yes	No					

2. Why did you have to fill out a CA-1 form?

Explain:\_\_\_\_\_

•	1	filled the CA-1 form? Unsatisfactory	Very Unsatisfactory
Explain:			
4. How clear wer	e the instructions?		
Very Clear	Clear	Unclear	Very Unclear
•			

5. If you have not filled out a CA-1 form, do you use information from this form? Yes No

6. Why did you have to use information from the CA-1 form?

Explain:\_\_\_\_\_

7. What was your ex WICS?	perience when you	had to enter information	n from CA-1 form into
Very Satisfactory	Satisfactory	Unsatisfactory	Very Unsatisfactory
Explain:			
		s WCIS when you filled licable Unfriendly	
Explain:			
9. What would make more useful information		of entering data into WC	CIS easier and provide
Explain:			
10. Have you filled Yes No	out a 3900-6 form?	If no, go to question 15.	
11. Why did you ha	ve to fill out a 3900-	6 form?	
Explain:			

Very Satisfactory		u filled the 3900-6 form Unsatisfactory	Very Unsatisfactory
Explain:	•		
13. How clear were Very Clear	e the instructions? Clear	Unclear	Very Unclear
•			2
1/ How user_frien	dly (or unfriendly) w	as SMIS when you fille	d out the $3900-62$
		as SMIS when you fille licable Unfriendly	
Very Friendly Fr	iendly Not App	licable Unfriendly	
Very Friendly Fr		licable Unfriendly	
Very Friendly Fr	iendly Not App	licable Unfriendly	
Very Friendly Fr	iendly Not App	licable Unfriendly	
Very Friendly Fr	iendly Not App	licable Unfriendly	
Very Friendly Fr	iendly Not App	licable Unfriendly	
Very Friendly Fr Explain:	iendly Not App	licable Unfriendly	Very Unfriendly
Very Friendly Fr Explain: 15. If you have not Yes No	iendly Not App filled out a 3900-6 fo	licable Unfriendly	Very Unfriendly
Very Friendly Fr Explain: 15. If you have not Yes No 16. Why did you ha	iendly Not App filled out a 3900-6 for ave to use information	licable Unfriendly orm, do you use inform n from the 3900-6 form	Very Unfriendly
Very Friendly Fr Explain: 15. If you have not Yes No 16. Why did you ha	iendly Not App filled out a 3900-6 fo	licable Unfriendly orm, do you use inform n from the 3900-6 form	Very Unfriendly
Very Friendly Fr Explain: 15. If you have not Yes No 16. Why did you ha	iendly Not App filled out a 3900-6 for ave to use information	licable Unfriendly orm, do you use inform n from the 3900-6 form	Very Unfriendly

18. What would make the process easier and provide more useful information? Explain:\_\_\_\_\_

Thank you for your participation.

# Federal Recordkeeping at FAA Focus Group Handout

**Instructions:** Write each solution down. Then, pretend you have 20 nickels as your budget. Allocate the money as you see fit. The solution with the largest budget should be the one you believe is the most important. Not every solution is required to have money allocated to it.

Solution	Money Allocated