

Primaris Airlines

Family Assistance Plan

I. Introduction

- A. The Primaris Airlines Family Assistance Plan is written in accordance with the Aviation Disaster Family Assistance Act, as amended (49 U.S.C. §§ 1136 and 41113), and 14 C.F.R. Part 243. This Plan has been revised in accordance with the provisions of Public Law 108-176 (Dec. 12, 2003), and supersedes the Primaris Airlines Family Assistance Plan dated April 22, 2003.
- B. This document is part of a larger effort, which includes the National Transportation Safety Board and other governmental entities, to assist survivors, survivor families and victim families in the event of an aviation disaster.
- C. The purpose of the Primaris Airlines Family Assistance Plan is:
 - 1. To act in the best interests of survivors, survivor families and/or victim families.
 - 2. To respond to survivors, survivor families and victim families with sensitivity, dignity and respect.
 - 3. To respect and be sensitive to the cultural and religious backgrounds of survivors, survivor families and victim families.
 - 4. To meet the needs of survivors, survivor families and victim families for such issues as timely information regarding the status of the passenger, transportation to and from the location of the accident, lodging and meals while at the accident location, timely information regarding survivor progress, clothing and personal hygiene necessities, medical needs, mental health counseling, assistance with transportation of remains, identification and return of personal effects and pastoral support and memorial services. Primaris will also provide similar services to immediate family members who do not travel to the accident location.
 - 5. To provide the same level of family assistance listed above, without regard to an individual's status as a revenue passenger, non-revenue passenger, or crewmember.
 - 6. To support Primaris employees as they deal with the aftermath of an aviation accident.

II. Pre-Response Planning

A. Commitment of Resources

Primaris Airlines has designed its emergency response structure to allow for separate management of the crisis and continued safe operation of the airline. Primaris will commit sufficient resources to carry out this Family Assistance Plan. To ensure that sufficient resources are available to respond to the needs of survivors, survivor families and victim families, Primaris has contracted with FEI Behavioral Health (FEI) to support Primaris in providing family assistance crisis support services. FEI has been in operation since 1979 and has a customer base of over 140 companies, including U.S. and foreign air carriers. In addition, Primaris has developed policies and operational procedures to ensure appropriate activation and implementation of the following resources:

1. A toll-free inquiry line, staffed by trained personnel of Primaris Airlines and FEI, will be provided for family members to obtain information about the accident and the status of their loved one, within 60 minutes of Primaris notifying FEI of an accident. A similar toll number for receiving collect calls from international locations will also be activated within 60 minutes of Primaris notifying FEI of an accident. Primaris will promptly issue a media statement providing these toll numbers.
2. Trained Family Assistance Call Center staff who will:
 - notify family members that their loved one's name appears on a preliminary (unconfirmed) name list and as manifest is reconciled, that the loved one has been confirmed on board
 - provide continuous support and information to family members regarding their loved one's status as confirmed from the scene
 - arrange for families to travel to the location of the crash
 - maintain daily contact and support of non-traveling family members
3. Family Assistance Representatives trained in the skills necessary to effectively and sensitively interact with survivors, survivor families and victim families, assigned to individual passenger and crew families, who will:
 - at the family's request, deploy to the family's home community OR escort family members from home communities to the accident site city
or
 - meet arriving family members in the accident site city and escort to the designated Family Support Hotel
 - offer ongoing information, support, and logistical assistance while families remain in accident site city and escort back to home communities as requested

4. Provisions for local transportation, lodging and meals as well as necessary clothing and personal hygiene articles as requested by families.
5. Provisions for briefing families on a regular basis
6. Provisions for families' travel home

In addition, Primaris will arrange for:

7. Private meeting space for families at affected airports where they can be protected from intensive media and unwelcome solicitors.
8. Suitable space in proximity to the accident site to serve as the Family Support Hotel and location of the Joint Family Support Operations Center ("JFSOC") for responding agencies.
9. Coordination with local hospitals through the American Red Cross for purposes of information sharing, visitation, and progress reports.
10. Mental health professionals to be available to provide grief counseling and other mental health services, through the American Red Cross and a designated third party crisis management/mental health organization.
11. Appropriate pastoral support suitable to diverse religious and ethnic backgrounds.
12. Through the American Red Cross, appropriate and acceptable child care.
13. Suitable transportation of victim remains.
14. Return and/or storage of personal effects.
15. In cooperation with federal agencies, accident site visit and memorial services.

B. Training

FEI has trained behavioral health professionals to serve as Family Assistance Representatives on Primaris' behalf. FEI will also conduct training for Primaris' Corporate Team members.

C. Preparedness Activities

Primaris will hold simulations to test its plan at least twice annually. Recurrent training for team members will be conducted on an annual basis.

D. Organizational Cooperation

Primaris recognizes and respects the National Transportation Safety Board as having jurisdiction over the accident site and subsequent investigation. Primaris will cooperate fully with the NTSB as well as other federal, state and local authorities that have emergency responsibilities.

E. Manifest Policy

Primaris has established an internal policy prohibiting the unauthorized release of manifest information. That policy is as follows: *In the event of an airline accident, no employee will release information about the accident, associated crew, or passengers to any individual outside of Primaris. All information regarding passengers and crew is strictly confidential and release of such information will result in immediate termination. Only Primaris Airline's President/CEO or designee has the authority to authorize release of any information to the public through a designated spokesperson.*

III. Passenger Manifest, Ticket Reconciliation and Notification

- A. Immediately following an accident, Primaris will begin the process of determining which passengers actually boarded the flight. This will include identifying:
 - 1. Passengers with reservations
 - 2. Standby passengers
 - 3. Non-revenue passengers
 - 4. Rerouted passengers
 - 5. Crew
- B. Immediately following an accident, the specific flight manifest will be locked out on the reservation system to avoid unauthorized access as well as to secure manifest data.
- C. Primaris will establish a command center at its headquarters in Las Vegas. Immediately following an accident, all manifest data will be forwarded to this command center.
- D. Reconciliation will involve reviewing flight reservations, the final manifest, as well as ticket coupons. This task will begin immediately. Families will be informed as to whether the passenger's name appeared on a preliminary passenger manifest and as the manifest is reconciled, notified that the loved one is on board the affected flight. As the status of individual passengers is confirmed by officials at the scene, families will be notified on a rolling basis.
- E. Upon request by the NTSB Transportation Disaster Assistance Director, Primaris will provide a passenger list that reflects the best available information at the time of the request. This list will contain the names of passengers and crew aboard the aircraft whether or not such names have been verified.
 - 1. Any passenger list released to the NTSB will be considered highly confidential and sensitive. Such lists will be marked *confidential* and will only be sent via secure facsimile or other secure means of delivery. This list will only be delivered to the NTSB Transportation Disaster Assistance Director or his/her designate.
 - 2. Until fully verified, all passenger lists will be marked *preliminary* and *unconfirmed*.
 - 3. As passengers and crew are verified, the list will be updated and forwarded to all authorized individuals.

F. Notification Procedures

1. Primaris will notify families of passengers as soon as information becomes available. Primaris will not wait for the names of all of the passengers to be verified; rather, notification will be conducted on a rolling basis.
2. Notification will be conducted by FEI professionals with education, experience and training in dealing with persons in crisis. These individuals are sensitive to the impact of the notification and are able to offer appropriate support to family members. In addition, these trained personnel will have a sample notification script available in order to ensure the most appropriate, sensitive words are utilized.
3. Primaris will provide the public with continuous updates on the progress of notification through its authorized spokesperson.

G. Primaris will provide the U.S. Department of State with information on foreign passengers.

H. Immediately upon learning of an aviation disaster occurring in foreign air transportation (on a flight to or from a country other than the United States), as soon as possible but no later than 3 hours, Primaris will provide notification to the U.S. Department of State, at the address provided below, of the name of each U.S. citizen passenger and for each U.S. citizen passenger the name and telephone number of a contact person. Upon request, Primaris will provide this information to the National Transportation Safety Board, Director of Family Support Services.

Managing Director of Overseas Citizen Services
Bureau of Consular Affairs
U.S. Department of State

I. Throughout the above process, Primaris will repeat, both in writing and verbally, its policy prohibiting the unauthorized release of manifest information to all Primaris employees.

IV. Passenger Identification

A. Medical Examiner/Coroner

1. Primaris recognizes the role of the medical examiner, or coroner, as responsible for the positive identification of fatalities. Primaris will take all appropriate and necessary steps as requested by the medical examiner or coroner, to aid in this process.
2. Primaris recognizes that if the passenger has died, the medical examiner will coordinate with the disaster mortuary team commander to provide official notification of death directly to the family. Primaris will take all appropriate and necessary steps as requested by the medical examiner or coroner, to aid in this process.
3. For injured passengers, the hospital is responsible for status updates and either the hospital or Primaris will advise the families. Primaris will work with the designated non-profit organization and FEI to provide liaison with the hospital and families so that the latest information is shared with families. In all cases of injured passengers, their privacy and confidentiality will be maintained and protected by Primaris and other appropriate agencies.

V. Family Access to Accident Site

- A. Primaris recognizes and respects that the National Transportation Safety Board has complete jurisdiction over the accident site. Primaris will take all necessary steps to support the NTSB in this role including provisions for a joint family support operation with space, communication and logistical assistance for the federal staff.

- B. Primaris will provide all necessary assistance to the family of a passenger in traveling to the location of the accident. In addition, Primaris will provide for the physical care of the family while the family is staying at such location. Specific services will include:
 - 1. A dedicated 800 toll-free line for family assistance to be staffed by Primaris and FEI, who will promptly notify all appropriate agencies, press, and family members.
 - 2. Professionally trained Family Assistance Representatives assigned to each family who will provide logistical support.
 - 3. Travel to the location of the accident via the most convenient and expedient means.
 - 4. Local transportation, which may include rental cars.
 - 5. Lodging and meals at a suitable hotel at the location of the accident.
 - 6. Emergency medical attention for family members, if necessary.
 - 7. Assistance with purchase of necessary clothing and articles of personnel hygiene.
 - 8. Assistance with other special needs of the family such as child care, special dietary needs, counseling (including pastoral and/or mental health), etc.

- C. Within the limitations set by the National Transportation Safety Board and other federal, state and local authorities, Primaris will support family requests for access to the accident scene, and will assist with this site visit. Every precaution will be taken to ensure families are not exposed to biohazard contamination or other physical harm. In addition, Primaris will aid in establishing a viewing area that is appropriately and sensitively situated. Primaris will provide for private transportation of families to and from the accident scene and will do everything possible to assist in protecting families from the media and other unauthorized individuals while at the accident site.

- D. When the National Transportation Safety Board conducts a public hearing or comparable proceeding at a location greater than 80 miles from the accident site, Primaris will ensure that the proceeding will be made available electronically at a location open to the public in both the origin city and destination city of Primaris' flight, if that city is located in the United States.

VI. Human Remains and Personal Effects

- A. Primaris recognizes that the Medical Examiner is responsible for the disposition of identifiable and unidentifiable human remains. Primaris will take all appropriate and necessary steps to aid in this process.
- B. Primaris recognizes that it will be the custodian of personal effects for a period of at least 18 months. It has contracted with Global BMS, a company specializing in the recovery, restoration and return of personal effects, to be responsible for any personal effects that may come into Primaris' custody or control. Through its agreement with Global BMS, Primaris will make every effort to identify personal effects and return to the appropriate family.
- C. Primaris will, through Global BMS, consult with each family about the disposition of personal effects that are in the airline's control. If requested by the family of a passenger, Primaris will return all personal effects in its control (regardless of condition). However, personal effects may be retained if they are needed for the accident investigation or any criminal investigation. Any unclaimed passenger possession within the control of Primaris will be retained by Primaris, through Global BMS, for at least 18 months.
- D. Primaris will consult with the family of each passenger about memorial services and the construction by Primaris of any monument to the passengers including any inscription on the monument. Memorial services will be arranged through the designated non-profit organization.

VII. Relationship with Designated Independent Organization

- A. Primaris and its contractor FEI will work with the organization designated under Section 1136 (a) (2) of the Aviation Disaster Family Assistance Act on an ongoing basis to ensure that families of passengers receive an appropriate level of services and assistance following each accident.
- B. Primaris will also utilize the services of FEI to provide additional mental health support to the Family Assistance Representatives and Primaris employees. FEI services will include critical incident debriefing, crisis intervention, and general crisis support. As needed, referrals to counseling services for additional assistance will be made. In all situations, FEI will work cooperatively with the designated not-for-profit organization.
- C. Primaris will develop a procedure to pay reasonable compensation to the designated independent non-profit organization. The procedure will include a request for a description of the specific services provided as well as receipts for accident-related expenses. Primaris will meet with the designated independent non-profit organization in advance to develop a plan for the services provided and a structure for reasonable compensation.

VIII. Notice to Property Owners

- A. In the event that an accident results in significant damage to a man-made structure or other property on the ground that is not government-owned, Primaris will promptly provide written notice, to the extent practicable, directly to the property owner regarding liability for any property damage and the means of obtaining compensation

- B. Contents of Notice to Property Owner. The written notice must advise the owner (1) to contact the insurer of the property as the authoritative source for information about coverage and compensation; (2) not to rely on unofficial information offered by air carrier representatives about compensation by the air carrier for accident-site property damage; and (3) to obtain photographic or other detailed evidence of property damage as soon as possible after the accident, consistent with any restrictions on access to the accident site.

IX. Filing and Support of the Primaris Airlines Family Assistance Plan

- A. This plan will be on file with the U.S. Department of Transportation in Docket OST-96-1960 and the National Transportation Safety Board as required by the Aviation Disaster Family Assistance Act, as amended.
- B. To support this plan, Primaris:
1. Has contracted with FEI, a private crisis management/mental health firm that will provide consultation, training, and 24/7/365 preparedness in activating Inbound and Outbound Call Center Services, Family Assistance and Crisis Support services.
 2. Has contracted with Global BMS to handle the disposition of personal effects.
 3. With FEI, will provide training to its employees and agents to meet the needs of survivors and family members following an accident.
 4. Will conduct simulations testing its Family Assistance and emergency response plans at least twice annually.
- C. International Response
- In the event that Primaris provides assistance to U.S. citizens within the United States with respect to an aircraft accident outside the U.S. involving loss of life, Primaris will consult with the NTSB and the Department of State on the provision of the assistance.