



Building Aviation Mental Health into a Safety Management System

William R. Hoffman, M.D.

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Co-Chair, Aerospace Medical Association Mental Health Working Group





(1) Review Healthcare Avoidance

(2) Mental Health in Safety Management

(3) Mental Health in Regulatory Design

The views expressed in this presentation reflect those of the speaker and do not necessarily reflect the official policy or position of the Defense Health Agency, Department of Defense, nor the US government.

Knowledge Check 1:

Which one of the following is false related to aviation mental health research?

- A. There is clear empirical evidence of the clinical effectiveness of peer support in aviation personnel
- B. Current data suggest peer support is the top factor in lowering the barriers to addressing mental health concerns in US pilots
- C. As many as 56% of US and Canadian pilots report a history of healthcare avoidance due to fear for certificate loss
- D. Junior flight attendants may report healthcare avoidance at a higher rate than more senior flight attendants
- E. All of the above





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Guide for Aviation Medical Examiners



Synopsis of Medical Standards

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Summary of Medical Standards

Medical Certificate Pilot Type	First-Class Airline Transport Pilot	Second-Class Commercial Pilot	Third-Class Private Pilot
Distant Vision	20/20 or better in each eye separately, with or without correction.		20/40 or better in each eye separately, with or without correction.
Near Vision	20/40 or better in each eye separately (Snellen equivalent), with or without correction, as measured at 16 inches.		



Code of Federal Regulations

A point in time eCFR system



PART 67 - MEDICAL STANDARDS AND CERTIFICATION

Authority: 49 U.S.C. 106(g), 40113, 44701-44703, 44707, 44709-44711, 45102-45103, 45301-45303.

Source: Docket No. 27940, 61 FR 11256, Mar. 19, 1996, unless otherwise noted.

Subpart A - General

§ 67.1 Applicability.

This part prescribes the medical standards and certification procedures for issuing medical certificates for airmen and for remaining eligible for a medical certificate.

§ 67.3 Issue.

A person who meets the medical standards prescribed in this part, based on medical examination and evaluation of the person's history and condition, is entitled to an appropriate medical certificate.

[Doc. No. FAA-2007-27812, 73 FR 43065, July 24, 2008]

§ 67.4 Application.

An applicant for first-, second- and third-class medical certification must:

- (a) Apply on a form and in a manner prescribed by the Administrator;

Breaking the Pilot Healthcare Barrier

William Hoffman; Elizabeth Bjerke; Anthony Tvaryanas

Pilot healthcare barriers **are factors that impede healthcare seeking behavior** by individuals who hold a pilot certificate. These barriers include **perceptions about potentially negative consequences of new health information on future ability to perform piloting duties.**

Hoffman W, Bjerke E, Tvaryanas A. *Breaking the pilot healthcare barrier*. *Aerosp Med Hum Perform*. 2022; 93(8):649–650.

> *Occup Med (Lond)*. 2023 Sep 2;kqad091. doi: 10.1093/occmed/kqad091. Online ahead of print.

Multinational comparison study of aircraft pilot healthcare avoidance behaviour

W R Hoffman ^{1 2}, P K Patel ³, J Aden ⁴, A Willis ¹, J P Acker ^{5 6}, E Bjerke ², E Miranda ¹, J Luster ¹, A Tvaryanas ⁷

Affiliations + expand

PMID: 37658781 DOI: [10.1093/occmed/kqad091](https://doi.org/10.1093/occmed/kqad091)

Healthcare Avoidance Behavior

- Non-disclosure during screening
- New symptom but flew
- Informal care seeking
- Prescription medication use

> Occup Med (Lond). 2023 Sep 2;kqad091. doi: 10.1093/occmed/kqad091. Online ahead of print.

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Affiliations + expand

PMID: 37658781 DOI: 10.1093/occmed/kqad091

56%

n = 5,170



> [J Occup Environ Med.](#) 2022 Apr 1;64(4):e245-e248. doi: 10.1097/JOM.0000000000002519.
Epub 2022 Feb 15.

Healthcare Avoidance in Aircraft Pilots Due to Concern for Aeromedical Certificate Loss: A Survey of 3765 Pilots

William R Hoffman¹, James Aden, R Daniel Barbera, Ryan Mayes, Adam Willis, Parth Patel, Anthony Tvaryanas

> [Mil Med.](#) 2023 Mar 20;188(3-4):e446-e450. doi: 10.1093/milmed/usac311.

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William R Hoffman¹, James K Aden², Daniel Barbera³, Anthony Tvaryanas⁴

Affiliations + expand

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William Hoffman, Elizabeth Bjerke, Anthony Tvaryanas

PMID: 36050857 DOI: 10.3357/AMHP.6063.2022

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Parth K Patel¹, William R Hoffman, James Aden, Jason P Acker

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> [J Occup Environ Med.](#) 2019 Sep;61(9):e401-e405. doi: 10.1097/JOM.0000000000001662.

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William Hoffman¹, Nikhil Chervu, Xue Geng, Aykut Üren

Affiliations + expand

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William R Hoffman¹, R Daniel Barbera², James Aden³, Matthew Bezzant¹, Aykut Uren⁴

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Walter J Jerke, Anthony Tvaryanas

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Affiliations + expand

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What are the factors the influence health behavior of pilots?



AFRL

WHAT FACTORS INFLUENCE HEALTHCARE SEEKING BEHAVIORS AMONG CIVILIAN AIRLINE PILOTS?

WILLIAM R. HOFFMAN, MD, CAPT, USAF, MC

DEPARTMENT OF NEUROLOGY, BROOKE ARMY MEDICAL CENTER, TX

TANYA GOODMAN, M.S.; NICOLE DEVLIN,

M.S

NEUROSTAT ANALYTICAL SOLUTIONS, LLC

RACHAEL N. MARTINEZ, PH.D.

AEROMEDICAL OPERATIONAL AND CLINICAL PSYCHOLOGY

711TH HUMAN PERFORMANCE WING, USAF SCHOOL OF AEROSPACE MEDICINE

WRIGHT-PATTERSON AFB, OHIO



	n (%)	M (SD)
Gender		
Male	24 (67%)	
Female	12 (33%)	
Age		40.6 years (11.3)
Career Stage		
Early	13 (36%)	
Mid	12 (33%)	
Late/Senior	11 (31%)	
Total pilot years		15.08 years (12.39)
Total flying hours		7147.7 hours (5462.4)

268 Pages of Transcript

80 hours of Recorded Interviews

Codebook Saturated at 18 Interviews

Results Encouraging Factors

Encouraging Factors	n	Definition	Quote
Peer support services	12	Extent to which pilot's may be more likely to share their personal problems with pilots through utilizing a peer support service	<i>"I think there are services, for example, unions have peer support quick response programs, where you are able to talk through what is going on with them, without it being reported, i.e., completely confidential. It excludes the ability to go to an actual licensed medical professional. It excludes being able to get medication for mental health, but it does allow for people to at least talk through those issues with peers, people in the same industry and at least provide some sort of support as opposed to therapy or a diagnosis."</i>
Company Support	12	Extent to which pilot's company financially and administratively supports use of healthcare providers, insurance (e.g., healthy HSA insurance program), and preventative health resources (e.g., gym memberships)	<i>"For example, there is a health insurance plan that I am on that called healthy HSA insurance program where I save money each year on my health insurance by getting a physical from an actual civilian doctor. So, by proving that I'm a healthy individual, I save money on my health insurance plan. So, that gives me incentive to actually get a real physical."</i>
Aeromedical Consultation Services	11	Extent to which pilot's value having access to a sponsored aeromedical consultation service associated with the airline (either company or union) to assist with aeromedical certification questions and inform pilots about processes (e.g., experience with that information may be needed) and maintains confidentiality	<i>"They can help them to document everything appropriately from the start the special issuance process and make sure that they have all the proper documentation to send to the FAA the first time to get that special issuance. I have heard that they will ask we need this document and that document and all that stuff. So they kind of help guide you through the Aeromedical process."</i>



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US Based Flight Attendants

Healthcare Avoidance Due to
Fear for Loss of Flying Status

66.8%

n = 2,542



Hoffman W, Parekh P, et al. Pending Peer Review.

Who is participating in these healthcare avoidance behaviors?

Factor	Yes to Healthcare avoidance Behaviors
All	1686 (66.27%)
Age	
<29	202 (79.84%)
30-39	354 (78.15%)
40-49	291 (65.84%)
50-59	473 (62.57%)
>60	353 (57.12%)
Gender	
Males	528 (70.21%)
Females	1122 (64.48%)
Other	11 (84.62%)
Experience	
Early	315 (68.78%)
Mid	667 (72.34%)
Late	701 (60.69%)



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By experience



The International Journal of Aerospace Psychology >


Volume 34, 2024 - Issue 3

Review

Are Peer Support Programs Effective in the Detection and Prevention of Mental Health Issues in Commercial Aviation?

Marika Melin  & Vilmer Lång

Pages 162-175 | Published online: 13 Nov 2023

 Cite this article  <https://doi.org/10.1080/24721840.2023.2278670>



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Conclusion

Although there is limited or no evidence in any direction, the peer support programs seem to be without evident harm and were generally appreciated. The insufficient empirical evidence is nonetheless concerning, with these programs being implemented throughout Europe in such a high-risk context as the aviation industry. The results highlight the importance of more research on peer support in aviation.

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Knowledge Check 1:

Which one of the following is false related to aviation mental health research?

A. **There is clear empirical evidence of the clinical effectiveness of peer support in aviation personnel**

B. Current data suggest peer support is the top factor in lowering the barriers to addressing mental health concerns in US pilots

C. As many as 56% of US and Canadian pilots report a history of healthcare avoidance due to fear for certificate loss

D. Junior flight attendants may report healthcare avoidance at a higher rate than more senior flight attendants

E. All of the above

Knowledge Check 2:

Which one of the following is true?

- A. Safety Risk Management (SRM) portion of a Safety Management System (SMS) determines need for and adequacy of risk controls in a system
- B. Bow Tie Analysis includes all portions of the SMS process
- C. Multiple regulatory approaches cannot be used to control the risks related to mental health in aviation
- D. SMS aims to eliminate all risk in a regulated system
- E. All of the above

Mental Health Regulation in Civil Aviation

Today

Prescriptive Approach

Identifies Hazards
Screens for Hazards
Requires Compliance

Diagnosis or Services
AME Examination
Medical Certificate



REC10 – Aeromedical Screening - Safety Management Systems (SMS)

Mental health screening functions should be performance based upon and managed within an SMS framework.

INTENT: To employ SMS principles when making medical certification decisions about a mental health condition or treatment and the potential threat of degraded performance. The focus should be on mitigating threats to performance capability relative to occupational standards rather than on the diagnosis *per se*.

Safety Management Manual (SMM)



2.3 Service Providers' Safety Management Requirements

ICAO SARPs also include requirements for the implementation of an SMS by service providers and general aviation operators as an element of each State's SSP. The SMS provides the means to identify safety hazards, implementation actions to reduce safety risks, monitor safety performance, and achieve continuous improvement in safety performance.



Federal Aviation Administration

The Four SMS Components

Safety Policy

Establishes senior management's commitment to continually improve safety; defines the methods, processes, and organizational structure needed to meet safety goals

Safety Assurance

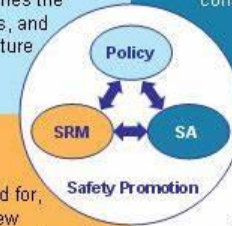
Evaluates the continued effectiveness of implemented risk control strategies; supports the identification of new hazards

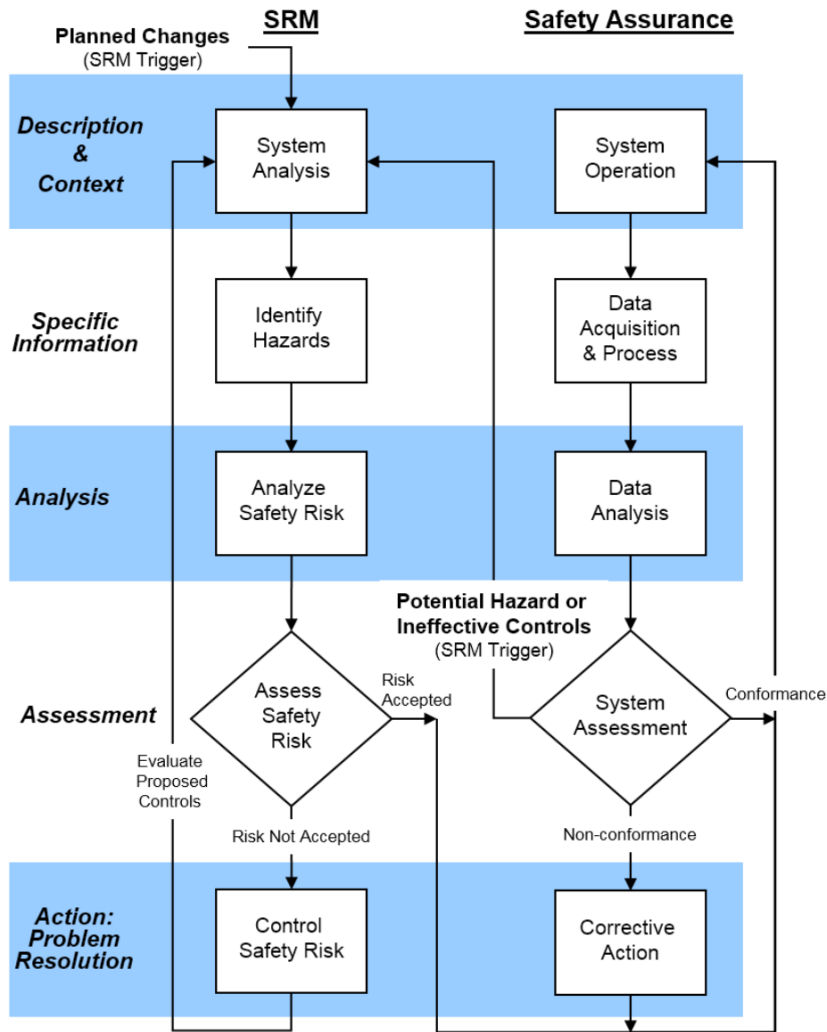
Safety Risk Management

Determines the need for, and adequacy of, new or revised risk controls based on the assessment of acceptable risk

Safety Promotion

Includes training, communication, and other actions to create a positive safety culture within all levels of the workforce





Federal Aviation Administration

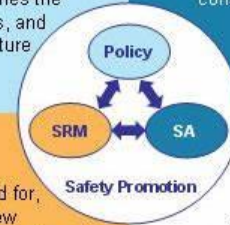
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Safety Risk Management

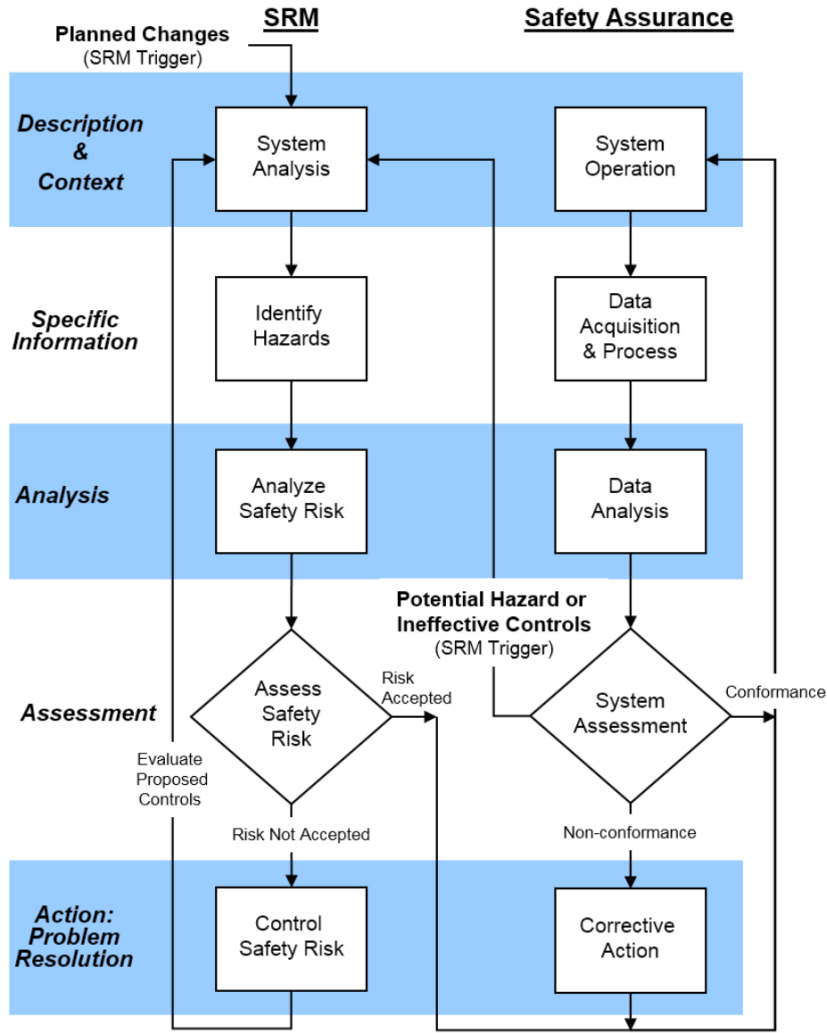
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Federal Aviation Administration

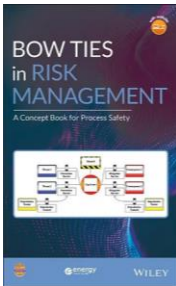
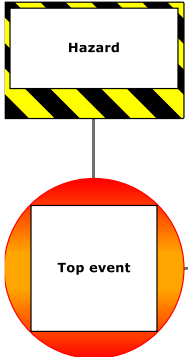


The Four SMS Components

<p>Safety Policy Establishes senior management's commitment to continually improve safety; defines the methods, processes, and organizational structure needed to meet safety goals</p>	<p>Safety Assurance Evaluates the continued effectiveness of implemented risk control strategies; supports the identification of new hazards</p>
<p>Safety Risk Management Determines the need for, and adequacy of, new or revised risk controls based on the assessment of acceptable risk.</p>	<p>Safety Promotion Includes training, communication, and other actions to create a positive safety culture within all levels of the workforce</p>

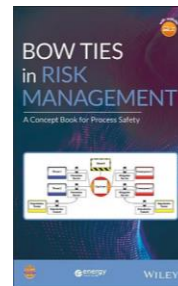
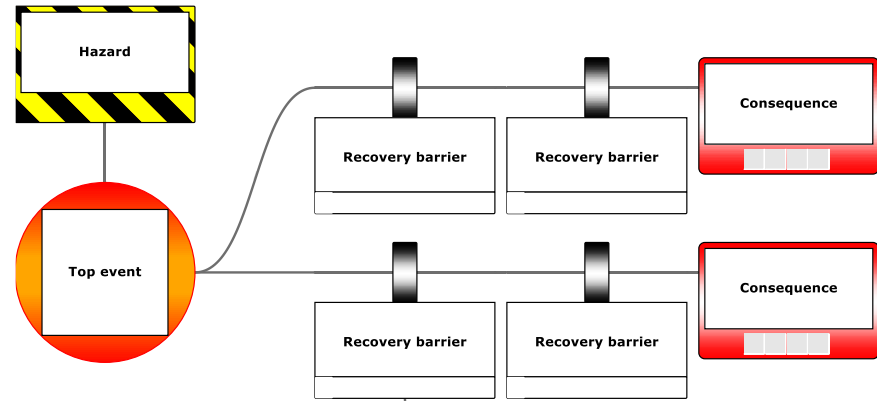
The diagram shows three interconnected circles: Policy (top), SRM (left), and SA (right). Arrows indicate a clockwise cycle between them. Below this cycle is a larger circle labeled Safety Promotion, with arrows pointing from the Policy, SRM, and SA circles towards it.

Bowtie models = barrier management frameworks



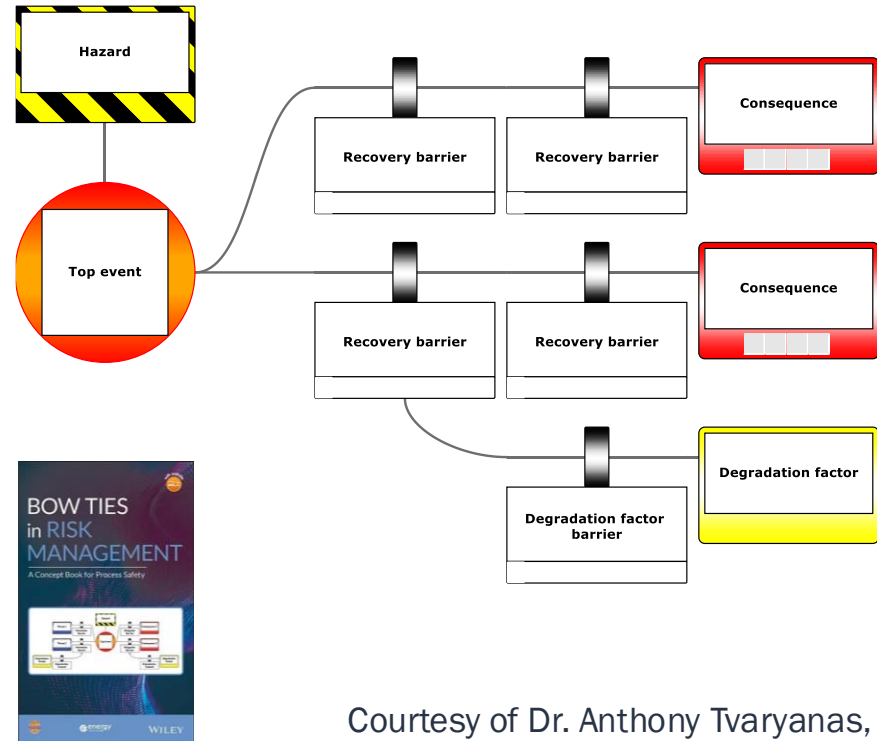
Courtesy of Dr. Anthony Tvaryanas, FAA

Bowtie models = barrier management frameworks



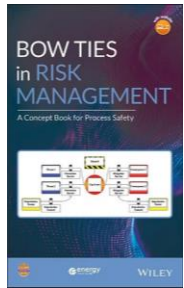
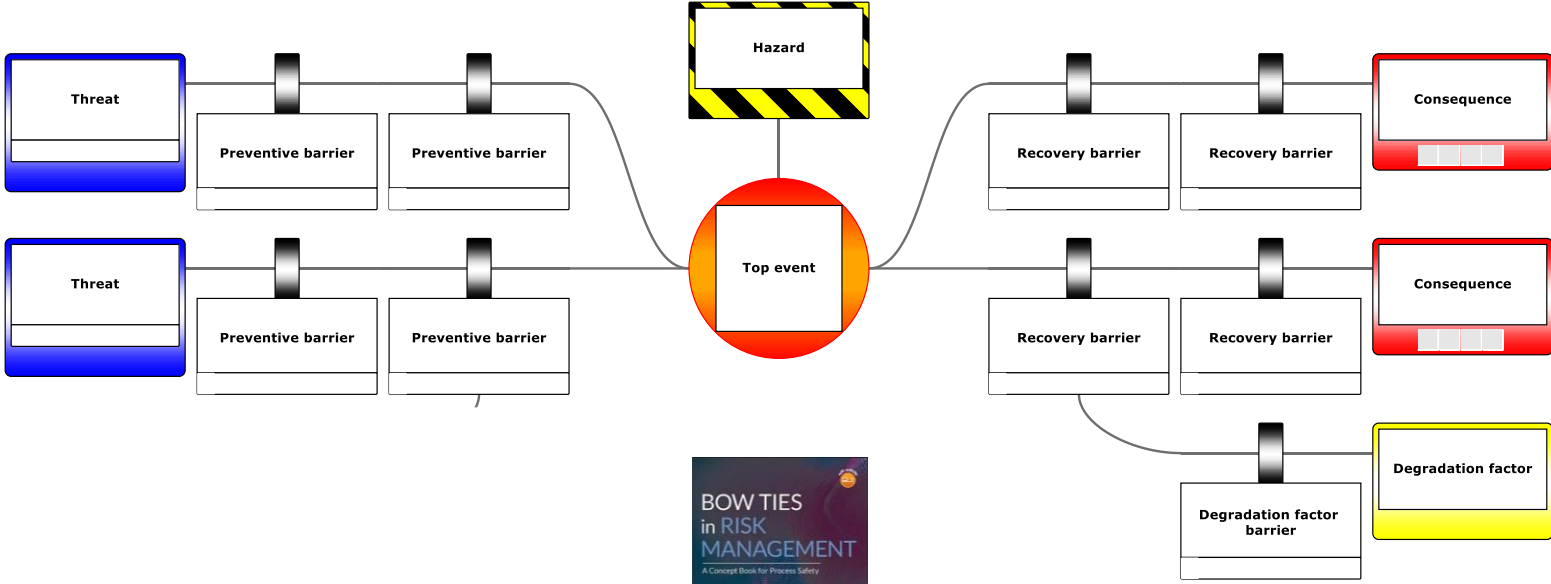
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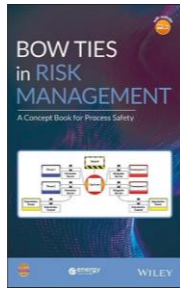
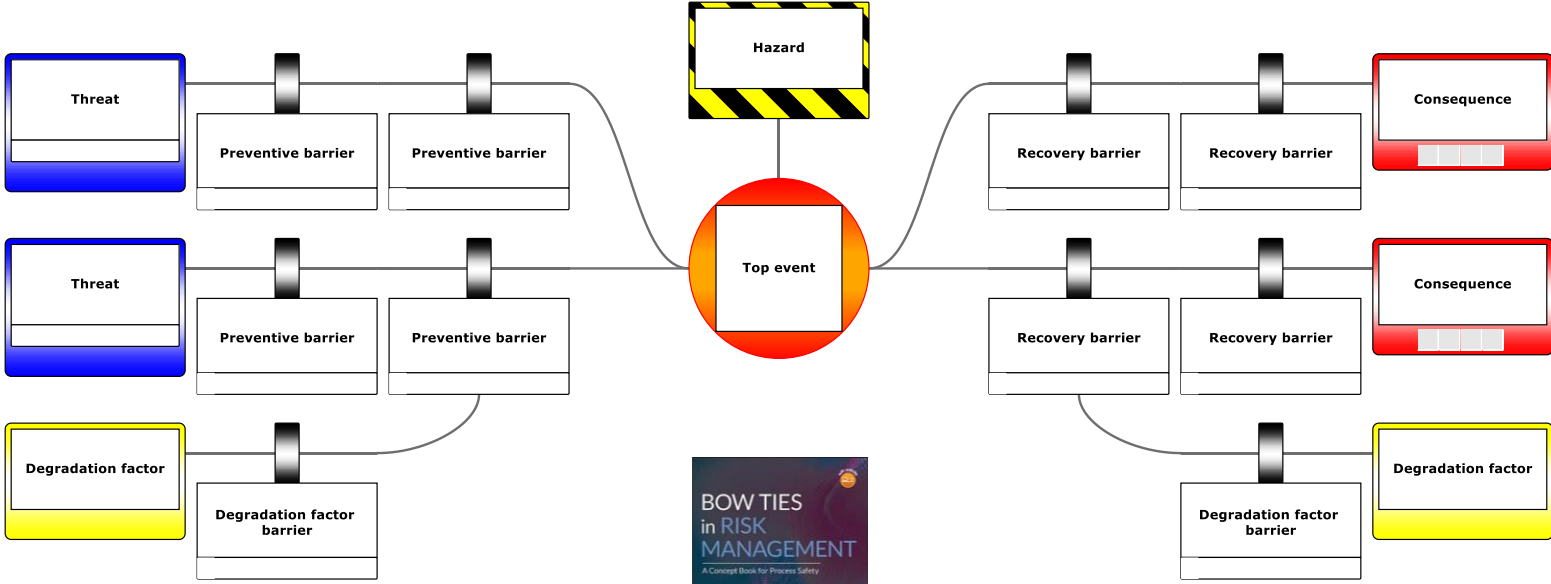
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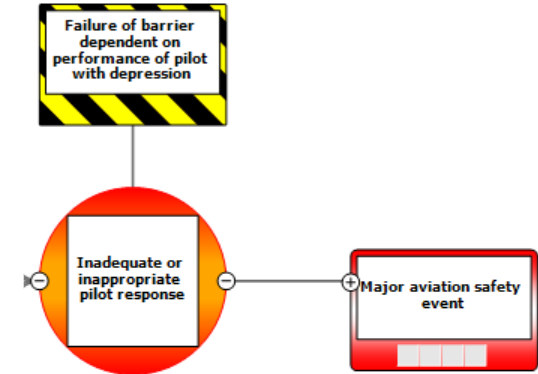


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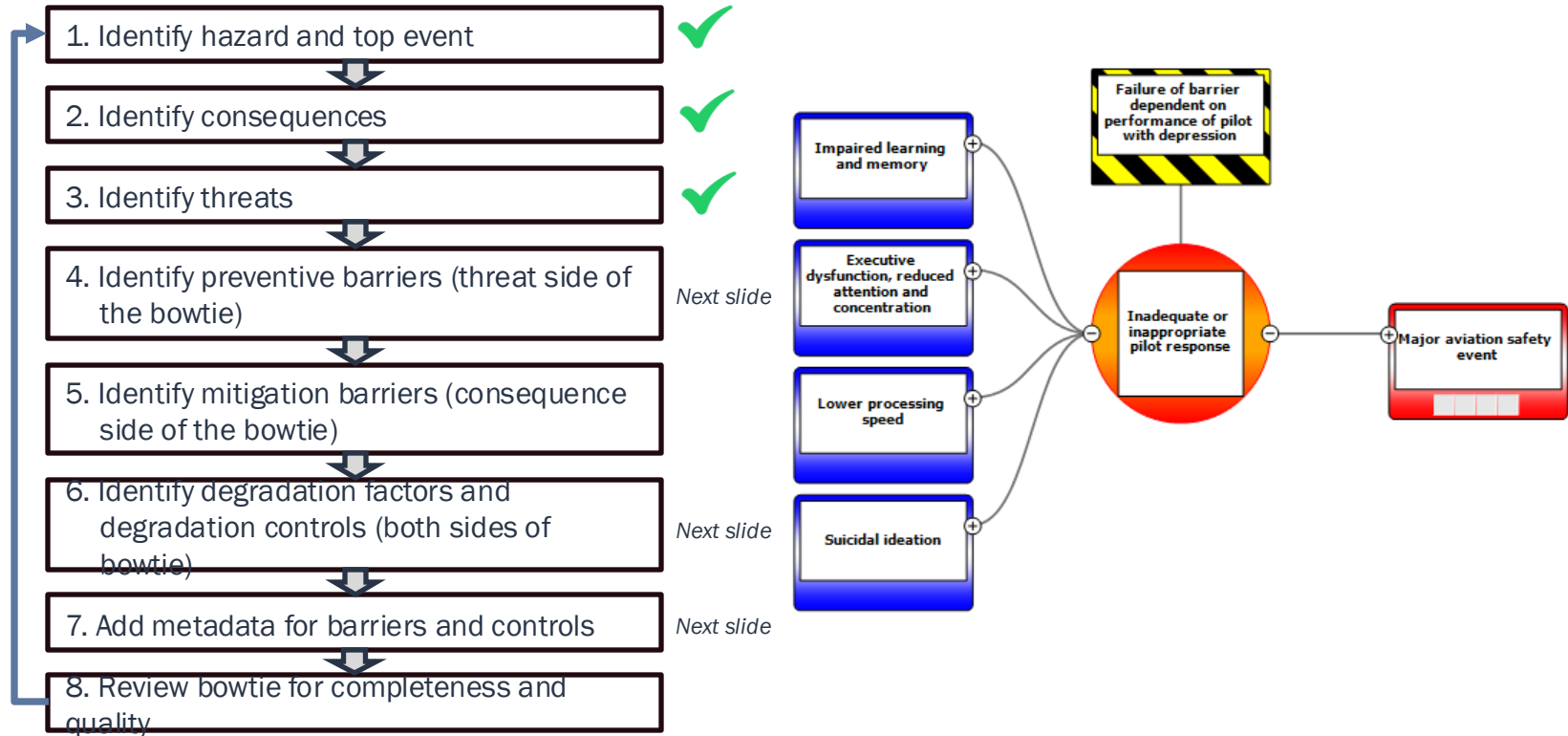
Bowtie model development



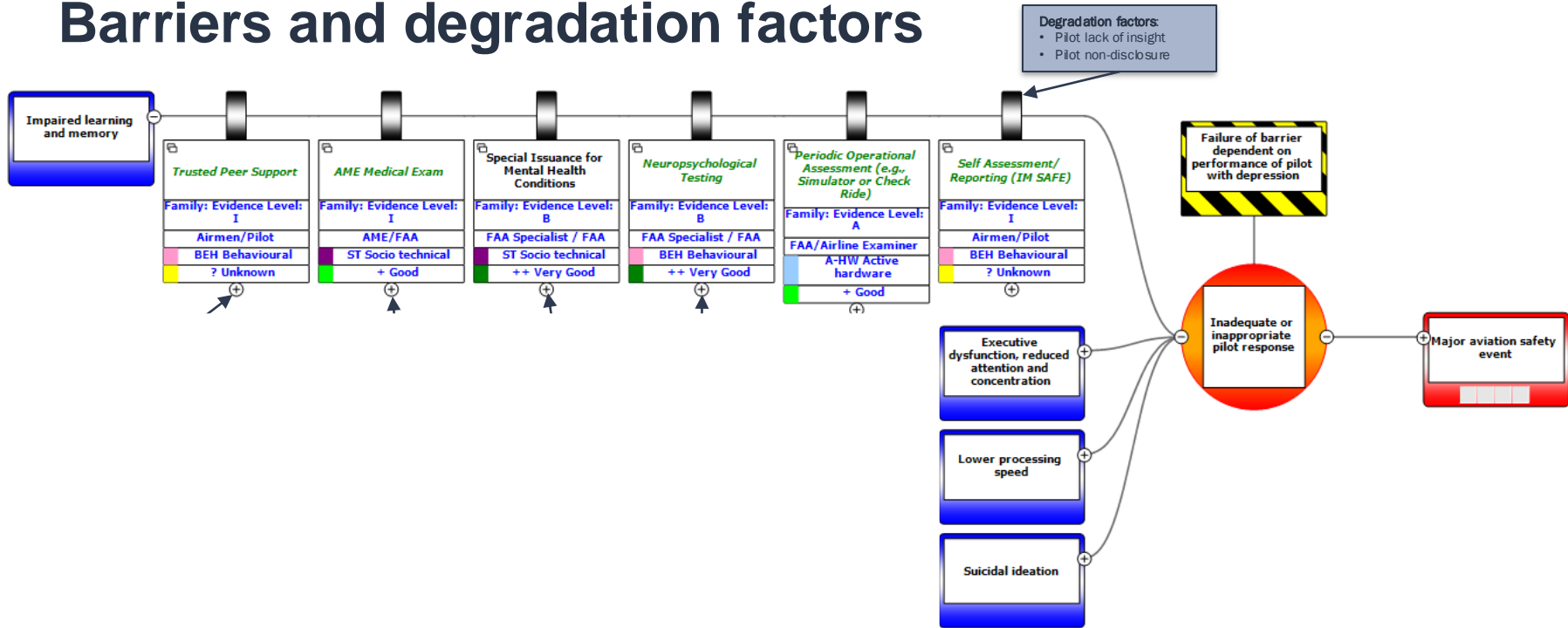
Bowtie model development



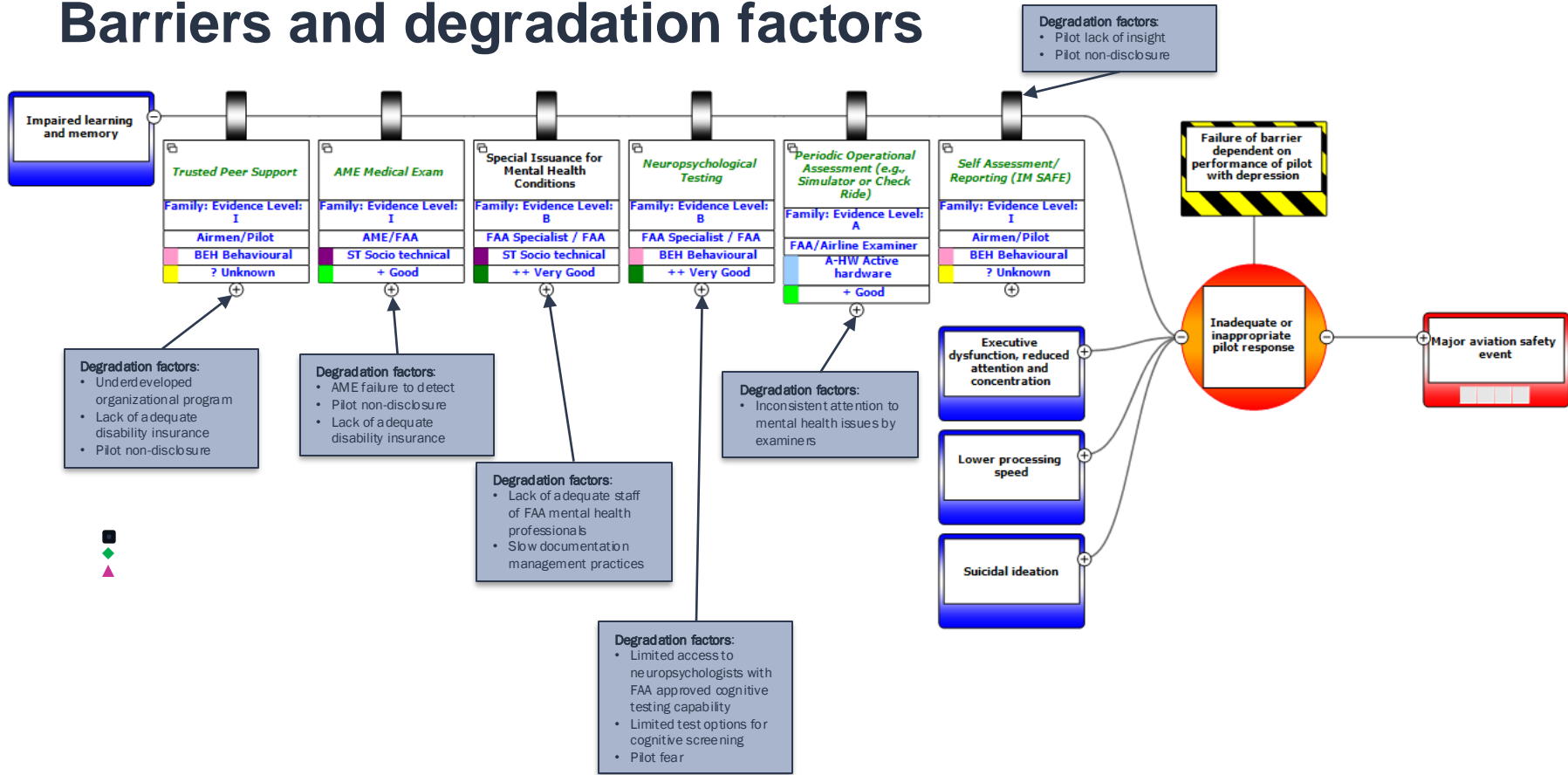
Bowtie model development



Barriers and degradation factors

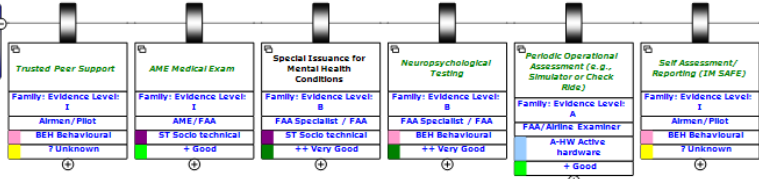


Barriers and degradation factors



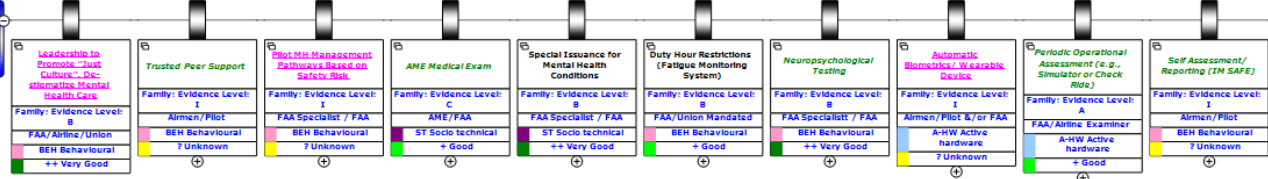


Impaired learning and memory



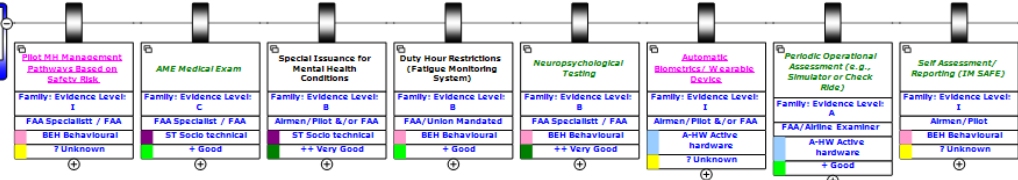
Failure of barrier dependent on performance of pilot with depression

Executive dysfunction, reduce attention and concentration

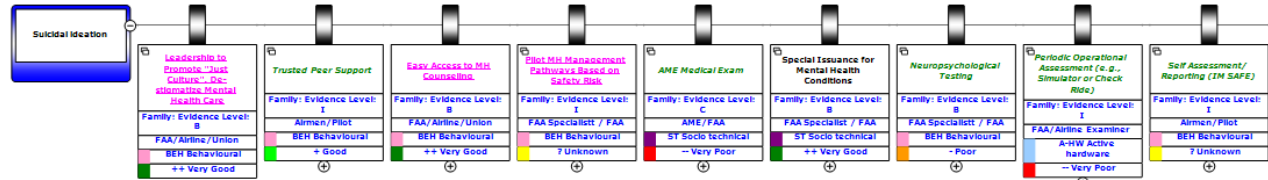


Inadequate or inappropriate pilot response

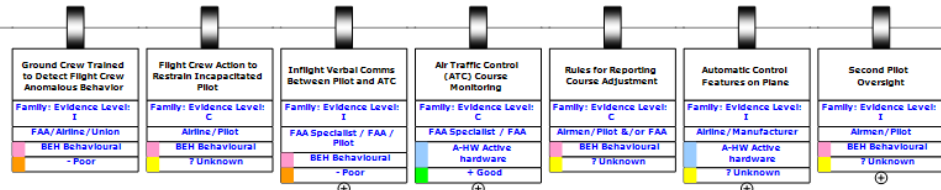
Lower processing speed



Suicidal Ideation



Inadequate or inappropriate pilot response



Major aviation safety event



[dot_73096_DS1 \(5\).pdf](#)

Bowtie Analysis of Pilot Depression and Barrier-Based Risk Management

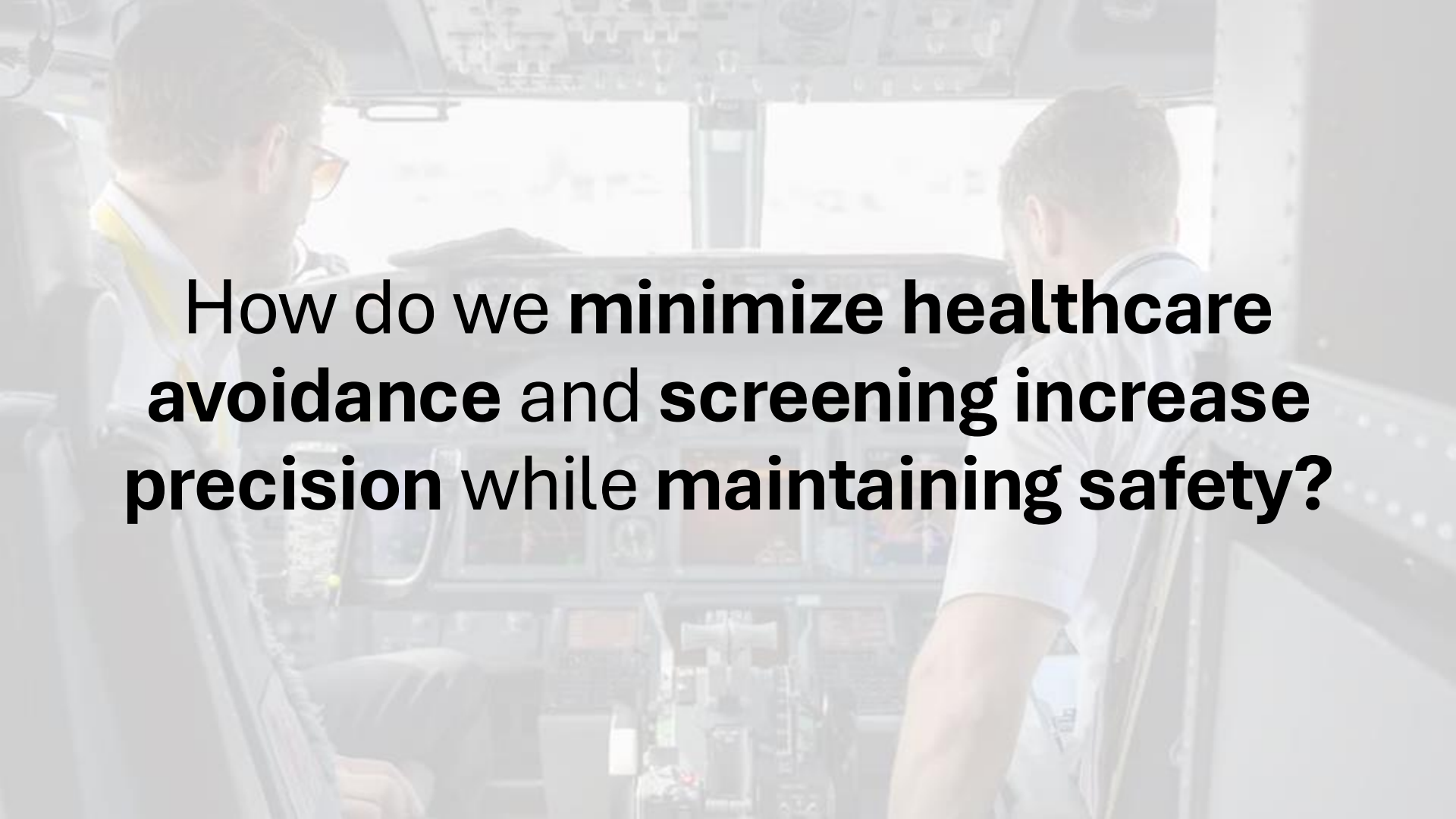
Sponsor: Federal Aviation Administration
Dept. No.: P234
Contract No.: 693KA8-22-C-00001
Project No.: 100976.10.102.1016.MH4
Outcome No: 4-5.B.2-3
PBWP Reference: Alternative Recertification Pathways for Pilots With Mental Health Conditions

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McLean, VA

A photograph of two pilots in a cockpit, viewed from behind. The pilot on the left is wearing a white shirt and a yellow tie. The pilot on the right is wearing a white short-sleeved shirt. They are both looking forward at the cockpit instruments and the windshield. The image is semi-transparent, allowing the text to be overlaid.

How do we **minimize healthcare avoidance and screening increase precision while maintaining safety?**

HARVARD UNIVERSITY



Malcolm K. Sparrow

Fundamentals of Regulatory Design



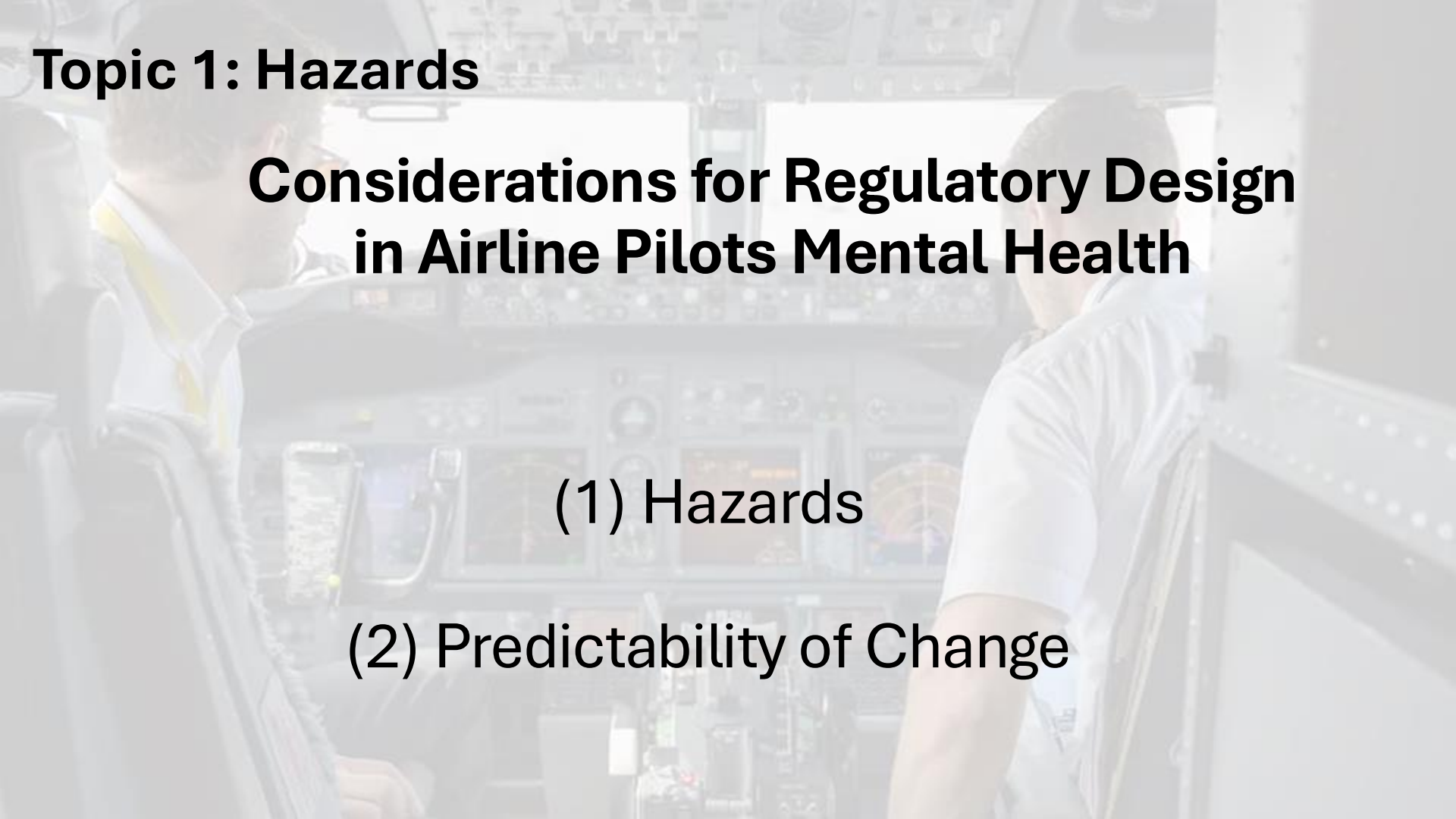
A faded background image of two pilots in a cockpit. The pilot on the left is wearing a white shirt and a yellow tie, and is looking towards the right. The pilot on the right is wearing a white short-sleeved shirt and is looking forward. The cockpit is filled with various instruments, dials, and control panels.

Outline

Topic 1: Hazard

Topic 2: Regulatory Approaches

Topic 3: Proposed Model

A faded background image of two pilots in a cockpit. The pilot on the left is wearing a white shirt and a yellow tie, looking towards the right. The pilot on the right is wearing a white short-sleeved shirt, looking forward. The cockpit is filled with various instruments, screens, and controls.

Topic 1: Hazards

Considerations for Regulatory Design in Airline Pilots Mental Health

(1) Hazards

(2) Predictability of Change

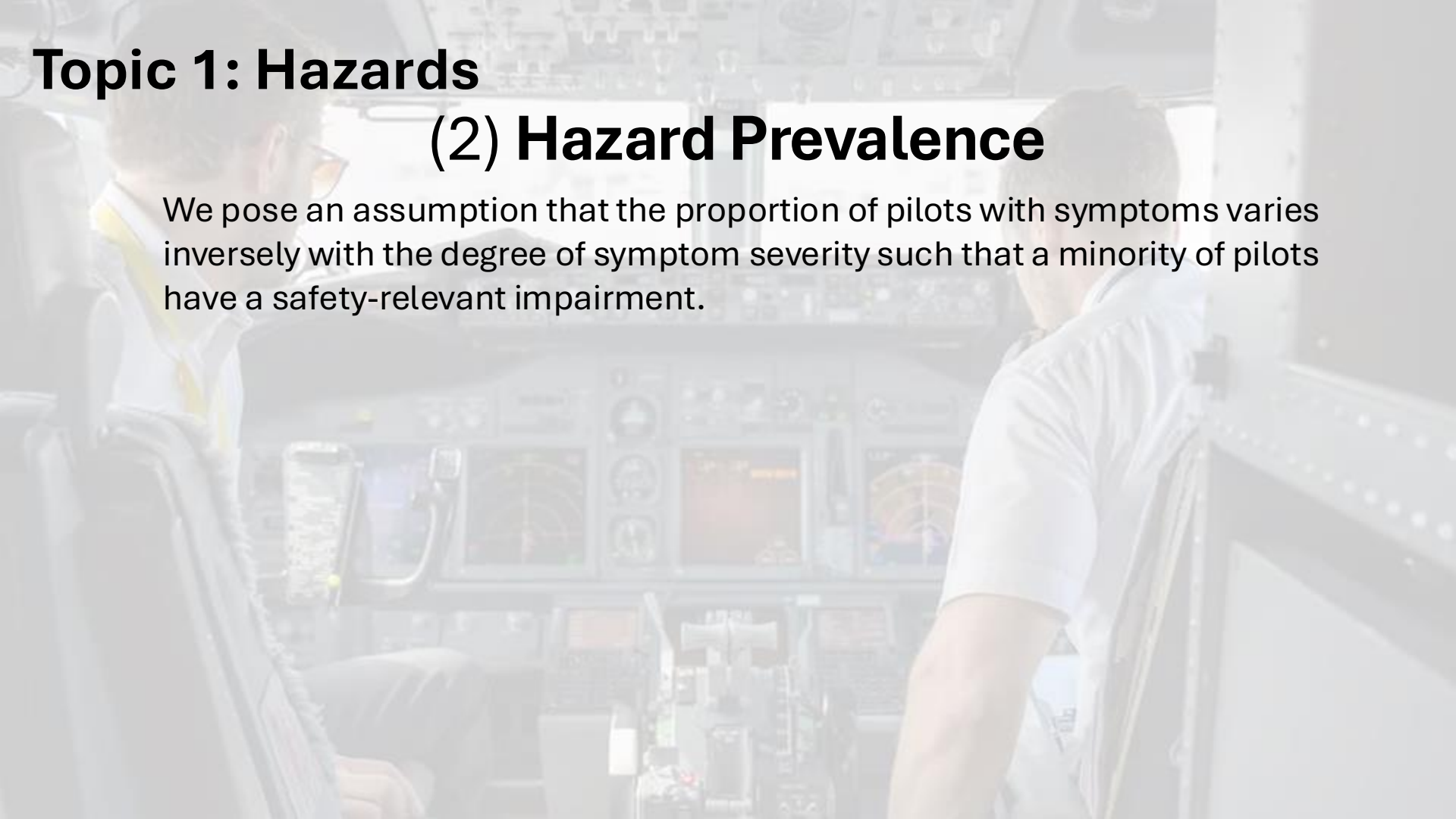
Topic 1: Hazards

(1) Hazards Related to Mental Health

Focusing on the safety-impacting manifestations of a condition rather than the diagnosis itself, we propose two broad hazard categories:

Hazard Category 1:	Hazard Category 2:
Cognitive Dysfunction	Harmful Behaviors
Executive Dysfunction	Suicidality
Impaired Learning	Homicidality
Impaired Attention and Concentration	
Impaired Working Memory	
Impaired Decision Making	
Impaired Self and Situational Awareness	

Topic 1: Hazards



(2) Hazard Prevalence

We pose an assumption that the proportion of pilots with symptoms varies inversely with the degree of symptom severity such that a minority of pilots have a safety-relevant impairment.

Topic 1: Hazards

Severity

		Low	High
Predictability	High	<p>Box 1</p> <p>Low Severity High Predictability</p> <p>E.g. Normal life and operational stress, excessive workload, mild anxiety, depression</p>	<p>Box 3</p> <p>High Severity High Predictability</p> <p>E.g. Personality disorders</p>
	Low	<p>Box 2</p> <p>Low Severity Low Predictability</p> <p>E.g. Unpredictable operational stress, forms of, mild anxiety, depression, PTSD</p>	<p>Box 4</p> <p>High Severity Low Predictability</p> <p>E.g. Psychotic Disorders, Bipolar I Disorder</p>

*Theoretical Model

Topic 2: Regulatory Approaches

Concept 3: Regulatory Approaches

Location of Responsibility:

Risk Identification (RI)

Analysis & Design (A&D)

Implementation (Imp)

Topic 2: Regulatory Approaches

Concept 3: Regulatory Approaches

Location of Responsibility:

Risk Identification (RI)

Analysis & Design (A&D)

Implementation (Imp)

Regulator

Regulated

Topic 2: Regulatory Approaches

Concept 3: Regulatory Approaches

Location of Responsibility:

Risk Identification (RI)

Analysis & Design (A&D)

Implementation (Imp)

Regulator

RI

A&D

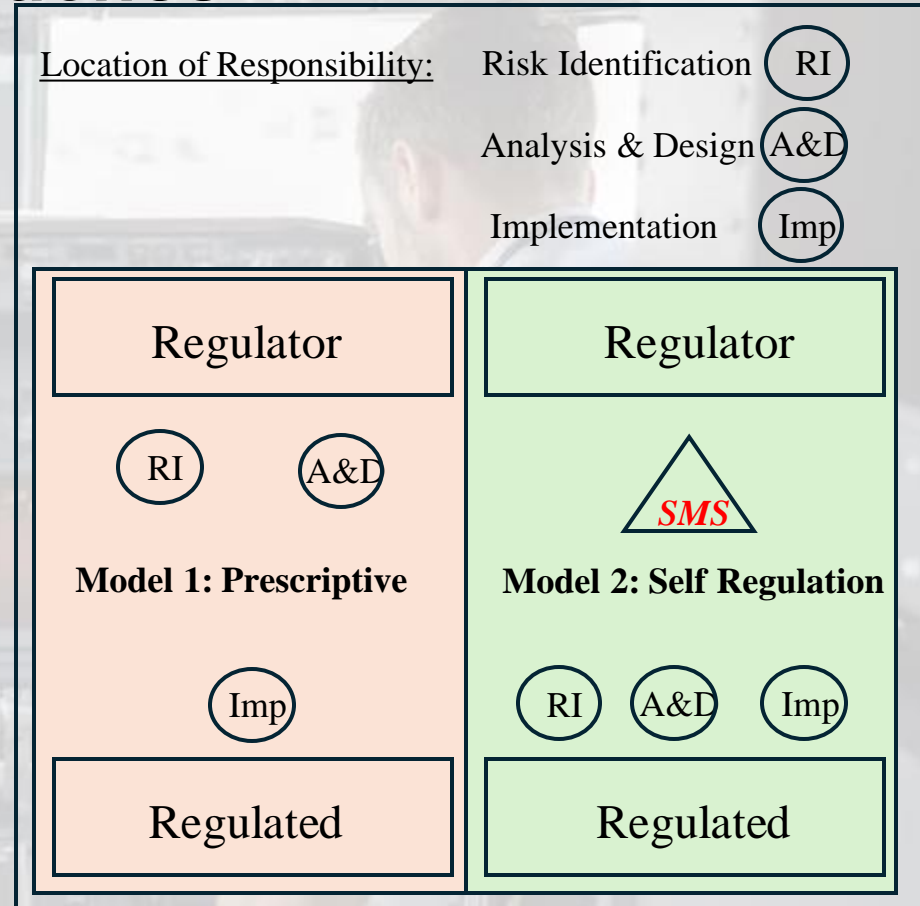
Model 1: Prescriptive

Imp

Regulated

Topic 2: Regulatory Approaches

Concept 3: Regulatory Approaches



Topic 3: Proposed Regulatory Model

1. The broad hazard categories of cognitive dysfunction and risk of harmful acts require different risk controls
2. The preferred regulatory model differs based on the predictability and severity of the manifestations of a mental health condition
3. Multiple regulatory models can be used simultaneously

Topic 3: Proposed Regulatory Model

Hazard Category 1:
Cognitive Dysfunction

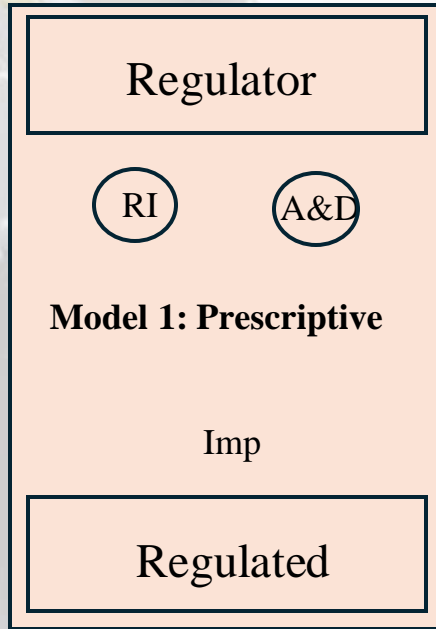
Hazard Category 2:
*Predisposition to
Malicious Acts*

		Low		High	
		Low		High	
Predictability	High	Box 1 Low Severity High Predictability E.g. Normal life stress, mild anxiety, depression	Box 3 High Severity High Predictability E.g. Personality disorders	Box 5 High Severity High Predictability E.g. History and risk of suicidality, homicidality or predisposition towards harmful acts	
	Low	Box 2 Low Severity Low Predictability E.g. Forms of mild anxiety, depression, PTSD	Box 4 High Severity Low Predictability E.g. Psychotic Disorders, Bipolar I Disorder	Box 6 High Severity Low Predictability E.g. No history but risk of suicidality, homicidality or predisposition towards harmful acts	

Topic 3: Proposed Regulatory Model

Hazard Category 1:
Cognitive Dysfunction

Hazard Category 2:
Predisposition to Malicious Acts



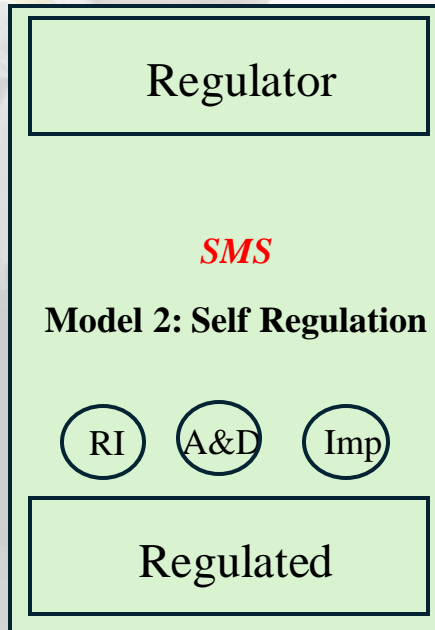
		Low		High	
		Low	High	Low	High
Predictability	High	Box 1 Low Severity High Predictability E.g. Normal life stress, mild anxiety, depression	Box 3 High Severity High Predictability E.g. Personality disorders	Box 5 High Severity High Predictability E.g. History and risk of suicidality, homicidality or predisposition towards harmful acts	
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Model 1: Prescriptive

Topic 3: Proposed Regulatory Model

Hazard Category 1:
Cognitive Dysfunction

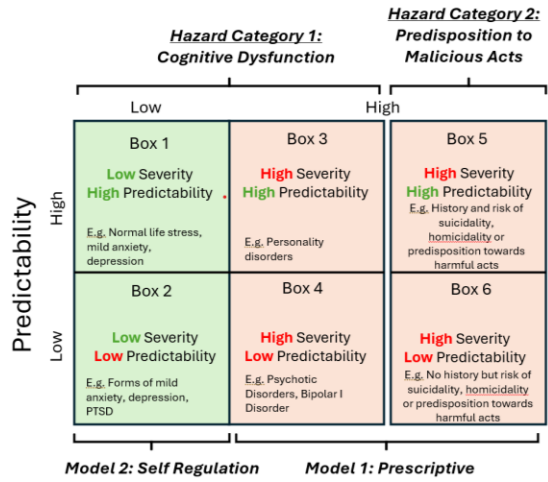
Hazard Category 2:
Predisposition to Malicious Acts

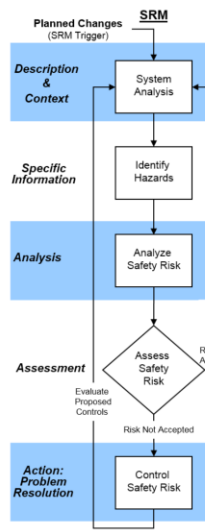
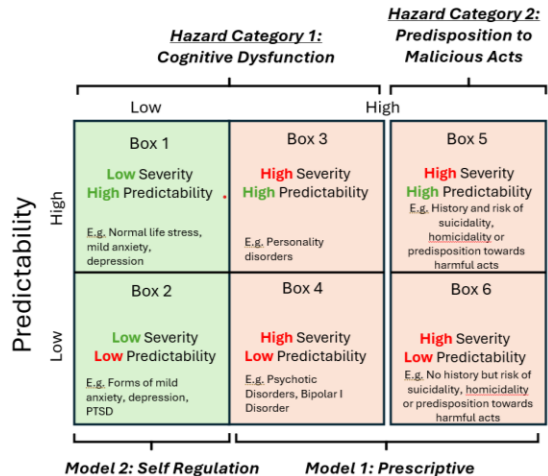


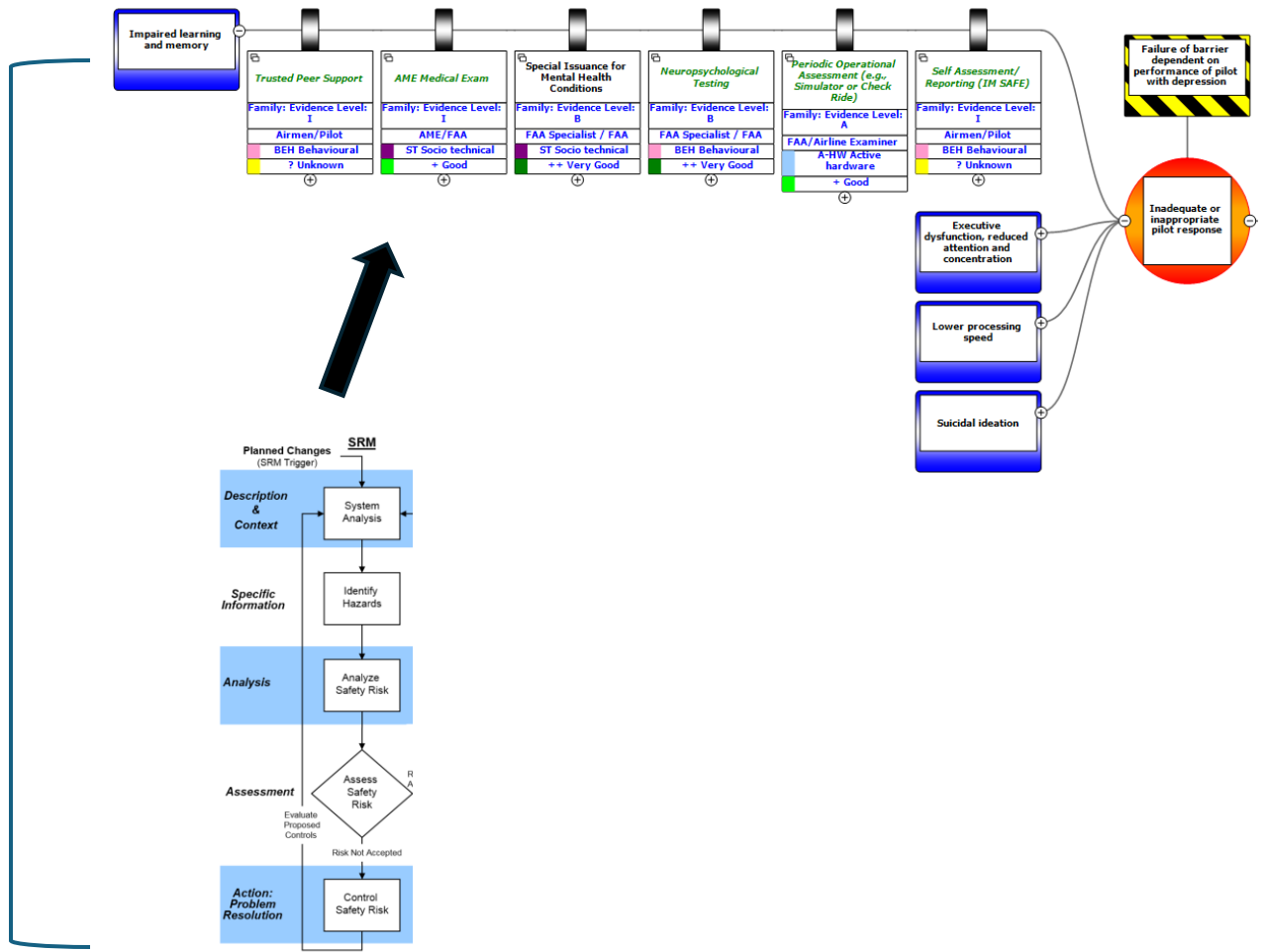
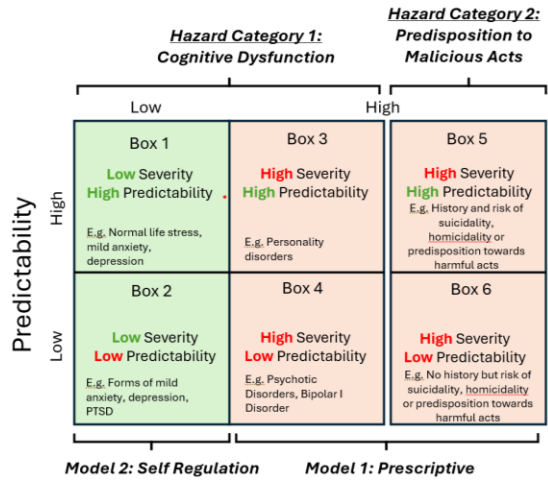
		Low	High	
Predictability	High	Box 1 Low Severity High Predictability E.g. Normal life stress, mild anxiety, depression	Box 3 High Severity High Predictability E.g. Personality disorders	Box 5 High Severity High Predictability E.g. History and risk of suicidality, homicidality or predisposition towards harmful acts
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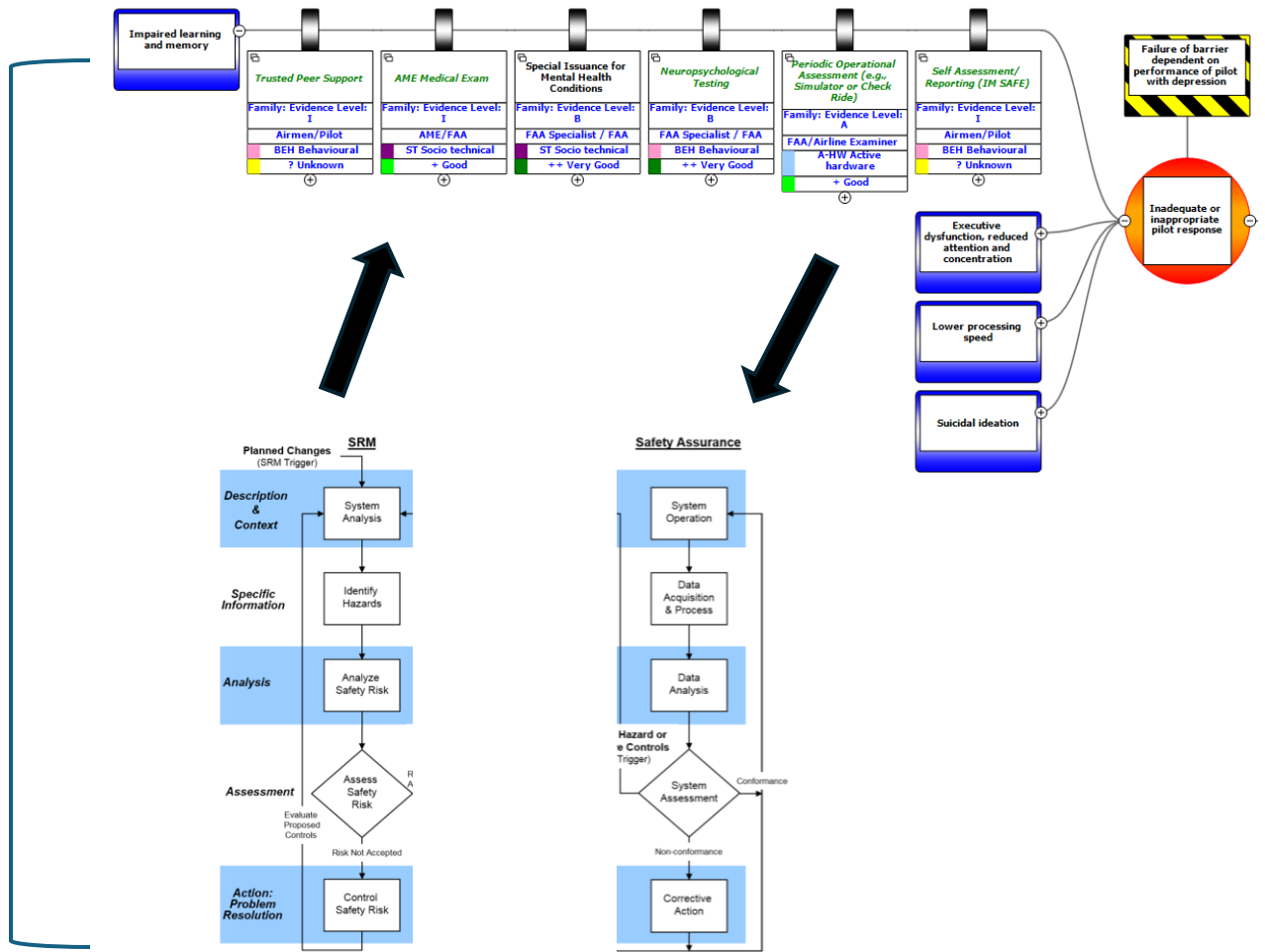
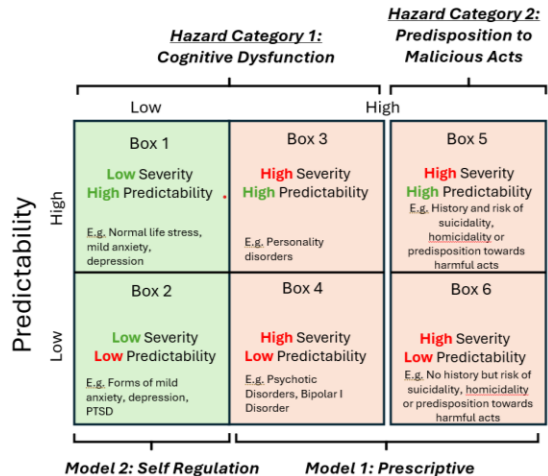
Model 2: Self Regulation

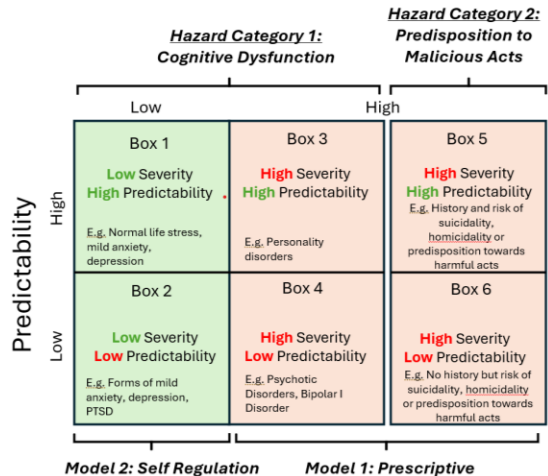
Model 1: Prescriptive



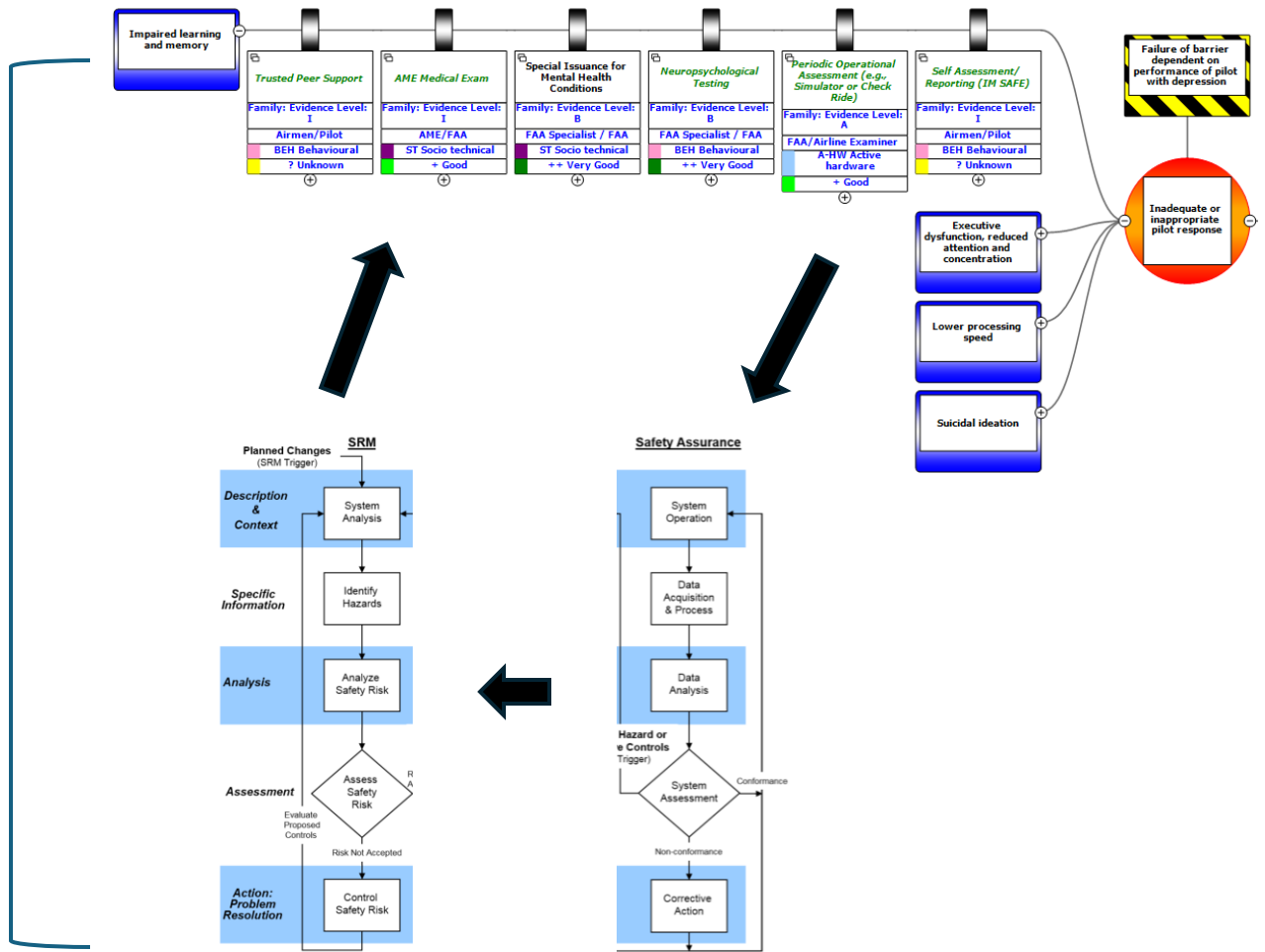








Model 2: Self Regulation Model 1: Prescriptive





A Proposed Framework to Regulate Mental Health in Airline Pilots

William R. Hoffman; Anne Suh; Timothy Sprott; Kate Manderson; Quay Snyder; Malcolm Sparrow; Anthony Tvaryanas

INTRODUCTION: The current regulatory approach to U.S. airline pilot mental health may have unintended negative consequences including healthcare avoidance and screening imprecision. An alternative approach should aim to address these factors while maintaining safety. The authors summarize the following related to mental health in U.S. airline pilots: 1) current regulatory approach and limitations, 2) available regulatory tools within the Sparrow fundamentals, and 3) a proposed novel regulatory approach. The authors propose the simultaneous utilization of multiple models to minimize the negative consequences of healthcare avoidance and screening imprecision. The proposed framework aims to address current limitations.

KEYWORDS: mental health, aerospace medicine, aerospace psychology, screening, public health, regulatory design, occupational medicine.

Hoffman WR, Suh A, Sprott T, Manderson K, Snyder Q, Sparrow M, Tvaryanas A. *A proposed framework to regulate mental health in airline pilots.* *Aerosp Med Hum Perform.* 2024; 95(12):1–4.

Knowledge Check 2:

Which one of the following is true?

- A. Safety Risk Management (SRM) portion of a Safety Management System (SMS) determines need for and adequacy of risk controls in a system
- B. Bow Tie Analysis includes all portions of the SMS process
- C. Multiple regulatory approaches cannot be used to control the risks related to mental health in aviation
- D. SMS aims to eliminate all risk in a regulated system
- E. All of the above

Knowledge Check 2:

Which one of the following is true?

- A. **Safety Risk Management (SRM) portion of a Safety Management System (SMS) determines need for and adequacy of risk controls in a system**
- B. Bow Tie Analysis includes all portions of the SMS process
- C. Multiple regulatory approaches cannot be used to control the risks related to mental health in aviation
- D. SMS aims to eliminate all risk in a regulated system
- E. All of the above

Single-Blinded Randomized Controlled Study of Peer Support in Aviation Personnel

William R. Hoffman, MD, Quay Snyder, MD MSPH, Anthony Tvaryanas, MD
PhD, MPH&TM, et al.



Project 5



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(1) Review Healthcare Avoidance

(2) Mental Health in Safety Management

(3) Mental Health in Regulatory Design

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