



**NTSB** National Transportation Safety Board

---

*Office of Marine Safety*

# Oversight of Pilots

# Oversight

- State pilots licensed and overseen by local or state authorities
- State pilots required to hold valid Coast Guard licenses
- Coast Guard does not oversee performance of state pilots operating under their state license

# State Oversight

- In California, as in many other jurisdictions, Board of Pilot Commissioners:
  - Establishes, implements, and oversees selection criteria
  - Establishes training requirements
  - Investigates mishaps
  - Imposes corrective action, if needed, following investigations

# Oversight

- Unlike most jurisdictions, California Board of Pilot Commissioners established pilot medical oversight system
- U.S. Coast Guard also established pilot medical oversight system

# Oversight

- Authorities are independent of each other
- No formal mechanism for communication among the authorities
- No national pilot data base, thus limited reliability of pilot performance assessments

# Oversight

- Most pilots belong to associations
- Associations serve as their business agents
- Pilots consider themselves “independent contractors”
- In San Francisco, work schedules coordinated by San Francisco Bar Pilots Association

# Oversight

- In addition to scheduling, San Francisco Bar Pilots Association carries out:
  - Drug and alcohol testing
  - Matching pilot scheduling with level of training
  - Reporting (potentially) incapacitated pilots to California Board

# Accident Pilot

- Investigation method and record changed in 1993
- 13 incidents before *Cosco Busan* accident
- One was a grounding 1 ½ years before accident
- One, 3 ½ years before accident, resulted in a psychiatric determination of fitness for duty

# Oversight of Accident Pilot

- 13 incidents reported being “more than average in number but not by much” for someone with his years of service
- San Francisco sample size is 60

# Medical Oversight

- Two related systems of medical oversight
- Pilots found fit by physician selected by California Board of Pilot Commissioners
- Physicians not required to be qualified in occupational medicine
- Medical guidance to physicians not updated since 1984 (SHIPS Standards)

# Medical Oversight

- LNPs, PAs or MDs can perform evaluations
- Evaluation data provided on form 719K
- Coast Guard determines fitness based on data provided by examiner
- Numerous systemic deficiencies noted in *Andrew J. Barberi* investigation

# Previous Safety Recommendations

- M-05-04 urged reporting of all pilot medical evaluations to Coast Guard
- M-05-05 asked Coast Guard to review and correct Safety Board-noted deficiencies in medical oversight system
- No requirement for reporting of change in medication use or medical condition

# Response

- Beginning in 2006 pilots required to submit results of annual medical evaluations
- All medical evaluation results submitted to and reviewed by a medical expert at a central Coast Guard facility
- Reviewer has training in occupational medicine

# Response

- New NVIC issued in September 2008 to address shortcomings in medical condition and medication guidance
- Still no requirement to report changes in medication and medical condition

# Pilot Medical Evaluation

- Several medications and medical conditions listed – new since 1999 waiver
- Use of potentially addicting pain reliever and an anti-anxiety medication
- Absence of follow-up regarding previous alcohol dependency diagnosis

# Pilot Medical Evaluation

- Reportedly warned pilot not to use these medications while serving as a pilot
- Necessitated additional information and subsequent medical review
- Without it, no assurance of a medically qualified pilot

# Pilot Medical Evaluation

- Examining physician neither trained or qualified in occupational medicine
- Not familiar with either NVIC 2-98 or Form 719K

# Coast Guard at That Time

- Had not yet transitioned its San Francisco office to “new” centralized review system
- That office improperly applied the 1999 waiver to pilot’s 2007 evaluation results
- Conducted no further enquiry despite considerable information on medical condition and medications

# As a Result

- Pilot retained Coast Guard license without any Coast Guard medical review
- Asked pilot to surrender license after the accident because of information in January 2007 form 719K
- Coast Guard actions in response to Recommendation M-05-05 completed in mid-2008

# California Board of Pilot Commissioners

- Reviewing its medical oversight system
- In interim, not using pilot's examining physician to determine medical fitness for duty
- Reviewing its use of 1984 standards



**NTSB**