

## U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.261

National Policy

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## **SUBJ:** Resources Not Available for ATOS and National Work Program Guidelines Surveillance

**1. Purpose of This Notice.** This notice reinforces the Air Transportation Oversight System (ATOS) Resources Not Available (RNA) policy and revises National Work Program Guidelines (NPG) policy to more accurately identify Federal Aviation Administration (FAA) surveillance activities that are not accomplished due to lack of resources.

**2.** Audience. The primary audience for this notice is Flight Standards Service (AFS) personnel who perform or manage surveillance oversight activities using ATOS or the NPG. The secondary audience includes Flight Standards branches and divisions in the regions and in headquarters (HQ).

**3. Where You Can Find This Notice.** You can find this notice on the MyFAA employee Web site at https://employees.faa.gov/tools\_resources/orders\_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avs.faa.gov. Operators can find this information on the FAA's Web site at http://fsims.faa.gov. This notice is available to the public at http://www.faa.gov/regulations\_policies/orders\_notices.

- 4. Explanation of Policy Changes. This notice accomplishes the following:
  - Establishes an NPG Planned Surveillance Work Activity (P-item) cancellation procedure,
  - Revises the current NPG Required Surveillance Work Activity (R-item) cancellation procedure,
  - Emphasizes the NPG R-item termination procedure (Work Program Management Process (WPMP)) using inspector analysis,
  - Requires quarterly field office NPG accomplishment meetings, and
  - Revises ATOS RNA procedures.

**5. Background.** Current ATOS policy requires the use of RNA to identify surveillance activities that are not accomplished and current NPG policy requires cancellation of R-items if resources are not available. The ATOS and NPG policies are not being followed consistently to identify surveillance activities that are not accomplished because resources are not available. In addition, the current NPG policy does not address the cancellation of P-items, which comprise the

majority of NPG work programs. It is essential to accurately report surveillance activities not performed due to a lack of resources; therefore, the current reporting process needs revision.

**a.** Current NPG Policy. The current policy addresses the cancellation of R-items in FAA Order 1800.56N, National Flight Standards Work Program Guidelines, Appendix A, subparagraph 5c, for resource shortfalls.

**b.** Current ATOS Policy. The current policy for ATOS resource shortfalls is found in FAA Order 8900.1, Flight Standards Information Management System (FSIMS), Volume 10, Chapter 2, Section 3, Design and Performance Assessment Resource Management.

6. RNA Policy and Guidance. It is vital that NPG work programs and the ATOS Comprehensive Assessment Plans (CAP) reflect the oversight necessary for a vigorous, all-inclusive, and effective oversight program. This means those programs should be constructed based on those safety considerations and not on resources available. If the resources are not available to complete the NPG or CAP and the regions cannot provide additional resources, then the process for identifying and accurately reporting those shortages will be followed. Manipulating the oversight programs or the reporting process so as to present an inaccurate or distorted oversight program picture prevents senior management from addressing those shortages and potentially acquiring additional resources for AFS because the data is not accurate. Regional division managers and their staffs must support this philosophy and convey the importance of oversight program data integrity and accuracy to their field offices. It is highly recommended that regional division managers meet with their Flight Standards District Office (FSDO)/Certificate Management Team (CMT)/certificate management office (CMO)/International Field Office (IFO)/International Field Unit (IFU) managers from time to time to assure a common understanding of this policy. AFS surveillance resource shortfall policy found in Order 1800.56N and Order 8900.1, Volume 10, Chapter 2, Section 3 is revised as described in subparagraphs 6a and 6b.

**a.** Order 1800.56N, NPG Changes. AFS personnel should note the following changes to Order 1800.56N:

(1) Cancellation of R-Items and P-Items Due to RNA. Under certain circumstances, the FAA may cancel R-items and P-items if resources are not available to accomplish the work.

(a) Field offices that need additional resources to accomplish R-items or P-items will contact their Regional Office (RO) and request the resources needed to accomplish the work. At the time of the request, the field office will change the Program Tracking and Reporting Subsystem (PTRS) record "Status" field to "O" (Open) for the affected R-item or P-item that are proposed for cancellation. In the "Miscellaneous" field, enter one of the following abbreviations:

PTRS Miscellaneous Field Entry/Code	RNA Reason Code Definition
RNAP	Resource Not Available - Personnel Shortages
RNAQ	Resource Not Available - Personnel Qualifications
RNAF	Resource Not Available - Funds Unavailable
RNAS	Resource Not Available - Security Restricted

(b) Regions must make every effort to resolve RNAs before requesting national resources or authorization for cancellation. Regions unable to provide necessary resources will forward the field office resource request via email to: 9-AMC-AVS-AFS-NPG@faa.gov. The Flight Standards National Field Office (AFS-900) will provide authorization in writing to cancel the R-item or P-item and notify the Director, Flight Standards Service (AFS-1); Deputy Director, Flight Standards Field Operations (AFS-2F); or Deputy Director, Flight Standards Policy Oversight (AFS-2P), as appropriate.

(c) The transmittal for the R-item or P-item will remain open until resources are provided to accomplish the surveillance or closed when AFS-900 provides authorization to cancel the R-item or P-item (result field = X and status field = C). These PTRS entries will allow for the tracking of annual resource deficiencies. Document the rationale for cancelling the R-item or P-item in the comments section of the PTRS record. The documentation should be clear and detailed so that someone unfamiliar with the cancellation can easily understand the rationale.

**Note:** Open R-items and P-items identified for cancellation may remain open from quarter to quarter but should not be left open until the end of the fiscal year (FY) for AFS-900 authorization for cancellation and closing.

**Note:** Regions must submit requests for authorization for cancellation to AFS-900 no later than the beginning of the FY 4th quarter. The R-item and P-item cancellation procedure in subparagraph 6a(1) replaces the information found in Order 1800.56N, appendix A, subparagraph 5c(2).

(2) Field Office NPG Planning. The annual work program is based on risk alone. Developing P-items based on risk is the primary driver of the program and not staffing or budget. AFS field offices must meet quarterly to review their work programs to identify any R-items or P-items that require cancellation.

**Note:** New P-items may be generated quarterly to address new risks identified during this review.

(3) Inspector Analysis for the Termination of R-items. Inspectors may continue to use the Safety Performance Analysis System (SPAS) WPMP to terminate R-items based on low risk or make other adjustments to air carrier/air operator/air agency work program, as described in Order 1800.56N, appendix A, subparagraph 5c(1)(a).

**Note:** Inspector analysis using SPAS WPMP to terminate R-item surveillance based on low risk should not be confused with cancelling R-item or P-item surveillance due to resource shortfalls.

**b.** Order 8900.1, Volume 10, ATOS Changes. AFS personnel should note this is reflected in the following changes to Order 8900.1, Volume 10, Chapter 2, Section 3, paragraph 10-150:

**10-150 DOCUMENT REASONS WHY WORK WAS NOT ASSIGNED.** The Front Line Manager (FLM) assigns work based on the CAP priorities for a given quarter until no resources remain. The CAP is a risk-based plan created by the principal inspector (PI), independent of the resource function. If resources are not available to complete the entire CAP, the FLM documents

why he or she did not assign the remaining work. The CAP should not be modified to accommodate resource shortfalls. The FLM will use the "Not Assigned Reason" dropdown to identify the reason. The dropdown options are: "Training," "Budget," "Staffing," and "Other." Use the "Comment" text box to document why the work is not assigned. The PI and FLM should consider the work not assigned in future planning and resource management cycles.

**7. Disposition.** We will incorporate the policy information in this notice into Order 8900.1, FAA Order 1800.56O, and other applicable FAA guidance. Direct questions concerning the information in this notice to the AFS-900 Continual Improvement Program Office via email to: 9-AMC-AVS-AFS-NPG@faa.gov.

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