



**Federal Aviation  
Administration**

# **Chief Counsel**

## **Fiscal Year 2016 Business Plan**



# FY2016 AGC Business Plan

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## Make Aviation Safer and Smarter

The Office of the Chief Counsel (AGC) supports the FAA's objective of increased safety primarily through our rulemaking activity, regulatory enforcement activity, and vigorous defense of the agency in various types of litigation. FAA safety regulations are one of the agency's primary means of ensuring safety in air commerce and commercial space. AGC plays a key role in the FAA's rulemaking activities by ensuring that rules meet legal standards and by assisting the agency in completing critical safety rules on schedule. AGC attorneys participate on rulemaking teams, review draft regulations for legal sufficiency, and provide advice on the legality of regulations, orders, decisions on petitions for exemption, airspace actions and obstruction determinations. We also provide interpretations of FAA regulations to internal agency officials and members of the public.

Regulatory enforcement is a core safety activity. AGC attorneys prosecute all manner of enforcement cases referred by the Flight Standards Service, Aircraft Certification Service, the Office of Aerospace Medicine, the Office of Security and Hazardous Materials, the Office of Airports, and the Office of Commercial Space Transportation. Our attorneys represent the FAA on such matters before the NTSB, the FAA Decision-maker, and the federal courts. Proactively, we provide legal advice and policy guidance on the FAA's various voluntary safety programs, such as the Aviation Safety Action Program (ASAP), Voluntary Disclosure Reporting Program (VDRP), and Flight Operational Quality Assurance (FOQA) program.

The litigation staff defends the agency in all phases of aircraft accident litigation and represents the agency in various other actions. AGC attorneys provide advice during aircraft accident investigations and defend the agency in associated litigation; evaluate tort claims; secure Department of Justice (DOJ) representation for FAA employees sued in an individual capacity; assist DOJ in defending wrongful death, personal injury and property damage lawsuits; represent the FAA before federal courts, including courts of appeals on petitions to review agency orders; and handle requests for employee testimony in private litigation matters. The Civil Penalty staff advises the Administrator, in his capacity as Decision-maker on cases appealed from decisions issued by Administrative Law Judges (ALJs).

## Internal Work Objective: Rulemaking Legal Services

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Assist Office of Rulemaking and program offices to provide regulatory legal services in accordance with Agency and client priorities.

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### Internal Work Initiative: Support Agency Rulemaking Activity

Support Agency rulemaking activities and improvements by ensuring rules meet legal standards.

#### Internal Work Activity: Provide Legal Services on Agency Rulemaking Initiatives in Accordance with Agency Priorities

Provide legal advice, representation, policy guidance, and legal sufficiency reviews relating to rulemaking.

##### Activity Target 1:

Provide legal services on rulemaking documents and related guidance material. Due September 30, 2016

#### Internal Work Activity: Evaluate Effectiveness of Legal Services on Agency Rulemaking Initiatives

Ensure through regular formal meetings, that legal services are provided in a manner that reflects the strategic priorities of the Administrator, and AGC's primary clients.

##### Activity Target 1:

Meet regularly with primary clients to formally identify priorities, address type of legal support needed to advance the projects, obtain client feedback on support provided and reassess service being provided, as appropriate. Due September 30, 2016

## Internal Work Objective: Compliance and Enforcement

Prioritize and prosecute enforcement actions timely in accordance with the agency's safety goals by taking the first legal action in at least 60% of cases within 60 days of receipt by legal counsel and 80% within 90 days. Conduct 70% of informal conferences within 90 days of receipt of a respondent's request and 90% of informal conferences within 180 days.

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### Internal Work Initiative: Legal Services Supporting the Agency

## Compliance and Enforcement Program

Provide legal support for the compliance and enforcement activities of AVS, ASH, ARP, and AST, which include representing the agency before the NTSB, FAA Decisionmaker and the federal courts, providing timely and effective legal advice and policy document review in support of enforcement activities, and assisting with training that improves the effectiveness of the agency's enforcement program.

### Internal Work Activity: Timely Prosecute Legal Enforcement Actions

Take first legal action (initiate case, transmit case alert to headquarters, return case to program office, take significant action (EIS legal event code 20)) in at least 60% of cases within 60 days of receipt by a legal counsel and 80% within 90 days.

#### Activity Target 1:

Take first legal action (initiate case, transmit case alert to headquarters, return case to program office, take significant action (EIS legal event code 20)) in at least 60% of cases within 60 days of receipt by a legal counsel and 80% within 90 days. Due September 30, 2016

#### Activity Target 2:

Monitor and report results for each Field Enforcement Team, AGC-300 HQ, and AGC-wide. Due quarterly and final report due on September 25, 2016 Due September 30, 2016

### Internal Work Activity: Efficient Processing of Enforcement Actions

Process legal enforcement cases efficiently by conducting 70% of informal conferences within 90 days of receipt of a respondent's request and 90% within 180 days and by taking the next action (e.g., scheduling the informal conference, issuing a final notice, responding to a written reply to a notice) after initiating a case in at least 70% of the cases within 90 days of case initiation and in at least 90% within 180 days.

#### Activity Target 1:

Conduct 70% of informal conferences within 90 days of receipt of a respondent's request and 90% within 180 days. Due September 30, 2016

#### Activity Target 2:

Take the next action (e.g., scheduling the informal conference, issuing a final notice, responding to a written reply to a notice) after initiating a case in at least 70% of the cases within 90 days of case

initiation and in at least 90% within 180 days. Due September 30, 2016

#### Activity Target 3:

Monitor and report results of Targets 1 and 2 for each Field Enforcement Team, AGC-300 HQ, and AGC-wide. Due quarterly and final report on September 25, 2016. Due September 30, 2016

### Internal Work Activity: Efficient Coordination and Approval of Significant Enforcement Actions

Efficiently process the coordination and approval of significant enforcement actions within the FAA Headquarters.

#### Activity Target 1:

Submit to the program office for concurrence 80% of enforcement alerts within 45 days of receipt by AGC-300 HQ. Due September 30, 2016

### Internal Work Activity: Establish Air Carrier Enforcement Attorney Network

Establish an Air Carrier Enforcement Attorney Network by producing a quarterly report on legal enforcement activity in air carrier cases and holding a quarterly teleconference with enforcement attorneys.

#### Activity Target 1:

Produce a quarterly report on legal enforcement activity in air carrier cases. Due quarterly with last quarter report due September 25, 2016 Due September 30, 2016

#### Activity Target 2:

Hold a quarterly teleconference with attorneys to discuss their air carrier cases with attorneys on air carrier cases and related matters. Due quarterly with last teleconference by September 25, 2016. Due September 30, 2016

### Internal Work Activity: Enhance Legal Representation

Publish enforcement newsletter and meet with primary client offices.

#### Activity Target 1:

Publish enforcement newsletter four times each year. Due September 30, 2016

#### Activity Target 2:

Hold at least four training teleconferences for enforcement attorneys. Due September 30, 2016

### **Internal Work Activity: Compliance and Enforcement Training for AVS**

Provide support for AVS's Compliance and Enforcement Training for inspectors. To the extent practicable, provide instructors for the legal portions of AVS's Compliance and Enforcement Training for new inspectors and Advanced Recurrent Compliance and Enforcement Training for experienced inspectors.

#### **Activity Target 1:**

To the extent practicable, provide instructors for the legal portions of AVS's Compliance and Enforcement Training for new inspectors and Advanced Recurrent Compliance and Enforcement Training for experienced inspectors. Due September 30, 2016

### **Internal Work Activity: Enforcement-Related Rulemaking**

Update procedural rules relating to FAA compliance and enforcement activities contained in 14 C.F.R part 13 and prepare a notice proposing a general falsification rule.

#### **Activity Target 1:**

Put into formal coordination a rulemaking document updating procedural rules relating to FAA compliance and enforcement activities. Due September 30, 2016

#### **Activity Target 2:**

Put into formal coordination a notice proposing a general rule prohibiting falsification of information provided to the FAA Due September 30, 2016

### **Internal Work Activity: Revise Compliance and Enforcement Program, FAA Order 2150**

Revise "Compliance and Enforcement Program," FAA Order 2150

#### **Activity Target 1:**

Put into formal coordination a revised FAA Order 2150.3 that reflects pertinent changes, including the FAA Compliance Philosophy. Due September 30, 2016

### **Internal Work Activity: More Effective Use of Support Staff Resources**

Evaluate and implement a plan to use support staff resources more effectively.

#### **Activity Target 1:**

Identify activities in enforcement cases that could be handled by support staff and develop action plans for implementation. Due December 31, 2015

#### **Activity Target 2:**

Brief and train support staff on processes for any activities determined to be appropriate for handling by support staff, and support begin to handle those functions Due March 31, 2016

#### **Activity Target 3:**

Assess effectiveness of support staff's handling of the activities and their level of satisfaction. Due September 25, 2016

### **Internal Work Activity: Evaluate the Impact of FAA Compliance Philosophy on Workload**

Evaluate the Impact of FAA Compliance Philosophy on Workload

#### **Activity Target 1:**

Evaluate the effect of the FAA Compliance Philosophy on AGC-300's workload by program office and prepare a report. Due September 30, 2016

### **Internal Work Activity: Efficiencies Achieved under the New Enforcement Practice Structure.**

Evaluate the Efficiencies Achieved under the New Enforcement Practice Structure.

#### **Activity Target 1:**

Benchmark the overall average time for initiating a case in FY 2015 and decrease that overall average time by 10% during FY 2016. Due September 30, 2016

#### **Activity Target 2:**

Benchmark the overall average time for holding an informal conference in FY 2015 and decrease that overall average time by 10% during FY 2016. Due September 30, 2016

#### **Activity Target 3:**

Benchmark the number of cases completed in FY 2015 and increase the number of cases completed in FY 2016 by 10%. Due September 30, 2016

### **Internal Work Objective: Tort Litigation Services**

Review claims submitted under the Federal Tort Claims Act and complete claims analysis within 6 months of receipt for 70% of the unsettled claims.

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### **Internal Work Initiative: Tort Litigation Support**

Provide representational legal services on all phases of tort litigation.

### **Internal Work Activity: Tort Litigation Support**

Ensure that tort litigation services are provided in a timely manner.

#### **Activity Target 1:**

Complete the claims analysis within 6 months of the receipt of the claim or within 6 months of when, in the absence of a settlement, the claim file is complete and sufficient factual information is available. Due September 30, 2016

#### **Activity Target 2:**

Prepare proposed answers or response as requested by the Department of Justice, if DOJ has assumed control of a matter otherwise, within 50 days of filing of complaint. Due September 30, 2016

## **Internal Work Objective: Agency Tort Liability Analysis**

Monitor the Agency's contingent liability and keep the Chief Counsel and Administrator apprised of potential agency exposure and prepare quarterly reports.

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### **Internal Work Initiative: Agency Tort Liability Analysis**

Assessment of potential agency exposure and monitor the Agency's contingent liability.

#### **Internal Work Activity: Assessment of Contingent Liability**

Prepare required contingent liability reports for tort litigation.

#### **Activity Target 1:**

Coordinate with Financial Management Services (AFM) litigation liability response. Due September 30, 2016

#### **Activity Target 2:**

Keep the Administrator, Deputy Administrator and ATO apprised of significant changes and potential future liability likely to affect the agency. Due September 30, 2016

## **Internal Work Objective: Regulatory Legal Services**

Provide legal analysis of agency regulations to Office of Rulemaking and program offices and provide the

regulated community with timely guidance on regulations by (i) completing review of 85% of exemption responses within 30 days of receipt; (ii) responding to 70% of public requests for regulatory interpretations within 120 days of receipt; and (iii) providing final team concurrence within 90 days of the original rulemaking program schedule as approved by the Rulemaking Management Council for at least 85 percent of the rule projects. For FY15, of the 116 interpretations that were due to be answered, AGC-200 issued 92 within the 120-day metric, or 79.3% on time. The workload associated with UAS and other priority rulemaking projects may make equaling that on-time rate difficult in FY16. For FY15, a total of 253 exemptions were sent to AGC-200 for legal review of which 248 were completed within the 30 day metric or 90% on time.

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### **Internal Work Initiative: Provide Legal Analysis of Agency Regulations and Documents Associated with Existing Regulations**

Provide legal analysis of agency regulations and responses to exemptions from regulatory requirements to Office of Rulemaking and program offices by (i) completing review of 85% of exemption responses within 30 days of receipt, and (ii) providing final team concurrence within 90 days of the original rulemaking program schedule as approved by the Rulemaking Management Council for at least 85 percent of the rule projects.

#### **Internal Work Activity: Provide Legal Review of Agency Grants and Denials of Exemptions from Regulatory Requirements**

Provide program offices with timely legal review of grants and denials of exemptions from the agency's existing regulatory requirements in accordance with criteria set forth by statute in 14 CFR Part 11.

#### **Activity Target 1:**

Within 30 days of receipt, provide legal concurrence or return document to program office with detailed explanation of why document is not legally sufficient for 85% of the exemptions submitted to AGC for review in FY 16. Due September 30, 2016

#### **Internal Work Activity: Provide Legal Review of Agency Guidance and Advisory Materials**

Provide legal concurrence or return document to program office with an explanation of why the document is not legally sufficient.

**Activity Target 1:**

Complete review within timeframes requested to the extent possible based on other priorities. If program office has designated insufficient time for adequate legal review, attorney is to notify the program office and let it know when legal review will be complete. Due September 30, 2016

**Activity Target 2:**

Provide final team concurrence within 90 days of the original rulemaking program schedule as approved by the Rulemaking Management Council for at least 85 percent of the rule projects. Due September 30, 2016

**Activity Target 3:**

Concur on the Final Rule, Flight Simulation Training Device Qualification Standards for Extended Envelope and Adverse Weather Event Training (International Cooperation) Due September 30, 2016

**Activity Target 4:**

Concur on the Final Rule, Operation and Certification of Small Unmanned Aircraft Systems (Reauthorization), Due September 30, 2016

**Activity Target 5:**

Initiate rulemaking on Investigative and Enforcement Procedures. Due September 30, 2016

**Activity Target 6:**

Initiate rulemaking on Civil Penalty Inflation Adjustment. Due September 30, 2016

**Activity Target 7:**

Provide legal counsel to the Crisis Response Working Group (CRWG) and Crisis Response Steering Group (CRSG), Provide legal support to FAA's emergency operations planning and response efforts, including planning for and response to all hazards, emergencies and the continuity of operations (COOP) function. Due September 30, 2016

## **Internal Work Initiative: Provide Regulated Community with Guidance on Agency Regulations**

Provide regulated community with timely and publicly available guidance in response to requests for interpretations of FAA regulations.

### **Internal Work Activity: Enforcement Program Implications**

Provide initial response regarding implications on the enforcement program of a request for interpretation within 5 business days of a request from AGC-200.

**Activity Target 1:**

Within 5 days of a request from AGC-200 provide initial response to AGC-200 on whether a request for interpretation relates to an ongoing enforcement action. Due September 30, 2016

**Activity Target 2:**

Within 5 business days of a request from AGC-200 provide initial response to AGC-200 on the enforcement implications of a request for interpretation or a draft response to a request for interpretation. Due September 30, 2016

### **Internal Work Activity: Statutory Interpretation and Preemption**

Provide a plan of action to respond to initial question of statutory interpretation and preemption from internal sources and external sources.

**Activity Target 1:**

Within 15 days of a request from an internal source, provide an initial response or course of action on questions of statutory interpretation and preemption. Due September 30, 2016

**Activity Target 2:**

Target 2: Within 30 days of a request from an external source, provide a course of action to respond to questions of statutory interpretation and preemption. Due September 30, 2016

### **Internal Work Activity: Respond to Requests by the Public for Legal Interpretations of Agency Regulations**

Provide regulated community with timely guidance in response to public requests for interpretations of FAA regulations.

**Activity Target 1:**

Respond to 70% of requests for interpretation within 120 days of receipt in FY2016. In cases where the Agency decides not to answer the request, a "no-response" letter will be sent within 120 days, consistent with performance metric. Due September 30, 2016

**Activity Target 2:**

Have legal interpretations of agency regulations placed on the FAA website within 10 business days of issuance. Responses to legal interpretations requested by program offices will be posted on the website when not otherwise

contrary to the agency's interest and the response addresses a matter that could directly impact regulated parties. Due September 30, 2016

## **Internal Work Objective: Civil Penalty Appeal Decisions**

Complete draft decisions for the Administrator, or other decision-maker, for civil penalty appeals within 180 days of the receipt of the last brief in 60% of the appeals.

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### **Internal Work Initiative: Civil Penalty Appeal Decisions**

Prepare draft civil penalty decisions within 180 days of the receipt of the last brief in 60% of the appeals.

#### **Internal Work Activity: Prepare Draft Civil Penalty Decisions**

Provide timely draft civil penalty decisions.

##### **Activity Target 1:**

Complete draft decisions for the Administrator, or other decision-maker, for civil penalty appeals within 180 days of the receipt of the last brief in 60% of the appeals. Due September 30, 2016

## **Internal Work Objective: Agency Tort Claims Consolidation**

Assess the current state of tort processing within AGC nationwide and recommend any changes to improve the quality and efficiency of tort claims processing/advice.

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### **Internal Work Initiative: Agency Tort Claims Consolidation**

Assess the current state of tort processing within AGC nationwide and recommend any changes to improve the quality and efficiency of tort claims processing/advice.

#### **Internal Work Activity: Agency Tort Claims Consolidation**

Assess the current state of tort processing within AGC nationwide and recommend any changes to improve the quality and efficiency of tort claims processing/advice.

##### **Activity Target 1:**

Establish a joint Regional and Headquarters Team to assess tort claims processing; benchmark how all tort claims currently are processed throughout AGC. Due September 30, 2016. Due September 30, 2016

##### **Activity Target 2:**

Identify the advantages and disadvantages of consolidating tort claims processing and the possible consolidation models that might be used, assessing whether to recommend any organizational changes in the way tort claims are processed. Due September 30, 2016

##### **Activity Target 3:**

Recommend to AGC-1 whether tort claims processing should be consolidated within AGC and the model for any such consolidation. Due September 30, 2016

## **Internal Work Objective: Agency Part 9 Request Consolidation**

Assess the current state of Part 9 request processing within AGC nationwide and recommend any changes to improve the quality and efficiency of Part 9 processing/advice.

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### **Internal Work Initiative: Agency Part 9 Request Consolidation**

Assess the current state of Part 9 request processing within AGC nationwide and recommend any changes to improve the quality and efficiency of Part 9 processing/advice.

#### **Internal Work Activity: Agency Part 9 Request Consolidation**

Assess the current state of Part 9 request processing within AGC nationwide and recommend any changes to improve the quality and efficiency of Part 9 processing/advice.

##### **Activity Target 1:**

Establish a joint Regional and Headquarters Team to assess Part 9 request processing; benchmark how all Part 9 requests currently are processed throughout AGC. Due September 30, 2016

##### **Activity Target 2:**

Identify the advantages and disadvantages to consolidating Part 9 request processing and the possible consolidation models that might be used, assessing whether to recommend any organizational changes in the way Part 9 requests are processed. Due September 30, 2016

##### **Activity Target 3:**

Recommend to AGC-1 whether Part 9 request processing should be consolidated within AGC and the model for any such consolidation. Due September 30, 2016

## Internal Work Objective: Agency Tort Order/Handbook Update

Revise and update FAA Order 2250.1A FAA Federal Tort Claims Act (FTCA Handbook), dated January 23, 1969.

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### Internal Work Initiative: Agency Tort Order/Handbook Update

Revise and update FAA Order 2250.1A FAA Federal Tort Claims Act (FTCA Handbook), dated January 23, 1969.

#### Internal Work Activity: Agency Tort Order/Handbook Update

Revise and update FAA Order 2250.1A FAA Federal Tort Claims Act (FTCA Handbook), dated January 23, 1969.

##### Activity Target 1:

Establish a joint Regional and Headquarters Team to review the Order/Handbook for updating. Due September 30, 2016

##### Activity Target 2:

Identify the revisions needed to accurately reflect the current state of the law along with the procedures for handling FTCA claims within the FAA Due September 30, 2016

##### Activity Target 3:

Rewrite the Order/Handbook to reflect the needed changes and present to AGC-1 for implementation. Due September 30, 2016

## Internal Work Objective: Agency Tort Claims/Civil Penalty Litigation Calendar

Establish a litigation calendar for all AGC-400 litigation

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### Internal Work Initiative: Agency Tort Claims/Civil Penalty Litigation Calendar

Establish a litigation calendar for all AGC-400 litigation

#### Internal Work Activity: Agency Tort Claims/Civil Penalty Litigation Calendar

Establish a litigation calendar for all AGC-400 litigation.

##### Activity Target 1:

Establish a Headquarters Team to identify all

litigation matters to be included on the AGC-400 litigation calendar. Due September 30, 2016

##### Activity Target 2:

Develop a protocol for entering all identified litigation matters on the AGC-400 litigation calendar. Due September 30, 2016

##### Activity Target 3:

Implement a litigation calendar for use by all AGC-400 attorneys. Due September 30, 2016

## Internal Work Objective: Agency Tort Claims/Part 9 Requests SOPs

Establish standard operating procedures (SOPs) for handling tort claims and Part 9 requests

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### Internal Work Initiative: Agency Tort Claims/Part 9 Requests SOPs

Establish standard operating procedures (SOPs) for handling tort claims and Part 9 requests.

#### Internal Work Activity: Agency Tort Claims/Part 9 Requests SOPs

Establish standard operating procedures (SOPs) for handling tort claims and Part 9 requests.

##### Activity Target 1:

Establish a Regional and Headquarters Team to establish SOPs for tort claims and Part 9 requests; identify best practices for providing legal services for these matters. Due September 30, 2016

##### Activity Target 2:

Develop SOPs for entering handling tort claims and Part 9 requests within AGC, incorporating best practices into the SOPs. Due September 30, 2016

##### Activity Target 3:

Recommend to AGC-1 SOPs for all attorneys providing legal services involving tort claims and Part 9 matters. Due September 30, 2016

## Internal Work Objective: Agency Information/Privacy Legal Services

Assess how legal services are provided for information/privacy matters within AGC to identify opportunities for proactive involvement with program offices on these matters.

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## **Internal Work Initiative: Agency Information/Privacy Legal Services**

Assess how legal services are provided for information/privacy matters within AGC to identify opportunities for proactive involvement with program offices on these matters.

### **Internal Work Activity: Agency Information/Privacy Legal Services**

Assess how legal services are provided for information/privacy matters within AGC to identify opportunities for proactive involvement with program offices on these matters.

#### **Activity Target 1:**

Establish a Regional and Headquarters Team to assess how information/privacy related legal services currently are provided. Due September 30, 2016

#### **Activity Target 2:**

Engage program offices and other LOB/SO with potentially significant information/privacy related legal issues to identify areas where AGC can engage proactively to assist in minimizing the legal risk presented by these issues. Due September 30, 2016

#### **Activity Target 3:**

Make recommendations to AGC-1 on how AGC can better serve clients' information/privacy legal needs. Due September 30, 2016

## **Deliver Benefits Through Technology/Infrastructure**

The Office of the Chief Counsel (AGC) supports the agency's objective of maximizing access to the aviation system in two critical ways. First, AGC plays a vital role in advising program offices on the legal and environmental implications of programs that enhance airport and airspace capacity and defending the agency's choice of action. Second, AGC provides legal support to program offices responsible for acquiring safety and capacity enhancing equipment, services and technology.

AGC attorneys provide legal advice, litigation support, policy and regulatory guidance, and legal sufficiency reviews related to environmental review of airport capacity and capacity-related projects, administration of the airport improvement program, funding of runway expansion and safety projects, redesign of the airspace surrounding airports in major metropolitan areas, and streamlined environmental review and compliance. In FY 2015 there was a sharp increase in controversy concerning noise impacts of proposed air traffic and airport modernization

projects and in advice and counsel on community outreach and congressional inquiries and community requests for noise abatement operational procedures. This trend is expected to continue in FY 2016.

AGC attorneys in our acquisition and fiscal law practice area assist clients in acquiring safety and capacity enhancing equipment and services, as well as, the intellectual and real property needed to support the strategic initiatives and other high priority projects. The attorneys support all high value agency procurement activities; advise on grants, cooperative agreements, and other transaction agreements; and represent the Agency in acquisition related litigation and disputes. The acquisition attorneys also provide the acquisition and fiscal law services needed to support the agency's information security requirements, export control compliance, bankruptcy cases, antitrust issues, real estate activity and appropriations matters.

The Office of Dispute Resolution for Acquisition ("ODRA") is an independently operating adjudicatory authority comprised of administrative judges. The ODRA safeguards the quality and integrity of the Agency's acquisition and contract administration processes by fulfilling its statutory mandate as the sole administrative tribunal authorized to decide or resolve all bid protests and contract disputes on behalf of the FAA administrator under the FAA's Acquisition Management System. The ODRA has developed and now provides an option allowing parties to electronically file new cases and subsequent documents with the ODRA.

## **Internal Work Objective: Performance Based Navigation**

Optimize airspace and Performance Based Navigation (PBN) procedures to improve efficiency an average of 10 percent across core airports by 2018.

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### **Internal Work Initiative: Metroplex (Airspace Optimization)**

Optimize airspace and procedures in the Metroplex.

#### **Internal Work Activity: Metroplex Support (Airspace Optimization)**

Responsible for the Optimization of Airspace and Procedures in the Metroplex (OAPM) project. The Airspace Optimization Group will begin integrated airspace design and associated activities, including traffic flow analysis and facilitated design and procedures optimization. This will lay the framework for accelerating Performance Based Navigation (PBN) initiatives, taking a systems approach for airspace design and procedure implementation. This project is focused on operational optimization, delivering key efficiencies for the nation's busiest

metropolitan areas within 2-3 years once work begins at each site.

**Activity Target 1:**

Provide advice to expedite and streamline environmental reviews for OAPM projects and other proposed RNAV/RNP procedures in accordance with Section 213 of the FAA Modernization and Reform Act. Due September 30, 2016

**Activity Target 2:**

Complete legal review within 30 calendar days of receipt of technically adequate and complete environmental assessments for OAPM projects and other proposed RNAV/RNP procedures. Note: After legal review has been completed, ATO is required to review and respond to legal comments. Legal's comments must be addressed and resolved so that legal concurrence can be provided before ATO publishes the EA. Due September 30, 2016

## **Internal Work Objective: NextGen and Emerging Policy Issues**

Timely and high-quality support to senior management and stakeholders in monitoring and developing cross-agency policies, including but not limited to NextGen and emerging policy issues.

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### **Internal Work Initiative: Identify and Develop Cross Cutting Policies**

Identify and develop cross-cutting NextGen and emerging aviation and commercial space policies as needed, working across the agency, and with the Administration, Congress, and stakeholders.

### **Internal Work Activity: Provide Technical Assistance and Draft Legal Documents to Support Agency Reauthorization Proposals and Activities as Necessary**

Develop legislation and legal documents in support of agency reauthorization proposal(s). Assist with evaluating alternatives and provide technical assistance on Congressional legislative proposals in support of the Administration, as needed.

**Activity Target 1:**

Develop legislation and legal documents in support of agency reauthorization proposal(s). Assist with evaluating alternatives and provide technical assistance on Congressional legislative proposals in support of the Administration, as needed. Due September 30, 2016

## **Internal Work Objective: Optimize Agency Resources**

Optimize the use and management of FAA resources to improve accountability and enhance operational efficiency through improved management of FAA acquisitions, effective management of financial resources, and support of non-AFN workforce planning. Successful accomplishment of this objective is measured through effective management of Agency acquisitions, continuous improvement of acquisition management policies and practices, and favorable financial system audit results.

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### **Internal Work Initiative: Productivity and Financial Metrics**

Each FAA organization will develop, track, and report quarterly on a comprehensive measure of its operating efficiency or financial performance. These measures will include: ATO cost per operation, overhead rates, and cost per accounting transaction.

### **Internal Work Activity: AGC Efficiency Measure: Response Time to Public Requests for Interpretations**

Implement measures to improve timeliness of responses to public requests for interpretations of FAA regulations.

**Activity Target 1:**

Report quarterly results and comments to ABA on response rate as percentage of requests. Due 30 days after the end of each quarter. Due September 30, 2016

**Activity Target 2:**

Provide updated FY 2017 measure template for review and approval. Due June 30, 2016

### **Internal Work Activity: AGC Efficiency Measure: Time to Process Enforcement Cases**

Efficient Processing of Enforcement Cases

**Activity Target 1:**

Report quarterly results and comments to ABA on the percentage of legal enforcement cases. Due 30 days after the end of each quarter. Due September 30, 2016

**Activity Target 2:**

Provide updated FY 2017 measure template for review and approval. Due June 30, 2016

## **Internal Work Objective: Procurement and Acquisition Related Adjudication and Dispute Resolution Services (ODRA)**

As an independently operating adjudicatory authority comprised of administrative judges, safeguard the quality and integrity of the Agency's acquisition and contract administration processes by deciding or resolving, on behalf of the FAA Administrator, all bid protests and contract disputes that arise under the FAA's Acquisition Management System. Provide timely, fair, responsive and efficient adjudication, alternative dispute resolution ("ADR") and dispute avoidance services in matters arising under the AMS, as well as in other designated administrative matters.

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### **Internal Work Initiative: Adjudicatory/Dispute Resolution Services**

Serve as the FAA's exclusive tribunal for adjudicating and deciding procurement and acquisition-related and other administrative disputes. Provide dispute avoidance and early resolution services to the Agency and its private sector contracting partners, assisting them through voluntary dispute resolution and dispute avoidance methods to the maximum extent practicable. For those matters that cannot be avoided or resolved through ADR, provide a flexible, efficient and transparent adjudication process. Educate Agency personnel and private sector stakeholders regarding the FAA's dispute resolution and adjudication processes.

#### **Internal Work Activity: Provide timely, fair, responsive and efficient ADR and Adjudication Services to the FAA and its contracting partners**

Provide timely, fair, responsive and efficient dispute avoidance, ADR and adjudication services to the FAA and its contracting partners.

##### **Activity Target 1:**

Operate a permanent system for the optional electronic filing and exchange of pleadings and other documents in ODRA matters. Establish procedures that facilitate the voluntary use of electronic filing and document exchange in ODRA matters. Due September 30, 2016

##### **Activity Target 2:**

Conduct educational programs for Agency personnel and outside stakeholders on the FAA dispute resolution system and participate in outside programs and professional activities that

promote knowledge and acceptance of the FAA acquisition process. Due September 30, 2016

##### **Activity Target 3:**

Develop and publish on the ODRA website additional instructional programs on specific topics such as participating in mediation, small business disputes and protecting proprietary and competition-sensitive information. Due September 30, 2016

##### **Activity Target 4:**

Provide voluntary ADR and pre-dispute services as the primary means of managing matters filed with the ODRA. Actively manage and establish appropriate timeframes for completion of ADR and adjudication processes in all cases. Complete Findings and Recommendations in typical adjudicated cases in the following average number of days from the date of closing of the administrative record: non-complex protests- 30 calendar days; complex protests- 60 calendar days; non-complex contract disputes-90 calendar days; complex contract disputes- 160 calendar days. Due September 30, 2016

##### **Activity Target 5:**

As the Agency's designated Dispute Resolution Specialist under the Administrative Dispute Resolution Act, advise the Agency on dispute resolution policies and practices; and provide guidance and training, if requested, to Agency components regarding dispute resolution or conflict management. Confer and consult with the Director of Acquisition regarding the 20th Anniversary AMS 2016/Mayflower Compact. Due September 30, 2016

##### **Activity Target 6:**

If requested, provide non-adjudicative, conflict management and dispute resolution services for disputes arising from Agency grants, cooperative agreements and other transactions or acquisition-related agreements. Due September 30, 2016

## **Internal Work Objective: Acquisition Related Legal Services**

Provide timely acquisition related legal services.

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### **Internal Work Initiative: Acquisition & Fiscal Law Services Division Support of Strategic Initiative: NAS**

Provide legal advice and represent the Agency interests relating to the FAA's acquisition of the systems and

services needed to achieve the NAS Strategic Initiative and other high priority goals. In particular, this Core Initiative supports the NAS Guiding Principle: Provide safe, secure, and efficient services to NAS users in the most cost effective and innovative manner. The Division's staff ensures the legal sufficiency of acquisition documents; assists clients in developing a rational basis for acquisition decisions; and, represents the agency when acquisition decisions are challenged.

### **Internal Work Activity: Provide Timely and Accurate Review of Acquisition Documentation**

The Office of the Chief Counsel will review 100% of documents within 10 days, on average, of receipt of complete packages.

#### **Activity Target 1:**

The Office of the Chief Counsel will review 100% of documents within 10 days, on average, of receipt of complete packages. Due September 30, 2016

### **Internal Work Activity: Provide Timely and Accurate Representation at the Office of Dispute Resolution (ODRA)**

Represent the Agency before the Office of Dispute Resolution for Acquisition (ODRA)

#### **Activity Target 1:**

The Office of the Chief Counsel will represent the Agency in all matters before ODRA, meeting 100% of deadlines imposed. Due September 30, 2016

### **Internal Work Activity: Provide Timely and Accurate Support for Real Estate Matters**

Provide timely and accurate support for Real Estate matters.

#### **Activity Target 1:**

Process 80% of the transactions within 30 days from the date the property custodian reports the asset as inactive or excess to the Logistics Real Property. Verify 95 % of the annual real property inventory target by the end of the fiscal year. Due September 30, 2016

### **Internal Work Activity: Procurement Support To NAVAID Program Office**

Provide acquisition support to the NAVAID program office in its acquisition of various navigational aids

#### **Activity Target 1:**

Support procurement of ten (10) Medium Intensity Approach Lighting Systems (MALSR) Due September 30, 2016

#### **Activity Target 2:**

Support procurement of five (5) Precision Approach path Indicator (PAPI) systems Due June 30, 2016

### **Internal Work Activity: Procurement Support To Terminal Automation Program Office**

Provide acquisition support to the Terminal Automation program office in its acquisition of various air traffic control automation in the terminal environment. Support procurement of replacement FDIO System Components.

#### **Activity Target 1:**

Support issuance of replacement FDIO System Solicitation. Due December 30, 2015

#### **Activity Target 2:**

Support issuance of replacement FDIO System Contract award. Due June 30, 2016

#### **Activity Target 3:**

Support single source justification for acquisition of additional Terminal Main Display Monitors. Due December 30, 2015

#### **Activity Target 4:**

Contract award/modification for acquisition of additional Terminal Main Display Monitors. Due June 30, 2016

### **Internal Work Activity: Procurement Support To Future Flight Services Program Office**

Support increasing capacity by improving General Aviation Pilot access to the NAS through innovation.

#### **Activity Target 1:**

Support Future Flight Services Program SIR release to industry. Due September 30, 2016

### **Internal Work Activity: Small Business Development**

Meet FAA commitment to small business development and good corporate citizenship.

#### **Activity Target 1:**

Support award of at least 25% of total agency

direct procurement dollars to small business. Due September 30, 2016

### **Internal Work Activity: Managed Print Services Implementation**

Implement managed print services.

#### **Activity Target 1:**

Support completion of 80% of approved milestones owned by ACQ for Managed Print Services acquisition to be completed by June 30, 2016 Due June 30, 2016

### **Internal Work Activity: Optimize Agency Resources Within ANG**

Manage existing contracts within ANG-A1.

#### **Activity Target 1:**

Identify and execute contract options and modifications in a timely manner to ensure no gaps in services. Due September 30, 2016

## **Internal Work Objective: Airport and Environmental Law Services To Build the National Airspace System of the Future**

Provide legal advice and guidance to assist the Office of Airports, Air Traffic Organization, and other lines of business to build the national airspace system of the future by completing review of environmental impact statements for projects at core and capacity-constrained airports and projects to optimize airspace within the metroplexes within 30 days of receipt. Airport and other environmental legal services will be provided in accordance with agency strategic initiatives to make aviation safer and smarter and deliver benefits through technology and infrastructure. J. Collaborate across lines of business and modes and with the U.S. Department of Transportation and Department of Justice to provide excellent representational legal services and training to improve the effectiveness of agency airport and environmental programs.

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### **Internal Work Initiative: Support Airport and Agency Environmental Program Activities**

Support strategic initiatives to increase airport and system capacity and Next Generation system capability. Complete timely and effective legal reviews for infrastructure modernization and military special use airspace projects. Assist in formulating and implementing policies, strategies, and best practices to advance aviation in an environmental responsible and

sustainable manner. Provide timely legal services to help the Office of Airports improve the safety and sustainability of US airports and maintain investment for airport infrastructure that benefits the National Airspace System. In FY 2015 we completed expedited legal review of one draft airport environmental impact statement (EIS) and approximately fourteen airport environmental assessments (EA) including an EA Finding of No Significant Impact/Record of Decision for a replacement airport in Williston, South Dakota. We also streamlined review of Written Reevaluations of four airport EISs including reevaluations for the Chicago O'Hare International Airport Modernization and Philadelphia International Airport Capacity Enhancement Programs. In FY 2015 there was a significant increase in airport and community concerns and requests for noise abatement procedures and meetings, congressional inquiries, and litigation challenging RNAV and OAPM projects largely based on noise issues. We provided written case overviews within 30 days of filing the administrative record in seven cases, reviewed eight initial petitioners/plaintiffs' briefs within 30 days of receipt, assisted DOJ in drafting six respondents' briefs within ten days of receipt, participated in one moot court and provided analysis ten days before oral argument in one case. Continue to adhere to best practices to maintain excellence in representational legal services in multi-year litigation involving the Northern California and DC OAPM projects, Phoenix Sky Harbor International Airport RNAV Procedures, access to Santa Monica, East Hampton, and Dallas Love Field Airports, and the decision approving collection and use of passenger facility charges at Tampa International Airport.

### **Internal Work Activity: Validate Client Priorities and Provide Timely Legal Services to Office of Airports**

Ensure that airport and environmental law services are provided in a manner that reflects agency and primary client priorities, provide timely service in providing advice and processing complaints concerning noncompliance of airport sponsors with grants under 14 CFR Part 16, Rules of Practice for Federally Assisted Airport Enforcement Proceedings.

#### **Activity Target 1:**

Meet periodically, at least twice a year, with primary clients (e.g. ARP, ATO, AEE) to formally identify priorities, address type of legal support needed to advance the projects, obtain client feedback on support provided, and, as necessary, reassess services being provided. Due September 30, 2016

### **Internal Work Activity: Provide Timely Legal Review of NEPA Documents**

Support timely completion of high quality legally defensible NEPA documents to fulfill strategic initiatives to make aviation safer and smarter and deliver benefits through technology and infrastructure. These NEPA documents are necessary to complete airport improvements and air traffic infrastructure projects

**Activity Target 1:**

Except as set forth in Targets 2 and 3 below and Initiative 15C.30G1, complete legal review within timeframes requested to the extent practicable based on other priorities. If the program office has not provided sufficient time for adequate legal review, staff will work with management to notify the program office and advise when legal review will be complete. Due September 30, 2016

**Activity Target 2:**

Legal review of preliminary EISs for airport projects at Core and capacity-constrained airports will be completed within 30 working days of receipt of a technically adequate and complete document. Due September 30, 2016

**Activity Target 3:**

Legal review of preliminary EISs for all other airport projects will be completed within 30 working days of receipt of a technically adequate and complete document 75% of the time. Due September 30, 2016

**Internal Work Activity: Clarify Interpretation of Provisions to Petition Secretary for Review Of Certain Airport Projects Under 49 USC §47106**

Clarify Interpretation of Provisions to Petition Secretary for Review Of Certain Airport Projects Under 49 USC §47106

**Activity Target 1:**

Respond to public comments on Proposed Interpretation. Due December 31, 2015

**Activity Target 2:**

Issue Final Interpretation. Due March 30, 2016

**Internal Work Activity: Policy and Guidance Information for NEPA Compliance Support**

Provide policy and guidance on the requirements on the National Environmental Policy Act and related natural and cultural resource issues.

**Activity Target 1:**

Maintain an updated Order 1050.1F Desk

Reference and provide guidance, oversight and support for FAA NEPA activities by September 30. Due September 30, 2016

**Activity Target 2:**

Complete the updated Community Involvement Manual and complementary actions and products to facilitate awareness and use of the new approaches, practices, and tools by FAA practitioners by Sept 30. Due September 30, 2016

**Internal Work Activity: Provide Guidance and Coordinate FAA Sustainability Efforts**

Provide guidance and coordinate FAA sustainability efforts.

**Activity Target 1:**

Update the FAA Strategic Sustainability Performance Plan (SSPP) in accordance with guidance from the Department of Transportation and Presidential Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance. This item requires critical support from ATO, ANG (including ANG-E), AFN (including ACQ, ABA, AIO, ARC, and MMAC), ARP, AGC, AHR, AVS, and AST. Due September 30, 2016

**Internal Work Activity: Timely and Effective Provision of Representational Legal Services**

Provide timely and effective representational legal services to deliver benefits through technology and modernized National Airspace System infrastructure.

**Activity Target 1:**

No later than 30 days after the certified list of documents comprising the administrative record has been filed, contact the U.S. Department of Justice attorney and provide a written overview of the key issues in the case. Due September 30, 2016

**Activity Target 2:**

Review petitioners' initial briefs within 2 weeks of receipt and provide written comments on the accuracy of the statement of facts, with references to the administrative record. Due September 30, 2016

**Activity Target 3:**

Assist the U.S. Department of Justice attorney in drafting respondents' briefs, as requested, within 10 business days of the request. Due September 30, 2016

**Activity Target 4:**

Review petitioners' reply briefs and provide any appropriate additional analysis and comments, with references to the administrative record at least ten days before oral argument is held. Participate in moot courts to help the Department of Justice attorney prepare for oral arguments. Due September 30, 2016

**Internal Work Activity: Recurrent Training for Practice Area**

Conduct recurrent training for attorneys in our practice area.

**Activity Target 1:**

Form Committee. Due December 31, 2015

**Activity Target 2:**

Draft Agenda, identify speakers. Due April 29, 2016

**Activity Target 3:**

Identify and confirm a location. Due July 1, 2016

**Activity Target 4:**

Conduct the training. Due September 23, 2016

**Internal Work Activity: Support Recurrent Training and Industry Conferences**

Support Recurrent Training and Industry Conferences.

**Activity Target 1:**

Provide speakers to enhance understanding of current legal issues and legal compliance at recurrent training conducted by lines of business and industry conferences as requested, consistent with availability of funding. Due September 30, 2016

**Internal Work Objective: Ensure the Nation's System of Airports Has the Right Technology and Infrastructure to Support Evolving Needs.**

Ensure the nation's system of airports has the right technology and infrastructure to support evolving needs.

**Internal Work Initiative: Align Airport Infrastructure with Demand**

Support improvements in airport infrastructure to enhance airport safety and capacity while also protecting airport accessibility.

**Internal Work Activity: Align airport infrastructure**

Create policy guidance

**Activity Target 1:**

Commission new Runway 10R/28L at Chicago O'Hare International Airport Due December 31, 2015

**Activity Target 2:**

Increase by 10% draft Part 16's submitted to AGC for legal review for a FY16 total of 11 cases. Due September 30, 2016

**Activity Target 3:**

Increase with 20% the number of Part 16 reviews completed by AGC in 2015 for a total of 10 cases. Due September 30, 2016

**Activity Target 4:**

By December 31, 2015, submit draft guidance to AGC and APO on evaluating requests for NPIAS airport closure, and by August 31, 2016 complete coordination with APO and AGC (draft guidance to be published for notice and comment during FY-2017). Due August 31, 2016

**Activity Target 5:**

Complete MOA for EIS for proposed airfield capacity enhancements at Charlotte/Douglas International Airport; Due March 31, 2016

**Internal Work Initiative: Accommodate New Entrants to the Aviation System**

Complete internal ARP coordination on definition of which types of Unmanned Aircraft Systems (UASs) and commercial space activity represent "aeronautical use".

**Internal Work Activity: Accommodate new entrants to the aviation system**

Policy work.

**Activity Target 1:**

Prepare an internal ARP draft policy defining what types of UAS and commercial space activity represent 'aeronautical use' for purposes of evaluating airport access and determining what types of operations could count toward planning thresholds for facility requirements and project

justification. (ACO-1 lead with support by AAS and APP) Due June 30, 2016

Provide legal assistance to FAA Program Offices on technical issues involving ICAO Standards and Recommended Practices. Serve as legal representatives at upcoming ICAO meetings, as necessary.

## Enhance Global Leadership

In support of the FAA's goal of maintaining U.S. leadership in global civil aviation, AGC assists in developing the agency position on international law issues and serves as a liaison for FAA international aviation legal matters with other government agencies and industry. AGC attorneys provide legal services relating to drafting and negotiating international agreements on safety oversight, air traffic, airworthiness, technical assistance, and other aviation related areas. The attorneys also prepare the U.S. position on matters before the International Civil Aviation Organization (ICAO); represent the FAA in ICAO legal fora; and provide legal policy guidance on registration of aircraft and recordation of property rights in aircraft.

### Activity Target 1:

Provide (i) legal support by reviewing ICAO initiatives, including proposals for new or revised international standards and recommended practices; and (ii) legal assistance to FAA program offices in implementation of any new ICAO standards and recommended practices. Due September 30, 2016

### Activity Target 2:

Provide legal input on USG positions for meetings in ICAO and other international organizations as necessary. Due September 30, 2016

### Activity Target 3:

Serve as FAA legal clearance point for the Interagency Group on International Aviation (IGIA) by performing initial review and coordination of 75% of U.S. positions and strategies by the deadlines specified in a particular IGIA paper. Due September 30, 2016

### Activity Target 4:

Represents the United States on ICAO legal bodies as required. Due September 30, 2016

## Internal Work Activity: International Aviation Safety Assessment Audits (IASAs)

Implement and support the IASA program by (1) conducting legal assessment of the civil aviation laws, regulations, and enforcement systems of foreign aviation authorities for compliance with minimum international aviation safety standards established under the Convention on International Civil Aviation; (2) assisting with communicating the results of the assessment to both representatives the assessed country and the U.S. embassy staff; and (3) assisting the program office in development of policy for execution of the Administrator's responsibility for the safety of foreign air carriers.

### Activity Target 1:

Cooperate with AFS-50 in scheduling and conducting IASA assessments, consultations, or final discussions, including the review of cables to foreign governments about IASA activities. Due September 30, 2016

### Activity Target 2:

Participate in the development and presentation of

## Internal Work Objective: International Legal Services

Provide legal services as required to FAA program offices responsible for promoting USG interests with other countries and international organizations, including (ICAO). Assist API in meeting work plan milestones. Complete legal sufficiency reviews within timeframes that meet defined client needs by (i) providing the initial review of 80% of template-based technical assistance agreements for international activities within 15 working days of receipt, and (ii) by performing initial review and coordination of 90% U.S. positions and strategies by the deadlines specified in a particular Interagency Group on International Aviation (IGIA) paper.

## Internal Work Initiative: Support Client Offices

Provide legal services relating to drafting and negotiation of international agreements; prepare the U.S. position on matters before ICAO; and provide legal support for the client offices with international legal issues through the provision of legal services. Provides legal services to ensure strategic priorities of the Administrator, and primary clients are met by (i) providing the initial review of 80% of template-based technical assistance agreements for international activities within 15 working days of receipt, and (ii) by performing initial review and coordination of 75% U.S. positions and strategies by the deadlines specified in a particular interagency Group on International Aviation (IGIA) paper.

## Internal Work Activity: Promote USG Interests at the International Civil Aviation Organization (ICAO)

IASA training program for legal and technical staff.  
Due September 30, 2016

**Activity Target 3:**

Participate in the development of IASA policies and procedures and in the revision of cables as requested by the program office. Due September 30, 2016

**Internal Work Activity: Efficient Processing of International Aspects of Rulemakings**

Provide legal counsel on international aspects of agency rulemaking projects.

**Activity Target 1:**

In coordination with AGC-200, monitor priorities for rulemakings with international implications. Due September 30, 2016

**Activity Target 2:**

Provide international legal support and guidance on regulations and rulemakings as needed by AGC-200. Due September 30, 2016

**Activity Target 3:**

Provide legal review of, and guidance on, the international aspects of draft NOTAMs, SFARs, responses to petitions for exemptions to SFARs, requests for approvals, and other related FAA actions to be taken in response to a particular event within the timeframes dictated by the nature of the event and the response expected of the FAA. Due September 30, 2016

**Activity Target 4:**

Provide legal counsel on international legal issues in the work of the Crisis Response Working Group (CRWG) and Crisis Response Steering Group (CRSG). Due September 30, 2016

**Internal Work Activity: Technical Assistance**

Provide legal technical assistance efforts to foreign aviation authorities, either independently or in conjunction with FAA program offices or other USG agencies or programs, including the DOT Safe Skies for Africa Program, in furtherance of FAA international aviation safety and/or efficiency objectives and to achieve global harmonization with ICAO standards. Provide legal advice, representation, international legal policy guidance and legal sufficiency reviews relating to international technical assistance activities in a timely and responsive manner.

**Activity Target 1:**

Provide legal technical assistance to countries or regional organizations directed at achieving compliance with ICAO civil aviation standards for primary aviation law, regulations, enforcement systems, and related issues. Due September 30, 2016

**Activity Target 2:**

Support FAA program offices and the Office of the Secretary of Transportation by (i) assisting in identification of priority countries for technical assistance, including technical reviews or the development of action plans for achieving compliance with international standards; (ii) participating in technical reviews; and (iii) when requested by a foreign authority, participating in action planning when deficiencies in the primary aviation law, regulations, or enforcement system have been identified. Due September 30, 2016

**Activity Target 3:**

Provide legal review of FAA policies and procedures for providing technical assistance to foreign aviation authorities as needed. Due September 30, 2016

**Activity Target 4:**

Continue to provide support and guidance to FAA program offices in implementing the expanded international technical assistance authority provided in the 2012 FAA reauthorization. Due September 30, 2016

**Internal Work Activity: International Agreements**

Provide legal counsel to business lines and staff offices for international activities to support agency objectives by providing advice on agreement strategies, review of international agreements, and legal coordination with necessary U.S. government agencies (particularly the U.S. Department of State). Participate in negotiations with foreign civil aviation authorities, air navigation service providers, and research and development organizations.

**Activity Target 1:**

Provide initial review of 80% of template-based technical assistance agreements for international activities within 15 working days of receipt in the legal office. Due September 30, 2016

**Activity Target 2:**

As necessary, develop and submit to the U.S. Department of State for clearance (i) new agreement templates; (ii) agreements designed to accomplish specific international objectives of the

FAA that are not otherwise addressed in the standard templates; and (iii) draft Circular 175 packages. Due September 30, 2016

**Activity Target 3:**

Meet regularly with program offices to identify priorities, define the scope of a project to be covered in an agreement, discuss the legal support necessary for agreements, and coordinate realistic strategies and timelines given the complexity and urgency of individual agreements. Due September 30, 2016

**Activity Target 4:**

Provide legal support for all agreements, annexes, or appendices for technical assistance, air navigation services, operational data sharing, research and development, and the transfer of oversight functions pursuant to Article 83 bis to the Chicago Convention. Due September 30, 2016

**Activity Target 5:**

Provide legal clearance and assistance to AIR and AFS in drafting, negotiating, and implementing international safety agreements, implementation procedures (IPs), or amendments to existing agreements or IPs. Due September 30, 2016

## **Internal Work Initiative: Assist in Development and Implementation of the FAA's Global Leadership Initiative (GLI)**

Provide assistance to the Executive Director for International Affairs in development, oversight, and execution of the FAA's International strategy.

### **Internal Work Activity: Assist in Development and Implementation of the FAA's Global Leadership Initiative (GLI)**

Provide assistance to the Executive Director for International Affairs in development, oversight, and execution of the FAA's International strategy.

**Activity Target 1:**

Support the Chief Counsel and Principal Deputy Chief Counsel's participation in the International Advisory Board (IAB). Due September 30, 2016

**Activity Target 2:**

Participate in the staff-level International Steering Committee (ISC). Due September 30, 2016

## **Empower and Innovate with the FAA's People**

In support of the agency's objective of building and enhancing our high performance workforce, AGC continues to support the numerous agency-wide strategic initiatives and provide legal services in support of the administrative activity of the agency, including employment and labor law services, ethics counsel, FOIA and Privacy Act services, and legislative services. The largest legal practice group within this goal area is our employment law office. The employment law attorneys represent the agency before various administrative and federal courts and provide advice and guidance to the Administrator and primary client offices on personnel, labor, civil rights, equal employment opportunity matters. They also counsel on ways to minimize the legal risks relating to employment decisions and policy. Moreover, AGC have programmatic responsibility for administration and oversight of the agency's compliance with government-wide ethics requirements.

## **Strategic Objective: Workforce of the Future**

Prepare FAA's Human Capital for mission-critical transformational changes by identifying, recruiting and training a workforce with the leadership, technical and functional skills to ensure the safest and most productive aviation sector.

### **Strategic Initiative: Attracting Talent**

Operate efficient and effective hiring processes and conduct consistent corporate on-boarding.

#### **Strategic Activity: Strategic Workforce Planning**

Review the encumbered core compensation positions report from the Federal Payroll and Processing System (FPPS) on a quarterly basis to identify positions which are vacant and/or projected to be vacant within 90 days.

**Activity Target 1:**

Provide current and projected vacancies for core compensation positions to AHR, via KSN, no later than (NLT) 30 days after posting of the quarterly FPPS report. Due September 30, 2016

## **Internal Work Objective: Hiring Persons with Targeted Disabilities (PWTD)**

Support the DOT Strategic Objective to build a capable, diverse, and collaborative workforce of highly-skilled, innovative, and motivated employees by increasing the hiring of PWTD for eligible positions to 3 percent by 2018. In FY 2016, ACR in collaboration with the FAA LOBs/SOs

will ensure that at least 2.33% of all FAA new hires are PWTD.

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### **Internal Work Initiative: Hiring PWTD**

The FAA line of businesses and staff offices (LOBs/SOs) will work collaboratively to support the DOT goal to increase the representation of PWTD in the workforce by ensuring that at least 2.33% of all FAA new hires are PWTD. Each year, FAA will increase incrementally the percentage of PWTD hires by .33% per year to reach the 3% DOT hiring goal by 2018.

#### **Internal Work Activity: Hiring PWTD**

In FY 16, the Office of Civil Rights in collaboration with the FAA LOBs/SOs will ensure that at least 2.33% of all FAA new hires are PWTD.

##### **Activity Target 1:**

The head of each LOB/SO will issue a memorandum (key language will be provided by ACR) directed to their managers promoting the PWTD hiring goal. Due January 31, 2016

##### **Activity Target 2:**

Each LOB/SO will report to ACR their total hiring projections for FY 16, and identify the estimated number of PWTD hires required to meet their 2.33% hiring goal. Due April 30, 2016

##### **Activity Target 3:**

Managers with hiring authority from each LOB/SO will participate in one consultation session held by the National People with Disabilities Program Manager to establish hiring initiatives. Due June 30, 2016

##### **Activity Target 4:**

Meet with AHR and ACR to develop recruitment plan. Due October 31, 2015

##### **Activity Target 5:**

Present PWTD plan to AGC-1 and AGC-2. Due November 30, 2015

##### **Activity Target 6:**

Implement Plan. Due January 30, 2016

### **Internal Work Objective: Alternative Dispute Resolution (ADR)**

Encourage the FAA workforce to engage in the ADR process as a method to resolve disputes in the EEO Complaint Process at the lowest possible level to avoid the cost, delay, and unpredictability of the traditional adjudicatory processes.

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### **Internal Work Initiative: ADR Engagement**

Encourage workforce to resolve disputes in an amicable way by utilizing the ADR process.

#### **Internal Work Activity: ADR Engagement**

ACR, in coordination with the LOBs/SOs, will ensure that 70% of all managers engage in mediation when requested by employees.

##### **Activity Target 1:**

Assist Agency effort with ADR engagement by ensuring that 70% of all managers engage in mediation when requested by employees. Due September 30, 2016

### **Internal Work Objective: EEO/Diversity and Inclusion Action Committee (EAC)**

The EAC oversees and supports the FAA efforts to create a diverse and inclusive workplace that ensures equal opportunity for all its employees.

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### **Internal Work Initiative: EAC**

In collaboration with the LOBs/SOs, ACR will identify recommendations and strategies regarding EEO and diversity efforts within the FAA workplace.

#### **Internal Work Activity: EAC**

Identify recommendations and strategies regarding EEO and diversity efforts within the FAA workplace.

##### **Activity Target 1:**

Analyze and present demographic data in comparison to the civilian labor force statistics to the EAC; and identify strategies and actions for improving groups with lower than expected participation rates. Due November 30, 2015

##### **Activity Target 2:**

Support Agency efforts to implement and/or revise performance evaluation methods to the managers EEO performance standard. Due September 30, 2016

##### **Activity Target 3:**

Identify and track Diversity and Inclusion initiatives through the EAC Workgroups. Due September 30, 2016

## **Internal Work Objective: Workforce of the Future Mission Support**

Support the FAA in meeting its goals and objectives with a back to basics approach supporting innovative HR systems; strong, strategic and effective communications through the most valuable resource, PEOPLE.

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### **Internal Work Initiative: HR Core Services**

Improve the efficiency, effectiveness and timeliness of HR programs and services in support of the FAA's mission and workforce.

#### **Internal Work Activity: FAA Human Resource Management (HRM) Policy Framework**

Collaborate with AHR (specifically the HRM System Framework work group led by the HR Policy and Compliance Division, AHR-100) to refine, brief, and gain FAA stakeholder and management concurrences on the changes to the framework document (currently referred to as the FAA Personnel Management System (PMS)).

##### **Activity Target 1:**

Actively participate with the work group to brief the document to various groups of FAA stakeholders, research and respond to issues and questions raised, assist with refinements to the document, assist in meeting labor relations and collective bargaining obligations, and provide formal AGC concurrence before the document is presented to the Administrator for transmission to DOT for review and concurrence. Due August 31, 2016

#### **Internal Work Activity: FAA Human Resource Management Policy Framework**

Streamline and update foundational Human Resource Management policy framework.

##### **Activity Target 1:**

Provide legal support to complete internal AHR coordination of draft Human Resource Management System (HRM) framework document. Due March 31, 2016

##### **Activity Target 2:**

Complete coordination and vetting of draft HRM framework with FAA stakeholders. Due July 31, 2016

##### **Activity Target 3:**

Send HRM framework document to DOT for vetting. Due September 30, 2016

### **Internal Work Activity: Air Traffic Control Specialist (ATCS) Hiring Process**

Continuously improve the ATCS hiring process to deliver innovative and defensible strategies to recruit, assess and hire ATCS.

##### **Activity Target 1:**

Provide subject matter expertise and assign a dedicated resource to support a plan to replace the Air Traffic Selection and Training (AT SAT) assessment tool. Due September 30, 2016

##### **Activity Target 2:**

Provide legal support and review for AHR's review of FAA's performance during the FY2015 specialized and general experience recruitment process, focusing on internal management and administrative processes, and draft an after action report which identifies strengths, weaknesses, and opportunities for improvement for the FY2017 ATCS recruitment. Due June 30, 2016

## **Internal Work Objective: Equal Employment Opportunity (EEO) Training**

Assist Agency efforts to create a FAA culture in which managers and employees understand their role in creating and maintaining an inclusive workplace by providing training on EEO laws, FAA policies, and appropriate workplace behavior.

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### **Internal Work Initiative: EEO Training**

Increase workforce competency of EEO laws, FAA policies and appropriate workplace behavior through EEO Training.

#### **Internal Work Activity: EEO Training Requirements for FAA Workforce**

Increase workforce competency of EEO laws, FAA policies and appropriate workplace behavior.

##### **Activity Target 1:**

Monitor and report monthly on the completion of NO FEAR training to ensure 100% completion rate. Due September 30, 2016

##### **Activity Target 2:**

Ensure that 60% of management complete at least one EEO training course. Due September 30, 2016

**Activity Target 3:**

Ensure that 10% of employees complete at least one EEO training course. Due September 30, 2016

**Internal Work Activity: EEO Training for Agency Managers**

Provide monthly EEO training to agency managers.

**Activity Target 1:**

Provide monthly training to Agency managers about the EEO process and working with EEO investigators. Due September 30, 2016

**Internal Work Objective: Personnel & Labor Law Legal Services**

Meet 100% of EEOC, MSPB, and federal court employment case deadlines.

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**Internal Work Initiative: Legal Services in Labor and Personnel Law**

Represent the FAA in administrative and court litigation having a potentially significant impact on any law, regulation, or FAA policy relating to the employment of FAA personnel and provide timely and effective legal advice regarding employment matters. Provide legal services and representation in a timely and effective manner reflecting agency priorities and continue to improve the Agency's employment practices by identifying ways of minimizing the FAA's legal risk relating to employment decisions and policy.

**Internal Work Activity: Legal Representation and Policy Advice**

Represent the FAA in administrative and court litigation having a potentially significant impact on any law, regulation, or FAA policy relating to the employment of FAA personnel.

**Activity Target 1:**

Meet 100% of EEOC, MSPB, and federal court employment case deadlines. Due September 15, 2016

**Internal Work Activity: Develop Template Litigation Pleadings, Discovery Documents and Brief Bank for Employment Lawyers**

Develop Standard/Template Pleadings, Discovery Documents and a Brief Bank for Representation in EEOC and MSPB cases to ensure use of best

practices and to bring greater consistency to AGC's employment practice area.

**Activity Target 1:**

Work with ELC to develop electronic system of organizing the repository with extant Agency and AGC resources. Due November 30, 2015

**Activity Target 2:**

Gather and review sample documents. Due February 28, 2016

**Activity Target 3:**

Populate database and provide access to all employment lawyers in AGC. Due May 31, 2016

**Internal Work Activity: NATCA Contract Negotiations**

Support AHR to prepare and negotiate NATCA contract.

**Activity Target 1:**

Provide legal review and advice to contract negotiation team. Due January 31, 2016

**Activity Target 2:**

Provide legal support and advice during NATCA contract negotiations. Due September 30, 2016

**Internal Work Activity: Centralize Legal Review of schedule/overtime/Leave MOA**

Centralize legal review of Watch Schedule/Overtime/Leave Memoranda of Understanding between the FAA and NATCA.

**Activity Target 1:**

Centralize in Headquarters, legal review of basic watchschedule, annual leave, and overtime agreements that are negotiated annually at EnRoute Air Traffic Centers and large TRACONS. Due July 31, 2016

**Internal Work Activity: Trend Analysis EEOC/MSPB Decisions**

Review EEOC findings of discrimination and MSPB decisions that failed to sustain Agency action to identify lessons learned and possible topics for attorney training.

**Activity Target 1:**

Track EEOC and MSPB decisions on a quarterly basis from across AGC. Due September 30, 2016

**Activity Target 2:**

Brief lessons to AGC employment attorneys during

quarterly employment law telecons. Due September 30, 2016

## **Internal Work Initiative: Manage Ethics Program and Related Legal Services**

Timely management of Agency Ethics Program

### **Internal Work Activity: Manage Ethics Program and Related Legal Services**

Provide training to Agency Ethics Program Coordinators (EPCs) and New Ethics Officials (ECs).

#### **Activity Target 1:**

Train EPCs on program management duties under Order 3750.7A prior to the opening of the filing cycle. Due September 30, 2016

#### **Activity Target 2:**

Train New Ethics officials within 45 days of their designation as a new Ethics Official, to prepare and provide ethics opinion(s). Due September 30, 2016

#### **Activity Target 3:**

Prepare and provide ethics opinions within 60 days of receiving the request and any AGC requested supporting documentation. Due September 30, 2016

### **Internal Work Activity: Financial Disclosures**

Train and educate employees on requirements for reporting financial disclosures in accordance with OGE requirements.

#### **Activity Target 1:**

Provide support for employees within 10 days of receiving a request from the employee asking questions regarding their accurate and timely completion of financial disclosure forms. Due September 30, 2016

### **Internal Work Activity: Ethics Training**

Train and educate employees on the OGE Standards of ethical Conduct.

#### **Activity Target 1:**

Identify FAA Offices that require Ethics training to minimize potential for conflicts of interests. Due March 30, 2016

#### **Activity Target 2:**

Provide ethics training for targeted office. Due September 30, 2016

## **Internal Work Activity: Prohibited Financial Interests**

Establish Standard Operating Procedures (SOP) for collecting and determining new prohibited financial interests.

#### **Activity Target 1:**

AGC-110 establishes efficient and effective manner to collect and determine new prohibited financial interests. Due December 31, 2015

#### **Activity Target 2:**

AGC-100 prepares and drafts new process. Due January 29, 2016

#### **Activity Target 3:**

Complete coordination and vetting of draft with Region/Center Ethics Officials and AGC-1/2. Due February 28, 2016

#### **Activity Target 4:**

Publish Final and distribute to Program Organizations for collection of information on regulated entities and companies doing business with FAA. Due September 30, 2016

## **Internal Work Activity: Ethics Training - HR On-Boarding Orientation**

Coordinate with HR Ethics Training during On-Boarding Orientation.

#### **Activity Target 1:**

Coordinate with AHR to ensure participation in the process. Due October 30, 2015

#### **Activity Target 2:**

Develop Ethics presentation for new employees. Due January 30, 2016

#### **Activity Target 3:**

Participate in New On-Boarding Orientation Program with AHR to provide Ethics briefings to new agency employees. Due September 30, 2016

## **Internal Work Activity: Agency Ethics Legal Advice Consolidation**

Assess how ethics legal advice is currently handled within AGC nationwide and recommend any changes to improve the quality and efficiency of ethics legal advice.

#### **Activity Target 1:**

Establish a joint Regional and Headquarters team and benchmark how all ethics legal advice currently is handled throughout AGC. Due September 30, 2016

**Activity Target 2:**

Identify the advantages and disadvantages of consolidating ethics legal advice and the possible consolidation models that might be used, assessing whether to recommend any organizational changes in the way ethics legal advice should be handled. Due September 30, 2016

**Activity Target 3:**

Recommend to AGC-1 whether ethics legal advice should be consolidated within AGC and the model for any such consolidation. Due September 30, 2016

## Internal Work Objective: FAA Historian Function

Researches and provides rough draft of FAA Alaskan Region history; completes and publishes 2015 FAA Chronology by January 31, 2016; prepares history-related materials; responds to routine internal and external requests for information generally within two weeks.

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### Internal Work Initiative: FAA Historian

Research, write, and maintain material necessary to document FAA's role and accomplishments as the premier aviation authority in the world.

**Internal Work Activity: FAA Historian**

Research and provide rough draft of FAA Alaska Region history; prepare FAA history-related materials; and respond to requests for information.

**Activity Target 1:**

Research and provide rough draft FAA Alaska Regional history. Due September 30, 2016

**Activity Target 2:**

Prepare and have posted on FAA history website the 2015 FAA Chronology. Due January 30, 2016

**Activity Target 3:**

Respond to routine internal and external requests for information generally within two weeks. Due September 30, 2016

## Internal Work Objective: Law Library Legal Research Services

Provide internal legal research services generally within 5 days of request and external research services generally within two weeks.

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## Internal Work Initiative: Law Library Legal Research Services

Provide legal research services upon request within established time frames.

### Internal Work Activity: Law Library Services

Ensure FAA employees receive prompt and appropriate legal research to ensure mission success.

**Activity Target 1:**

Provide legal research for internal FAA requests generally within 5 days of request, unless the requester identifies a later date. Due September 30, 2016

**Activity Target 2:**

Provide legal research for the external aviation community generally within two weeks of request. Due September 30, 2016

## Internal Work Objective: General Legal Services & Other Legal Services

Meet client due dates 80% of the time.

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### Internal Work Initiative: General Legal Services & Other Legal Services

Various small practice areas related to administrative requirements imposed on the agency by statute, including Ethics, FOIA, Privacy Act, Alternative Dispute Resolution and Legislation.

### Internal Work Activity: Review of FOIA Appeals

Provide timely review of the appeal of initial FOIA decisions.

**Activity Target 1:**

Prepare appeal responses within 20 days of the receipt of a complete FOIA appeal package in 60 percent of the appeals. Due September 30, 2016

## Internal Work Objective: Acquisition & Commercial Law Services Division Support of Strategic Initiative: Workforce of the Future

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Provide legal support for acquisition workforce training and quality assurance needed to achieve the Workforce of the Future Strategic Initiative and other high priority goals.

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### **Internal Work Initiative: Acquisition & Commercial Law Services Division Support of Strategic Initiative: Workforce of the Future**

Provide legal support for acquisition workforce training and quality assurance needed to achieve the Workforce of the Future Strategic Initiative and other high priority goals. In particular, this Core Initiative supports the Workforce of the Future Aspiration: Drive results and deliver on services and assignments. The Division's staff provides training and quality assurance to the FAA's Acquisition Workforce.

#### **Internal Work Activity: Legal Support to National Acquisition Evaluation Program (NAEP)**

Participate in formal oversight program to review solicitations and contracts through the National Acquisition Evaluation Program (NAEP). Based on the result of these reviews assist with corrective actions as necessary.

##### **Activity Target 1:**

Provide legal support to NAEP audits done in FY2014. Due September 30, 2016

##### **Activity Target 2:**

Review and provide input to the NAEP reports and assist the contracting office with any proposed corrective action plans. Due September 30, 2016

#### **Internal Work Activity: Training and Certification in Key Acquisition Disciplines**

Train, develop, and certify personnel in key acquisition disciplines to ensure FAA has sufficient numbers of skilled acquisition professionals (current and pipeline) to successfully manage acquisitions.

##### **Activity Target 1:**

Provide training to designated acquisition professionals on legal aspects of acquisition for all three service centers on at least three different acquisition topics. Due September 30, 2016

##### **Activity Target 2:**

The Office of the Chief Counsel will deliver acquisition training to designated COTR's and Contracting Officers (at all levels) for all three

service centers on at least three different acquisition topics. Due September 30, 2016

### **Internal Work Objective: Office Of The Chief Counsel (AGC) Regional Practice Areas Management**

Develop management plan for managing regional practice areas in the Office of the Chief Counsel (AGC).

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#### **Internal Work Initiative: Office Of The Chief Counsel (AGC) Regional Practice Areas Management**

Develop management plan for managing Office of the Chief Counsel regional practice areas.

#### **Internal Work Activity: Management of Regional Practice Areas**

Develop management plan for managing AGC-700 practice areas.

##### **Activity Target 1:**

Identify work flow processes and evaluate existing workloads by field office, using data from MTIS and LDR. Due December 15, 2015

##### **Activity Target 2:**

Present proposal for field office workloads, identifying which practice areas will be performed in which offices, and by what resources. Due March 29, 2016

##### **Activity Target 3:**

Finalize plan from Target 2. Due May 31, 2016

##### **Activity Target 4:**

Create workload shifting plan to equalize workloads and to shift work to comply with final plan from Target 3. Due September 30, 2016

#### **Internal Work Activity: Standard Information Templates**

Develop templates for standard information to be pulled from MTIS for the AGC-700 managers.

##### **Activity Target 1:**

Identify templates for 2 practice areas. Due December 31, 2015

##### **Activity Target 2:**

Identify templates for 2 additional practice areas. Due March 15, 2016

**Activity Target 3:**

Identify templates for remaining practice areas.  
Due June 30, 2016

**Activity Target 4:**

Adjust MTIS rules and tips for each practice area.  
Due September 30, 2016

### **Internal Work Activity: Security Clearances and Position Sensitivity**

Identify and recommend Security clearances and Position Sensitivity levels for AGC-700 attorneys

**Activity Target 1:**

Identify and recommend Security clearances and Position Sensitivity levels for AGC-700 attorneys, considering the position duties and responsibilities as well as budget implications. Due December 15, 2015

### **Internal Work Activity: Incorporation of I Band Attorneys**

Review and recommend options for incorporating new I Band attorneys.

**Activity Target 1:**

Review and recommend options for incorporating new I Band attorneys into either AGC-300 or AGC-700. Due June 15, 2016

## **Internal Work Objective: Office of the Chief Counsel (AGC) Training Objectives**

Identify, review and develop training objectives and initiatives for the Office of the Chief Counsel employees.

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### **Internal Work Initiative: Office of the Chief Counsel (AGC) Training Objectives**

Identify, review and develop training objectives and initiatives for the Office of the Chief Counsel employees.

### **Internal Work Activity: On-Boarding Checklist**

Prepare on-boarding checklist for new hires in the Office of the Chief Counsel (AGC).

**Activity Target 1:**

Prepare on-boarding checklist for new hires. Due December 31, 2015

### **Internal Work Activity: Recurrent Training Plan**

Identify and develop an initial and recurrent training plan for AGC employees on systems applications used by all employees, such as MTIS, eLMS, CASTLE, and E2

**Activity Target 1:**

Develop an initial training program designed for new employees. Due December 31, 2015

**Activity Target 2:**

Develop a recurrent training program for AGC employees, identifying best practices and personnel resources to provide in-house assistance. Due March 31, 2016

### **Internal Work Activity: Improve Substantive Legal Knowledge**

Develop a training plan for AGC employees to improve substantive legal knowledge and foster a better understanding of industry issues.

**Activity Target 1:**

Meet with legal practice area representatives to identify training needs and desires for FY 2016. Due November 30, 2015

**Activity Target 2:**

Identify at least two practice areas for targeted in-house training. Due November 30, 2015

**Activity Target 3:**

Design and deliver training in the practice areas identified above. Due September 30, 2016

### **Internal Work Activity: Training Plan for Office of the Chief Counsel (AGC) Support Staff**

Develop and implement a training plan for support staff in accordance with the Support Staff Study Group Recommendations dated September 3, 2015.

**Activity Target 1:**

Identify and prioritize training needs for support staff. Due November 30, 2015

**Activity Target 2:**

Recommend a specific training plan in at least two practice areas, including participants, training curriculum, and training methodology. Due February 28, 2016

**Activity Target 3:**

Deliver training in at least two practice areas to support staff. Due September 30, 2016

## **Internal Work Objective: AGC Employee Engagement Index**

Raise AGC's Employee Engagement Index score from the FY 2015 score of 63% to 66% in FY 2016.

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### **Internal Work Initiative: AGC Employee Engagement**

Raise AGC's Employee Engagement Index score from the FY 2015 score of 63% to 66% in FY 2016.

#### **Internal Work Activity: AGC Employee Engagement Index**

Raise AGC's Employee Engagement Index score from the FY 2015 score of 63% to 66% in FY 2016.

##### **Activity Target 1:**

Raise AGC's Employee Engagement Index score from the FY 2015 score of 63% to 66% in FY 2016. Due September 30, 2016

## **Internal Work Objective: AGC FY16 Management Objectives**

The Office of the Chief Counsel (AGC) supports the FAA's strategic objectives by providing legal services to the FAA Administrator and all agency organizations. In support of the Agency's objective to empower and innovate with the FAA's People, AGC has developed organizational management objectives for AGC executives to achieve during this fiscal year.

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### **Internal Work Initiative: AGC FY16 Management Objectives**

The Office of the Chief Counsel (AGC) has identified organizational management objectives to be achieved during FY2016.

#### **Internal Work Activity: Implementation of Study Group Recommendations**

During FY16 AGC will implement study group recommendations.

##### **Activity Target 1:**

Develop an onboarding process to acquaint new hires with the agency, its mission, clients' lines of business and AGC. Due June 30, 2016

##### **Activity Target 2:**

Consolidate support staff series and develop core competencies and standards applicable to these support staff series. Due January 30, 2016

##### **Activity Target 3:**

Implement 75% of proposed reductions identified by Legal Resources Study Group. Due September 30, 2016

### **Internal Work Activity: Office Governance**

Improve office governance during FY 2016.

##### **Activity Target 1:**

Develop for consideration and discussion plan to restructure non-enforcement regional practice areas. Due June 30, 2016

##### **Activity Target 2:**

Establish and receive reports from two new study groups - management processes and practices and client relationships. Due July 31, 2016

### **Internal Work Activity: Training**

Develop and implement training plans for AGC Employees

##### **Activity Target 1:**

Develop a training plan for AGC attorneys to improve substantive legal knowledge by identifying training needs. Due January 30, 2016

##### **Activity Target 2:**

Ensure oral communication skills training is available for all attorneys. Due January 30, 2016

##### **Activity Target 3:**

Develop and implement training for support staff on systems applications and software (MTIS, EIS, eLMS and Adobe Professional) to support staff. Due September 30, 2016