U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
National Policy

ORDER
FS 8000.96A

Effective Date:
11/1/23

SUBJ: Flight Standards Service Guidance Document Development

This Federal Aviation Administration (FAA) Flight Standards Service (FS) order establishes the policy and guidelines for FS personnel who develop, update, or change FS policy and guidance documents, including directives and advisory circulars (AC).

Wesley L. Mooty

Wesley L. Mooty
Acting Deputy Executive Director, Flight Standards Service

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Chapter 1. General Information

1. Purpose of This Order. This order establishes policy and provides information on how the Flight Standards Service (FS) creates, reviews, publishes, evaluates, amends, and cancels directives and guidance documents. This information should be utilized as a foundation for all document production within FS. This order contains guidance that is pertinent to DOT Order 2100.6A, Rulemaking and Guidance Procedures, Office of Management and Budget (OMB) Bulletin No. 07-02, Agency Good Guidance Practices (GGP), and Executive Orders 12866, Regulatory Planning and Review, and 13563, Improving Regulation and Regulatory Review.

2. Audience. All FS employees who write or review policy and guidance documents.

3. Where You Can Find This Order. You can find this order on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices and the Dynamic Regulatory System (DRS) at https://drs.faa.gov. Operators and the public can find this order on the Federal Aviation Administration's (FAA) website at https://www.faa.gov/regulations_policies/orders_notices and DRS.

4. What This Order Cancels. This order cancels:

- FAA Order 8000.87A, Safety Alerts for Operators, dated October 24, 2006;
- FAA Order 8000.91, Information for Operators (INFO), dated October 20, 2006;
- FAA Order FS 8000.96, Flight Standards Service Guidance Document Development, dated January 7, 2016; and
- FAA Order 8900.3, Flight Standards Service Document Control Board, dated March 2, 2012.

5. Effective Date and Duration. This guidance remains in effect from the date published until canceled by the Executive Director of Flight Standards Service (AFX-1).

6. Explanation of Policy Changes.

a. General.

(1) Deletes references to former FS organizational entities and outdated systems.

(2) Deletes references to canceled orders and outdated document control procedures.

(3) Expands scope to include all types of policy and guidance documents and good guidance development principles.

b. Chapter 1.

(1) General revisions.

(2) Adds roles and responsibilities of primary stakeholders.

   c. **Chapter 2.** General revisions.

   d. **Chapter 3.** Adds sections on the policymaker's mindset, safety continuums, document development lifecycle, organizational intent, issue identification, selecting the correct type of guidance document, project management, critical thinking, mutual learning, integrated management, implementation, communication, change considerations, and document evaluation.

   e. **Chapter 4.**

      (1) General revisions.

      (2) Adds document collaboration and coordination earlier in the review process.

      (3) Adds section on providing meaningful feedback as a stakeholder.

   f. **Chapter 5.** Deleted and incorporated into Chapter 4.

   g. **Chapter 6.** Deleted and incorporated into Chapter 3.

   h. **Chapter 7.** Deleted and incorporated into Chapter 3.

   i. **Appendix A.** Updated references for currency and applicability.

   j. **Appendix B.** Updated based on changes into Chapter 3.

   k. **Appendix C.** New appendix includes a document development and coordination flowchart.

   l. **Appendix D.** New appendix includes a Decision-Making Guide.

   m. **Appendix E.** New appendix includes a job aid on choosing the correct document to support policy and guidance documents.

7. Background. On February 14, 2012, the President signed Public Law (PL) 112-95, FAA Modernization and Reform Act of 2012 (FMRA).

   a. **Consistency of Regulatory Interpretation Aviation Rulemaking Committee (ARC).** In response to section 313 of FMRA, the FAA chartered the Consistency of Regulatory Interpretation ARC. The ARC created a forum for the U.S. aviation community to assess, determine the root causes of, and provide recommendations to reduce inconsistent interpretation and application of regulations.

   b. **2012 Report and Recommendations.** The ARC specifically cited the important role of guidance documents. In its 2012 report, the ARC recommended instructions for FAA personnel who develop policy. The intent of this recommendation was to ensure that new guidance does not contradict or otherwise negate a current acceptable method of compliance and that guidance documents (when not administrative in nature) are consistent with regulatory language. This order provides a standardized framework for authors of guidance documents.

    c.   **Directives for Developing Effective Guidance.** On January 18, 2011, Executive Order 13563 was issued, which supplements and affirms the requirements of Executive Order 12866, issued on September 30, 1993. Both Executive Orders state the principles and requirements to establish regulations, promote public participation, improve integration and innovation, increase flexibility, ensure scientific integrity, and increase analysis of existing regulations.

8. **Significance of Effective Guidance.** Well-designed and well-written guidance documents serve important and critical functions. They can channel the discretion of the FAA, increase efficiency, and enhance fairness by providing the public clear notice of the line between permissible and impermissible conduct. Three main types of documents exist to provide guidance and information to FAA personnel and industry.

    a. **Internal Guidance.** These types of documents are commonly referred to as directives, since applicable FAA personnel must follow them. Directives are the primary means used by the FAA to issue, establish, and describe agency policies, organization, responsibilities, methods, and procedures. The primary audience for directives is internal stakeholders, including designees, delegated organizations, and organization unit members. The most common and frequently seen internal guidance documents include:

    (1) Orders. Orders are permanent directives and stay in effect until canceled.

    (2) Notices. Notices are temporary directives and expire one year from their effective date or have a cancelation date before one year. Notices are used to communicate information regarding critical matters requiring immediate action, as well as issues of a temporary nature. You should not draft a notice to announce a permanent change.

    (3) Miscellaneous Job Aids and Documents. This category of guidance includes various types of documents that exist outside the scope of FAA Order 1320.1, FAA Directives Management. However, FS personnel still rely on them to complete certain tasks. These documents include job aids, checklists, job task documents, technical information sharing, or other documents that support adherence to policy and standards.

    b. **External Guidance.** External guidance is used when the FAA has a need to communicate with the public or industry members. Generally, external guidance does not have the force of law in the way regulations do; however, it can provide information on ways to comply with existing regulations. The most common and frequently seen external guidance documents include:

    (1) Advisory Circulars (AC). ACs provide information on methods, procedures, and practices acceptable to the Administrator for complying with regulations. While ACs do not establish requirements, they can help to implement regulations because they provide standardized implementation methods. ACs may contain explanations of regulations, best practices, and other information useful to the aviation community. (Refer to FAA Order 1320.46, FAA Advisory Circular System.)

    (2) Handbooks. Handbooks are large documents that provide comprehensive information on subject matter to pilots and industry.

(3) Information for Operators (InFO). InFOs are short documents that range from one to three pages on average, which provide information to the industry on a wide variety of topics. For example, launch of new programs, operational issues that are not safety critical, reminders on due dates, etc.

(4) Safety Alert for Operators (SAFO). SAFOs are short documents that range from one to three pages on average, which provide safety critical information to industry.

c. **Exemptions.** An individual or entity may petition the FAA for relief from the requirements of a current regulation. The granting of an exemption is generally viewed as an alternative method of complying with a regulatory requirement. Exemptions are transmitted under Title 14 of the Code of Federal Regulations (14 CFR) part 11. A grant of exemption and its specific conditions and limitations is a regulatory requirement. Exemptions are only applicable to the petitioner, not to the broader public or industry.

d. **Authorizing Documents.** "Authorizing documents" is the collective term used for operations specifications (OpSpec), management specifications (Mspec), training specifications (TSpec), and Letters of Authorization (LOA) managed and issued in the automated Operations Safety System (OPSS). This also includes waivers and deviations. While 14 CFR regulates air operators and air agencies, the FAA issues authorizing documents to describe specific conditions and limitations to individual entities. FAA uses authorizing documents to apply the conditions and limitations of 14 CFR to air operators and air agencies. Revisions to authorizing document templates must follow the OPSS Template and Guidance Development. See Appendix A, Related Websites and Publications, for additional information.

e. **Miscellaneous Guidance.** Some documents published by FS do not neatly fit into the internal or external category. Some document types serve as a knowledge base for both FAA personnel and industry. This includes documents such as manuals, guides, waivers, and plans.

f. **Roles and Responsibilities.** Drafting, processing, publishing, and the management of a policy and guidance document throughout its lifecycle requires the coordination and collaboration of multiple offices. Regardless of these described roles, it is a collective responsibility of all offices to communicate issues, adhere to due dates, elevate concerns, and be responsive to inquiries. The general roles and responsibilities are as follows:

g. **Office of Safety Standards (OSS).** OSS develops, drafts, implements, and tracks regulations, guidance, and directives, with ultimate responsibility for a document's content. Since aviation safety trends often affect policy, OSS works collaboratively and interdependently with other FS offices, divisions, and internal and external stakeholders to identify and create awareness of those trends in relation to guidance document development. OSS also plays a leading role in the formal and informal document review and evaluation process, in which divisions or offices work collaboratively to ensure consistency, effectiveness, and implementability.

h. **Office of Foundational Business (AFB).** AFB supports OSS, as it manages the formal processes and publication of most of the document types listed above, in accordance with federal, DOT, FAA, and FS publication policies. AFB drafts, formats, edits, and manages

internal/external stakeholder coordination in support of the document development process. They prepare the final document for publication in the applicable FS repository and for directives projects related case folder management. AFB also manages feedback routing and forms management.

    i.   **Office of Air Carrier Safety Assurance (ACSA) and Office of General Aviation Safety Assurance (GASA).** ACSA and GASA are the end users of many policy documents. They ensure consistency and standardization in how to apply oversight activities. They also collaborate with OSS to provide technical expertise and comments on policy. These offices play an important role during policy development to promote successful implementation and desired outcomes.

    j.   **Office of the Chief Counsel (AGC).** The Regulations Division (AGC-200) provides a broad range of legal counsel to OSS on a variety of matters that include drafting and ensuring the legality of regulations, orders, exemptions, guidance, ACs, obstruction evaluation determinations, and space transportation licenses and permits. AGC-200 reviews for legal sufficiency, which includes structure, clarity, and focus of the document. This office also issues legal interpretations of aviation regulationsfor OSS and others, and acts as a liaison with the Office of the Secretary of Transportation (OST) on the legal aspects of the agency's regulatory programs.

    k.   **Office of Rulemaking (ARM).** ARM provides general rulemaking information, and manages the agency's rulemaking program and processes, Aviation Rulemaking Advisory Committee program, international rulemaking cooperation, and the exemption process.

9. Directive Feedback Information. FAA Form 1320-19, Directive Feedback Information, is the last page of this order. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this order on FAA Form 1320-19.

Chapter 2. Compliance Requirements of Guidance Documents

1. Guidance Documents. FS recognizes the value of guidance documents in providing predictability, stability, and consistency to internal and external stakeholders. Because of this, it is important that FS use effective guidance practices when we draft or revise these documents.

    a. Clear Guidance. A positive safety culture begins with clear and unequivocal guidance documents. The safety policy outlined in guidance documents describes the methods and procedures that an organization can use to achieve desired safety outcomes. An important aspect of safety management is to revisit effectiveness of guidance documents and determine whether they produce the desired outcome. Effective guidance documents promote safety policy and result in increased regulatory compliance.

        Note: Some orders and content are administrative in nature and not based on regulatory or statutory requirements. The best practices for effective guidance typically do not apply to administrative documents or administrative sections/paragraphs of guidance documents. An example of an administrative document is FAA Order FS 1100.1, Flight Standards Service Organizational Handbook.

    b. Public Comment. Generally, the FAA is not required to publish guidance documents for public notice and comment. It can be beneficial, however, when the agencies determine public feedback could help improve compliance. Pre-adoption notice and comment can be most helpful for guidance documents that are particularly complex, novel, consequential, or controversial. Offices in FS are also encouraged to consider observing notice and comment procedures for guidance documents that effectively would extend the scope of the jurisdiction the FAA will exercise, alter the obligations or liabilities of private parties, or modify the terms under which the FAA will grant entitlements. In those rare circumstances in which a guidance document would result in an annual effect of $100 million or more on the economy, the FAA must publish a notice in the Federal Register announcing that the draft guidance document is available for comment. If you think your guidance document could meet this threshold, you should consult with AGC to identify next steps.

2. Must Be Based on Regulatory or Statutory Requirements. Guidance cannot create or change regulatory or statutory requirements.

    a. Cannot Create New Regulatory Requirements. Regulatory requirements can only be created through rulemaking, which generally includes public notice and comment on the FAA's proposed regulations. For example, if certain recordkeeping requirements are established by a regulation, guidance documents can provide options and effective practices for computerized recordkeeping but must not direct certificate holders (CH) to keep new or different records. This new requirement could only occur through rulemaking.

    b. Must Conform to Regulatory Requirements. In some cases, a regulatory requirement stays the same, but over the years, the guidance regarding that regulatory requirement is created, updated, and changed to address innovations in technology, changes in the operating environment, or what we have learned from accident investigations. There is value in updating

guidance to reflect the current aviation environment and to respond to public questions about how to apply legacy requirements to emerging technology. The newly updated guidance must continue to conform to the regulatory requirements. However, it cannot "drift" from the baseline regulatory requirements to the point that the updated guidance, in effect, creates new regulatory requirements. As previously noted, new or amended requirements can only occur through rulemaking or statutory amendments. For example, certain regulations allow participation in voluntary safety programs. Guidance documents could identify how to participate in these voluntary safety programs but could not require CHs to participate.

3.   Are Not Legally Binding to Regulated Entities. Although guidance documents include a connection and reference to the regulations, guidance documents are just that: guidance. As a standalone, these documents are not legally binding. A full discussion of the non-legally binding nature of guidance is contained in OMB Final Bulletin for Agency GGP, published January 25, 2007 (72 FR 3432).

4.   Should Explain Changes in Compliance Methods. The FAA may create or update guidance to increase safety value, address changes in the operating environment, or incorporate what we have learned from accident investigations. In some circumstances, guidance changes may invalidate certain methods of compliance contained in previously issued guidance. It is important to provide a rationale for a change in acceptable compliance methods to provide transparency for all stakeholders. These explanations can be brief, but, at a minimum, should include what has changed and why, so readers clearly understand why the previous method of compliance is no longer valid. Include the rationale for changes made to compliance methods as follows:

- Order 8900.1: In the Executive Summary Form (ESF). Portions of the information from the ESF are available in the Change History in Order 8900.1.
- Orders (other than 8900.1): In the Explanation of Changes paragraph.
- ACs: In the Purpose paragraph.
- Notices: In the Purpose of This Notice paragraph.

   Note: Updates to all guidance documents require an ESF (see AFS 002-103, Policy and Guidance Document Production).

5.   Methods of Compliance Updates. Methods of compliance can be updated when guidance is no longer in compliance with a statute or when new or updated guidance invalidates previously issued guidance. Examples of these methods follows:

   a.   Example 1. A change to a statute that is the underlying basis for certain regulations or guidance may invalidate previously issued guidance. For example, on December 13, 2007, the Fair Treatment of Experienced Pilots Act (PL 110-135) amended Title 49 of the United States Code (49 U.S.C.) by adding § 44729. Along with raising the upper age limit for pilots to 65, § 44729 specified that a pilot who has attained 60 years of age may serve as pilot in command (PIC) in certain international operations, only if there is another pilot in the flight deck crew who has not yet attained 60 years of age. Section 44729 also stated that this crew pairing requirement would sunset on the date that the International Civil Aviation Organization (ICAO) removed a similar pilot pairing limitation in ICAO Annex 1, Personnel Licensing, Standard 2.1.10. On

November 13, 2014, ICAO removed the pilot pairing limitation from their Standards and, as a result, the statutory basis for the FAA crew pairing requirement no longer existed. The FAA immediately issued revised guidance stating that the FAA would no longer enforce the crew pairing requirements.

   b. **Example 2.** In some cases, guidance is issued on the basis of a statutory requirement with no associated FAA regulations. For example, in the fall of 2003, Congress established a flight attendant (F/A) certification requirement in the Vision 100—Century of Aviation Reauthorization Act. The act required that after December 11, 2004, no person may serve as a flight attendant aboard an aircraft of an air carrier unless that person holds a certificate, which FS identifies as a Certificate of Demonstrated Proficiency, issued by the FAA. In response, the FAA did not create new regulations, but addressed the statutory requirement via FS guidance documents. If there is an amendment to the underlying statute on which the FS guidance documents regarding a Flight Attendant Certificate of Demonstrated Proficiency are based, then FS could issue revised guidance, superseding previously issued guidance. It is important to note that, for this situation, the FAA did not create a new FAA regulation, nor did they establish a regulation through agency guidance, as the FAA does not have this authority. The agency used guidance documents to help stakeholders understand how to comply with the statute.

   c. **Example 3.** The FAA continually reviews and updates the standard average passenger weights listed in AC 120-27, Aircraft Weight and Balance Control, after the release of new National Health and Nutrition Examination Surveys (NHANES). This survey is facilitated by the Centers for Disease Control and Prevention (CDC) and is designed to assess the health and nutritional status of adults and children in the United States. If the FAA finds that the data from NHANES indicates a weight change of more than 2 percent, the FAA updates this AC to include the new standard average weights. This supersedes the previously issued guidance regarding standard average passenger weight because that data no longer supports a finding of compliance with the regulatory requirements regarding weight and balance (W&B).

6. Statutory or Regulatory Reference Citation. Guidance documents must include the citation to the governing statutory provision or regulation (in Code of Federal Regulations (CFR) format), which it applies to or interprets. Additionally, external guidance documents cannot use mandatory language such as "shall," "must," "required," or "requirement" unless intended to describe a statutory or regulatory requirement.

   Note: To the extent possible, statutory and regulatory references should be cited at the beginning of a guidance document, and the Office of Primary Responsibility (OPR) (FS policy division) should minimize redundant citation of statutory and regulatory references. The OPR should use its best judgement on when repeated citation of statutory or regulatory references is appropriate.

   a. **Citations in ACs.** To remain focused on the underlying regulatory or statutory basis that guidance documents support and to assist automated search functions, FS will include regulatory or statutory citations in guidance documents. This requirement already exists for ACs. As outlined in Order 1320.46, ACs must cite the regulatory requirement that the AC is supporting in the Purpose paragraph. With this order, FS is extending this requirement to all directives, including Order 8900.1.

b. Citations in Notices and Orders. For notices and orders other than Order 8900.1, include a specific reference to the regulatory or statutory citation the directive supports in the Purpose paragraph. The last sentence of the Purpose paragraph should contain the regulatory or statutory citation. For example, "This notice contains guidance that is pertinent to § 91.313," "This order contains guidance that is administrative in nature," or "This order contains guidance that is pertinent to Title 49 U.S.C. § 44702."

c. Citations in Order 8900.1. For updates or draft sections of Order 8900.1, include the regulatory or statutory citation in a new paragraph directly under the section header. Title the paragraph, "Source Basis," then include the regulatory or statutory citations or the word "Administrative." For example:

Source Basis:
- Section 61.55, Second-in-Command Qualifications.
- Section 61.153, Eligibility Requirements: General.
- Section 61.155, Aeronautical Knowledge.
- Section 61.157, Flight Proficiency.
- Section 61.159, Aeronautical Experience: Airplane Category Rating.

Source Basis: Appendix A to Part 121, First Aid Kits and Emergency Medical Kits.

Source Basis: Special Federal Aviation Regulation (SFAR) No. 106, Rules for Use of Portable Oxygen Concentrator Systems On Board Aircraft.

Source Basis: Administrative.

Source Basis: Title 49 U.S.C. § 44728, Flight Attendant Certification.

Note: The source basis may contain regulatory citations, statutory citations, and the word "Administrative"; in this case, include all, if applicable. If there are multiple regulatory or statutory citations, put them in a bulleted list. The source basis may include multiple regulatory or statutory sections. Be sure to list each section and not just the applicable subpart. In the case where the source basis is in one of the appendices of a part, list the applicable appendix. (See Figure 2-1, Example of Source Basis in Order 8900.1.)

Figure 2-1. Example of Source Basis in Order 8900.1

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VOLUME 3 GENERAL TECHNICAL ADMINISTRATION

CHAPTER 33 CABIN SAFETY AND FLIGHT ATTENDANT MANAGEMENT

Section 6 Operations—Cabin Safety

Source Basis:
- Section 121.311, Seats, Safety Belts, and Shoulder Harnesses.
- Section 121.333, Supplemental Oxygen of Emergency Descent and for First Aid; Turbine Engine Powered Airplanes with Pressurized Cabins.
- Section 121.570, Airplane Evacuation Capability.
- Section 121.571, Briefing Passengers Before Takeoff.
- Section 121.573, Briefing Passengers: Extended Overwater Operations.
- Section 121.574, Oxygen for Medical Use by Passengers.
- Section 121.575, Alcoholic Beverages.
- Section 121.576, Retention of Items of Mass in Passenger and Crew Compartments.
- Section 121.577, Stowage of Food, Beverage, and Passenger Service Equipment During Airplane Movement on the Surface, Takeoff, and Landing.
- Section 121.587, Closing and Locking of Flightcrew Compartment Door.
- Section 121.589, Carry-On Baggage.

3-3546 SERVICE OF ALCOHOLIC BEVERAGES. The boarding of a passenger who appears to be intoxicated is a violation of Title 14 of the Code of Federal Regulations (14 CFR).

Note: The trigger to add the regulatory, statutory, and/or administrative citation is basis for the creation or change of an order. For Order 8900.1, provide the correct source basis for the entire section when you update the section or a paragraph within the section (excluding editorial updates).

Chapter 3. Developing Effective Guidance

1.   General. Guidance documents should have clear intent. The content should be based on thorough and accurate research and be consistent with existing regulations and policies, and reflect FS principles of consistency, interdependence, and critical thinking. They should adhere to integrated risk management, which includes safety management, enterprise risk management, and quality management. Guidance developed without these critical attributes can lead to inconsistency and a product that is not sufficient toward achieving desired outcomes.

    a.   Foundational Knowledge. There is foundational knowledge that every FS policymaker should have before initiating policy and guidance document development projects. In addition to this order, there are agency and other Federal guidance documents on required and best practices (see Appendix A). A series of agency-supported rulemaking and regulatory courses provides general knowledge. A strong understanding of the FAA's and FS' mission, vision, values, strategic initiatives, programs like the Compliance Program, and interdependence with stakeholders, are essential. OMB Bulletin No. 07-02, Agency Good Guidance Practices (GGP), establishes general policies and procedures for guidance development and issuance. The GGP ensures that Executive Branch departments and agencies develop and issue guidance documents with appropriate review and public participation, accessible and transparent to the public, are of high quality, and are not improperly treated as legally binding requirements. Beyond this knowledge, the policymaker should also have the right mindset (see Figure 3-1).

Figure 3-1. The Policymaker's Mindset and Foundational Knowledge
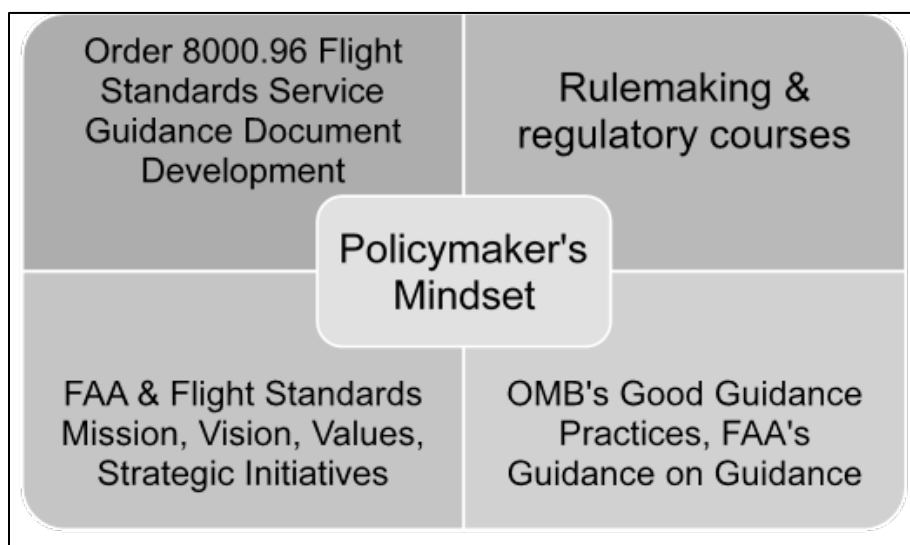
    b.   Policymaker's Mindset. The policymaker should ensure they maintain a high-level of integrity and consider the safety continuum as they develop policy and guidance documents.

        (1) Integrity. FS employees who develop policy, guidance, and standards are expected to think and act with integrity. They should have a certain mindset and behaviors when approaching this work. Integrity within policymaking work is defined by being:
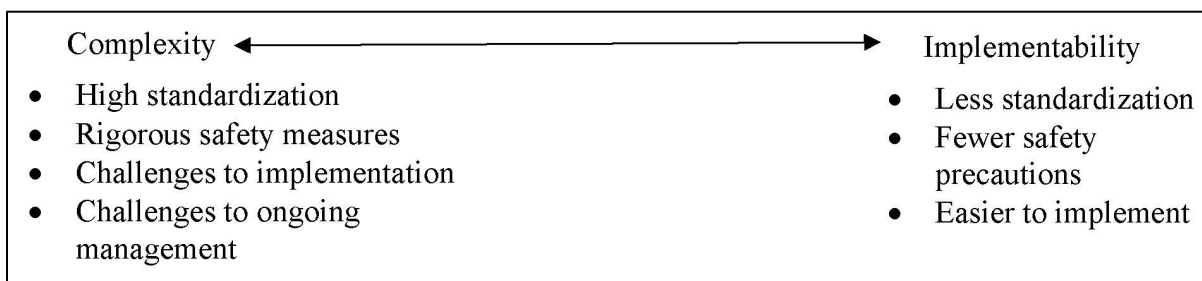
- Stakeholder-focused: The policymaker should put the interests of the stakeholder and safety above any personal interests.
- Unprejudiced: The policymaker should be aware of any biases or preferences and not let these influence any discussions or decisions.
- Open-minded: The policymaker should be open to see all aspects of the situation, regardless of any negative aspects that may exist.
- Humble and respectful: The policymaker should have an attitude that is open, receptive, and respectful to all interested parties, policy solutions, and potential outcomes.

(2) The Safety Continuum. The policymaker should be aware of choices that need to be made to balance critical and opposing principles of policy development. As choices are made to balance these continuums, the policymaker may need to forfeit the benefits from one end of a continuum so that the policy can gain the benefits from its opposing principle. (See Figure 3-3, The Safety Continuums of the Policymaker's Mindset.) Early engagement and collaboration with stakeholders supports achieving the right level of balance between these continuums.

(a) Consistency vs. Flexibility. The policymaker should weigh the balance between consistency and flexibility for each policy issue. While consistency is important, it can interfere with flexibility. This is important in guidance development as it can reduce rigidity of a policy. The policymaker should analyze each policy issue to ensure that flexibility is appropriately balanced with complexity and safety measures.

(b) Complexity vs. Implementability. Aviation safety issues are complex, and often require complex and rigorous solutions. Flexibility can also contribute to complexity. However, policymakers can balance complexity and rigor with assumptions concerning understandability, implementability, and affordability. Too little complexity and we might not achieve the safety precautions and standards needed to reach desired outcomes. Too much, and the end user may not understand it, or may not be able to manage or implement it (see Figure 3-2).

Figure 3-2. Balancing Complexity and Implementability

Complexity ⟷ Implementability	
• High standardization	• Less standardization
• Rigorous safety measures	• Fewer safety precautions
• Challenges to implementation	• Easier to implement
• Challenges to ongoing management	

1. As complexity is incorporated into a policy solution, it should be proportionate with the type of operation or system. Too much could introduce potential barriers, like with costs or resources, thus making those desired outcomes less likely to be actualized.

2. There should also be a balance on how much rigor is applied during different components of a policy solution (i.e., during a specific step of a process, or on a specific actor in the process).

3.   Implementability may not always affect a technical area, but it may affect an administrative one. Policymakers should be aware of changes that might overburden an organization in complying with administrative changes.

4.   Balance a policy's complexity with consistency and agility, to address differing needs and abilities of stakeholders. For example, you may place a more structured oversight regiment or stricture requirements on a larger-scale operation than you would a smaller-scale operator.

(c) Prescriptive vs Descriptive. There is also a prescriptive/descriptive consideration. A prescriptive policy, like a prescription, is exacting and specific. Descriptive guidance is explanatory, which focuses on outcomes and performance. Depending on the issue, greater specificity may be required, or there may be a stronger need for performance-based policies. The Compliance Program is an example of a performance-based policy, focused on supporting operators to achieve compliance, without dictating the exact method of compliance. As another example, policy could prescriptively dictate what specific job classifications can perform the defined work activity; however, performance-based policy enables flexibility in determining the strategy to achieve compliance, and allowing the job classifications that perform the work to be descriptive in policy would enable the office to have greater flexibility to accomplish the task.

(d) Risk Averse vs. Risk Tolerant. As the policymaker balances consistency with flexibility, complexity with implementability, and prescription with description, there is a final balance between the level of risk tolerance and risk aversion. The choices made on risk tolerance are often related to operational risk. For example, the accident rate for General Aviation (GA) operations is much higher than that for air carrier operations, yet the FAA cannot produce guidance that drives GA to an equivalent level of safety (ELOS) and is more risk tolerant in GA operations. Be aware that not all risk relates to aviation safety. There is also risk in procedural, administrative, political, and other areas.

Figure 3-3. The Safety Continuums of the Policymaker's Mindset
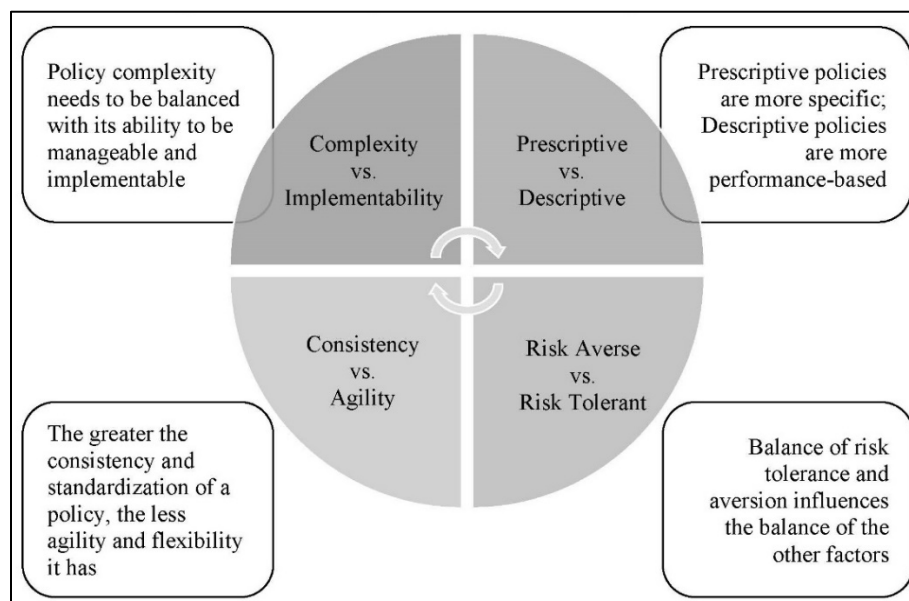
(3) The Policy and Guidance Document Project Lifecycle. Developing guidance documents is more than writing. There is a continuous process of how to identify issues, research, plan, write, implement, and evaluate (see Figure 3-4). This chapter is structured to present policy and guidance development at each step in this lifecycle. The process starts with how to define the issue and establish organizational intent. This allows the next step of planning and decision-making to occur more collaboratively, which creates a solid foundation for the writing. Once a document is written, policymakers plan for document implementation. Consider appropriate and effective communications and implementation strategies that consider change principles. Finally, the document should undergo continuous evaluation to determine if the document will fulfill its intent, address the identified issue, and achieve the defined success. The document development process is grounded in collaboration and interdependence. While not all projects will require formal project teams, there will always be multiple stakeholders and organizations involved in a document project's lifecycle.

Figure 3-4. The Policy and Guidance Document Lifecycle
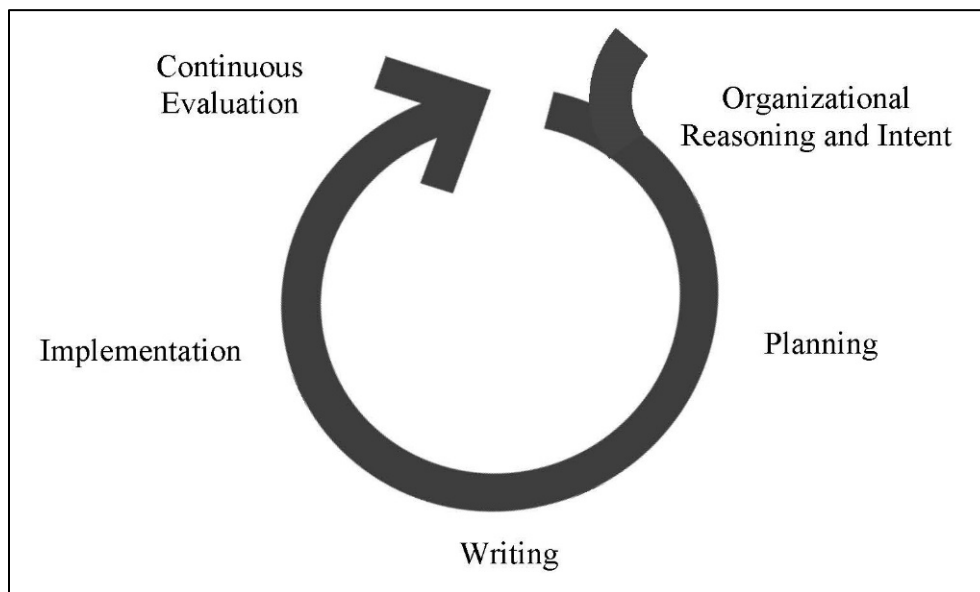
2. Determine Reasoning and Intent. It is human nature to desire immediate solutions. However, rushing to implement a solution to a problem could result in overlooking critical steps in the guidance development process, which may impair implementation of a policy or program. The policy and guidance development process starts as you determine the reason and intent, which also includes that you define the issue, determine the audience, select the appropriate document type, and conduct research (see Figure 3-5, The Problem Pyramid).

Figure 3-5. The Problem Pyramid
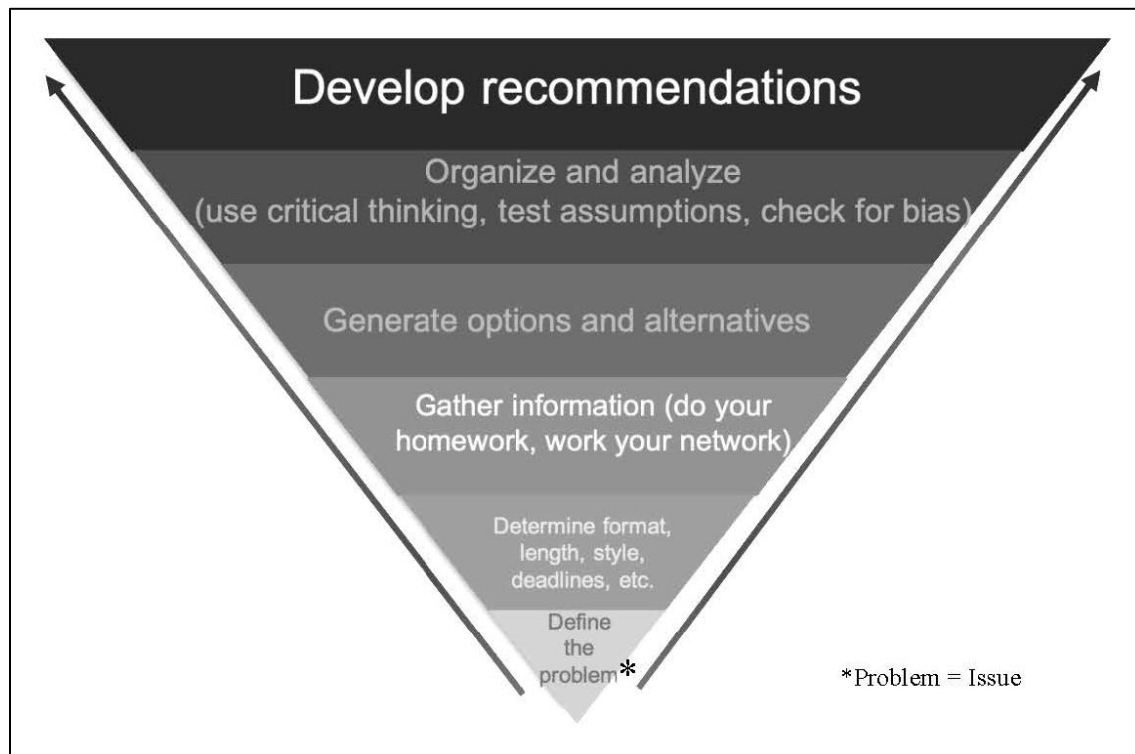
a.   **Identify the Issue and Purpose.**

   (1) Identify the Issue.

      (a) An issue is often intermixed with other challenges, so identifying the specific issue and its root cause is essential to solving the correct issue. As you identify the issue, start to consider the unmet need, value, or practice. However, the issue is not just stating what is needed, as that addresses a solution. The issue looks at a gap, failing, or malfunctioning part of a system that fails to bring desired outcomes. As an example, the issue is not an ineffective form, but that the form is consistently submitted with inappropriate information.

      (b) Considering why this issue exists is important and can provide information for how to define success when you implement the new or revised policy or program. Determine the consequences if this issue is not resolved. You may need to evaluate how this issue was initiated, either through another organization or through a formal recommendation procedure. You may need to bring in others to help define this issue. Once formulated, a well-structured issue is specific enough to create potential solutions with measurable outcomes, but not so broad that it generates unlimited solutions.

      (2) Identify the System. During this initial step of identifying the issue, it is important to identify the affected system. Analyzing the issue from a systemic perspective will help in identifying root causes, dependencies, interdependencies, and desirable and unwanted outcomes. This system could include an organization, program, procedure, operation, a work instruction, or any other type of operation that works together to achieve a designated outcome. When

policymakers identify the affected system, it ensures we look at all aspects of the issue as we define it and identify root causes. System identification can also support later steps in the policymaking process, specifically when the document reaches formal coordination and implementation.

(3) Identify the Root Causes. When you transition to determine the root cause of the issue, a simple process is to keep asking "but why?" to each potential cause. This will allow you to look deeper at the issue in order determine its root cause, rather than stopping at higher-level causes or symptoms. When you consider these different levels of causes, you focus on how and why something happened, not who was responsible. When you look at the entire system, it allows you to consider all aspects of the issue: the purpose, methods, processes, connected programs, tools, physical evidence, performance measures, resources, environment, and skills involved. Leverage quantitative or qualitative data or reports to support this analysis. Determine if there was a triggering event, like a congressional or National Transportation Safety Board (NTSB) recommendation, which could provide data in this area.

(4) Establish the Case for Change. Another consideration is to ensure there is a case for change for the issue. As you define the consequences of not resolving an issue, you may find there is not a significant case to make changes within the system. This could signal that there may not need be a need for a policy or program change, or that you have defined the issue or root cause inaccurately, and you may need to revisit that step.

(5) Create the Problem Statement.

(a) Once you identify the issue, system, root causes, and consequences, establish a concise problem statement that provides a means for you to communicate the issue to others quickly. You can also use this as a problem statement for other processes, such as obtaining leadership approvals or funding, or communicating to stakeholders. When you create the problem statement, you finalize the step of how to determine reasoning and intent for the policy and guidance document.

(b) The problem statement should only include facts, not speculations, assumptions, or opinions. There is a consistent and logical flow to the problem statement to build your case: a statement of the issue, the negative outcome of the issue, a statement of the root causes, and an ending about reasons to address the issue. This sample problem statement provides a logical flow from the issue, to its causes, to the final impact statement.

(c) Example. "The Project form is consistently submitted with inappropriate information. This has led to delays in how we process forms and implement The Project. Analysis of form data and stakeholder interviews revealed that stakeholders have a widespread misunderstanding of how to use the form. It is critical to address this issue so that organizational resources are not wasted on correcting a form that appears to be effective if used correctly, and so the safety goals of The Project are actualized."

b. Identify Your Audience and Choose the Correct Guidance Document. As you move up the problem pyramid, you next identify your audience and select the type of guidance document for your purpose and audience.

(1) Who is the audience for the guidance document? It is important to keep the reader in mind when you develop the guidance document. Readers may include a broad range of internal and external stakeholders, or a smaller subset of stakeholders. As you look at the system(s) you identified, it can provide insight into groups that may be affected by the guidance document, which can help define the audience. You may identify more than one audience and it may be necessary to write more than one policy and guidance document to ensure all stakeholders have the information they need on this issue.

> **Note:** Figure 3-6 depicts many of the types of policy and guidance documents that we develop. On the left side of the pyramid are documents for internal agency guidance and for oversight. On the right side are document types for external stakeholders to support compliance. This is a general structure only, as specific guidance documents can serve both oversight and compliance purposes, and can be detailed, but be based in agency authority (i.e., exemptions).

(2) What is the goal of the guidance document? As you determine the goal of the document, you can begin to select the appropriate document type. Depending on the specific case, the document may serve to exercise regulatory authority, be based on a statute or rule, or be directive in nature. The document might not be regulatory, but the agency has a responsibility to provide guidance or information, with a goal to ensure continuous safety, implement a risk control, or issue an exemption. Or, you may only want to impart influence, and guide others on how to gain the greatest benefit from a program, provide education and outreach on a specific identified hazard, or issue a job aid or work instruction on a standardized process.

Figure 3-6. Guidance Document Pyramid: A General Guideline for Determining the Type of Document
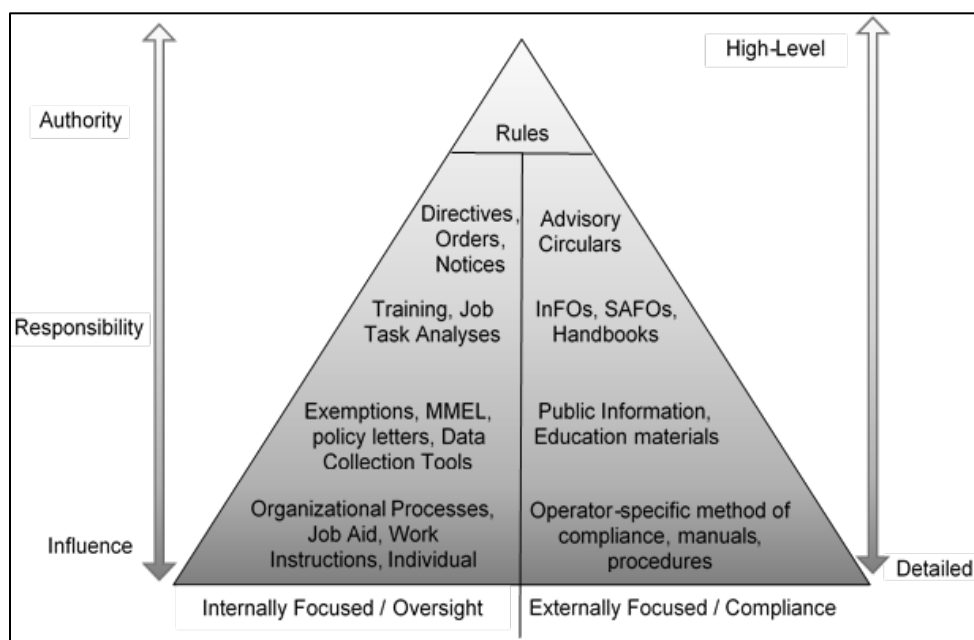
(3) Looking again at Figure 3-6, the types of policy and guidance documents at the top of the pyramid are higher-level, with specificity that increases as we descend through the types of

documents. Generally, the types of documents that are broader in scope are often based more on regulatory authority. Generally, as a document becomes more detailed, it is based less on authority and more of a responsibility or a need to influence. Appendix E includes a job aid to assist in selecting the correct type of document to use in supporting policies and guidance.

(4) What is the needed duration of the document? Consider if the document needs to be temporary or permanent when you select the appropriate document type. Some documents, such as notices, have specific time limits.

(5) How soon does the document need to be published? It is also important to consider time aspects related to the document's publication. Are there specific dates required for the document's publication? Is there an urgency to disseminate this information? Do you need to time the document's publication with the publication of other documents or with the actions of another organization?

> **Note:** Informal documents, like educational materials or public information, could be issued with greater urgency, but would lack permanence and authority. You may need to exercise greater collaboration and detailed coordination if the exact publication timing coincides with other events or activities. These factors can affect the type of document selected.

(6) What types of documents are needed? You can find a description of the different types, purposes, and limitations of guidance documents in Chapter 1, paragraph 8.

   c. Do Your Research. Conduct an exhaustive search into the subject, for not only regulatory and guidance documents, but also other documents on your subject. This can provide relevant information not obtained through existing regulations. As you conduct essential research at this stage, it is also vital to be mindful as the document development progresses; you may need to conduct additional research as new information emerges, or as you find gaps.

(1) Determine Regulatory Authority. Consider the regulatory requirements stated in Chapter 2, and determine if existing regulations controls or limits the identified issue.

(2) Identify Regulations. As you develop the guidance, ensure it does not conflict with other guidance and conforms to the regulations. Review the relevant regulations, as well as regulatory history. Include the preambles from the Notice of Proposed Rulemaking (NPRM), as well as the Final Rule. Include relevant FAA legal interpretations in the review.

(3) Related Guidance Documents. Review the relevant guidance and reference documents. Be aware of and consider the interfaces between all FAA guidance and other documents that address a certain issue, as well as the need for a consistent FAA message. For example, if your tasking is to update a section of Order 8900.1, you should also review Order 8900.1 in general, for other references to the topic to ensure consistency throughout the order. You should also review all other FAA documents on the topic to ensure there are no contradictions between the materials. For example, AC 39-9, Airworthiness Directives Management Process, and several sections in Order 8900.1, Volume 3, Chapter 59, Airworthiness Directive Management Process and Alternative Method of Compliance, cover the same topic and process. As a result, if you change one document, you may need to change other

documents. When drafting ACs and directives on the same topic, it is imperative that the documents do not conflict.

(4) Other Associated Documents. Research should not be limited to FAA guidance and policy documents, but should also explore research and papers by academic and professional organizations, organizational reports, communications by FAA and external organizations, and even similar guidance documents by other government agencies. Exhausting the literature on your topic can provide a breadth and depth of knowledge to generate potential solutions, conduct risk analyses, and select an optimal solution.

(5) Identify Interdependencies and Collaborate. Do not assume that the formal FAA coordination process provides the same kind of information as when you reach out directly to stakeholders and subject matter experts (SME) during the initial drafting and research process. Interdependencies typically involve multiple entities that have commonalities and interests in the identified issue. As you evaluate the system, consider other projects and work that may have an impact on, or be affected by, your specific issue. If the issue relates to a formal recommendation or other triggering event, this may help you identify interdependencies.

(a) Once you identify the interdependencies, network and reach out to the organizations to collaborate with them to plan, develop, and implement your policy and guidance document. Acknowledge that not all potential partners may not be located within FS. SMEs from other lines of business and other agencies may need to be involved. You should also consider external organizations, including industry, political, and professional organizations. Depending on the issue, look beyond any existing relationships you may have to ensure optimal representation, not just familiar organizations.

(b) Acknowledge that not all interdependencies are affected in the same way. Stakeholders may need to engage in different ways. Some may need awareness and information only; others may need to be fully engaged in the document's development. You may need to find alternative ways to engage different stakeholders to meet their interests, as you remain focused on the purpose of the project.

(6) Determine Dependencies and Relationships.

(a) Dependencies are different from interdependencies. Where interdependencies bring interested parties to work together, dependencies are more one-sided. A dependency can be an actor, project, or other work the issue may rely on. Without the execution or success of a dependency, you may not be able to move forward or implement the guidance. For example, another office in FS or the agency may be developing another policy development or program that needs to be implemented before this document can be published.

(b) Once you identify dependencies, determine their relationship to and impact on the issue. Like interdependencies, network to get stakeholders for these dependencies involved in the issue. Their involvement will provide critical information as you plan and develop the policy and guidance document.

d. Finalize Reasoning and Intent. The culmination of this first phase formally documents the issue, problem statement, interdependencies, dependencies, resources, stakeholders, and

organizational intent. You may need to include a scope to address limitations. It is important that this documentation does not include any solutions. This disregards systems thinking and an integrated management approach, which may possibly exclude more optimal solutions. It also bypasses interdependence, critical thinking, and accountability.

    e. Project Initiation Form (PIF). Submitting a Project Initiation Form (PIF) is the first step in formally starting the production process in FS. The PIF compiles the reasoning and intent information in a standardized format. The completed PIF will populate other tracking systems and share across the service that a new policy or guidance project has been initiated. See Appendix A for the Quality Management System (QMS) and Business Processes list. (See AFS 002-103).

> **Note:** If the document is one that does not need to go through the formal document review process, this form can provide a consistent template for documenting the reasoning and intent for the issue.

3. Planning. After you finalize the organizational reasoning and intent for the issue, you can start to plan the document. Apply project management strategies to ensure effective organization and oversight of stakeholders, communications, and administration. Use integrated management and critical thinking skills as you generate, analyze, and select an optimal policy solution. This phase culminates in the development of a well-structured outline or plan to support the writing phase of the document.

    a. Project Management. Developing a policy and guidance document is complex and requires strong project management principles for its planning and development.

      (1) Gathering the Team. Earlier in your research, you identified interdependencies and dependencies for the document. Use this information to create a list of stakeholders to involve as you develop the document.

        (a) Depending on the subject, you may have a long list of potential stakeholders that could be part of the team. Too many team members and the document may not be able to progress nor achieve consensus. Too few, and the document may not have sufficient input to ensure it will meet stakeholder's needs or even be viable for a successful implementation. If your list of potential stakeholders is quite long, you may need to analyze what representatives would best serve this effort. You may need to leverage single team members to represent more than one interest area. You could consider a smaller working team, but with a larger advisory team to ensure you represent all interests. Teams may look different for different projects and policy issues.

        (b) Depending on the identified issue, you may want to consider coordination with the Safety Risk Management Division (AFB-400). If the issue may generate solutions that have a direct impact on aviation operations or the National Airspace System (NAS), or may bring any organizational changes, risk analyses may be necessary. The earlier in the process you obtain AFB-400's involvement, the sooner it may assist you as you propose or select policy solutions.

        (c) Again, depending on the issue and the level and type of change, you may want to consider inclusion of the Learning Solutions Branch (AFB-540) on the project team. This office

provides project management and instructional systems design expertise to collaboratively develop learning strategies and solutions to meet FS training and development needs. While not all policy and guidance documents require training, if there is uncertainty of a training need, the inclusion of AFB-540 will only help to make the implementation phase more efficient.

(d) During this time, consider and determine if you need to notify the union before you make any policy decisions. As you evaluate this early in the process, you should consider the scope of the issue and if it is at a level of complexity that may need early union involvement. You can also consider the degree of change that may occur with the publication of the document. Depending on the team representatives identified, this may also warrant formal union notification. You may need to involve your organization's leadership in this decision and process.

(e) Once you select your team, apply mutual learning principles, which lead to effective collaboration by doing the following:

- Create an environment where team members feel safe to state their views;
- Share all relevant information on the policy issue;
- Ensure all team members receive equal time to communicate interests and ideas;
- Be compassionate to help deter judgment and allow all information to be shared;
- Be curious and ask probing and explanatory questions;
- Hold team members accountable to be transparent about their interests and ideas;
- Ensure the input and presentation of proposed solutions have sufficient detail;
- Use the established reasoning and intent to keep the team focused on interests, not positions;
- Confirm decisions and statements with the team so that all team members have agreement and a common understanding;
- Keep the team informed on challenges so they are openly discussed and so that you can make informed choices;
- Recognize that team members may disagree, but their intent may still be in the best interest of the issue; and
- Acknowledge that differences provide opportunities for learning, which can elevate informed choices.

(2) Establish Accountability. With the team established, you may establish a project plan together.

(a) Identify Roles and Responsibilities of Team Members. Formally establish roles and responsibilities to help the team understand and accept their roles and lessen collaborative challenges.

(b) Develop a Work Plan and Schedule.

1. Establish a breakdown of tasks involved to develop, write, and implement the document. You may want to establish meeting schedules, milestones, and specific tasks for the document's development. This listing of specific tasks should include responsible team members and a timeline.

2. The work plan should include deliverables. While the document is certainly one deliverable, you may want to consider other milestones, such as document drafts, specific chapters or sections of the document, related education material or communications, reports, or other items that will demonstrate progress. You should also include dependencies that you identified in the earlier reasoning and intent phase, as the schedule for the document is dependent on those.

3. You should track the work plan, deliverables, and schedule throughout the document's development and implementation. You may use this tracking data to report to stakeholders and organizational leadership. This data can also help to identify challenges or roadblocks you may encounter, which can be used to inform leadership for information-sharing or getting support in addressing these challenges.

(c) Resource Planning. As you develop a work plan, note specific resources that you may need as you develop and implement the document. This may include operational and/or contract support personnel, travel, tool and technology development, development and administration of educational programming, dissemination of communications, and conduct of change activities, or other resources unique to this effort. The work plan and schedule should reflect the need for these identified resources. Work with appropriate offices to determine the various resource availability.

(d) Determine the Level of Responsibility for Document Approval. The established organizational intent, document audience and type, and the Guidance Document Pyramid's scale on authority, responsibility, and influence provides foundational information as you determine the level of approval/signature level needed for the document. While some types of documents always require a signature, not all documents require signature authority, nor the highest organizational signature level.

1. Is the document for awareness, to impart influence on a specific audience, or for information dissemination? The document may not need signature authority but only consensus or approval.

2. Does the document require the review or acceptance of something as part of our responsibility to act? Does the document require some type of intervention or approval, thus having some level of authority? All documents in which we exercise our authority will require signature approval, but the level of that signature may vary. Consider the complexity, scope, and impact the document may have on stakeholders. The greater the complexity, scope, and impact, the greater likelihood the document may need a higher level of signature authority. If appropriate, reference existing guidance that includes information on specific requirements for signature authority (see Appendix A).

(3) Incorporate QMS Practices. Your project management should include QMS practices, such as having a structured approach, appropriate documentation, and incorporating measurable goals. If any processes are established during the development of the document, you should follow established QMS procedures for documenting and publishing these processes. To ensure compliance with the consistency and standardization initiative, document development should include methods for stakeholder feedback at appropriate milestones. You can find more information at: https://www.faa.gov/about/office_org/headquarters_offices/avs/consistency_stan dardization.

(4) Address Changes Caused by New or Revised Policies. It is important during this early stage of planning that you address potential changes and plan to incorporate change principles during the document's development. Research has shown that if we consider and address change at the start of a project, it has a strong positive impact on the project's success. At this point in the document's planning, the level or degree of change is likely still unknown, as the solution is not yet determined. However, you can still consider and prepare for change by doing the following:

- Describe the current status of the policy area and determine if the policy area affects a tool or technology, a procedure, job role, organizational or reporting structure, performance measures, critical behaviors or mindset, other factor, or any combination of these.
- Consider the groups affected in this policy area, the size of those groups, if the groups are affected differently by this policy area, if there have been recent changes in similar areas, and how the groups adapted to these recent changes.
- Describe what success looks like, such as the desired outcomes, quality standards, stakeholder acceptance, stakeholder satisfaction, resources expended, policy deadlines, knowledge and skills exhibited by affected groups, or communication or collaboration desired by affected groups.
- Establish how you will validate success. For example, if you define specific levels of quality standards, how will you measure how those quality standards are applied? If a desired outcome is to increase knowledge in a specific subject, how will you determine if that knowledge level has increased?
- As you initiate these conversations on how to validate success, you may find that you need to determine baseline data for a comparison with post-implementation data.
- It is important to refrain from including solutions in these success statements, but to focus more on outcomes.

(5) Plan to Measure Success. As you determine how you will measure success, it is easy to default to quantitative measures, such as the number of training classes given, or the number of request forms received. However, these types of measurements likely will not inform how desired outcomes are met. While reporting the number of classes provided shows that training was conducted and how many individuals were trained, it likely will not provide information if knowledge was increased or if the affected groups apply the knowledge consistently and correctly. You may need to establish methods for collecting and analyzing qualitative data to

validate your defined success. Also, be aware that success and compliance to a policy may change over time.

b.   Generate and Determine Solutions. Now you are ready to begin to generate potential solutions for the issue. Team members should feel safe to present potential solutions and should be open to listening to other team members present their idea.

(1) Address Assumptions or Biases. It is important for the team to be aware of any assumptions or biases, especially during this step of generating potential solutions. It may be good practice for the team to discuss any preferred solutions to be aware of any preferences. This may help the team overcome the tendency to jump to a solution too quickly. Having an open discussion about assumptions and biases can help the team identify areas of resistance and address them early.

(2) Apply Mutual Learning. Mutual learning continues to be important so that the team generates many possible solutions and considers all perspectives. Specifically, mutual learning approaches of curiosity, compassion, and informed choice are important. See subparagraph 3a(1)(d) for a list of mutual learning tactics.

(3) Use Critical Thinking. Apply critical thinking during the entire process of policy and guidance document development and be aware that it becomes especially important as you evaluate potential solutions. For each proposed solution, the team should discuss:

- Its pros and cons;
- How it could bring the desired outcomes;
- Any unintended consequences;
- Resources needed to implement;
- Complexity of implementing the solution;
- Challenges or resistance in implementing the solution;
- Level of consistency with similar policies and guidance; and
- Flexibility and scalability of the potential solution.

(4) Apply an Integrated Management Approach. You should apply integrated management as you analyze and determine the policy solution, and apply either safety management, enterprise risk management, or quality management procedures. Reference the appropriate published guidance on integrated management.

(5) Use Systems Thinking. As part of the critical thinking and integrated management discussions, the team should keep a systems thinking mindset. It is likely that this system interacts with other systems. It is essential to consider all affected systems and determine all future effects that could transpire as you analyze each potential solution. Consider the audience of the document and the impact on them, not just the safety impact, but also other factors such as resources or changes needed to implement the solution. Consider the offices that would have a role in implementing the policy. It may be Safety Assurance, but it could also be other FAA offices.

(6) Choose a Policy Solution. You conclude this analysis after evaluating all possible solutions and decide on a policy solution.

c. **Create an Outline/Plan for the Document.** Document organization is essential for effective guidance. Before you begin to write the document, and as a final step in the planning phase of document development, develop an outline of chapters, sections, and major points. The outline should be detailed enough to provide a complete picture of how the document will be organized and its full content. This outline can serve as a checkpoint with stakeholders for critical feedback.

(1) Create a New Document.

(a) If the document is new, you can create a list of all concepts and information, and then organize related notions into smaller groups.

(b) If the document has chapters, each chapter should be relatively independent of the other chapters, but be placed in an order that provides a linear and logical structure from chapter to chapter. Whether within a chapter or in a document without chapters, the sections should also be organized to build upon each other and provide a structured flow.

(c) Ensure headings and subheadings effectively represent what you wish to convey.

(d) At this stage, the formatting for the outline is not as important as making sure your ideas are grouped appropriately, and that the groups are arranged in an effective order.

(2) Update Existing Documents. If you update an existing document, you could use its structure as an outline and a starting point, making adjustments for your changes.

d. **Ensuring Stakeholder and SME Feedback During Planning and Development.**

(1) During planning, it is important that there are dedicated mechanisms to receive stakeholder and SME feedback. If you have a method to obtain feedback before you begin to write, it can support a smoother process during formal review, publication, and implementation. Early involvement can also prepare other organizations for future changes. Interdependencies (i.e., technologies, other guidance documents, systems, procedures) may be affected. Interdependence is more than collaborating to get the guidance complete. Some examples of dedicated mechanisms to ensure feedback could be regular project team meetings with stakeholders, milestone meetings with stakeholders, open discussion forums, and use of communication portals for sharing input. Additionally, incorporating specific strategies during meetings with stakeholders can support receiving meaningful feedback. Having a planned purpose and process meeting can ensure stakeholders are prepared to give needed feedback. Establishing a structured format can ensure sufficient time for presentation, discussion, and feedback. Identifying a meeting facilitator can help keep the meeting on track to its purpose and process, summarize stakeholder feedback, ensure all interests are acknowledged, and capture critical input that may need to be discussed at future meetings.
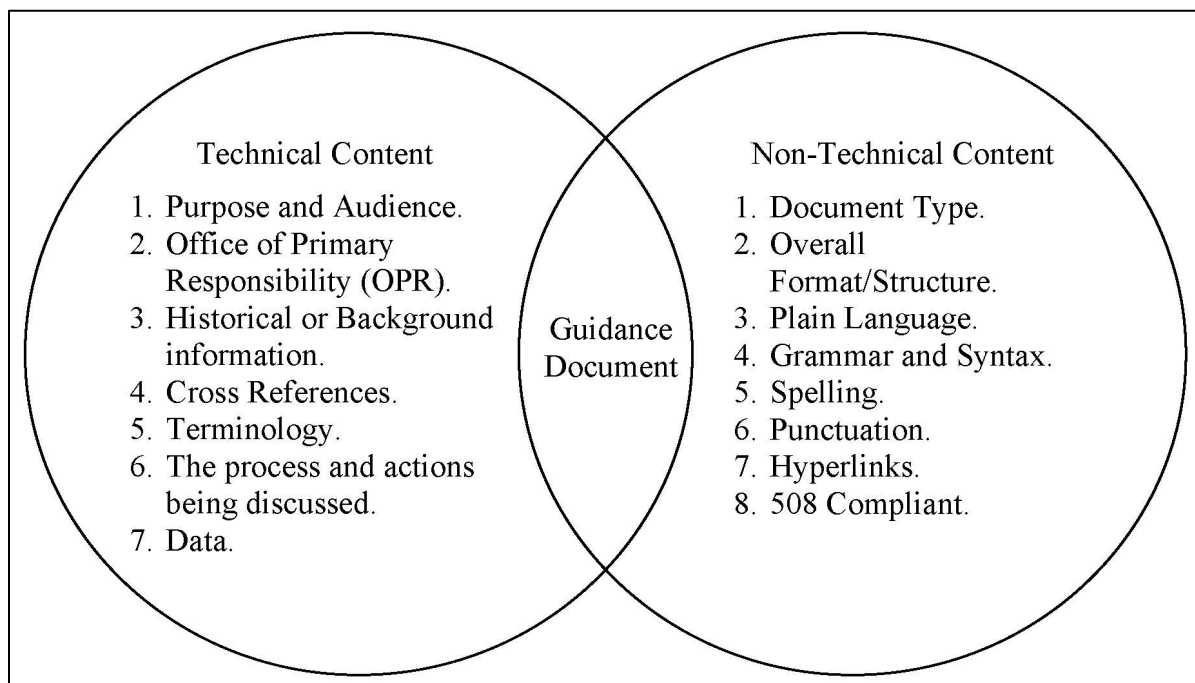
(2) Depending on the type of document, its topic, and its level of change, your methods to obtain feedback could vary in formality and frequency. Generally, those types of documents

higher up on the guidance document pyramid (see Figure 3-5) would likely have a greater impact on systems and affect more stakeholder organizations and may need more frequent and formal checkpoints. While this is just a general guideline, apply critical thinking and consider the issue, its system(s), and level of change when planning for stakeholder and SME feedback.

4. Writing and Development. After you develop an outline and plan for the document, you may begin the writing phase. This phase includes the process and considerations of writing and editing effective guidance. In order to adhere to the organizational intent and achieve the intended outcomes for this policy area, it is important to apply good guidance writing skills, and ensure your document is accurate and fact-based so that it is clearly understood by your stated audience.

  a. General Characteristics of Effective Guidance. In order to write effective guidance, it is important to understand what major parts make up a guidance document. Guidance is composed of technical and non-technical content as shown in Figure 3-7. These components are described in the subsequent sections.

Figure 3-7. A Policy and Guidance Document Includes Technical Content and Non-Technical Content to be Effective

Technical Content

1. Purpose and Audience.
2. Office of Primary Responsibility (OPR).
3. Historical or Background information.
4. Cross References.
5. Terminology.
6. The process and actions being discussed.
7. Data.

Guidance Document

Non-Technical Content

1. Document Type.
2. Overall Format/Structure.
3. Plain Language.
4. Grammar and Syntax.
5. Spelling.
6. Punctuation.
7. Hyperlinks.
8. 508 Compliant.

  b. Technical Content. Technical content is information based on the subject matter. It is fact-based data and includes information, such as references and processes. Most FS publications contain the following types of information:

    (1) Purpose and Audience. This content clearly states the purpose of the document and the intended audience. For example:

(a) Purpose Example. "The purpose of this document is to provide methods for how to comply with federal regulations," and "The purpose of this document is to direct inspectors to conduct a focused review," etc.

(b) Audience Example. "The primary audience for this notice is the FS Safety Assurance offices' Aviation Safety Inspectors (ASI). The secondary audience includes the Safety Standards and Foundational Business offices, and the Air Traffic Organization (ATO)."

(2) Office of Primary Responsibility (OPR). If your document does not contain a specific section listing the OPR contact information, it is recommended to include this information early in the document. It is recommended to keep this information high-level to account for future organizational changes.

(3) Historical or Background Information. This content usually outlines a sequence or timeline of events and or foundational information.

(4) Cross References. This section documents resources that directly affect the policy document or that the document has an impact on. It may also be important to include references to supplemental materials, depending on the specific policy or topic.

(5) Terminology. Depending on the topic, you may need to define associated terminology. Depending on the quantity and type of terms that need definitions, this may need its own section.

(6) Processes and Actions. This information is the policy, process, or procedure being developed. This information is often complex and highly technical and will need a large degree of focus to ensure effectiveness.

(7) Data. The inclusion of quantitative or qualitative data may be needed in order to provide background information, to provide purpose and reasoning for a policy, or may be part of the process or policy being implemented. You should evaluate the quantity and type of quantitative data that is being included to ensure its appropriate location in the document and the appropriate presentation method (i.e., graphs, tables, text).

c. **Non-Technical Content.** Non-technical content supports how you present and convey technical information. For example, the formatting, spelling, grammar, punctuation, page numbers, and a document's overall organization.

d. Write to the Audience. Keep the audience in mind when you write the document. Since readers may include a broad range of internal and external stakeholders, you may need to adjust your writing style based on the audience.

(1) Language.

(a) Regulatory Language. Properly use regulatory language terms, such as "must," "shall," and "required." See Chapter 2 for guidance on specific language that is required, which includes the use of language for statutory or regulatory documents.

(b) Plain Language. Government documents require the author to use plain language per the Plain Writing Act of 2010. The goal of plain language is to ensure documents are as easily understood as possible. As such, plain language is writing that is clear, concise, well organized, and follows other best practices appropriate to the subject and intended audience. Common characteristics of plain language include the following:

- Using active voice, rather than passive.
- Using shorter sentences and paragraphs.
- Using words that are easy to understand over technical jargon, to ensure the end user understands the content, while ensuring you balance the simpler verbiage with the level of technical detail needed for successful implementation.

(2) Style and Grammar. Policy and guidance documents will go through a review by technical editors for non-technical writing aspects. However, every writer should be aware of these linguistic features when they draft documents, and they should use available tools and resources as needed. When drafting the document, you should be aware of the following:

- Using correct grammar, spelling, and punctuation.
- Keeping consistent verb tenses.
- Using of pronouns for consistent style and readability.
- Using consistent terminology to describe specific concepts.

(3) Organizational Pattern. In addition to the document outline, you may need to incorporate an organizational pattern to ensure readability and understandability. Depending on the topic, this could include a chronological or hierarchical approach, or a structure that moves from general information to more specific.

(4) Incorporates Expository Writing Characteristics. Expository writing is a writing style that presents research, data, and analytical information from a neutral perspective to inform and explain more complex topics. Early in the guidance development process, we described the policymaker's mindset as a balance of the safety components of complexity, consistency, risk, and performance. You should reflect this balance in your writing.

(a) Consider a balance between specificity needed to implement the policy with flexibility for future needs and emerging issues. Additionally, too much detail in the writing may lose the reader, which may hinder the ability to implement the policy effectively.

(b) The document should ensure consistency with other guidance documents, programs, procedures, and standards. The document should not include any opinions or subjective statements. The intent of a policy and guidance document is not to persuade, but to present a guideline or process in a simple, understandable, and objective manner so that successful implementation is achieved.

e. **Formatting.** Format is the visual structure of a policy and guidance document.

(1) Document Template. FAA orders, Order 8900.1, notices, and ACs all have standardized formats and templates that dictate how to organize chapters, sections, paragraphs, and subparagraph levels. This includes font size, margin settings, paragraph numbering, and spacing. You can find the standardized formats and templates at: https://avssp.faa.gov/avs/afs/Pages/FS_Templates.aspx

(2) Section 508 Compliance. Section 508 of the Rehabilitation Act of 1973 and FAA Order 1370.120, Section 508 Accessibility Policy, requires policy and guidance documents to be 508 compliant to ensure the public has access to and can use these documents. A well-formatted document will also aid in the navigation and readability of the final document for the accessibility of reviewers and the audience.

(3) Other Formatting Considerations When Drafting the Document:

(a) Proper use of whitespace on a page ensures that documents with a lot of text are easier to read and understand.
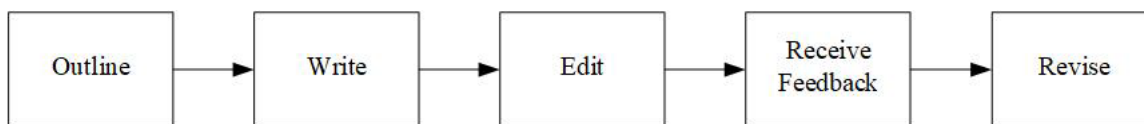
(b) Use description headings for chapters, sections, subsections, paragraphs, tables, or figures. These headings should be short and to the point, but still descriptive enough so the reader finds needed information more quickly.

(c) Use paragraphs and subparagraphs to organize information to help the reader navigate complex information. Keep in mind that too many paragraph levels can become overly complex, making it more challenging for the reader.

(d) Hyperlinks can provide access to essential and relevant information that directly supports the policy and guidance document. However, overuse of hyperlinks could lead to a frequent need to revise incorrect or broken links, or even create a visually distracting page. You should evaluate whether to include hyperlinks to ensure they provide direct value to document users and not a nice-to-know resource.

(e) Use tables and figures to complement the document text. Reference them in the text and use a consistent numbering system. Be mindful of the placement of these graphics to ensure the audience can understand them.

f. **Finalize Your Draft Document.** This phase of the document development process started with the outline and plan from the previous steps. During this drafting stage, you should ensure regular feedback. This may be from stakeholders who were involved in the earlier planning phases. You should also conduct some editing during this process to support your stakeholders who provide feedback to focus more on content and less on editing. At the end of this phase of writing, editing, reviewing, and revising, a final draft document is ready for the next step in guidance document development (see Figure 3-8).

Figure 3-8. Stages of the Writing and Editing Process


```
┌─────────┐   ┌─────────┐   ┌─────────┐   ┌──────────┐   ┌─────────┐
│ Outline │ → │  Write  │ → │  Edit   │ → │ Receive  │ → │ Revise  │
│         │   │         │   │         │   │ Feedback │   │         │
└─────────┘   └─────────┘   └─────────┘   └──────────┘   └─────────┘
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5. Implementation.

   a. Communications and Awareness. It is important to make stakeholders aware of updated or new guidance. There are several methods for mass communication and this section details several of them.

      (1) Confirm Your Audience. The audience(s) you identified during the planning and writing stages help you determine with whom you need to communicate during implementation. Reexamine this list to ensure it remains accurate as you prepare for these communications. As you review this list, evaluate the impacted processes and systems, if any job roles are changing, or if any reporting or organizational structures are impacted.

      (2) Plan your Communications. Communicate with all the audiences you identified. Consider the purpose of the document and how it relates to each member of the audience. Different audiences may need a different communication style or method, and different levels of detail and content in communications.

         (a) Some audiences may only need an awareness-focused communication. Other audiences may need information that is more specific if their roles and responsibilities are changing.

         (b) Consider the quantity of communications that you need to distribute. Some audiences need to receive multiple communications to reinforce the policy, and others may need communication in phases that emphasize specific policy aspects.

         (c) As you develop communications, you may need to reference the same resources used during the policy writing process, such as agency guidance on writing and information management (see Appendix A).

   b. Methods of Distribution. There are many vehicles to distribute information to FAA employees. Some examples are the Employee Advisory, Management Advisory, FAA Focus, AVS Flyer, FAA Daily Broadcast, etc. Decide which vehicle(s) are best for the document and work with the appropriate office or division to execute the communications.

      (1) Internal Methods. In an effort to streamline organizational messaging to all FS employees and all FS Managers, AFB established the Employee Advisory, a mass emailing process in FS. This process limits messages to FS employees and managers to designated days. This allows employees to anticipate delivery of FS news and have less concern about missing important information. See the Flight Standards Administrative Manual (FSAM) for more information.

(2) External Methods. Depending on the document type, you may need to inform the aviation industry at large with a press release. If so, you will work with the FAA Office of Communications (AOC) to develop and send the press release.

(3) Coordination/Notification with Bargaining Unit Employees. Consider what actions you should take to ensure the bargaining unit processes are followed.

c. **Change Considerations and Outreach.** We use change principles, a systematic approach for leading the people side of change for new projects and programs. Change is inevitable in the aviation industry, and many changes institute a new policy or guidance document, or a revision to current guidance. In earlier phases of the document development process, you identified a case for change on the issue, which included the following factors:

- Why the change is needed or if there was a trigger for the change;
- The risks of not changing or waiting for the change;
- The impacted groups and the level of change they will experience;
- The benefits of implementing this change, (e.g., benefits to the agency, employees, industry, the NAS at large, etc.);
- A description of the current state and the future state; and
- Potential challenges or risks associated with the policy.

(1) You should revisit this case for change and evaluate whether it ensures all aspects are still relevant and accurate. Reconsider these same questions, and revise the case for change, as applicable.

(2) After you confirm the case for change, determine what type and extent of change activities you need to conduct. Again, different audiences may require different levels and types of change principles. This may include activities such as communications, outreach, training, briefings, tools, and direct support.

(3) Work with AFB-540 to determine collaboratively if new or enhanced training is needed. This office provides instructional systems design expertise to help you develop learning strategies that best meet the FS training and development needs. Know that each policy change may require different change solutions, or a mixture of activities.

(4) Depending on the findings of any safety risk analyses or organizational risk analyses, you may need to work with AFB-400 to focus communications on certain risk areas to ensure understanding and acceptance.

(5) As you establish a framework for change activities, be aware that you may need to have different activities at different points during implementation. Considering the stages of change, the current state, any transitional states, and the future state may need different targeted activities connected to the unique aspects of each state. Using change principles are essential to ensure the policy is accepted and implemented properly to ensure success (see Figure 3-9). See the Change Management Services Branch (AFB-160) internal website for more information.

Figure 3-9. The Change Process
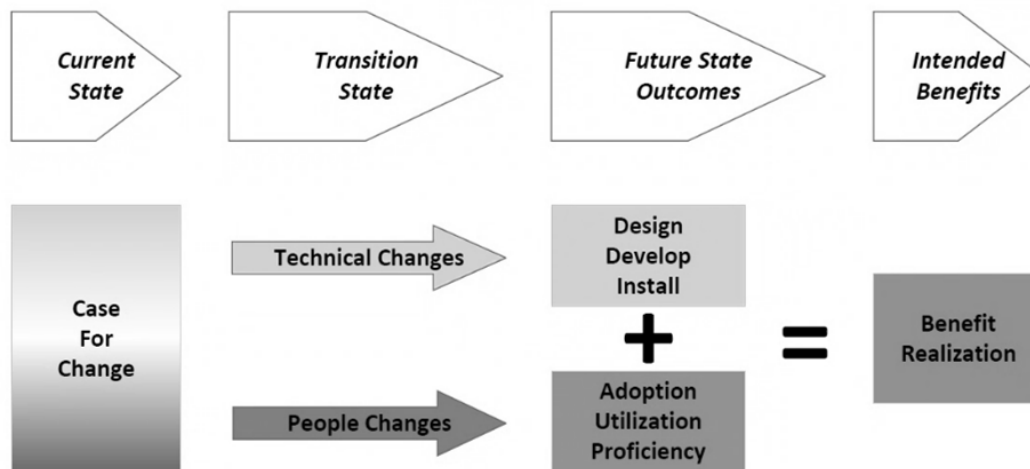
6. Continuous Evaluation.

    a. Importance of Policy Evaluation.

        (1) Responsibility of the OPR. Each OPR has a key responsibility to stakeholders to ensure that its guidance documents are current, reflect the regulations, and do not contradict one another. As discussed previously, effective guidance documents are consistent with the applicable rules and with each other.

        (2) Value of Evaluating for Success. The OPR has a responsibility to evaluate policy and guidance for effectiveness and to ensure that the desired outcomes occurs. Working with your stakeholders and users of the policy document can support this evaluation to identify challenges and successes.

        (3) Value of Periodic Review. When guidance documents do not reflect current regulatory requirements and FAA, Aviation Safety (AVS), and FS policies, the outcome is an uneven and inconsistent application of agency guidance and standards. Additionally, this can negatively affect the communication and coordination between offices, which may lead to further inconsistency in the application of Agency guidance and standards.

    b. Conduct a Policy Evaluation. We define success by reaching a goal or accomplishing the objective. Success is measured qualitatively by looking at overarching trends within and outside our organization to determine whether FAA guidance produces the desired result. We can also measure policies quantitatively through data collection and analysis. This journey towards success includes making course corrections along the way when needed.

        (1) Conduct Continuous Evaluation for Succes. In order to enhance success, it is crucial that FS staff perform evaluations to determine whether policy documents are applied as intended. Additionally, the OPR should work interdependently with stakeholders to ensure the guidance is accurate and that it achieves desired outcomes. It is imperative that the OPR evaluates whether

the guidance document meets the vision of success described during the policy development process. During these evaluations, an OPR may discover that a policy is not achieving the desired outcomes. The OPR should analyze their findings to determine if further communications, education, outreach, or supporting documentation (i.e., work instruction, job aid) is needed before revising the policy.

(2) Conduct Periodic Reviews. Periodic review is the regular and methodical review of policy and guidance documents to ensure they remain effective, relevant, and accurate.

(a) Order 1320.1, FAA Directives Management, requires each OPR to review, revise, modify, or rescind all directives for which it is responsible, at least every 3 years. Order 1320.46, FAA Advisory Circular System, requires an OPR to ensure all ACs remain current. In keeping with the requirements and intent of the previously mentioned orders, OPRs will review all their orders, order supplements, and ACs at least every 3 years for currency, accuracy, and consistency; this includes each section of FAA Order 8900.1. Notices do not fall under this review requirement, as they expire within one year of issuance. OPRs should also include other types of documents, such as SAFOs, InFOs, job aids, job task documents, and FAA websites as part of the review.

(b) The OPR is responsible for conducting the triennial review. The OPR may elect to perform a document life cycle (DLC) review early which would reset the next due date. Additionally, an OPR may elect to postpone a DLC review if a revised draft of that guidance document is currently under review, as long as that review has included all DLC review components. This ensures consistency among these supporting documents and the regulations, related directives, and ACs. Refer to AFS Business Process 002-103, Policy and Guidance Document Production, for additional information on periodic reviews.

c. Directives Feedback.

(1) Value of Stakeholder Feedback. After guidance documents are published, they become subject to various forms of internal and external stakeholder feedback. Feedback provides valuable input to guidance developers in a structured format. Reviewing feedback provides OPRs an opportunity to identify errors and discrepancies. Feedback is an essential part of continuous improvement.

(2) Responsibilities and Expectations.

(a) Expectations of OPRs. OPRs must meet deadlines for the review and disposition of feedback items. If there are no set deadlines, OPRs must review all feedback items as soon as possible. In accordance with effective guidance practices, OPRs should review open feedback items whenever you create or update guidance documents. As an OPR, you will manage feedback items to use in future guidance development activities within the division.

(b) Follow-On Actions. OPRs should follow guidance review processes to address necessary revisions to guidance documents. Ensure you revise the associated documents, training materials, websites, and other related content to ensure consistency between all documents.

Note: Inconsistencies between ACs and directives on the same topic should be resolved as soon as practical. Providing conflicting information to FS personnel and industry can make compliance difficult. If FS personnel discover a conflict between a directive and an AC, they should raise the issue with the appropriate policy office for resolution. The selected method of feedback may depend on the impact of the conflict.

(c) Methods of Delivering Feedback. Internal and external stakeholders can provide feedback on published FS guidance documents through a variety of methods, some of which include:

- Applicable FS Repository Feedback. Applies to documents contained in FS repositories such as DRS.
- AVS Directive Feedback System. Applies to all guidance documents used by AVS employees.
- Directive Feedback (Agency Level). Stakeholders use FAA Form 1320-19, Directive Feedback Information.
- Direct Feedback. Internal or external stakeholders use email or telephone calls to FS divisions.
- AVS Stakeholder Feedback Process. Applies to all QMS documents including QMS processes, programs, work instructions, forms, standard operating procedures (SOP), etc.

d. Determining the Next Steps. You should conduct a periodic review of guidance documents to determine whether the guidance document is still necessary and relevant. If the guidance document is still needed, assess if the guidance document achieves the desired result. You may achieve this in various ways as you:

- Assess data.
- Assess accident/incident reports.
- Assess Enforcement Information System (EIS) data.
- Consult with stakeholders.
- Analyze trends.

Note: If you determine that a guidance document is no longer necessary, begin work to cancel the guidance document.

Chapter 4. Review and Clearance

1.   Importance of Stakeholder Review for New and Revised Guidance Documents. It is important to have individuals and groups not involved in developing the document to review it before publication.

   a.   Stakeholders. While there is only one OPR for a document, it is likely there are one or more stakeholders, some very significant. It is critical to get input, feedback, and concurrence from these stakeholders by way of informal and formal reviews.

   b.   Types of Coordination. For this chapter, the following terms apply:

   - "Internal" means internal to the FAA.
   - "External" means external to the FAA.
   - "Informal coordination" means a review where a signed Clearance Record (CR) is not required.
   - "Formal coordination" means a review that requires a signed CR.

2.   Types of Informal and Formal Collaboration and Review. There are informal and formal methods available to review FS guidance draft documents. Some guidance documents, such as changes due to minor editorial updates, require little to no review or coordination. (If an SME wants to use the editorial update process, they must ensure the edits do not affect policy and do not change the policy process or intent.) Others, such as a significant change to Order 8900.1 or an AC, may require substantial collaboration and review. Regardless of the type, reviewers are expected to:

   - Provide specific suggestions on how to change the content.
   - Provide a rationale as to why the change is needed.

   a.   Informal Review and Clearance. Informal review or pre-clearance provides a proactive review of draft policy documents by internal stakeholders prior to formal coordination. Informal reviews do not require official forms and/or comment logs. This process benefits FS by incorporating the key principles of critical thinking, consistency, and interdependence in the development process.

      (1) Critical Thinking. Reviewers from other divisions and field offices may analyze and question proposed changes from a different perspective.

      (2) Consistency. Reviewers may help account for the different work environments in which the proposed guidance will apply and can ensure consistency with existing guidance, programs, and activities.

      (3) Interdependency. While the author is an SME, other stakeholders and SMEs may offer insight based on their unique knowledge, responsibilities, and experience.

   b.   Document Collaboration Across the Service. A process for draft document sharing, review, and comment prior to it entering formal coordination is established in QMS and Business Processes AFS-002-103. This process ensures the informal distribution of draft documents across

the functional offices, and it further supports a collaborative and transparent approach to policy drafting. This organized method for informally coordinating draft documents with internal stakeholders helps the OPR become aware of impacts that may not have been considered previously. Increasing communication and transparency with stakeholders early in the document development stages can improve the overall quality of FS policy and the speed in which it is published.

c. **Internal Formal Coordination.** This formal review period involves applicable FS divisions and offices identified by the OPR that have a stake in the document. Other FAA offices may also need to be a part of the internal formal coordination, depending on the subject of the guidance document. Formal coordination is conducted in a more systematic, rigid environment that includes the following features:

- Directives and ACs are distributed throughout FS for review for a specific number of days.
- Reviewing offices must indicate concurrence or nonconcurrence, along with any comments, by signing a CR.
- Applicable documents involved during formal coordination are retained in a case file, which must adhere to federal recordkeeping requirements.

Note: Refer to Orders 1320.1 and 1320.46 for additional information on the coordination process for directives and ACs, respectively.

(1) Required Reviewers. For certain documents, only those offices selected by the OPR, or those self-selected during the process of sharing draft documents across the service, must respond to formal coordination.

(2) Assign a Reviewer. When assigning a document for review, the reviewing organization should select an SME that has technical expertise in the document's subject, as well as critical thinking skills to provide a meaningful review, to the extent possible. In order to ensure an appropriate SME is assigned, the reviewing organization may need to collectively determine the SME(s) for a document. Additionally, any SME assigned to review a document should consider their specialized knowledge on that topic to confirm they can provide meaningful review of a document and coordinate with other SMEs, as needed.

d. **Importance of the Document CR.** FS requires signed CRs on all guidance documents presented for final signature prior to publication. The reviewing office's division manager may physically sign or use an approved method of digitally signing a CR indicating their concurrence or nonconcurrence. As stated in Order 1320.1, guidance must not place requirements on another FAA organization without its knowledge and consent. The CR documents this consent.

e. **Public Review and Comment.** Once the coordination of the draft is complete, FS encourages OPRs to seek public comments on draft guidance documents if it has an impact to the public and/or industry.

(1) FS requires public comment for ACs. Public comment is an opportunity for FS to increase transparency, clarity, value, and usability of our guidance.

Note: Public review is not required when the AC only contains editorial updates.

(2) Public comment can occur only after the Service and AFS-1 have fully vetted the document. In some cases, other offices and AFX-1 may also review and approve it for public review. The public review can be conducted concurrent either with or after internal formal coordination.

(3) The Flight Standards Publications Branch (AFB-120) manages the process to obtain AFS-1 approval for public review on behalf of the OPR.

(4) AFB-120 posts the draft guidance document on the Aviation Safety Draft Documents Open for Comment: Aircraft Certification Service and Flight Standards Service website (https://www.faa.gov/aircraft/draft_docs/) with clear directions on how to submit comments.

(5) You may consider submitting a document for a second public comment period if the initial comments received resulted in a significant change to the document.

3. Providing Meaningful Feedback as a Stakeholder. As an SME, your feedback is vital. As you provide feedback, do not merely mark up or write comments. Just as the development of a policy and guidance document requires planning and critical thinking, so should your feedback. While you will need to follow the prescriptive requirements of the feedback form used during this step, you still have a responsibility to provide feedback that is logical, well planned, and supports finalizing the document under review. Clear and coherent feedback supports a more efficient review process.

   a. Document Review. Your feedback should not be solely a search to find errors or a list of errors. Some best practices as you review the document include:

   - Read the document through entirely first, without making any comments, to obtain a complete understanding. Then, go back and add your feedback.
   - Your review should apply systems thinking as you consider the impacted systems and stakeholders. Finally, consider if the document addresses all these systems, stakeholders, and potential outcomes.
   - Ask yourself critical thinking questions: Is the solution/policy in the document going to bring about its desired outcome? Are there unintended consequences associated with the document's solution? Have they addressed potential challenges with implementing the document's solution?

   b. Feedback Documentation. Some best practices when documenting your feedback are:

   - Documenting as much as possible on the specific location your comment refers to, including chapter, section, subsection, line, and page number, so the authors are fully able to identify and understand your comment.
   - Providing information about why it is wrong or how it will not work; SMEs do not just state what is wrong or what is not working. Also, offer a specific solution.
   - Offering critical and constructive feedback. Considering and providing the details on the what, why, and how.

- Allowing time to review your comments. Just like reviewing a document, a review of your comments for editorial or grammar issues is vital for the OPR to understand them fully. Consider if your comments are understandable to someone else so that your comments will be read, analyzed, and considered. Finally, reviewing your feedback to ensure it provides value and not just a list of what is wrong; but that it provides sufficient detail for resolution.
- Calling the OPR directly if your feedback is complex or is a nonconcurrence. A nonconcurrence from a reviewing organization creates a work stoppage. Direct communication between stakeholders could bring the change needed to satisfy both parties without undue delays and resolving the issue at the lowest level possible.

Note: Depending on your technical expertise, it may be appropriate for you to review only specific chapters or sections. Or, you may need to balance your review and feedback with additional priorities. These best practices are listed as guidelines to provide some support in providing meaningful feedback.

4. Delays Caused by Reviewing Organizations. Listed below are common ways a reviewing organization may cause delays during coordination.

a. Missed Due Dates. If a reviewing organization does not provide a signed CR, this does not create a work stoppage. The OPR can note that no response was received and continue the review and approval process. However, this is likely to cause significant delays in approval and publication, as the OPR may need to go back to that reviewing organization and request a signed CR, if an approving official determines it is necessary.

b. Requests for Extensions. A reviewing organization can request an extension of the original due date. However, the OPR may reject such requests if not submitted in the proper timeframe.

c. Nonconcurrence. If a reviewing organization nonconcurs with a document, it must indicate so on a signed CR. Indicating nonconcurrence on a comment log alone is not sufficient. Submitting a nonconcurrence should not be used for minor issues and editorial/formatting discrepancies. A nonconcurrence from a reviewing organization creates a work stoppage.

5. Review of Comments. OPRs must review and consider all comments and incorporate comments that improve the document or correct information. OPRs must provide justification for any comments they do not accept from internal stakeholders and public reviewers. Further, the OPR should consult with commenters to address critical, substantive comments that are rejected and to resolve nonconcurs.

6. Final Review and Approval. After all comments are dispositioned, the OPR reviews the final draft and ensures the final draft is compliant with Title 29 of the United States Code (29 U.S.C) § 794 (referred to as Section 508). The document then gets routed through the division for approval. The division manager must sign the Final Clearance Record (FCR). The final draft and supporting documents then move to AFS-1 for review and signature, then to AFX-1 for review and final signature.

7.   Prepare and Publish Final Guidance. The final guidance document preparation and publication steps are managed by AFB-120. The office conducts the following:

- Reviews the contents of the final clearance package (FCP), as they become part of the official case file;
- Obtains guidance document publication numbers from the FAA directives program manager for non-Order 8900.1 documents;
- Incorporates the publication number and effective date (date of signature) to the final documents;
- Prepares and verifies the final document is Section 508-compliant; and
- Posts the final document to repositories (i.e., FAA website and applicable FS repository).

Appendix A. Related Websites and Publications

1. **Technical/Business Processes Related to Guidance Document Development.**

- Flight Standards Processes (https://my.faa.gov/org/linebusiness/avs/offices/afx/qms.html).
- Aviation Safety Processes (https://my.faa.gov/org/linebusiness/avs/programs/qms/qms-systems.html).
- AFS 001-000-S2, Flight Standards Handling of Request for Legal Interpretation to AGC.
- AFS 001-000-S4, Flight Standards Service Use of Digital Signatures on Directives and Advisory Circular Clearance Records.
- AFS 002-103, Directive and Advisory Circular Production.
- AFS 002-103-F1, Union Form.
- AFS 002-103-F2, Executive Summary.
- AFS 002-103-F3, AFS Directive and AC Initial Feedback Form (Pre-Coordination).
- AFS 002-103-F4, AFS Directive and AC Comment Form (Coordination).
- AFS 002-103-F5, AFX-1 Priority for Processing of [document number and/or title].
- AFS 002-103-W1, Processing Request for Public Comments.
- AFS 002-104-F1 R7, DRS Publication Index Card Data Sheet.
- AFS 002-104-W2, Processing Minor Editorial Updates to the Content of FAA Order 8900.1 (Inspector Handbook).
- AFS 002-104-W3, MMEL Publication Process Work Instruction.
- AFS 002-104-W4, Flight Standardization Board Report (FSBR) Publication Process Work Instruction.
- AFS 002-105, Flight Standards Service (AFS) Executive Correspondence.
- AFS 002-206, OPSS Template and Guidance Development.
- ARM 002-001-W1, Rulemaking Work Instruction.
- ARM 002-002-W1, Exemption Work Instruction.
- AVS 001-003, AVS Stakeholder Feedback Process.
- AVS 001-007, Document Control.
- AVS 002-008, FAA International Rulemaking Cooperation Process.
- AVS 002-009, Exemption Process.
- AVS 002-010, Rulemaking Process.

2. **Federal Guidance Relevant to Guidance Document Development.**

- Department of Transportation (DOT) Order 2100.6, Rulemaking and Guidance Procedures.
- FAA Order 1000.36, FAA Writing Standards.
- FAA Order 1320.1, VS SUP 1, FAA Directives Management.
- FAA Order 1320.1, FAA Directives Management.
- FAA Order 1320.46, FAA Advisory Circular System.
- FAA Order 1360.16, FAA Correspondence Policy.
- FAA Order 1370.120, Section 508 Accessibility Policy
- FAA Order 1700.6, FAA Branding Policy, Use of the FAA Logo, FAA Signature, and DOT Seal.

- FS Order 8000.377, Flight Standards Safety Management System (FSSMS) Requirements.
- Flight Standards Administrative Manual (FSAM).

3. **Policy and Guidance Document Templates.**

- ACs (https://my.faa.gov/content/dam/myfaa/tools_resources/branding_writing/legal/Short_Advisory_Circular_Template.dotx).
- General Documents (https://my.faa.gov/tools_resources/branding_writing/standards_tools/general_documents.html).
- Letters (https://my.faa.gov/tools_resources/branding_writing/standards_tools/letters.html).
- Memorandums (https://my.faa.gov/tools_resources/branding_writing/standards_tools/memorandums.html).
- Orders and Notices (https://my.faa.gov/tools_resources/branding_writing/standards_tools/orders_notices.html).
- PowerPoint Templates (https://my.faa.gov/tools_resources/branding_writing/standards_tools/powerpoint_templates.html).

4. **Writing and Plain Language.**

- FAA's Plain Language Program (https://my.faa.gov/tools_resources/branding_writing/plain_language.html).
- Federal Plain Language Guidelines (https://www.plainlanguage.gov/).
- Writing User-Friendly Documents: A Handbook for FAA Drafters (https://my.faa.gov/content/dam/myfaa/tools_resources/branding_writing/plain_language/learn_more/Writing_User_Friendlier_Documents.pdf).
- FAA's Other Writing Help (https://my.faa.gov/tools_resources/branding_writing/other.html).
- Office of the Federal Register, Document Drafting Handbook (https://www.archives.gov/federal-register/write/handbook#ddh).

5. **Other Sites Related to Guidance Document Development.**

- Automated Exemption System (https://aes.faa.gov/).
- Aviation Safety Draft Documents Open for Comment: Aircraft Certification Service and Flight Standards Service (https://www.faa.gov/aircraft/draft_docs/).
- Current Legislative Activities (https://www.congress.gov/).
- Electronic Code of Federal Regulations (e-CFR) (https://www.ecfr.gov/).
- OMB Bulletin No. 07-02, Agency Good Guidance Practices (GGP). (https://www.federalregister.gov/documents/2007/01/25/E7-1066/final-bulletin-for-agency-good-guidance-practices).
- ICAO Annexes (https://my.faa.gov/org/linebusiness/avs/offices/afx/divisions/afs/afs50/key_icao_docs.html).
- DOT Office of the Inspector General (OIG) Reports (https://www.oig.dot.gov/oversight-areas/aviation).

- Report on DOT Significant Rulemakings Information ((https://www.dot.gov/regulations/report-on-significant-rulemakings).
- The White House Regulatory Matters (https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/).

Appendix B. Policy and Guidance Document Development Checklist

The purpose of this checklist is to provide policy and guidance document writers and reviewers a list of items to consider when developing or revising guidance documents. Not every question will apply to every guidance document project, but you can use the following questions as a tool to improve overall document quality. This checklist contains different sections for different steps in this process. Each section should be referenced after each step in the document development process. Additionally, Appendix D includes a Decision-Making Guide, which can be used during root cause determination, evaluation and selection of policy solutions, and document planning.

Determining Reasoning and Intent:

1		Did you have discussions and apply critical thinking to ensure you thoroughly analyzed and identified the correct policy issue?
2		Did you identify root causes for the policy issue?
3		Did you identify all the interdependencies and systems that the issue and policy solution would affect?
4		Did you apply safety continuum practices when evaluating and selecting a policy solution, including balancing policy complexity, rigor, and prescriptiveness with implementability, agility, and descriptiveness?
5		Did you collaborate with stakeholders and SMEs, and include them, as appropriate, during this stage of issue identification and establishing organizational intent?
6		Did you select the audience and the most appropriate guidance document for the issue and policy solution?
7		Did you submit your Project Initiation Form (PIF) for cross-service awareness and tracking, if applicable?

Conducting Research:

1		Did you collaborate with stakeholders and other SMEs?
2		Did you research related regulations and guidance to ensure no conflict exists?
3		Did you conduct research to review other types of documents and research to provide more information on the policy area?
4		Did you address all the questions on the topic?
5		Did you try to anticipate questions that readers may have and address them in the document?
6		Did you review available feedback on the document (if revising a document)?
7		Does this guidance relate specifically to Safety Assurance System (SAS)? If yes, did you consider the:
		Safety attributes;
		Correct reporting requirements (Data Collection Tools (DCT)); and
		Correct SAS automation module?

Document Planning:

1		Did you discuss and consider changes that may occur as a result of any policy changes?
2		Did you and the development team generate potential policy solutions for evaluation?
3		Did you apply an integrated management approach when evaluating each potential solution and selecting a solution?
4		Did you apply a systems thinking approach, considering other systems and structures that would be affected by the policy solution?
5		Did you develop an outline and plan for the writing of the policy and guidance document?

Document Writing:

1		Did you organize the document to enhance understanding?
2		Is the intent clear?
3		Did you adequately define all terms within the document?
4		Is your content readable and understandable?
5		Did you write with the intended audience in mind?
6		Did you check contact information, job titles, emails, and web links to ensure they are current?
7		Does the document use standardized FAA and/or industry nomenclature?
8		Does the document use Plain Language and use active voice where possible?
9		Did you use informative headings, illustrations, tables, and white space effectively?
10		Did you use pronouns and name the actor and the action, to better help the reader understand the content?
11		Did you use short sentences and short paragraphs?

Regulatory Effects:

1		Did you use words like must, must not, may, and should correctly?
2		Did you make sure that the guidance document does not create or change a regulatory requirement?
3		Is this guidance document a reasonable application of the rule?
4		Does the document include a citation to the statutory provision or regulation to which it applies?
5		Did you make sure that the document does not contradict, or otherwise negate, a current acceptable method of compliance?

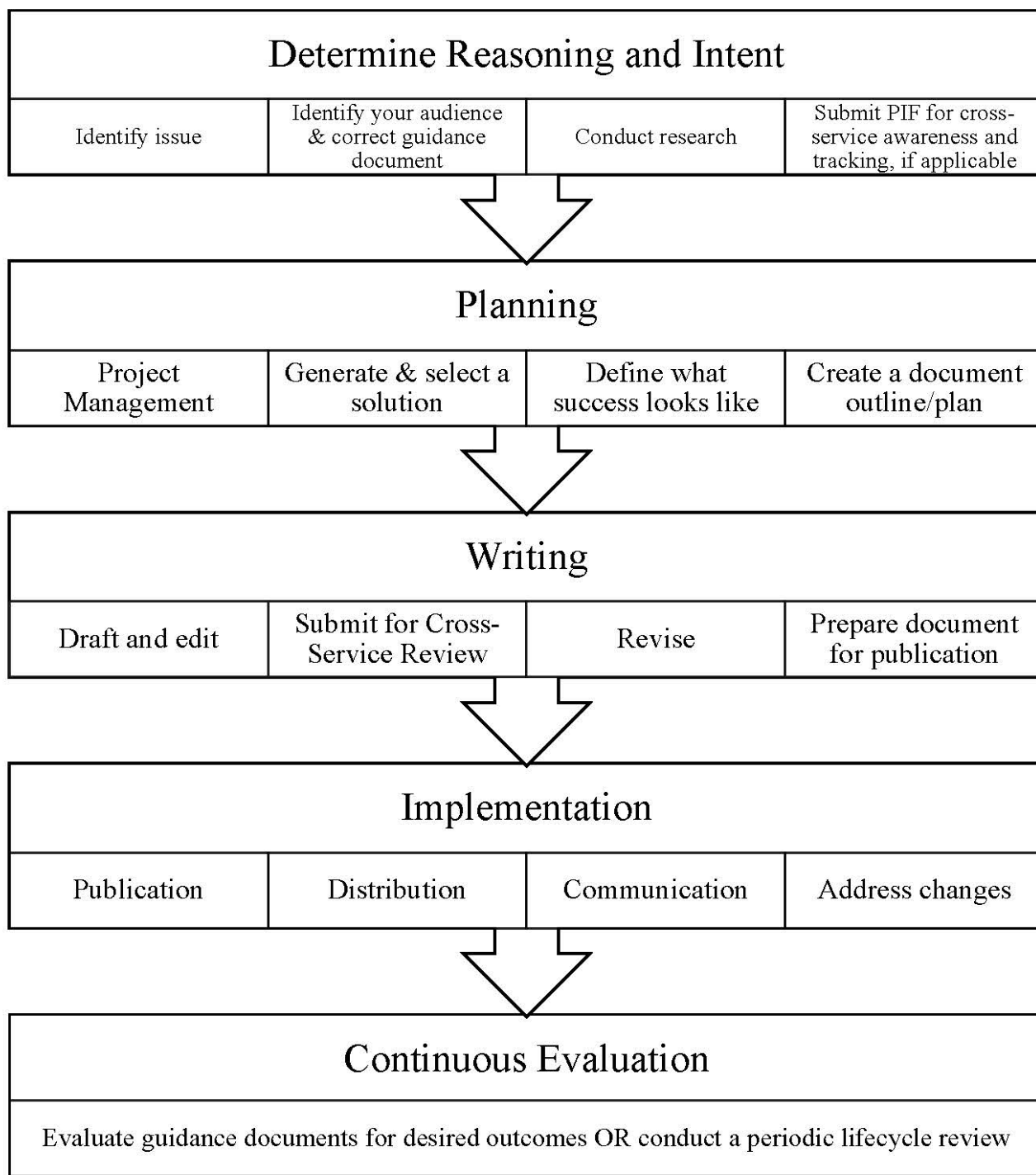**Pre-Clearance and Coordination:**

1		Did you informally coordinate the document with internal FAA stakeholders?
2		Did you consider their feedback during the initial drafting process?
3		Did you present the draft document for cross-service review?
4		Did you consider posting the document for public comment prior to publication?

Implementation of Your Policy and Guidance Document:

1		Did you plan for communication of the document, considering internal and external organizations, as appropriate?
2		Did you inform all identified audiences of the policy and guidance document?
3		Did you address any changes that the document's publication has made to other systems, programs, or structures?
4		Did you conduct any outreach, support, or training, as appropriate, for any changes?

Evaluation of Your Policy and Guidance Document:

1		Did you plan before document publication for evaluation, as appropriate, for any policy changes?
2		Did you reference the policy outcomes and success measures when planning for evaluation of the policy's implementation?

Appendix C. Guidance Document Development Flowchart

Determine Reasoning and Intent			
Identify issue	Identify your audience & correct guidance document	Conduct research	Submit PIF for cross-service awareness and tracking, if applicable

Planning			
Project Management	Generate & select a solution	Define what success looks like	Create a document outline/plan

Writing			
Draft and edit	Submit for Cross-Service Review	Revise	Prepare document for publication

Implementation			
Publication	Distribution	Communication	Address changes

Continuous Evaluation
Evaluate guidance documents for desired outcomes OR conduct a periodic lifecycle review

Appendix D. Decision-Making Guide

This document provides information about a general approach to decision-making and problem-solving. It is one method, but not the only method.

It is intended to be flexible, scalable, and complement other concepts and behaviors such as Risk-Based Decision-Making, Mutual Learning, Critical Thinking, and Interdependence[1]. When applying this process, you should consider how to integrate project, safety, and change management models such as SMS[2] and Prosci ADKAR[3].

This process can require multiple iterations to reach conclusion and serves as a guide for the following actions:

- Proposing and discussing topics for productive meetings.
- Determining which topics are applicable to, and appropriate for, certain types and organizational levels of discussion.
- Assembling information leading to a description of organizational intent.
- Communicating organizational intent and decisions.
- Framing and guiding the efforts of teams and working groups.

Purposeful interdependence is key to productive outcomes; seek out and involve those who might have relevant experience, knowledge, authority, and influence, as well as those who might challenge or test your assumptions and approach.

Steps:

1. Identify the Problem or Opportunity (it can be both).
2. Gather, Interpret, and Analyze Relevant Information.
3. Identify and Consider Alternative Courses of Action.
4. Choose Among Alternatives, Hybrid, or Another Approach.
5. Identify Next Steps and Execute Decision(s).
6. Monitor, Determine Actual Outcomes, and Review Decision(s).

1. Identify the Problem and/or Opportunity.

- What is the problem or opportunity? Is it pervasive or isolated?
- Who will likely be affected by actions taken?
- What key questions or information do we need to answer to solve the problem or take advantage of the opportunity?
- What terms do we need to agree on to clearly frame the problem or opportunity?
- What is the description of the desired decision, noting there are frequently many decisions associated with a large project, and different people can make those decisions along the way?

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[1]See Order 8900.1, Flight Standards Information Management System, Volume 1, Chapter 3, Section 2, Personal Ethics and Conduct, for more detailed information on interdependence, critical thinking, and consistency.
[2]SMS – Safety Risk Management, Safety Promotion, Safety Assurance, and Safety Policy.
[3]"ADKAR" stands for "Awareness, Desire, Knowledge, Ability, Reinforcement."

- Is the problem or opportunity something for which organizational intent is lacking? If so, who can provide organizational intent? If not, who should work to define, as appropriate, the scope and potential effects? Who else should be involved?
- Is a team or working group needed? If so, seek agreement about participation and for complex problems, consider drafting a tasking statement, Terms of Reference (TOR)[4], or charter (for more complex issues).
- What communications, internal and external to FAA, are appropriate until resolution?
- Is this something important to work on now? If so, why?
- Who needs to be aware of the effort and your intent to devote resources to it (including your time)?
  - High impact, broad scope, and high resource efforts should have senior management visibility and concurrence before proceeding. Management might have additional information about priorities (can the Service absorb another large-scale project?) and other initiatives underway in the same area. The level of management awareness should align with the scope of the impact.
  - Management should be involved for a variety of reasons (see below).
    - Offer relevant experience.
    - Provide relevant and current information.
    - Help to align stakeholders around approach, desired outcomes, risk, cost, and schedule.
    - Provide direction, steer, and course correction.
    - Add to clarity about roles and responsibilities.
    - Provide clarity about organizational risk tolerance/appetite (for all types of risks).
    - Exercise authority (in the form of approval, endorsement, etc.) for decisions and resources.
    - Support internal and external sponsorship.
    - Learn and maintain awareness in area of responsibility.
    - Represent an organization and support others from the same organization.

2. **Gather, Interpret, and Analyze Relevant Information.**

- Who should be at the table for these discussions?
- What is the current state of the problem or opportunity?
- What is our desired state of the problem or opportunity?
- What are the gaps between the current state and desired state?
- What are the root causes of the gaps?
- What are the risks associated with doing nothing about the challenge or opportunity?
  - Safety risk.
  - Project risk.

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[4]From Wikipedia: "Terms of reference show how the object in question will be defined, developed, and verified. They should also provide a documented basis for making future decisions and for confirming or developing a common understanding of the scope among stakeholders. In order to meet these criteria, success factors/risks and constraints are fundamental. They define the vision, objectives, scope and deliverables (i.e. what has to be achieved); stakeholders, roles and responsibilities (i.e. who will take part in it); resource, financial and quality plans (i.e. how it will be achieved); work breakdown structure and schedule (i.e. when it will be achieved)."

   o Operational risk.
   o Technological risk.
   o Financial risk.
   o Security risk.
   o Reputational risk.
   o Political risk.
- What interests should be taken into account? These will be used to evaluate potential solutions.
- What relevant information should be taken into account (e.g., via a literature review; are there precedents, exemplars, or analogous issues, etc.)? Has someone else made attempts to solve this issue or done something similar?
- What existing data and material is relevant to the problem or opportunity? What is the description of the data quality (e.g., accuracy, timeliness, validity, consistency, integrity, etc.)?
- What perspectives and assumptions are senior managers/leaders expressly willing to make that can be taken into account (e.g., organizational risk appetite)?

3. Identify and Consider Alternative Courses of Action.

- Considering the decision-maker (individual or group), what is the preferred presentation of alternatives?
- What are the range of actions that might be taken regarding the risk (e.g., accept, transfer, defer, mitigate, eliminate, etc.)?
- How should the alternative actions be prioritized?
- Which alternatives address the gaps between the current state and desired state and how do they address the identified interests?
- How effective, executable, efficient, and affordable are each of the alternatives in terms of financial and other resources?
- How might each of these characteristics be measured?
- For significant decisions, what are the opportunity costs for each approach?
- How will you measure success/goal achievement?

4. Choose Among Alternatives, Hybrid, or Another Approach.

- What elements of the possible alternatives do we want to combine or integrate to create a solution that addresses the gaps between the current state and ideal state?
- How does the approach support organizational goals and objectives?
- What metrics should be used to measure progress toward desired outcomes?
- Can the solution be broken into phases to mitigate cost/resource concerns? What would be the impact of that?

5. Identify Next Steps and Execute Decision(s).

- What next steps need to be accomplished by whom and by when? Where will the necessary resources (people and funding) come from?
- What is needed to address project management, change management (internal and, as appropriate, external to FAA), and safety management aspects?
- Is this the final decision or will additional decisions be needed? For the latter case, what are the follow-on gates or milestones?
- To what degree should plans be formalized? The greater the complexity and higher resource efforts should be more formalized.
- How and where should decision(s) and action(s) be recorded? Who needs to know about the decision(s)?

6. Monitor, Determine Actual Outcomes, and Review Decision(s).

- After implementation, monitor and determine need for corrective action. Consider conducting a "hot-wash"/after-action analysis.
- Re-engage decision-making process at appropriate step.
- Consider lessons learned for future efforts.

Appendix E. Choosing the Correct Non-Policy Document to Support Policy and Guidance Documents Job Aid

Policy and guidance documents include requirements for compliance. However, they do not and should not include the details of how to comply with policy. Other tools and resources provide this information. There are different types of non-policy documents, each with a specific role and should be used in certain situations to increase the efficiency and effectiveness in complying with a policy.

Tool	Description	Consider This Tool When:
QMS Business Process	• Agency method for documenting standard operating procedures (SOP). • Provides information on the "what and who" of a process or procedure for conformance.	…required by Order VS 1300.2, Aviation Safety (AVS) Quality Management System (QMS). …a process or procedure has more than one organization or employees involved. …a procedure affects and involves a system(s).
Work Instruction	• A step-by-step instruction to conduct a task. • Provides the "how" of a job, its actions, and outputs.	…a job task is standardized with fixed steps and actions. …a job task is typically conducted by a single person.
Job Aid	• A tool providing additional information to complete work to help an employee do a job more efficiently and effectively. • It is not directions or step-by-step instructions.	…a process needs additional info to understand it or accomplish specific steps or actions. …you need to create a checklist, diagram, flowchart, graphic, table, directory, decision tree, or other supplemental material.
Checklist	• A type of job aid. • Systematic check of all important elements to consider during each step of a task.	…you need to list specific items, questions, or topics to consider when conducting a job task or managing a project.
Quick Reference Guide	• Concise and high-level overview and tips for completing tasks. • More to be used during training, not on the job. • Can be a refresher for work that has not been done in a while.	…a project or system needs to be summarized for efficiency. …you need to create a summary for a longer manual or handbook. …you need to create a high-level flowchart of a procedure.

Directive Feedback Information

Please submit any written comments or recommendation for improving this directive, or suggest new items or subjects to be added to it. Also, if you find an error, please tell us about it.

Subject: FAA Order FS 8000.96A, Flight Standards Service Guidance Document Development

To: Flight Standards Directive Management Officer, AFB-120 Directives Mailbox (9-AWA-AFB-120-Directives@faa.gov)

(Please check all appropriate line items)

An error (procedural or typographical) has been noted in paragraph _____ on page_____ .

Recommend paragraph _____ on page _____ be changed as follows: *(attach separate sheet if necessary)*

In a future change to this order, please cover the following subject:
(briefly describe what you want added)

Other comments:

I would like to discuss the above. Please contact me.

Submitted by: _____ Date: _____

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