

2 Sep 2015

After reviewing the OFFICE OF AUDIT AND EVALUATION response to DI-15-3034, the following comments are provided. These comments are by no means directed negatively at the OFFICE OF AUDIT AND EVALUATION which will be referred to as "OFFICE OF AUDIT AND EVALUATION REPORT:". This is, at great length, an attempt to give reference, interpretation and clarity regarding responses to allegations which will be referred to as "Comment:". Please take the time to **read all content and place special note/emphasis on comments and reference material (excerpted)**; that has been, underlined, placed in *italics* and/or placed in **bold text**:

**OFFICE OF AUDIT AND EVALUATION REPORT:**

*"The anonymous complainant's allegation was confirmed that ZAU managers were assigning FLMs to work in geographic areas in which they did not maintain currency. However, no FAA Order prohibits this practice. Regarding Allegation 2, we found that ZAU is assigning FLMs to fill in as temporary STMCs in the Traffic Management Unit (TMU). However, this also is not prohibited by an FAA Order or policy."*

**Comment:**

The intent of JO 7210.3 pertaining to certification and currency requirements was being misinterpreted by management at ZAU to universally assign FLMs to manage operations in areas **regardless to certification or currency requirements**. The dialogue that *IT* (JO 7210.3), doesn't specifically state that FLMs only supervise areas that they are certified and maintain currency in became the focus. Thus **it** was practiced to assign FLMs and STMCs to work in geographic areas whereas they did not maintain currency. There are plenty of ways to read around Orders. This matter on how FLMs and STMCs were being used (regarding out of area assignments) is one of them.

The intent of the Order was abandoned. The Joint Order specifies that the CIC must be fully qualified and rated in the assigned operational area must be designated as CIC. One could question: what would be the difference between CIC and FLM other than Bargaining Unit and Management respectively? If this was left out of the Joint Order regarding CIC's, would we use CIC's in this manner? The difference is that in the section for CIC's, the Order states "fully qualified and rated in the assigned area". Something was inadvertently left out of Joint Order 7210.3. With respect to the JO 7210.3, *IT* doesn't specifically have the same statement on FLM supervision. This was not intentionally done in order for ZAU to operate in this manner. The same should apply to SATCS's /FLM's with the exception that the FLM only has to be rated on a minimum of 2 positions. This standard has applied (for FLMs to Supervise in their area of assignment only) to FLMs as *IT* does for CICs in ARTCC facilities for decades.

Food for thought:

1. Hypothetical: An FLM is certified on two positions in an ARTCC and maintaining operational currency. Can that FLM go to another ARTCC's area and perform supervision without being certified in that area? If it were allowed by that facility, "it" (JO7210.3) does not prohibit this practice.
2. True Story: An FLM at ZAU is promoted to STMC and is in training in the TMU. That new STMC could not be in charge of a shift in the TMU until certified. A need develops for

an STMC in the TMU due to a shortage. Management assigns an FLM off the operations floor in the TMU to be in charge as STMC instead. This dumbfounded TMCs in the TMU. The FLM off the operations floor is not checked out (certified) on any positions within the TMU, but can supervise it, yet the newly promoted STMC, who is now assigned in **the TMU** cannot. How can this happen? Is it because the new STMC is not yet qualified/certified in the TMU? Neither is the FLM off the operations floor. Does the FLM's two Radar Associate position certifications in an operational area make them competent enough to run the Traffic Management Unit? It does not. This is the equivalent of what ZAU's Operational Managers were doing for assignments in the TMU and for any area within the building.

3. True Situation: A North Area **ATCS** promoted to FLM, was assigned and provided supervision in the East Area until leaving ZAU to another duty location. After several years, that FLM returns back to ZAU, and takes most of the allowable time to *train and certify on two (2) positions in the same East Area that the person worked as an FLM before leaving (East)*. After certifying in the East Area, this FLM, has been occasionally been directed to perform supervision in the North Area without any re-training. This makes no sense. Keep in mind that ZAU has undergone major airspace re-design, new RNAV arrival/departure routes, etc.. Does seem fair to put this FLM in this situation? How is the two positions certified in the East Area relevant to the North Area? The FLM is Familiar? Yes, somewhat but the operation has all mostly changed in the North Area. This is an unrealistic and unfair expectation for Supervisors responsible for directly managing air traffic control. It is not fair to the flying public. It can be unsafe.

4. A newly promoted FLM who has a terminal only background comes to ZAU is assigned the North Area Specialty. The FLM is taking some time to *certify on two positions in the area* as ARTCC duty is all new. When the North Area is short an FLM who is certified in the area (due to a sick leave, etc), a CIC is placed in charge (even with the FLM-in-Training on duty). However, in the absence of a CIC, rather than overtime for a certified North Area FLM; FLM's from other areas are displaced into the North Area are placed in charge of the North Area that are not certified in the North Area.

5. True Situation: A ZAU TMC who was previously an FLM at ZAU for seven (7) years becomes a TMC at ZAU. A need exists for a CIC within the TMU. This person is not eligible for CIC duty, and is not used to perform supervision in the TMU because he never had the one-day CIC class. A one-day CIC class trumps an individual who was a Supervisor for seven years. What is wrong here? Nothing. The individual did not meet the Requirements/Qualifications as impractical as that may seem.

End food for thought

To put the pieces together: **Ratings relate to qualifications. Qualifications relate to areas of specialization.** This presumably and appropriately applies to FLMs whom are also ATCSs in a supervisory capacity. The spirit of Joint Order 7210.3 was misinterpreted to suit ZAU's intent. However, ***certifications and currency requirements are imbedded through out various documents that support Area assignments. This is important.*** Supervisors (FLMs) are Air Traffic Control Specialists (ATCSs). With a special emphasis on the word SPECIALIST, the ATCS is an expert in their area of assignment. The following is submitted in an attempt to piece together the documents (Orders) that tie specific area assignment to all ATCS's:

Begin Excerpt:

Air Traffic Training - JO 3120.4N Appendix A item 4 Section IIB titled "Air Traffic Ratings" states:

**"4. Section II B. Air Traffic Ratings.** The entries in this section relate to specific facility ratings, not to certificates. *Ratings describe facility operational functions and are required for employees to perform the full range of duties associated with a particular area of specialization or facility. The use of the term "Facility" or "Area" indicates that the employee has successfully completed all the certification requirements for that facility or area.*"

JO 7210.3Y:

1. PARAGRAPH NUMBER AND TITLE:

2-3-1. GENERAL 2-3-2. APPLICATION 2-3-3. REQUIREMENTS 2-3-5. TRACKING

2. BACKGROUND: A multi-year Air Traffic Organization (ATO) effort to review/revamp currency and tracking requirements engaged the expertise of Operational Managers at Headquarters, field facilities, as well as representatives from the Air Traffic Supervisors Committee (SUPCOM) and National Air Traffic Controllers Association (NATCA).

3. CHANGE:

OLD

NEW

**SECTION 3: AIR TRAFFIC FAMILIARIZATION/CURRENCY REQUIREMENTS FOR EN ROUTE/ TERMINAL/SYSTEM OPERATIONS FACILITIES**

**2-3-1. GENERAL**

*It is the responsibility of the employees identified in Paragraph 2-3-2, Application, to work in conjunction with their supervisors to ensure they adhere to the requirements of this section.*

**NEW 2-3-2. APPLICATION**

***a. Air traffic managers, assistant managers, executive officers, staff managers, operations managers, support managers, traffic management officers and support specialists, who as a condition of employment are not required to maintain currency, must maintain familiarity with control room operations to perform their required duties in an efficient manner.***

***b. Air traffic control specialists (ATCS), traffic management coordinators (TMC), national traffic management specialists (NTMS), developmental specialists (ATCS/TMC/NTMS), first-level supervisors (including facility managers who also serve as first-level supervisors), operations supervisors (OS), front line managers (FLM), supervisory traffic management coordinators (STMC), national traffic manager officers (NTMO), and air traffic assistants (ATA) are required to meet currency requirements in order to perform their duties.***

**SECTION 3: AIR TRAFFIC FAMILIARIZATION/CURRENCY REQUIREMENTS FOR EN ROUTE/ TERMINAL/FLIGHT SERVICE FACILITIES**

**2-3-1. GENERAL**

It must be the responsibility of the employees identified in Para 2-3-2, Application, to adhere to the requirements of this section.

OLD 2-3-2. APPLICATION

a. Air traffic managers, assistant managers, operations support managers, and support specialists, who as a condition of employment are not required to maintain currency, must maintain familiarity with operating positions to perform their required duties in an efficient manner.

b. First-level supervisors (including facility managers who also serve as first-level supervisors), ATCSs, developmental specialists, and air traffic assistants are required to maintain currency in order to perform their duties.

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#### **OLD 2-3-3. REQUIREMENTS**

a. *Familiarization.* As a minimum, nonoperational personnel (see application a) must observe control room operations within their facility for 2 hours each week.

b. *Currency.* To maintain currency, personnel must rotate through all positions on which they are certified each calendar month. Additionally, they must meet the following minimum time requirements on control positions or operational positions, as appropriate, each calendar month:

1. First-level supervisors (including facility managers who also serve as first-level supervisors), and support specialists who are required to maintain currency by their air traffic managers:

(a) Radar/tower control/operational positions (excluding the operational supervisor in charge (OSIC) position): Four hours tower and four hours radar. If certified in only one area of operation (tower or radar), then a total of eight hours in that area.

(b) All other facilities: Eight hours in control/operational positions (excluding the OSIC position).

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#### **NEW 2-3-3. REQUIREMENTS**

a. *Familiarization.* The methods used for personnel identified in Paragraph 2-3-2a, Application, to maintain familiarization must be specified in a local facility directive.

b. *Currency.* Personnel must rotate through all positions on which they maintain currency each calendar month. Additionally, they must meet the following requirements:

##### **1. Number of positions required to maintain currency.**

**(a) ATCSs, TMCs, NTMSs, developmental specialists (ATCS/TMC/NTMS) and ATAs must maintain currency on all operational/control positions on which certified.**

**(b) First-level supervisors (OS, FLM, STMC, NTMO) and support specialists (who maintain currency) must maintain currency on a minimum of two and a maximum of eight operational/control positions.**

##### **NOTE-**

*Hand-off, Tracker, and CAB/TRACON coordinator positions do not count towards the minimum of two and maximum of eight operational/control positions.*

*(c) TMCs/STMCs required to maintain currency on operational positions within the traffic management unit (TMU), and control positions outside the TMU (dual currency), must maintain currency on a minimum of two and a maximum of eight operational/control positions outside the TMU.*

**(d) Waivers to any requirements contained in paragraph 2-3-3b(1), may only be approved by the respective Director of Operations, who is required to forward all waiver requests and dispositions to the Director of Operations Support for tracking and oversight.**

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2. The following minimum time must be met each calendar month: a minimum of one hour per position is required; time working combined positions satisfies the requirement for each of the combined positions. Except for flight service station (FSS) and air traffic assistants, time working the assistant controller, flight data communications, flight data, and clearance delivery positions is not counted toward total currency time requirements; however, the one-hour minimum time per position is required to maintain currency.

*NOTE-*

*Hand-off, Tracker, CAB/TRACON coordinator, Final Monitor, FLM/FLMIC, and managerial (in-charge) positions do not have a currency requirement and time spent working those positions is not counted.*

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**(a) ATCSs, Developmental (Dev) ATCSs, and ATAs.**

*NOTE-*

**1.** *Although the OSIC position is an operational position, time working as an OSIC is not counted toward currency time.*

**2.** *Time working Flight Data communications, Flight Data, or Clearance Delivery positions does not count towards currency requirements.*

**2.** Supervisory traffic management coordinators not covered in subpara b3 and traffic management coordinators are required to maintain currency and must rotate through all positions on which they are certified each calendar month. Additionally, they must work a minimum of eight hours per calendar month on control positions.

**3.** Supervisory traffic management coordinators at all ARTCCs and at A80, N90, PCT, NCT, and SCT are required to maintain currency and must rotate through all positions within the Traffic Management Unit (TMU) only. Additionally, they must work a minimum of eight hours per calendar month on these positions.

**4.** All other employees who are required to maintain currency:

**(a)** Radar/tower control/operational positions: Eight hours tower and eight hours radar. If certified in only one area of operation (tower or radar), a total of sixteen hours in that area.

**(b)** All other facilities: Sixteen hours in control/operational positions.

**5.** ASR approach (where published): Three each calendar quarter; one of which must be a no-gyro. Radar simulation may be used to satisfy these requirements.

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(1) TERMINAL. Radar/tower operational/control positions: A minimum of eight hours tower and eight hours radar. If certified in only one area of operation (tower or radar), a minimum of 16 hours is required.

(2) *EN ROUTE, FSS, and ATAs. A minimum of 16 hours on operational/control positions is required.*

(b) *TMCs, NTMSs, and developmental TMCs/NTMS are required to maintain operational/control position currency as follows: a minimum of 16 hours on operational/control positions.*

(c) Support specialists who maintain currency.

(1) TERMINAL. Radar/tower operational/control positions: a minimum of four hours tower and four hours radar. If certified in only one area of operation (tower or radar), a minimum of eight hours is required.

**(2) EN ROUTE/ATCSCC. A minimum of eight hours on operational/control positions is required.**

**(d) FLMs/OSs (including facility managers who also serve as first-level supervisors).**

(1) TERMINAL. Radar/tower operational/control positions (excluding the FLM/FLMIC position): a minimum of four hours tower and four hours radar. If certified in only one area of operation (tower or radar), a minimum of eight hours is required.

**(2) EN ROUTE, FSS. A minimum of eight hours on operational/control positions (excluding managerial (in-charge) positions) is required.**

**(e) STMCs/NTMOs are required to maintain operational/control position currency as follows: a minimum of eight hours on operational/control positions excluding managerial (in-charge) positions.**

**(f) Dual Currency. TMCs/STMCs at all Air Route Traffic Control Centers (ARTCC) and at New York TRACON (N90), Potomac TRACON (PCT), Northern California TRACON (NCT), and Southern California TRACON (SCT) are required to maintain currency only within the TMU. All other TMCs/STMCs are required to maintain dual currency.**

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(1) TERMINAL. Radar/tower operational/control positions: a minimum of four hours tower and four hours radar. If certified in only one area of operation (tower or radar), a minimum of 8 hours is required.

**(2) EN ROUTE. A minimum of eight hours on operational/control positions is required.**

**(3) TMC/STMC optional. Staffing and workload permitting, TMCs/STMCs not required to maintain dual currency may elect to maintain dual currency. Dual currency is not subject to the provisions of Paragraph 2-3-4; Differential.**

(g) Airport Surveillance Radar (ASR) approaches (where published): three each calendar quarter, one of which must be a no-gyro. Radar simulation may be used to satisfy these requirements.

3. Time spent performing on-the-job-training (OJT) instruction as an OJT instructor is not counted toward operational/control position currency.

4. Time spent receiving OJT on combined positions, where the employee is certified on some of the combined positions, is not counted toward operational/control position currency.

5. Time spent performing certification skills checks, operational skills assessments, skills checks, over-the-shoulders, etc., is not counted toward operational/control position currency.

NOTE-

*Initial operational/control position certification completed in a month meets the requirements for that position for that month. Individuals recertified in a month must meet currency requirements for that month regardless of the day of recertification*

TBL 2-3-1.

## **CURRENCY REQUIREMENTS**

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### **NEW 2-3-5. TRACKING**

*a. Operational/control position currency time must be documented in accordance with processes described in Paragraph 2-2-6, Sign In/Out and On/Off Procedures, and tracked.*

**b. Air traffic managers must document, in a facility directive, a quality control process to ensure that personnel who do not meet currency requirements in a calendar month do not work an operational/control position prior to recertification in accordance with FAA Order JO 3120.4, Air Traffic Technical Training.**

**End excerpt:**

In the above references, JO3120.4 defined Ratings for the ATCS (which includes the FLM). JO7210.3Y differentiates familiarization requirements for OMs, ATMs, etc. from currency requirements for ATCSs. In order to be current, you have to be rated in to perform the full range of duties with a particular area of specialization.

To clarify Area of specialization, Imbedded within JO 7210.3, the following is *italicized* below pertaining to Areas of Specialization:

Begin excerpt:

4/3/14 JO 7210.3Y

**Part 2. AIR ROUTE TRAFFIC CONTROL CENTERS Chapter 6. En Route Operations and Services Section 1. General**

**6-1-1. AREAS OF OPERATION**

The control room is divided into easily managed segments or areas of operation. An area of operation consists of a group of sectors requiring the service of ATCSs. The number of areas authorized is based on the ARTCC's requirements and staffing needs. Vice President of En Route and Oceanic Services approval must be obtained prior to changing the number of areas of operation.

**6-1-2. SECTORS**

The basic unit in each area of operation is the sector. Sectors are classified as Radar, Non-Radar, or Oceanic and subclassified by altitude strata.

**6-1-3. SECTOR CONFIGURATION**

a. The size and configuration of sectors are determined by:

1. Traffic volume.
2. Traffic flow.
3. Types of aircraft.
4. Location and activity of terminals.
5. Special operations/procedures.
6. Coordination requirements.
7. Consolidation capability.
8. Radar/radio coverage.
9. Equipment limitations.
10. Airway alignments.

b. Accordingly:

1. Align sector boundaries so as to contain the longest possible segments of airways.
2. Align sector consoles to conform with the primary traffic flow.
3. Distribute the workload equitably among the sectors.
4. Provide for a sector consolidation capability.

c. The lateral boundaries of sectors in different

altitude strata need not coincide.

d. A LOA must be prepared when adjacent sectors of two facilities are stratified at different levels.

**6-1-4. AREAS OF SPECIALIZATION**

ARTCC air traffic managers must divide their control rooms into areas of specialization as sector complexity dictates. ATCSs must be assigned to one or more areas of specialization commensurate with individual qualifications. An area of specialization is a group of interrelated sectors on which an ATCS is required to maintain currency.

ARTCC air traffic managers should strive to make areas of specialization coincident with areas of operation. There may be more than one area of specialization in an area of

operation. Avoid, if possible, establishing an area of specialization encompassing portions of two areas of operation. The En Route and Oceanic Service Area Office should be notified of changes affecting the number and type of areas of specialization.

End Excerpt.

Comment:

FLMs are ATCSs. FLMs are assigned to an area of specialization commensurate with individual qualifications. To clarify Qualifications:

Qualification requirements for Supervisory Air Traffic Control Specialists (FLM) are fully described in JO7210.3. In terms of qualification regarding supervision duties between a CIC and an FLM, the difference is that a CIC has to be fully qualified and rated in the assigned operational area. An FLM only has to be certified (qualified and rated) on two (2) positions (minimum) in an operational area. As you can see in para 6-1-4 above FLMs (ATCSs) are assigned to an Area as required.

In either case, Air Traffic Training - JO 3120.4N Appendix A item 4 Section IIB titled "Air Traffic Ratings" still apply and ties the FLM in with an area of specialization.

JO 7210.3 also differentiates the requirements between "Familiarization" and "Currency". FLMs/STMCs are required to maintain currency to perform their duties. Currency relates to an operational area.

According to JO 7210.3, in the Traffic Management Unit (TMU), STMCs are required to maintain currency within the TMU.

If an STMC does not meet currency requirements, that person is no longer qualified to perform those STMC duties. In cases whereas ZAU is assigning FLMs to fill in as temporary STMCs in the Traffic Management Unit, those FLMs do not meet the qualification and currency requirements to supervise the TMU as outlined in JO 7210.3.

As a result, they should not be assigned those duties. This perceivably violates the Joint Order. Any STMC (including previous STMC), that no longer meets currency requirements for positions they are certified on within the TMU, are no longer qualified to perform those STMC duties. If they are assigned those duties, this perceivably violates the Joint Order. Additionally, the TMU is a separate area of specialization.

Traffic Management training and certification requirements for STMC's are specialized as there are specific qualification requirements for the TMC/STMC:

To Clarify Qualification Requirements for the STMC:

Begin excerpt:

09/30/13 JO 3120.4N Appendix G  
Section 3. Stage 2: Facility Traffic Management Qualification and Certification (Course 55116 or current course)

**General:** The purpose of this stage is to provide the TMC-IT/TMS-IT with local facility orientation and site-specific training. **Course 55116** is broken into two parts: **Part A supplements and reinforces Course 50115 training and prepares the TMC-IT/TMS-IT for OJT.**

**Part B is to qualify the TMC-IT/TMS-IT to perform the full range of duties and attain certification on all traffic management positions of operation within the facility.**

Portions of this course may be used for TMCs/TMSs who have lost their currency or for TMCs/TMSs who have transferred from another facility. Facilities must decide which portions of Part A will be administered based on the needs of the specialist/facility.

**End Excerpt**

**Any FLM that has not received the specialized training in accordance with JO 3120.4 (Course 55116 Part A and 55116 Part B) is not qualified to perform duties within the TMU.**

**Any FLM who has lost currency in the TMU is no longer current and/or qualified must follow recertification procedures in accordance with JO 3120.4.**

Additionally,

**In the case of the Traffic Management Unit, the line of authority for ARTCC is as follows in according to JO 7210.3:**

**Begin excerpt:**

4/3/14

JO 7210.3Y      **Section 3. Line of Authority**

17-3-1. ATCSCC

a. Each national operations manager (NOM) is under the general supervision of the Manager of the ATCSCC. Each national traffic management officer (NTMO) is under the general supervision of the NOM. Each national traffic management specialist (NTMS) is under the general supervision of the NTMO.

b. In the absence of the NTMO, there will be designated a national traffic management specialist- in charge (NTMSIC) that performs these duties in accordance with management direction.

**17-3-2. ARTCC**

**The TM Coordinator at ARTCC facilities (TMC) is under the general supervision of the supervisory TM coordinator (STMC). The STMC is under the general supervision of the Traffic Management Officer**

**(TMO). In the absence of the STMC the STMCIC is under the general supervision of the TMO. In the absence of the TMO the STMC/STMCIC is under the general supervision of the air traffic manager.**

**End Excerpt**

**According to JO 7210.3y, the FLM is not in the line of authority for performing STMC duties. A Traffic Management Coordinator who is CIC qualified within the TMU is**

allowed to perform those Supervisory Traffic Management Coordinator (STMC) duties.

JO 3120.4N Chapter 4 item 7 specifies guidelines for those who fail to meet currency requirements:

Begin excerpt JO3120.4N:

7. Recertification Procedures. Personnel who fail to meet currency requirements and those who are decertified on one or more operational position(s) must be recertified prior to resuming operational duties. To be recertified, the specialist must demonstrate, under direct supervision, the ability to satisfactorily perform relevant operational duties during normal workload conditions. Recertification may be accomplished by individual position or a single action covering multiple positions at the discretion of the ATM. If recertification is not achieved the ATM must take action in accordance with Agency guidelines.

End excerpt

As stated above in item 7, An ATCS ( i.e. Supv ATCS /STMC) must be recertified to perform the relevant operational duties.

**Tie all of the above together and an FLM correlates to a particular area of assignment (JO3120.4) and the STMC correlates to the TMU only (unless dual certification is practiced following all currency requirements etc.)**

**OFFICE OF AUDIT AND EVALUATION REPORT:**

*"The FLM's role is not to control air traffic, but to provide oversight ensuring that general procedures (e.g. standard phraseology and other operating practices) are being adhered to. At ZAU, FLMs are assigned to supervise an average of 12 controllers per shift, with an average of 7 controllers working traffic in different geographic zones, at any given time.*

**Comment:**

This is an incorrect statement. The FLM's role *includes controlling air traffic*. Contrary to what was stated, FLM's are required to **maintain currency on Air Traffic Control positions controlling live air traffic**. The FLMs role should not be diminished. The requirement for an FLM to only be required on a minimum of two (2) operating positions has meaning.

An FLM who is certified on positions in their area lends some credibility to being able to provide the correct type of oversight (competent oversight). By being certified on at least two positions, the FLM has operational knowledge of applicable LOA's, SOP's, procedures and practices.

Being certified on two positions ensures that an individual possesses an understanding of how all positions within the area interrelate; because in order to control traffic on

those positions the FLM is certified on within that area, the FLM should have the technical knowledge of the other positions around them.

#### **OFFICE OF AUDIT AND EVALUATION REPORT:**

*“Even if an FLM is current and qualified in two of those positions, it is not humanly possible to maintain situational awareness of that amount of activity simultaneously during busy traffic periods, and the FLM’s attention is frequently focused upon resource management tasks unrelated to directly controlling traffic.”*

#### **Comment:**

When ZAU management assigned FLMs to operational areas when they had little to no experience with the expectation to supervise that area, the reports statement above is further exacerbated with respect to situational awareness with FLMs subjected to foreign area (out-of-area) assignments.

The reports statement actually reinforces the situational awareness challenges that an unqualified FLM is confronted with. Nevertheless, when it comes to watch supervision, JO 7210.3Y addresses that the FLM maintain situational awareness **as a requirement** contrary to the above report statement:

#### **Begin JO 7210.3 Excerpt:**

#### **Section 6. Watch Supervision–Terminal/En Route**

##### **2–6–1. WATCH SUPERVISION**

**a. Watch supervision requires maintaining situational awareness (defined below) of traffic activity and operational conditions in order to provide timely assistance to specialists and that ensure available resources are deployed for optimal efficiency.**

Watch supervision may be performed by a manager, supervisor, or controller-in-charge (CIC). The objectives and tasks of watch supervision must be specified in a facility directive, which is focused on operational requirements. The directive must specify, as a minimum, the required tasks for maintaining a safe and efficient operation. These tasks must include, but are not limited to:

1. The requirement to provide guidance and goals for the shift.
2. Monitoring/managing traffic volume/flow.
3. Position assignments.
4. Position relief.
5. Training assignments.
6. Processing leave requests (e.g., leave approval).
7. Configuring/monitoring/reporting equipment status.
8. Data collection and reporting.
9. Monitoring presidential aircraft and reporting security requirements.

**10. Situational awareness is defined as a continuous extraction of environmental information, integration of this information with previous knowledge to form a coherent mental picture, and the use of that picture in directing further perception and**

anticipating future events. Simply put, situational awareness means knowing what is going on around you.

11. Management of the operational environment with a goal toward eliminating distractions of:

(a) Non-operationally-related activities or tasks that are distracting, such as controller schedule or leave bidding.

(b) Non-operationally needed items and equipment.

(c) When activities or tasks that are not time critical or operationally necessary become distracting to the operation, watch supervision must take steps to defer or relocate these activities or tasks.

12. Administrative duties must not be accomplished to the detriment of any operational duty.

**NOTE-**

*Individuals medically disqualified or taking medically disqualifying substances must not be assigned watch supervision duties, in accordance with para 2-8-6, Restricted Drugs.*

b. In the role of watch supervision, a CIC must perform these duties in accordance with management direction, with the following exceptions:

1. Evaluating and counseling employees on their performance.
2. Recommending selections, promotions, awards, disciplinary actions, and separations.
3. Site Coordinator for drug or alcohol testing.

**NOTE-**

*On-the-spot corrections are not considered an evaluation of performance and are required as part of CIC duties.*

**End Excerpt**

ZAU introduced risk into the system when it began the practice of placing FLMs in areas other than their primary. ZAU's own SOP defining responsibilities for FLM. ZAU's own SOP complies with J07210.3Y that states the objectives and tasks of watch supervision listed must be specified in a facility directive, which is focused on operational requirements. The directive must specify, as a minimum, the required tasks for maintaining a safe and efficient operation.

Those tasks are as follows:

**Begin Excerpt: READ ALL**

**1/8/15 ZAU 7110.2T 2-3-12. FRONT LINE MANAGER-IN-CHARGE (FLMIC)**

The responsibilities include, but are not limited to:

- a. Assign controllers to positions of operation, maintain an awareness of air traffic activity, rotate controllers through different positions of operation, and ensure developmental controllers are assigned to positions of operations that will enable them to acquire the experience and competence required of the next higher level.
- b. Ensure controllers are briefed on new procedures, policies, rules and regulations. Give advice, counsel or instructions to employees on both work and administrative matters.
- c. Ensure accidents and incidents are reported in accordance with instructions.
  4. Approve leave and develop vacation leave schedules.
  5. Maintain an awareness of air traffic activity. Receive and conduct briefings on, and make

decisions concerning:

1. (1) Scheduled/unscheduled equipment/NAVAID outages
2. (2) Traffic flow restrictions
3. (3) Sector workload (traffic demands)
4. (4) Sector configurations
5. (5) Training
6. (6) Position relief
7. (7) Current and forecasted weather
8. (8) Weather avoidance procedures
9. (9) Adjacent facility status
10. (10) Back-up system status
11. (11) Military operations

f. Inform the Operations Manager-in-Charge about the work situation and requirements for overtime.

7. Evaluate employee performance.
8. Ensure on-the-job training is accomplished.
9. Ensure employee time and attendance is recorded in a timely manner.
10. Coordinate SIGMET, AIRMET, and CWA information with sector personnel at the time of issuance and during FLM/CIC relief briefings as applicable. Ensure weather data and requests for PIREPs remain posted at each affected sector, and that pertinent PIREP information is relayed during sector relief briefings.

k. Checks sectors for status of EBUS, frequencies and ensures the Sign In/Sign Off procedures are accomplished. Ensure weekly emergency frequency check at appropriate positions (East, North, Southeast, South, and Southwest). Record the information on the daily log. Emergency frequency checks that are still pending shall be carried over on the log until completed. Weekly required emergency frequency check information (complete or incomplete) shall be displayed on ESIS. Advise the Airspace and Procedures Office, as appropriate, of any problems encountered in obtaining needed documents.

## **End Except**

### **Comment:**

The FLM is placed with a severe disadvantage when trying to comply with the aforementioned tasks when they are placed in an area they are unfamiliar with and/or not certified to work in. Risk is introduced into the system. The FLM as a Supervisory *Specialist* in their primary assignment has a significantly greater chance for operational success in balancing these tasks/requirements. **I differ in opinion with the report statement that it is not humanly possible to maintain situational awareness. It is humanly possible for the FLM in their primary area, to maintain situational awareness and to balance these tasks. It is their (FLMs) responsibility to do so.**

On June 19, 2014, a report went out from FAA Administrator Michael P. Huerta to members of the House of Representative members for the Committee on Commerce, Science and Transportation and the Committee on Transportation and Infrastructure regarding FLM Staffing Requirements. The FAA commissioned an independent study conducted by Grant Thornton LLP to conduct a review of it's FLM staffing requirements:

([http://www.faa.gov/about/plans\\_reports/modernization/media/Report\\_to\\_Congress\\_on\\_Frontline\\_Manager\\_Staffing\\_Sec\\_604.pdf](http://www.faa.gov/about/plans_reports/modernization/media/Report_to_Congress_on_Frontline_Manager_Staffing_Sec_604.pdf)).

Again, the role of the FLM should not be diminished.

I have italicized specific information below:

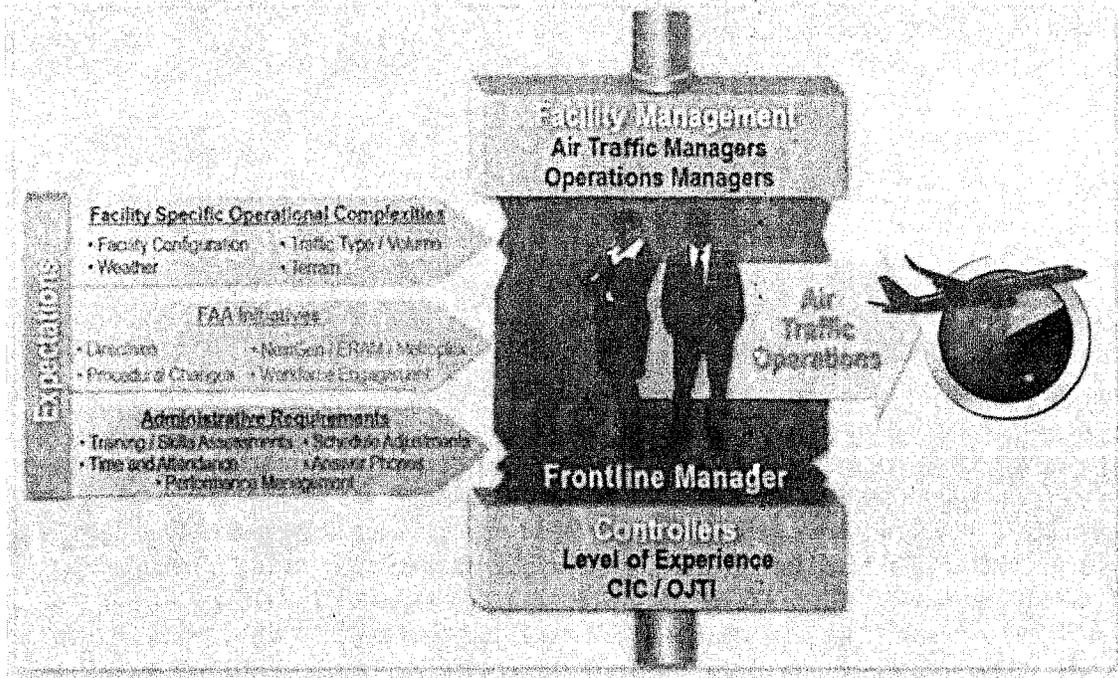
This comprehensive study identified the following FLM responsibilities excerpted below:

Begin excerpt:

### **3 Study Findings**

Leaders at the facilities visited and senior members of the ATO at FAA headquarters concur that ***the primary expectation of the frontline manager involves monitoring controllers and managing air traffic operations.*** A summary of the findings gathered from the five key activities performed during this study indicates that several factors impact the workload of a frontline manager, and, consequently, the staffing required for the position. As shown in Figure 8 the study confirmed that workload is impacted by facility specific operational complexities as well as various FAA initiatives. Over time, additional administrative requirements have also been assigned to frontline managers, and these tasks have increased the amount of non-operational work performed during a shift. These increases in administrative responsibilities are occurring as workforce demographics are changing. ***This has resulted in frontline managers who are supervising teams comprised of controllers with various levels of experience, both newer controllers and those who are nearing retirement. This dynamic increases the need for operational engagement*** on the part of the frontline manager, as well as increasing their administrative workload. Additional factors such as the expectations and priorities of the facility management team can also impact the workload of a frontline manager.

Figure 8: Factors Impacting the Frontline Manager's Workload in the Air Traffic Control Environment



This section discusses the key findings from the study as they relate to factors noted above, using the following categories:

- Expectations of frontline managers
- Administrative tasks
- Methods for completing administrative tasks

#### Frontline Manager Staffing Requirements Study

17

- Staffing ratios
- Level of experience
- Operational complexities
- Frontline manager training
- Other factors impacting frontline manager workload.

#### **Expectations of Frontline Managers**

**According to those interviewed, the primary responsibility of a frontline manager is to monitor controllers' actions on the operations floor to ensure that FAA procedures are followed to maintain a safe and expeditious flow of air traffic. This view was confirmed by facility leadership as well as senior executives in the ATO.** Aside from their core function of monitoring operations, frontline managers advise controllers on performance and administrative matters and oversee completion of training, conduct skills checks, and evaluate controller performance. The findings on the expectations of frontline managers are viewed in terms of the actual operational<sup>3</sup> and non-operational tasks that they perform along with the performance expectations associated with the frontline manager position.

The WBS lists 106 tasks that may be performed by a frontline manager. Attributes reflecting the complexity of each task and the frequency of performance were captured, and each task was also classified as “operational” or “non-operational” depending on where it was performed, and whether or not it impacted the National Airspace. The 25 tasks below generated constant workload while other tasks were considered to be sporadic or infrequent. The two tasks found at the bottom of the list were classified as “non-operational:”

1. Manage facility resources (i.e., personnel, funding) to meet operational needs
2. **Review work processes of controllers**
3. Analyze schedule alternatives
4. Develop overtime lists and contact employees
5. Monitor and respond to employee leave requests
6. **Anticipate and resolve problems before they impact air traffic operations**
7. **Resolve problems impacting air traffic operations**
8. Ensure proper communications
9. Ensure complete and timely coordination
10. Usage of equipment
11. **Ensure that controllers use good judgment while safely and effectively performing their duties**
12. **Ensure appropriate methods are used when performing assigned duties**
13. **Ensure operational safety**
14. Assign personnel to positions
15. Break rotation
16. Ensure controllers return from break without disruption to air traffic operations
17. Record position in Cru-X/ART
18. Manage distractions
19. Observe controllers to ensure they serve as effective team member
20. Oversee training in the operational environment
21. Perform Performance Skills Check and certify controller (or suspend on-the-job-training [OJT])
22. Position certification
23. Deliver training assignments to controllers
24. Monitor internal and external communications (non-operational)
25. Evaluate trainee progress-(non-operational).

<sup>3</sup> The Operational Nature attribute was used in the WBS to distinguish tasks that directly impacted the NAS from those that did not. Tasks were typically considered “operational” if the frontline manager performed them in the operational area when directly supervising or providing feedback to controllers on-position.

#### **Level of Experience**

**As more of the experienced controller workforce retires and newer controllers replace them, the supervisory role of a frontline manager becomes increasingly critical to maintaining safe operations. Frontline managers need to provide more oversight to controllers with less experience because these controllers do not have prior events to rely upon to make decisions in the fast-paced air traffic control environment.**

## End Excerpt

The responsibilities may seem humanly impossible, but the FLM MUST balance these tasks and maintain situational awareness of all these dynamics. An FLM place in unfamiliar territory (foreign area, no longer certified in an area, no longer current in area), are placed at a severe disadvantage but nevertheless is accountable for all the aforementioned tasks.

Even an FLM who worked an area previously may not be knowledgeable to new procedures and practices associated with the new area. ***One FLM at ZAU who has been routinely placed into an area that that person used to work in years ago, advised me that he does not really know what is going on in that area because that area underwent significant changes citing virtually all new RNAV arrival and departure routes and procedures and Military airspace changes to procedures. When this person was in the area as a controller, everything was navigating via airways and VORs. It's virtually all different.***

## OFFICE OF AUDIT AND EVALUATION REPORT:

*"The STMCs role is to supervise Traffic Management Coordinators (TMCs) that are coordinating with the internal areas/sectors and all external entities. They also monitor all of the traffic flows within ZAU boundaries. Neither the TMC nor the STMC provide control instructions to or communicate directly with any aircraft."*

## Comment:

The STMCs role should not be diminished. Chapter 17 in JO 7210.3 is the TMC/STMCs version of the Bible. FLMs simply do not apply/practice major portions of Chapter 17. The STMC receives extensive training on special decision support tools that FLMs simply do not use to the extent that the STMC does.

**FLMs were placed at a severe disadvantage when placed in the STMC position with the expectation to communicate to system Stakeholders on Traffic Management initiatives and plans of action balancing air traffic system capacity and demand.**

**An FLM should not be expected to perform STMC duties without meeting training, qualification and currency requirements.**

Procedures and processes and guidance change frequently within the TMU. Guidance comes from the TMO in the form of direction via email and briefing material directed only for TMCs/STMCs.

Even an STMC with previous experience removed for an extended period of time is considered inept until brought back up to speed on current practices and procedures and with that comes training and recertification IAW JO3120.3.

**STMCs maintain currency within the TMU only. FLMs maintain currency within their assigned area.**

The universal approach ZAU management was trying to apply was a direct result to not use overtime on FLM/STMC personnel because it was the ZAU management philosophy that FLMs/STMCs are not to be paid overtime. Many have questioned the previous Facility Managers motivation for such action in contrast to an operational necessity.

As a result, FLMs were either coerced or shamed into earning credit hours in lieu of overtime when operational necessity dictated that their presence was required.

#### OFFICE OF AUDIT AND EVALUATION REPORT:

*"Most importantly, we found no nexus between these assignments and any safety event occurring in ZAU airspace. A thorough examination of all FAA air traffic records, including systems that automatically record losses of separation, as well as safety reporting data bases, revealed no evidence that public safety was endangered during these "out-of-area" FLM/STMC assignments."*

*"During interviews of ZAU personnel,<sup>1</sup> no instances of unsafe actions on the part of the FLMs were reported. The complainant reported no specific instances in which safety was compromised. However, this investigation also concluded that these "out-of-area" FLM assignments, which began at ZAU in late 2014, are not a preferred operating practice in complex air traffic facilities during busy traffic periods. This practice is also in conflict with traditional FLM staffing philosophy in large facilities like ZAU. Moreover, this recent staffing practice was implemented in a disorganized, inefficient manner, without clarification or guidance to the affected FLMs."*

#### Comment:

**Several FLM's have filed numerous ATSAP reports on "out-of-area" FLM/STMC assignments concerning safety for FLM/STMC. Contrary to this report, an FLM (post OFFICE OF AUDIT AND EVALUATION investigation) advised that "nothing was held back" in exposing events during this persons interview. This person stated that during the interview, safety related matters were cited to the OFFICE OF AUDIT AND EVALUATION concerning being assigned in a particular area whereas the person was not certified, did not maintain currency and is not familiar with this area. As a result, this person purportedly reported to the OFFICE OF AUDIT AND EVALUATION, of an event being assigned to a foreign area and having no knowledge of major use of Military Airspace that was activated ½ hour before that FLM arrived to the area during a major Military exercise, that impacted the areas operations adversely.**

**That person stated to me that the OM asked him: did you get the military airspace on the board? The FLM asked what airspace? The FLM went to the TMU asking what airspace is active. They (TMU personnel) as told by this FLM, laughed at this person as by then, the airspace was already active.**

They (TMU) told this FLM to check the SAMs (internet based military airspace program) as to the airspace that was active. The problem was, this person did not use SAMs because this FLMs primary area does not have military airspace. This person purportedly informed the OFFICE OF AUDIT AND EVALUATION that he/she did not know what was going on and could not lend operational support. This person said he/she was scared that something bad was going to happen.

Prior to the OFFICE OF AUDIT AND EVALUATION investigation, this same FLM actually asked their reporting OM for specialized training for the cross aisle area (wanted to get certified in the opposite area) in order to work a "cross aisle configuration and was told NO.

This person was informed that ZAU's SOP does not allow training in another area! Thus the FLM was refused to receive training to manage an area unfamiliar. In another dialogue, this FLM was informed that he/she was on a waiver from the requirement. This was later retracted when it was called out by the affected FLM.

This same FLM in another instance, was told to manage the TMU (STMC duty) by an OM, the FLM advised the OM, "I don't know anything about TMU". The OM told the FLM, "*Don't worry about it*".

This is not the way Air Traffic Control should be managed. This is a disadvantage for this FLM who wanted to operate as competently as possible.

The ATM had recent email communication from ZAU NATCA leadership surrounding specific safety related issues involving Area Staffing and FLM assignments. NATCA pulled out of all collaborative endeavors to ensure an adequate workforce to staff the facility and more importantly citing safety concerns. This was not communicated to the investigative team but had they interviewed ZAU NATCA, they would have some direct communication on safety related issues.

Recently, over 170 controllers and supervisors were interviewed as a part of a program called "Right From the Start". A report should be forthcoming that directly relate to safety matters reported concerning "out-of-area' assignments. The "Right From the Start Report" (when released) should be a TRULY large sampling of controller/manager sentiment that will like have several safety concerns and other issues voiced by ATCS's FLM's, STMC's, OM's, etc.

*Worthy of Note:*

Citing the report from the FAA administrator to the congressional committees on the subject of Frontline Manager Staffing; nowhere in the study were references to FLMs being required to manage air traffic control operations in areas other than their primary. CIC's were frequently used as the solution to keep operational competency intact and getting other work accomplished.

I concur with the investigation conclusion that these out-of-area assignments are not a preferred operating practice.

However, the notation of "during busy traffic periods is inconsequential as even during slow periods bad things can happen.

and the air traffic manager instituted a policy of not authorizing overtime duty to FLMs. Which exacerbated the shortage. In addition, the ZAU air traffic manager had the option of assigning supervisory Controllers-in-Charge (CICs)<sup>2</sup> to serve in FLM roles. Supervisory CICs were available for assignment and would have been qualified in one or more of the areas supervised, but ZAU management failed to utilize this option, instead opting to assign FLMs to areas in which they had no operational experience. Thus, the ZAU air traffic manager's decisions were questionable.

**Comment:**

**Concur**

**OFFICE OF AUDIT AND EVALUATION REPORT:**

*In summary, there was no violation of law, rule or regulation, and no substantial or specific danger to public safety. The investigation did find flawed management decisions made by the ZAU air traffic manager.*

*As a result of this investigation, the Vice President of Air Traffic Services directed the facility to limit the practice of assigning FLMs to areas in which they have no familiarity except in extraordinarily unusual circumstances such as a national or local emergency (effective July 28, 2015). FLM overtime and CICs will be utilized to cover shortages and to maintain area familiarity. A new Air Traffic Manager will be assigned to ZAU within the next 30 days. In addition, the Air Traffic Organization (ATO) will issue new national policy guidance on this matter to all air traffic facilities by September 30, 2015.*

**Comment:**

**Concur that there was no violation of law - only.**

**I applaud the Vice President of Air Traffic Services directing the facility to: "limit the practice of assigning FLMs to areas in which they have no familiarity except in extraordinarily unusual circumstances such as a national or local emergency (effective July 28, 2015). FLM overtime and CICs will be utilized to cover shortages and to maintain area familiarity ensures technical competency remains consistent in the operational area to enhance efficiency and safety."**

**I applaud the fact that the Air Traffic Organization (ATO) will issue new national policy guidance on this matter to all air traffic facilities by September 30, 2015.**

The JO 7210.3 should be evaluated to clarify expectations of the FLM and clear out ambiguities.

Notwithstanding, **JO 7210.3 differentiates requirements for familiarity and currency.** It associates familiarity with **Air traffic managers, assistant managers, executive officers, staff managers, operations managers, support managers, traffic management officers and support specialists, who as a condition of employment are not required to maintain currency. They must maintain familiarity with** control room operations to perform their required duties in an efficient manner.

I further assert that unsafe situations can result as an unsuspecting FLM unfamiliar with the dynamics of area can easily decrease the safe orderly and expeditions flow of air traffic even without the adverse effects caused by severe weather.

I concur that the practice ZAU management was inflicting upon its FLMs to manage out-of-area was in conflict of traditional staffing philosophy in large facilities. The staffing practice was absolutely ad-hoc. An FLM would report to work to the "Watch Desk" and be randomly assigned.

The OMs were "plugging holes" with FLMs without regard. Some FLMs would go from one area to another to another in the same shift to get other FLMs out to details, to fill in because someone called in sick, etc. It was absolutely disorganized, inefficient and without clarification or guidance to the affected FLMs. I further assert that it was unsafe.

Contrary to the OFFICE OF AUDIT AND EVALUATION examination of FAA air traffic records, including systems that automatically record losses of separation, as well as safety reporting data bases, that may have not revealed evidence that public safety was endangered during these "out-of-area" FLM/STMC assignments; it does not mean unsafe situations by these FLMs were not occurring. They simply were not recorded.

However, as stated before, several FLMs put in these situations have purportedly used the ATSAP to report situations. There have been several. FLMs in the facility have revealed to one another when they have filed an ATSAP. One FLM in particular files an ATSAP each time put in an "out-of-area" situation.

I have personally heard an FLM go to another FLM and ask: I'm assigned to the \_\_\_ area tomorrow, what do I need to know? Some FLM's will call in sick when this happens. Others scour the WMTScheduler program and look for "holes" in the schedule to see where they may fall victim to be place in an out-of-area situation. These assignments were also scheduled in advance. Assignments were made without regard to weather conditions, complexity, personnel available etc.

In these "out-of-area" assignments, FLM's in most cases did not know who was certified where, what positions a partially certified controller was rated on, controller abilities, interpersonal differences between controllers, traffic complexities, sector configurations (when to combine/de-combine sectors, what sector to combine to), Area staffing numbers (how many people you need at given times of the shift), determining if a shift is in need of overtime personnel, etc.

And when weather became a factor, and a controller did not have time to "school" you on what is needed to keep the operation safe, it was unsafe and inefficient. The out of area FLM is guessing on what to do. Other FLM pitch in to help, but it is too easy for an out-of-area FLM to get in a situation that can take down the Area. It was an unrealistic expectation for that FLM to ask for Traffic Management initiatives when they did not know what to ask for to help the affected area. This is a huge disadvantage for the FLM as area controllers call the "guest" supervisor.

I applaud the fact that the OFFICE OF AUDIT AND EVALUATION saw the chaos of what was happening.

**OFFICE OF AUDIT AND EVALUATION REPORT:**

*At the time of this investigation. ZAU had a 30% shortage in authorized FLM headcount.*

Air traffic control specialists (ATCS), traffic management coordinators (TMC), national traffic management specialists (NTMS), developmental specialists (ATCS/TMC/NTMS), first-level supervisors (including facility managers who also serve as first-level supervisors), operations supervisors (OS), front line managers (FLM), supervisory traffic management coordinators (STMC), national traffic manager officers (NTMO), and air traffic assistants (ATA) are required to meet currency requirements in order to perform their duties.

I passively restate this because although an FLM may have *familiarity* in an area, it does not mean they are in contact with the day-to-day information flow of changes that affects that areas operation (SOP changes to procedures, etc. e.g. competencies that keep them a specialist in their area).

Once currency is lost regardless of familiarity, they are no longer a specialist in that area (they have to recertify to become current). An good example would be an FLM that leaves ZAU to another facility, then comes back to ZAU and is assigned back to the same area they left. That FLM is familiar with the operation but NOT current. Therefore that FLM is required to go through the requisite training to get up to speed on all area SOP changes, processes and procedures, etc. , meet qualifications and certify on positions all BEFORE being assigned to perform as FLM in that area.

My fear is that the term "familiarity" used opens opportunity to be can and will likely be loosely applied and become detrimental. There are no conditions or standard of measurement. FLM's will operate without the "current" technical's associated with proper training that they should possess.

Nevertheless, the Vice President of Air Traffic Services has made a dramatic step to preventing unsafe situations from occurring. This is exactly the kind of action necessary to prevent accidents. I feel the initial actions taken are preventative and in the best interest of the flying public, and are paramount to safety if they are explicitly followed.

#### OFFICE OF AUDIT AND EVALUATION Report :

##### *Detailed Findings*

*Allegation 1: Upper level managers have jeopardized situational awareness and endangered public safety by assigning Front-line Managers (FLMs) to areas in which they are not certified or current.*

*No violations of an FAA Order occurred. The investigation found that ZAU managers are assigning FLMs to work in geographic areas in which they do not maintain currency, but this not prohibited by either FAA rules or policy, and no evidence was found to suggest that public safety was ever endangered. During interviews with numerous ZAU personnel, no instances of unsafe actions on the part of the FLMs were reported. A review of 126 Mandatory Occurrence Reports and all 2014 and 2015 ZAU System Service Reviews did not identify any safety events attributable to FLM actions. Finally, the complainant reported no specific instances in which safety was compromised.*

*The complaint alleges that the practice of assigning FLMs to areas in which they are not*

*certified or current jeopardizes situational awareness. Situational awareness is subjective because it involves individual perceptions and varying degrees of ability. As such, quantifying and determining whether situational awareness has been "jeopardized" is not possible. All individuals interviewed denied losing situational awareness when they provided supervision to an area in which they did not have currency, or in their own area in which they do maintain currency.*

*FAA Order 7210.3 Y. Facility Operation and Administration only requires FLMs to maintain currency on a minimum of two control positions in order to perform Front Line Manager-in-Charge (FLMIC) duties. The Order neither requires FLMs to be assigned to specific areas exclusively, nor does it prohibit FLMs from supervising areas in which they do not maintain currency. Section 2-6-1 (a) requires a watch supervisor to maintain situational awareness of traffic activity and operational conditions in order to provide timely assistance to controllers by- assigning available resources when needed, or by opening additional positions and assigning controllers to work to ensure efficiency and safety. There is no expectation that an FLM would be able to intervene and control traffic should a controller ask for help. Supervisory assistance to controllers is a more standardized role, and includes actions such as coordinating with adjacent facilities, coordinating with traffic management, coordinating with search and rescue as needed in emergency situations, and calling other controllers off break to alleviate high workload. These duties are not area specific.*

*When interviewed, nearly all FLMs expressed varying levels of discomfort, using terms such as "inefficiency" and/or "potential risk" associated with area assignments other than their primary work areas. An anonymous FLM, who contacted the lead investigator, expressed frustration that it was not fair to hold FLMs accountable to a standard they cannot meet, and that the supervisor would not be able to lend operational support to a controller if needed. This FLM believed the practice was unsafe, but could not identify an actual safety event attributable to an "out of area" FLM.*

*All members of the ZAU management team advised that FLM staffing shortages and fiscal constraints at ZAU have necessitated the assignment of FLMs to alternate areas. Initially, the facility attempted to limit the assignment of FLMs to cross-aisle areas or areas where the FLMs had previous experience. Recently, significant impacts to FLM staffing numbers have reduced FLM numbers to the point where the facility began assigning FLMs to areas where they had no previous experience. One Operations Manager told investigators that the facility management team's philosophy is that there is no distinction between an FLM watching all the areas including the Traffic Management Unit (TMU) during the midnight shift when one FLM supervises all areas at ZAU, and an FLM being assigned a day or evening shift in an area where he/she does not maintain currency. It is a longstanding practice to have only one FLM or CIC assigned to supervise the "midnight shift" at some facilities when traffic is very light.*

*Around March 5, 2015, concerns regarding this alternate area scheduling practice were raised to the facility via an Air Traffic Safety Action Program (ATSAP)<sup>4</sup> report. In an April 16, 2015 response to the Event Review Committee (ERC)\ ZAU management indicated they were implementing "best practices" to employ before assigning FLMs to alternate areas. Such practices were to include only assigning FLMs to areas in which they previously were a supervisor or controller or to a cross-aisle assignment. Additionally, ZAU management committed to implementing familiarization training for all supervisors. To date, the*

*management at ZAU failed to follow through on this promise. Moreover, area familiarization training has not occurred except on an informal, ad-hoc basis, which is not documented as required of all training. Of the ten FLMs investigators spoke to, only one FLM reported receiving area familiarization training."*

**Comment:**

I am unaware of what was reported to the OFFICE OF AUDIT AND EVALUATION by those individuals interviewed. Under the previous Facility Manager, fear of reprisal may have suppressed/chilled individuals to hold back. However, post OFFICE OF AUDIT AND EVALUATION interview, **at least one FLM interviewee revealed that they cited safety issues to the OFFICE OF AUDIT AND EVALUATION.** Additionally, this same person (a senior FLM) stated losing situational awareness to the OFFICE OF AUDIT AND EVALUATION.

In reference to cross-aisle familiarization training, there are FLMs (some from terminal only backgrounds) that were instructed to monitor each sector in the cross aisle for at least one (1) hour and one (1) hour at the cross aisle Supervisor position. This constituted the FLM being qualified to perform cross aisle supervision. This loose standard was a resolve formulated by ZAUs OM Team. There are individuals under this standard being allowed to supervise in a cross aisle.

**There were recent safety related concerns voiced by NATCA that the OFFICE OF AUDIT AND EVALUATION may not have been made aware of.** Management had the opportunity to be forthcoming to the OFFICE OF AUDIT AND EVALUATION and elected not to do so. The following are a few examples forwarded by NATCA:

**Begin emails from NATCA to ZAU senior Management:**

Begin forwarded message:

From: Toby Hauck <toby.hauck@natca.net>

Date: July 1, 2015 10:19:46 PM CDT

To: Doris Arno <doris.arno@faa.gov>, Rita Thiel <Rita.Thiel@faa.gov>, Ray Cummins <ray.e.cummins@faa.gov>

Cc: Bryan Zilonis <bzilonis@NATCA.COM>, Craig Sullivan <craig.sullivan@natca.net>

Subject: ZAU Staffing and NATCA participation

All,

Over the last few months ZAU management has cut every corner possible to reduce the use of operational OT. The Agency has shown complete disregard for the stakeholders of the NAS and safety as a whole.

On multiple occasions the OMs have shorted areas and forced airlines to take diversions to save operational OT. Specifically, June 2, 9, 13 and 27. I have included the emails I have sent you reference these dates. There are many other occasions that have been reported through the ATSAP program.

One June 19, 2015, the Agency posted the schedule for the OSH EAA Airshow. This schedule

included staffing shifts with only 5 CPCs on a shift in the North Area. It also included short staffing the TMU, NE, SW, SE, NW areas. This is the busiest time of the year for Chicago Center and the OMs are comfortable with posting a schedule short staffing the Areas.

When I confronted the OMs on June 25, 2015, they announced they had a plan. On June 26, 2015, I filed an Article 7 requesting a briefing on the OMs' plan to staff the facility during the OSH EAA Airshow. The Agency has yet to respond to the request.

After a quick review of the area schedules, it would appear the OMs have started to react to ZAU NATCA's demands to staff the areas but this only highlights the philosophy of ZAU management. I have included a spreadsheet of the posted watch schedule and the OT provided since I confronted the OMs.

It is blatantly obvious that ZAU management has placed fiscal savings well above safety and efficiency - not to mention the morale of their employees.

There has to be a balance. ZAU NATCA has offered several times to help with pre-decisional input and collaboration. The OMs continue to make decisions behind closed doors.

The most critically staffed area in the building is the TMU. On several occasions ZAU NATCA has provided input and direction for the TMU. The Agency has yet to respond. I have included a letter dated April 14, 2015, that outlined ZAU NATCA's input and a plan to move forward. Also attached is a timeline reference the TMU's losses and gains, plus a spreadsheet highlighting staffing trends.

Increasingly, controllers are being removed from area staffing to man the CIC position thus adding to the problem. I have included a spreadsheet of TOP grievances filed since April of 2015.

In March ZMP implemented OPDs for the MSP airport. ZAU started to use TBFM for spacing of MSP arrivals. ZAU management continued to short staff areas and the TMU. This lack of staffing fundamentally slowed down the progression of TBFM at ZAU opening the facility for a barrage of negative comments and complaints.

After carefully considering all of the facts, options, attitude of the OMs and safety of the operation - ZAU NATCA must take measures to help keep the operation somewhat staffed and most importantly safe. ZAU NATCA will be removing all Reps from any and all projects effective July 6, 2015. Attached is a letter confirming this action and a list of Reps and programs in which they are involved.

If you have any questions feel free to contact me.

Thank You

From: Toby Hauck [mailto:toby.hauck@natca.net]  
Sent: Tuesday, June 09, 2015 10:42 PM  
To: Arno, Doris (FAA); Thiel, Rita (FAA); Gebhardt, Ian P (FAA); Cummins, Ray E (FAA)  
Cc: Craig Sullivan; Eric Christensen  
Subject: Sunday, June 7, 2015

All,

I spoke to Ian today and he mentioned he was looking into doing a TMR for the events that took place in the TMU on the Sunday swing shift. I have been doing some checking on my side and the accounts from the denial of OT by the OM for the TMU to the disappearance of FLMs at the end of shift is past being alarming.

It is becoming increasingly obvious the posture of this facility is to cut corners and staff areas and the TMU at dangerously low numbers in order to save a few extra dollars of overtime.

For example, this past Sunday, I have TMCs that spent over 4 hours on position without a break. Why - because this facility didn't want to spend the OT. This is not acceptable in any situation.

I have asked and forwarded suggestions to help provide additional support to the TMU. The Agency is moving at a snail's pace to address the suggestions and some others the agency chooses to simply ignore.

While I understand the argument of not placing former STMCs Freidlien and Robertson back in the TMU, it is not an acceptable argument to degrade the safety of the NAS. ZAU NATCA is requesting that Freidlien and Robertson be immediately placed in the TMU as STMCs.

ZAU NATCA has been made aware that the Agency intends to "cross-train" FLMs from the floor to moonlight in the TMU during STMC shortages. Does the Agency really believe that is not a separate position that requires its own certification and currency requirements? Another short cut that degrades the safety of the NAS.

Every regulation I have read and reviewed indicates this practice is not supported. ZAU NATCA requests the Agency provide in writing the regulation which covers this practice.

So let's go back to Sunday night. The following is a summary of poor management oversight and a complete disregard of safety to the NAS.

**Storms effecting the area the entire swing shift. At the end of the night there was a line of storms over Ebake blocking the Kubbs arrivals as and the north half of the departures and another line blocking the SE area arrivals as well as all our MDW departures. ORD was departing on one stream down a hole in the middle with heavy deviations. NE and SE arrivals were funneling into SBN though cribb/kellog and SBN was doing the blending. Around 10 we were down to 3 sectors and 1 D side still very busy but under control. When I turned to the SUP to ask for overtime there was nobody there. Dino had just left the area without saying a word to anyone. When exactly I am not sure but I think between 945 and 10.**

**I had Tom Alef combine the D to get me out to go find some help and tell them we needed holdover around 1015. At this point we had 2 people on shift until midnight, myself and starleaf home at 1030 and whidden until 1045. On the way to find any supervisor at all I ran into Dave Shmied on his way to tell us we were going to have to**

take SBN approach and work the arrivals as well as departures. I told him no way we were going to be able to handle that with 2 people left. We both found Jorge Sandoval who was the overnight Sup. We explained unless he wanted to shut off ORD there was no way we could take SBN while they still had two arrival streams coming in.

So the controller had to combine a position up to go find help. After help was found the following is the way it was handled.

**This was about 1024 I told him they need someone to stay and I leave in 6 minutes so "Are you letting me stay or what?" He actually tried to tell me he "was too busy with other stuff at the desk including a laser light show or something and couldn't deal with this right now" After another minute or so of discussion he assigned me an hour of OT and I went back to cribb D.**

I ask - is this appropriate? Is this the best management can do?

Not only is the BUE feeling the effects of this negligence, the users are being impacted. Because the areas were unable to assume airspace at the appropriate time arrivals were rerouted on alternate routes. 6 arrivals had to be rerouted hundreds of miles out of the way in order to avoid paying a minimum amount of dollars of OT.

The TMC had spoke to the FLMIC for the mid about the need of keeping SBN open past normal hours. The FLMIC advised he does not have the authority to do so. I have checked on the protocol of how this is approved. What I gather is that if the controller cannot assume the closing facility's airspace the closing facility stays until a proper relief briefing is done. As far as what facility is charged the OT - past practice would indicate it comes out of ZAU's budget. If this is not the process ZAU NATCA requests the practice in writing. If this is the practice then why isn't the FLMIC on the mid aware of it?

Think about it - for an hour of OT we could have saved the airlines the extra cost and delays, not to mention better serve the flying public.

I certainly would like to get all the players in the same room and have them explain their roles and decisions. ZAU NATCA must raise concern to whomever will listen about the practice of not providing the correct staffing. The actions of the Agency are not acceptable and someone must be held responsible for the negligence shown by the Agency on June 7, 2015.

Thank You

Subject: June 13, 2015

From: Toby Hauck <toby.hauck@natca.net>

Date: June 15, 2015 4:08:35 PM CDT

To: Doris Arno <doris.arno@faa.gov>, Rita Thiel <Rita.Thiel@faa.gov>, Ray Cummins <ray.e.cummins@faa.gov>

Cc: Craig Sullivan <craig.sullivan@natca.net>

All,

The disregard for safety to save money philosophy continues. The 13th swing was impacted by weather and lower than appropriate staffing was not adequate to handle the traffic and complexity.

At about 5:30pm an employee was to be relieved for the shift. The employee was working the 61R the FLM recalled another CPC because his go home time was approaching. The employee then move to the 61D to help with the volume and complexity of traffic. Sector 61 was yellow.

The guest FLM went to the OMIC of the shift and requested OT so the employee could provide assistance. The OMIC denied the request leaving the R-side without any help.

At about the same time all the lows were combined at 64R with no d-side. Traffic was picking up due to weather. The 64R requested to split the sectors. The controller turned and no FLM was in the area. I am assuming the FLM was arguing with the OMIC about holdover OT.

Another north area controller happened to walk in the area and open 62R to help. TMU started to call 62R sector directly for reroutes to DTW due to weather. TMU stated they had attempted to go through the FLM but was unable to reach them. Again, I am assuming the FLM was still attempting to get the OT from the OMIC.

The evening continued to be busy due to weather and the North area was down to 5 CPCs and one 1 d-side trainee (LNR and DBQ certified) at 8:30pm - with multiple weather reroutes and complex traffic plus no help from the OMIC with OT.

This is just another example of 2nd level management neglecting the operation to save OT dollars.

This practice must stop. 2nd level managers must be held responsible for their actions they can't continue to short the operation.

We have discussed bringing the players in to our meetings to explain their decisions - a practice I highly support. The problem being these issues are happening faster than we can get the people together. We have yet to discuss June 2 or June 7.

After reviewing the events of June 2, June 7 and June 13 the decision to not use OT to support the operation were mostly made by OMIC Karkula.

ZAU NATCA is requesting we schedule a meeting as soon as possible with OMIC Karkula.

Thank You

Subject: Sat morning shift

From: Toby Hauck <toby.hauck@natca.net>

Date: June 29, 2015 5:01:44 PM CDT

To: Doris Arno <doris.arno@faa.gov>, Rita Thiel <Rita.Thiel@faa.gov>  
Cc: Craig Sullivan <[craig.sullivan@natca.net](mailto:craig.sullivan@natca.net)>

As per our conversation:

5am. -I arrive at 5am, only me and Amy there

6am - Art (flm) and Brad arrive and we discover even though we have 6 people our guest flm (schleich) isn't coming in. Thus leaving us with 5 available controllers and a partial trainee, plus one CIC

630am - I tell brad we need to start the OT sheet before the morning gets going. Mr Gutierrez informs us not to bother because he knows the OM (Reisel) will deny. I tell Brad do it anyway or get me out from Malta and I will. Brad agrees and starts writing it up.

630-7am - submitted OT, denied by OM. Reason being 5 people is deemed sufficient to run an area with 5 radars. Traffic starts to increase steadily so now we start to open sectors. We have three sectors open with no d side at this point. Farmm/Malta, Coton, and Arlington/Waterloo.

730am - ARL numbers increasing so a d side is added. That's one on break and 4 people on plus CIC.

8am - traffic volume warrants opening ALO radar. Mr Gutierrez says the OM will be moving him over at 10am when another flm (Prendergast) arrives. He also says don't bother opening ALO at this time. We do it anyway.

830-9am - I suspect OM sees this and suddenly the SE area has a CIC and we are getting Art back. He says he needs an hour and half of currency at ARL.

930- Art starts working ARL and gets very very busy. A d side is definitely necessary. Farmm and Malta are busy enough with departures that they need to be split also. Carl opens Malta

10-1130am - at this point we end up with no one on break and max goes right to the 2 hour mark (check times to verify)  
Ryan bender comes in early at 11. Not sure what happened because it isn't in WS.

1130-1230 - Art finished at ARL and becomes NW area flm. I ask for OT denial sheet and mr Gutierrez replies offhand that we (controllers) think money grows on trees because of the OT request. I don't respond. Mr Reisel is seemingly not very pleased that we are copying it.  
1230-1 - I atsap the entire shift based on safety concerns I feel we're not met

**The following communication was sent to ZAU FLMs/STMCs by one of ZAU's OMs:**

"All,

I am forwarding the below to you on behalf of Doug. Perhaps you had already heard."

Thomas F. Reisel  
Operations Manager, East and Northeast Areas  
Chicago Center  
630/906-8777

From: Arno, Doris (FAA) [mailto: ]  
Sent: Wednesday, July 08, 2015 3:31 PM [mailto: ]  
To: Reisel, Thomas (FAA); Karkula, Frank (FAA); Holland, T Douglas (FAA); Langerveld, Robert W (FAA); Gebhardt, Ian P (FAA); Cummins, Ray E (FAA); Thiel, Rita (FAA); Etherington, John (FAA); Rucker, Thomas (FAA); McNeal, Dale (FAA); Kurowski, Karen A (FAA) [mailto: ]Cc: Arno, Doris (FAA) [mailto: ]  
Subject: FW: NATCA Withdrawal Clarification

Team,

The first message below was the initial message received from Toby last Thursday. There were more attachments but I only included one at this time. Below that is what I sent to Toby after yesterday's Leadership meeting and his response. I'm still not clear on what needs to happen to get out from under this position that NATCA has decided to pursue, but we will. Thank you for hanging in there,

Doris

"All, (from Toby last Thursday)

Over the last few months ZAU management has cut every corner possible to reduce the use of operational OT. The Agency has shown complete disregard for the stakeholders of the NAS and safety as a whole.

On multiple occasions the OMs have shorted areas and forced airlines to take diversions to save operational OT. Specifically, June 2, 9, 13 and 27. I have included the emails I have sent you reference these dates. There are many other occasions that have been reported through the ATSAP program.

One June 19, 2015, the Agency posted the schedule for the OSH EAA Airshow. This schedule included staffing shifts with only 5 CPCs on a shift in the North Area. It also included short staffing the TMU, NE, SW, SE, NW areas. This is the busiest time of the year for Chicago Center and the OMs are comfortable with posting a schedule short staffing the Areas.

When I confronted the OMs on June 25, 2015, they announced they had a plan. On June 26, 2015, I filed an Article 7 requesting a briefing on the OMs' plan to staff the facility during the OSH EAA Airshow. The Agency has yet to respond to the request.

After a quick review of the area schedules, it would appear the OMs have started to react to ZAU NATCA's demands to staff the areas but this only highlights the philosophy of ZAU management. I have included a spreadsheet of the posted watch schedule and the OT provided since I confronted the OMs.

It is blatantly obvious that ZAU management has placed fiscal savings well above safety and efficiency - not to mention the morale of their employees.

There has to be a balance. ZAU NATCA has offered several times to help with pre-decisional input and collaboration. The OMs continue to make decisions behind closed doors.

The most critically staffed area in the building is the TMU. On several occasions ZAU NATCA has provided input and direction for the TMU. The Agency has yet to respond. I have included a letter dated April 14, 2015, that outlined ZAU NATCA's input and a plan to move forward. Also attached is a timeline reference the TMU's losses and gains, plus a spreadsheet highlighting staffing trends.

Increasingly, controllers are being removed from area staffing to man the CIC position thus adding to the problem. I have included a spreadsheet of TOP grievances filed since April of 2015.

In March ZMP implemented OPDs for the MSP airport. ZAU started to use TBFM for spacing of MSP arrivals. ZAU management continued to short staff areas and the TMU. This lack of staffing fundamentally slowed down the progression of TBFM at ZAU opening the facility for a barrage of negative comments and complaints.

After carefully considering all of the facts, options, attitude of the OMs and safety of the operation - ZAU NATCA must take measures to help keep the operation somewhat staffed and most importantly safe. ZAU NATCA will be removing all Reps from any and all projects effective July 6, 2015. Attached is a letter confirming this action and a list of Reps and programs in which they are involved.

If you have any questions feel free to contact me.

Thank You

Toby Hauck ☐ President, Chicago ARTCC ☐ National Air Traffic Controllers Association ☐ Chicago Air Route Traffic Control Center ☐ 619 W. New Indian Trail ☐ Aurora, IL 60506 ☐ [toby.hauck@natca.net](mailto:toby.hauck@natca.net) ☐ w-630-906-8416 c-630-957-7205 ☐ [www.natca-zau.org](http://www.natca-zau.org) ☐ AFL-CIO ☐ [\[Facebook\]](#)

**From:** Toby Hauck [<mailto:toby.hauck@natca.net>] ☐ **Sent:** Wednesday, July 08, 2015 9:45 AM ☐ **To:** Arno, Doris (FAA) ☐ **Cc:** <[craig.sullivan@natca.net](mailto:craig.sullivan@natca.net)>; Cummins, Ray E (FAA); Thiel, Rita (FAA) ☐ **Subject:** Re: NATCA Withdrawal Clarification

Doris

This is correct. And yes the training specialists are not to be part of the training teams per the training order.

I also am disappointed to have to take this action. I truly believe that under the current direction reference staffing and collaboration we are headed for some sort of major

problem.

I can not and will not be part of staffing areas at dangerous levels especially when the eyes of the aviation community will be on us during OSH EAA. Can you imagine if I didn't start asking questions about staffing for the airshow?

The OMs show time and time again they are willing to take the gamble on safety. They have also proven time and time again morale is no concern of theirs. I can't continue to support that philosophy. I can't put the bargaining unit in that position.

I have highlighted staffing issues and the envelope for safety being passed over and over. There has been no change. If management doesn't want to change than the union must.

The definition of insanity is doing the same thing over and over and expecting different results. I had done the same thing over and over and the results have always been the same. It is time to take a different approach.

The only option I have is to put all the resources I have available on the floor. The operation must be our priority. Management has proven it is not their priority.

When the XO returns from a meeting in DC and the only thing he briefs on is the OT budget is over the limit there has to be a change. When FLMs are afraid to approach the OM for OT there has to be a change. The OMs should be mentoring the FLMs not bullying them. When OMs are more concerned about defending their actions as to learning from them there has to be a change. When we divert airlines to save money there has to be a change. I could go on and on but that would be insane.

I am disappointed and this does have ramifications for both parties but in my position there were no more options. I have to protect the BU and keep the NAS as safe as I can.

You witnessed Frank's resistance to yesterday's conversation about the schedule. You seen him attempt to wash his hands of it. He doesn't want to take responsibility for his actions and the sad thing he isn't the only 2nd level that feels that way.

Our leadership team no longer acts as a team with one goal. You have an agenda - I have an agenda and the OMs move in the opposite direction of either of our agendas.

I want nothing more than to collaborate and move forward but until there is a real change in attitude and direction I have no choice but to protect the bu and the NAS.

Sent from "the Tob"

On Jul 7, 2015, at 7:26 PM, <[Doris.Arno@faa.gov](mailto:Doris.Arno@faa.gov)> wrote:  
Toby,

Before sending this out, please verify your expectations as we discussed today at the Leadership meeting;

-All NATCA representatives assigned to National programs as listed on the attached

BUEjobs.docx will remain in place representing NATCA's interests on the respective workgroups.

-You and Craig will be the only persons authorized to represent and/or act as liaisons for NATCA on the following;

Airspace and Procedures issues

BWS/AL Negotiations (identified as "Schedule" on the attached document)

TBFM

WX Team

Advanced NAV

Maps

Local Safety Council

VIP Movement

Safety Briefing Team

OSHA

-The Areas no longer have Area Training Specialists. The Training Order says that if there cannot be agreement on whom to assign, there will not be an ATS. Is it your intent that they are no longer a part of each training team?

-The Professional Standards Team will remain available.

-Elected Area Representatives will continue to represent Bargaining Unit members.

-All other matters that require NATCA participation not listed above, such as participation in the ICV, shall be directed to you or Craig.

I will be reminding the management team that they still have a right to assign work, such as, conducting Refresher/Recurrent Training as required.

I must add that I find this action very disappointing and counter-productive on the heels of positively promoting Right From the Start last week.

Doris Arno  
Air Traffic Manager  
Chicago ARTCC  
630-906-8443

End email excerpts.

**Comment:**

The OFFICE OF AUDIT AND EVALUATION visit was July 13-16. Please note that some of the above emails were dated just prior to and/or very close to the OFFICE OF AUDIT AND EVALUATION visit. If ZAU management was asked if there were any safety issues by the OFFICE OF AUDIT AND EVALUATION and stated no, the above details were held back.

Back to out-of-area assignments: Newly assigned FLMs that have been on the operational floor for less than six (6) months that barely knew their area of assignment and are now allowed to supervise another area simply because it's across the aisle.

It has been stated frequently that it is insulting to controllers in the "other area" to have an FLM supervise them who barely know the En Route function to supervise them in

such short order. These hurried FLMs lack the requisite knowledge needed to perform this important role. The time given to these FLMs is an unrealistic expectation to perform supervision. They are not certified in the area. How can JO 7210.3 be so loosely applied?

When an FLM does not maintain their currency and has been away from ATC, there are prescribed training time allowances for adequate training. The JO 3120.4 and Facility Training Orders entitles ATCSs to training time(s) allowed for positions in training for certification. The Order states:

**Begin Excerpt:**

09/30/13 JO 3120.4N

**Chapter 6. Air Traffic Control Specialist On-the-Job Training (OJT) and Position Certification**

1. General. This chapter establishes requirements and procedures for standardization of instruction and evaluation of the OJT and position certification process.

**2. Facility Training Hours.** *Each facility must establish target hours, minimum certification hours, and OJT hours for each operational position within the facility. Cross-sectional work groups will be used to recommend these hours. Evaluate established hours at least annually and, if necessary, adjust the hours. Facility training hours must be categorized based on the level and type of previous Air Traffic Control (ATC) experience. (e.g., those with no previous experience, employees transferring from like-type facility to like-type facility, employees transferring from lower level to higher level or high level to lower facility, etc.).*

**End Excerpt**

All facilities have a local Training Orders with target hours for positions requiring certification. Individuals that were previously certified on positions within an area must be recertified. JO 3120.4 prescribes these requirements:

**Begin Excerpt:**

**7. Recertification Procedures.** ***Personnel who fail to meet currency requirements and those who are decertified on one or more operational position(s) must be recertified prior to resuming operational duties.** To be recertified, the specialist must demonstrate, under direct supervision, the ability to satisfactorily perform relevant operational duties during normal workload conditions. Recertification may be accomplished by individual position or a single action covering multiple positions at the discretion of the ATM. If recertification is not achieved the ATM must take action in accordance with Agency guidelines.*

JO 3120.4 Appendix - Definitions

20. Familiarity - Knowledge of delegated airspace, adjacent facilities, frequencies, traffic flows and types, and procedures (e.g., letters of agreement) associated with a sector/operational position.

**End Excerpt**

**Comment:**

Even FLMs who have been at ZAU for years who are no longer certified on an operational position (area implied) in an area are allowed target hours for re-certification. The fact that ZAU management loosely applied a familiarity concept to FLMs who never worked in an ARTCC before with such miniscule training time constraints is simply wrong for the affected FLM and the Area.

It was an unrealistic expectation that an FLM can garner that much information in so little time and be ultimately responsible for supervising the "cross aisle". Yet this practice took place and these new FLMs are now supervising these Areas.

**There have been several ATSAP reports filed by ZAU FLMs situations involving out-of-area assignments. According to FLMs that claim to have filed events, there should be numerous reports.** The ATSAP program has taken these reports and has combined them. The question is, how many have been combined? **The following are at least two (2) copied responses/excerpts from the Event Review Committee in the ATSAP program regarding filed safety issues resulting from out of area assignments:**

**ERC Response 1**

**Begin Excerpt**

*"The ERC unanimously agreed, your report has been accepted and can be closed. We will maintain your report in our database for future analysis.*

*"The issue raised in your report regarding supervising an area in which you are not familiar is being addressed in an earlier report. **We have decided to keep only one report open as a placeholder, to hold new documentation as we receive it.** We will keep you apprised as we follow this issue through the other report. Thank you for your report and please file if this issue reoccurs.*

*Thank you for participating in the ATSAP Program.*

*If you have any questions, you may contact the ATSAP Office at 1-866-384-0157.*

*Sincerely,*

*The Event Review Committee"*

**ERC Response 2 on a separate issue:**

*The ERC unanimously agreed, your report has been accepted and can be closed. We will maintain your report in our database for future analysis. Thank you for your report. Your assistance in approving our request to share the safety data in your report is appreciated. **We are consolidating action under this report with a previous report that was identified on the same issue.** We will keep you apprised as we follow this issue through the other report. Thank you for your report and please file if this issue reoccurs.*

*Thank you for participating in the ATSAP Program.*

*If you have any questions, you may contact the ATSAP Office at 1-866-384-0157.*

*Sincerely,*

*The Event Review Committee"*

### **End Excerpt**

#### **Comment:**

The ATSAP program office should be conferred with to review individualized complaints concerning experiences with out-of-area assignments. How many from ZAU? How many across the country? Still, the ERC goes to the facility for resolve. The facility has its own safety team formulate a solution to respond to the ERC. One of the flaws in this process is, ZAU facility management can influence/filter what recommendation goes out back to the ERC to suit it's own needs to continue the practice.

The personnel within the facility were supposedly working together to provide a safe solution, but ultimately there is manipulation by Facility Management in this process in what goes out to the ERC in order to continue the out-of-area practice.

There may be a difference of opinion in what constitutes a "safety situation as being compromised". Nevertheless, mitigating unsafe situations from occurring is paramount. The ATSAP program, OFFICE OF AUDIT AND EVALUATION hotline and OSC are avenues ZAU personnel have contacted for help addressing safety related concerns.

Regarding the reports comment on the whether the practice of assigning FLMs to areas in which they are not certified or current jeopardizes situational awareness. I agree with the statement that situational awareness is subjective because it involves individual perceptions and varying degrees of ability. However, I disagree that quantifying and determining whether situational awareness has been "jeopardized" is not possible.

According to post OFFICE OF AUDIT AND EVALUATION talk within the facility, the report comment that "*not all individuals interviewed denied losing situational awareness when they provided supervision to an area in which they did not have currency, or in their own area in which they do maintain currency.*" At least one (1) individual in particular admitted (according to this person) to the OFFICE OF AUDIT AND EVALUATION stating they did not know what was going on in an out-of-area assignment situation.

Regarding the reports statement that "*FAA Order 7210.3 Y. Facility Operation and Administration only requires FLMs to maintain currency on a minimum of two control*

positions in order to perform Front Line Manager-in-Charge (FLMIC) duties" this presupposes area of assignment.

Even though the Order is being interpreted that it neither requires FLMs to be assigned to specific areas JO 3120.4 (Area Ratings) does in terms of the ATCS. It also defines assignment of "Areas of Specialization" commensurate with individual qualifications as noted earlier. ZAU's own Order does as well.

And although JO 7210.3 does not specifically state that it prohibits FLMs from supervising areas in which they do not maintain currency, what are we trying to accomplish? ZAU management looked for ways to "get around" the intent of the Order(s).

The OFFICE OF AUDIT AND EVALUATION report commented: "*Section 2-6-1 (a) requires a watch supervisor to maintain situational awareness of traffic activity and operational conditions in order to provide timely assistance to controllers by- assigning available resources when needed, or by opening additional positions and assigning controllers to work to ensure efficiency and safety.*" **This reference listed in the report speaks for itself and confirms that maintaining situational awareness is a requirement to ensuring efficiency and safety.**

***The OFFICE OF AUDIT AND EVALUATION report indicated that ten (10) FLMs were spoken to, however, only eight (8) FLMs are listed as spoken to or interviewed in the report. There are at least thirty-seven (37) Supervisors at ZAU.***

When it was learned that an investigation was going to take place, **it was questionable how management communicated and scheduled individuals (FLMs) for interviews.** ZAU management (ATM) informed individuals by separate email messages. All individuals requested for interview were scheduled via WMTScheduler. **At least three individuals that were requested were scheduled in WMTScheduler and received an email from the Facility Manager were already scheduled for Annual Leave, yet they were listed in WMTScheduler for an interview.**

***Some FLMs were scheduled for interviews during times earlier than they were even scheduled to report to work. This lent the impression amongst FLMs that the front office was not being completely cooperative*** as any upper-management official (ATM/OM) would have had to check individual FLM schedules prior to scheduling them for an OFFICE OF AUDIT AND EVALUATION interview (or at least you would think so). After several FLM's called this out as questionable, The Executive Officer subsequently put out a subsequent email to specific individuals revising the scheduled interviews but left out specific individuals in the communication citing they may be interviewed by phone or a later date.

Still, **there were individuals stating that they WANTED to be interviewed by the OFFICE OF AUDIT AND EVALUATION** to be heard beyond those scheduled to interview. If the list for required personnel to be interviewed did not match who was requested, ZAU management substituted individuals of their choosing unless it was agreeable to the investigating team.

**OFFICE OF AUDIT AND EVALUATION REPORT:**

*“Allegation 2: Upper level managers have jeopardized situational awareness and endangered public safety by assigning FLMs to fill in as temporary supervisory traffic management coordinators (STMCs), despite the fact that these FLMs are either no longer current on their STMC certifications or have never been certified as STMCs.*

*The investigation found that ZAU management is assigning FLMs to work as STMCs despite lacking current STMC certifications. Again, this practice is not a violation of an FAA Order, and no evidence was found indicating a danger to public safety. The STMCs role is to supervise Traffic Management Coordinators (TMCs) that are coordinating with the internal areas/sectors and all external entities. They also monitor all of the traffic flows within ZAU boundaries. Neither the TMC. nor the STMC provide control instructions to. or communicate directly with any aircraft.*

*Instead, they work with other agency employees to communicate with the airlines and the military regarding Traffic Management Initiatives (TMI). TMIs include ground stops, miles-in- trail spacing, and rerouting of aircraft to ensure that demand does not exceed capacity within any element of the national airspace system.”*

**Comment:**

JO 7210.3 – **“Line of Authority” specifies that in the absence of an STMC, a STMCIC will be put in charge of the TMU.** FLMs at ZAU either do not possess qualifications to perform duties of STMC and/or are no longer current.

**STMCs have to be certified in the TMU in order to perform their duties. JO7210.3 Section 3 para 2-3-3 b1 (b) and (c) applies if an FLM is volunteering to perform dual currency ( JO 7210.3 Sect 3 para 2-3-3 b 2(f) (3)).**

Just because an FLM is certified on a couple of positions (usually a couple of Radar Associate/“D-Side” positions) in an operational area outside of the TMU, it should not mean that they have the requisite knowledge to manage the intricacies of the Traffic Management Unit. Doing so increases the likelihood of inefficiency, poor communication to system stakeholders, overall ineffectiveness to lead the operation (especially in reduced air traffic capacity situations caused by volume/weather/other constraints) and safety.

In reviewing the above reference qualification requirements of JO 7210.3, it is questionable how the report determines that this is *NOT* a violation of the FAA Order.

FLMs put in these situations are accountable for unknowingly making decisions that could lead to unsafe traffic flows and complexities impacting an areas operation. There can be great pressure during CDM processes on facility Traffic Management Initiatives (TMIs) whereas the STMC must make the best judgement/decision subject ATCSCC approval. The inexperienced/unqualified FLM put in these situations is disadvantaged, and will be exposed by system stakeholders on their ineptness.

ZAU managements’ decision to have an unqualified FLM performing STMC duties was a bad practice. **Worthy of note, is that the experience level of TMCs at ZAU is extremely low.** Staffing within the TMU has become critical. ZAU managements’ decision to not

adequately keep a balance of permanent TMCs and STMCs to retain continuity of experience has also resulted in inefficiencies in decision-making. These decisions can come at an extreme cost to airlines. *These inexperienced TMC's routinely need guidance from the STMC as they are new themselves. Bringing in an inexperienced FLM with no Traffic Management background further complicates the problem(s) inherent in day-to-day TMU duties.*

#### **OFFICE OF AUDIT AND EVALUATION REPORT:**

*"Approximately two years ago, management at ZAU decided to rotate personnel as STMCs through the TMU on two to three year details in lieu of permanent assignments. This new policy applied to Traffic Management Coordinators (TMCs) as well as STMCs.*

*The FLMs most often assigned to the TMU are two experienced former STMCs who were reassigned to the FLM position when the facility transitioned to the rotational policy.*

*Additionally, we determined through records, that one FLM identified in the OSC referral as an FLM who had never worked as an STMC was assigned STMC duties on May 10, 2015. However, the FLM in question was certified as a TMC in 1995.*

*ZAU management asserts that there is no distinction between supervising all areas during the midnight shift without individual area certifications, and being assigned to supervise one of the areas (including the STMC position) for a day or evening shift. There is no prohibition in facility or National Orders preventing an FLM, who maintains currency in one area of the facility from supervising other areas or the TMU. Further, if inclement weather has caused delays, the FLM makes traffic management decisions such as arrival rate or traffic restrictions as the OMIC, and as part of their daily routine."*

#### **Comment:**

**ZAU management created a plan called the "Opportunities for Improvement Action Plan" the plan called for the following:**

Begin Excerpt:

The plan as outlined called for the following as excerpted:

V. DUAL-CURRENCY

TITLE: Promote STMC/TMC credibility and support effective and efficient Resource Management.

OBJECTIVES:

1. Create a STMC rotation, which includes the following proposed criteria:

**A. 2.5 - 5 year rotation for new STMC selections.**

B. Career Progression position.

C. Program will begin in 2012.

D. STMC position bids made competitive through bid process.

E. Projected loss of two STMC's by January 2014 (June 2012, January 2014). F. Current number at five (5).

End Excerpt

**Comment:**

Note: The plan in item A above states "***new STMC selections***". Those individuals were full-time permanent STMCs in the TMU before the program was conceptualized; yet they were rolled into the program and removed to the detriment of the operation.

***ZAU management decided to remove two (2) full-time permanent STMCs that were assigned to the TMU and regressed them to Area FLM positions that they previously held as FTPs. Then, because of the shortage of TMC and STMC staffing, ZAU Management required them to work in the TMU as unqualified STMCs as they had lost their operational currency within the TMU as required. This made no sense. The ATM's decision and action to reassign involuntary came at a significantly great expense that was not in the best interest of the FAA. This is being realized today when the TMU is understaffed with STMC's.***

**Tremendous amounts of overtime are being used within the TMU.** STMC's are averaging 6 day work-weeks with overtime each pay period. A plan to avert the staffing this situation was communicated to the previous ATM(s) but was apparently ignored. Having a core of permanent TMC's and STMC's was supposedly stressed/conveyed that supported experienced supervisory management continuity in the TMU which was also ignored.

**Contrary to the OM's opinion, there is a distinction between status between STMC and FLMs.** This is outlined in the ATO's career progression model (<https://myatocareer.faa.gov/CareerPathOverview.aspx>). The career progression model outlines the career path from FLM to STMC to OM/TMO/etc.

The ATO defines the STMC path as uni-directional (one-way). The ATO recognizes full-time permanent employees (FTP) for air traffic services and lists Operations Supervisors (FLMs) and STMCs separately.

**As a result of management plan/actions, ZAU now has zero (0) full-time permanent STMCs .** The level of TMU experience has been depleted and with the rotation tempo of personnel created; ensures an imbalance of continuity of experience within the TMU.

There is also a distinction in the Performance Management System as there are separate plans. SF-50's are cut delineating a difference in position descriptions and there is separate coding between the two jobs ZAUE15J (FLM) and ZAUE18J (STMC).

Job descriptions ZAU lists in separate vacancy announcements distinguishes a difference. The National Position Description Library lists STMC and Operations Supervisor (FLM) positions are listed separately and have distinguished duties and responsibilities.

## OFFICE OF AUDIT AND EVALUATION REPORT:

### *Additional Considerations;*

*"The duties of supervisory air traffic controllers (FLMs) have evolved over time. In the past, FLMs were certified on all sectors that they were assigned to supervise. FLMs functioned as senior controllers, who were expected to intervene and control traffic if they deemed it necessary. Today, the Next Generation Air Traffic Control System (NextGen) is being deployed throughout the National Airspace System (NAS), and numerous decision support tools, automation, and equipment enhancements have been deployed in many facilities to enhance situational awareness. Accordingly, modern air traffic control technology is changing the role of the FLM to a different type of supervision, but the current system is still in a transitional phase between traditional air traffic control practices and the state-of-the-art NextGen system.*

*Today's FLM role is becoming more focused upon resource management, inter-and intra-facility coordination for traffic management restrictions, and general supervision. The latter includes ensuring that controller provided separation and phraseology is compliant and general conduct is appropriate, which is standard in all facilities and areas. During the transition to NextGen, New guidance and additional training will be required to ensure that both FLMs and facilities are prepared to perform a different type of supervisory role in the NextGen environment."*

### **Comment:**

The FAA Administrators report to Congress provides a comprehensive study on the Front Line Manager (FLMs) role. Contrary to this reports statement the information provided to Congress (see report to congress on frontline manager staffing - [www.faa.gov/.../media/Report\\_to\\_Congress\\_on\\_Frontline\\_Manager\\_Staffing\\_Sec\\_604.pdf](http://www.faa.gov/.../media/Report_to_Congress_on_Frontline_Manager_Staffing_Sec_604.pdf) ) identifies the critical role(s) of the FLM to supervise and manage and away form administrative tasks due to experience level of controller requiring increased supervision :

### **Begin Excerpt:**

### **Summary of Findings**

***The primary expectations of a frontline manager are to monitor controllers and manage air traffic operations. These expectations were confirmed not only through the interviews and with responses to the survey questions, but also through conversations held with senior officials in the Air Traffic Operations (ATO) organization at FAA headquarters.***

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The Study Team notes that all FAA stakeholders interviewed during this study recognize the importance of the frontline manager role and its impact on the National Airspace System (NAS). The information gathered from the study indicates that in addition to their operational duties, frontline managers face a growing number of administrative requirements. ***The administrative tasks, which typically do not involve directly supervising or providing feedback to controllers on- position, may be performed away from the operational area. The administrative requirements are increasing as the***

*collective experience level of controllers to be supervised is decreasing. This change in experience levels increases not only the need for operational engagement on the part of the frontline manager, but also their administrative workload.* Frontline managers rely on various methods to remain engaged in operations while concurrently addressing their administrative workload. The frontline managers interviewed reported that they often stay on the operations floor for most, if not all, of their scheduled shift.

The findings from the study indicate that workload is impacted by the facility size, as well as internal and external facility specific operational complexities. Examples include airspace complexity and equipment (internal), and adverse weather, runway configuration and ongoing construction (external). FAA initiatives such as the En Route Automation Modernization (ERAM) and Metroplex also impact frontline manager staffing, specifically when current managers are required to serve on long term details and are not available to provide coverage on the operations floor. While frontline manager staffing is limited at some facilities, concerns were expressed about the lack of incentives for experienced members of the controller workforce to apply for open frontline manager positions. In addition, for those who are selected as new frontline managers, the timing of the training received, the materials used, and the training process can vary between facilities. Additional factors such as the expectations and priorities of the facility management team can also impact the workload of a frontline manager.

#### **Summary of Recommendations**

The Study Team developed a series of recommendations that, if implemented, will enable the FAA to address the findings resulting from this study. These **recommendations are intended to provide the FAA with a baseline** to leverage as the organization moves forward with its NextGen initiatives. The recommendations focus on addressing the growing administrative workload, conducting further analysis that will serve as a basis for quantifying frontline manager staffing requirements in the future, and gathering additional qualitative information on the role and perspectives of other staff members who support frontline managers. Some initiatives are already partially underway, while in other cases additional analysis will be required.

**FAA leadership indicated that the primary role of a frontline manager is to remain operationally engaged** while performing appropriate operationally-related administrative tasks. Leadership also realizes that a “one size fits all” approach may not be the best approach given differences in operations and administrative support at facilities of various sizes. **In order to maintain a safe and efficient operating environment, the frequently performed administrative tasks should be reviewed in order to determine whether their performance is required, where and when they could be diverted to others, or improved in another way.** Specifically, the FAA should:

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#### Frontline Manager Staffing Requirements Study

- **Review administrative tasks that are performed constantly or frequently and identify those that can be delegated from the frontline manager to others, or perhaps eliminated entirely.**
- Identify and share “best practices” used by frontline managers to complete administrative work in order to determine applicability for use at other facilities.
- Explore ways to make the employee performance evaluation process more meaningful, timely, and proactive, while minimizing the potential for duplication of efforts.
- Review facility even flow metering process for the arrival of developmental controllers and identify opportunities to coordinate with facility workload distribution to minimize the impact on the workforce.

In addition to reviewing administrative tasks, identifying appropriate measures of administrative workload and devising ways to consistently capture that information will facilitate the ability to develop quantitative staffing guidelines for frontline managers. Conducting further quantitative analysis to validate, quantify, and correlate data elements such as the timing of training frequency of task performance, air traffic volumes, and time on-position will complement the topics discussed during the interviews and captured in the FLM Survey. To accomplish these analytical tasks the FAA should:

- Examine "actual" frontline manager supervisory capacity by facility and identify metrics and best practices in this area. Currently, some frontline managers are on long-term internal detail assignments or may be unable to work on the operations floor as a frontline manager.
- **Review current protocols for putting a Controller-in-Charge (CIC) in place, clarify requirements, document the prevalence of their current use, identify best practices and appropriate mechanisms for sharing them, and establish metrics that can be monitored over time.**
- Develop quantitative staffing guidelines for frontline managers that incorporate full shift coverage and account for administrative tasks and other non-operational time such as training and leave time. Current information on the volume of administrative work is qualitative; conducting a study to quantify the magnitude of these tasks will provide additional insight into where staffing level adjustments should be considered.

Obtaining input from additional facility support staff members, current controllers, On-the-Job Training Instructors (OJTIs), and CICs will complement the recommended analytical work. Gathering additional qualitative information from individuals performing these functions will provide a more complete understanding on topics such as the working relationship with the frontline manager and the role each one plays in supporting the frontline manager. In addition, developing a better understanding of the current on-boarding process for frontline managers, including the overall timing and staging of the process, content, and materials will facilitate the ability to consistently add and develop leaders in this role as NextGen initiatives become more

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#### Frontline Manager Staffing Requirements Study

prominent in FAA's operating environment. To complete the additional qualitative work the FAA should:

- Review the scope and level of effort provided by administrative and support personnel in order to understand gaps and differences in the level of assistance provided. This effort would complement the work performed during this study and offer additional insight into the roles and perspectives of those who support the frontline manager in completing various administrative areas.
- Conduct a series of controller interviews (to include those that perform the roles of CIC OJTI) to determine why these individuals may pursue the frontline manager role in the future. Gathering the perspective of OJTIs and controllers will assist in understanding the frontline manager's training-related administrative workload. **Capturing the perspective of CICs will assist in understanding the workload and challenges associated with the role.**
- **Review the current development path and training curriculum for frontline managers, evaluate the effectiveness of the current training process, and develop an inventory of training materials currently used. The evaluation would**

examine the uniformity of the initial off-site and on-the-job training that takes place for new frontline managers, the timing of training related to selection and placement, and training needs in relation to experience level both in the operation as well as in any previous management roles.

The FAA's universal acceptance that the frontline manager role is critical to managing the NAS and the agency's commitment to supporting the completion of this study are key steps in the process of further defining and streamlining the tasks associated with the role. Combining the qualitative information obtained in this study with additional quantitative analysis will position the FAA to develop staffing guidelines for frontline managers. These guidelines will augment the agency's ongoing efforts to maintain the appropriate complement of frontline managers at the facility level. A critical next step will require the FAA to update the baseline established in order to account for the impact of NextGen on the role of the frontline manager in the future.

End Excerpt

**Comment:**

Nowhere in the 131 page report to Congress, did it refer to FLMs being assigned to other operational areas other than their primary area. The document throughout the study, explained how CICs were used as a competent supplant of the FLM in an operational area when needed.

**OFFICE OF AUDIT AND EVALUATION REPORT:**

*"Investigation Methodology:*

*The investigative team was comprised of a senior investigator-in-charge from the Office of Audit and Evaluation (AAE) and subject matter experts from the ATO Safety and Technical Training organization. During the week of July 13-16, 2015, the team traveled to Aurora, IL to conduct interviews and review records. The investigators interviewed 15 individuals, including the air traffic manager, frontline managers, operations managers, and the training manager. The investigators reviewed training records, correspondence, FAA Orders and all databases containing safety and operational records at ZAU. FAA employees interviewed or spoken to included:*

*Robert Mickolavck. Front-line Manager*

*Joseph Bocik. Front-line Manager*

*Alex Govan. Front-line Manager*

*Keith Friedlein. Front-line Manager*

*Joel Brown. Front-line Manager*

*Jamie Feger. Front-line Manager*

*Cherie Obert. Front-line Manager*

*Wallace Charles. Front-line Manager*

*Bob Langerveld. Operations Manager*

*Doug Flolland. Operations Manager*

*Ray Cummins. Acting Executive Officer*

*John Etherington. Support Manager. Training and Planning and Requirements*

Tom Rucker. Acting Quality Assurance Manager  
Doris Arno. Acting Air Traffic Manager  
Anonymous Front-line Manager (telephone call received)

*Since the complainant requested anonymity and is known only to the U.S. Office of Special Counsel, it is not known whether he or she was interviewed during the investigation."*

**Comment:**

**None**

**OFFICE OF AUDIT AND EVALUATION REPORT:**

*Corrective Actions by the Agency:*

*The ATO has implemented the following process improvements at ZAU:*

- *Effective July 28, 2015, the facility was instructed by the Vice President, Air Traffic Services to limit the practice of assigning FLMs outside of geographic areas where they currently maintain familiarity, except in extraordinarily unusual circumstances such as a national or local emergency.*
- *ZAU was also instructed to utilize overtime or supervisory CIC in lieu of FLMs unfamiliar with a given area.*
- *The staffing of the ZAU TMU unit with a combination of permanent and detailed personnel will be adjusted to reduce the ratio of detailed positions.*
- *A new Air Traffic Manager will report to ZAU within 30 days.*
- *The ATO will issue new national policy guidance on this matter to all air traffic facilities by September 30, 2015.*

**Comment:**

Just after the OFFICE OF AUDIT AND EVALUATION team left, an FLM was medically disqualified. That FLMs absence prompted FLM scheduling moves by an OM that impacted seven other area FLMs via schedule changes and area assignments. *This was just AFTER the OFFICE OF AUDIT AND EVALUATION had just left!*

On 3 August 15, there seemingly was guidance to OMs in the form of an email

communicated to OMs only by the former ATM. But rather than conveying it to FLMs, the email was left lying around at the OMIC desk. The email listed as Urgent stated:

“ Effective immediately, do not assign Supervisors to an area in which they have no experience, training or familiarity (Familiarity must be formal and documented). You can use Supervisors to do cross aisle supervision and you can use them if they held previous certifications in that area, otherwise do not do so. We will work to get a list up to the OMIC and STAR Team to use as a reference when making assignments.”

Without this formal communication flowing to the FLMs; FLMs assigned to the OMIC desk would not know how to handle shortages of FLMs. If an FLM called in sick, an FLM assigned to the OMIC desk would not know whether they were authorized to call in an FLM for overtime. It was a big guess as to what to do. CIC's were used as appropriate, but in the absence of a CIC, an FLM did not have the authority to call in an FLM for overtime because it was not communicated.

A new ATM was put into ZAU. It was more than likely, the new ATM was not up to speed of all the dynamics of what had been occurring. The new ATM likely was unaware of these new situations only being at the facility a couple of days.

No direction/information was communicated to FLMs until 25 August on how FLM staffing would be handled. The information presented was conflicting. The Ex Officer communicated during the daily weather briefing, for FLMs, STMC's OM's and Support Managers; that the OM's have planned to continue cross-aisle assignment and one other area. Additionally, the OM management team would determine who could work in this other operational area based upon familiarity with an area the OMs felt an individual had. Without the FLM's input??. This infuriated some FLMs that more of the same was going to occur (out-of-area assignments).

The Ex Officer communicated that FLMs would occasionally be required to work an “alternate area” *which could be changed if needed*. Areas would be determined by OM's and the assignments could even be quite possibly for a few months??

This lent the impression of either another ad hoc initiative by ZAU OMs or a misinterpretation of guidance. As of 8/27/15, the only detailed explanatory guidance and direction on the matter came from the ZAU SUPCOM chairman.

The information SUPCOM had should have been coming from the OMs to the FLMs.

With respect to the comment: *“Effective July 28, 2015, the facility was instructed by the Vice President, Air Traffic Services to limit the practice of assigning FLMs outside of geographic areas where they currently maintain familiarity, except in extraordinarily unusual circumstances such as a national or local emergency.”*

**Realizing that this situation is in a state of evolution. The standard has already changed. Contrary to what was stated by the Vice President Air Traffic Services, direction has been communicated that “Front Line Managers (FLMs) and Supervisory Traffic Management Coordinators (STMCs) shall be assigned “in-charge” duties only in their primary area or unit (where they maintain operational currency) and one other area.** Operational managers will identify the alternate assignment areas based

on familiarity and/or formal training and maintain this information in the "FLM/STMC Area Assignments" database."

In the above, It's the "**and one other area**" that concerns FLM's

**How is it that Operations Managers are determining for the affected FLM, how familiar he/she is with *another area* where they are no longer certified and maintain operational currency? To what standard is familiarity measured against? **How and why are Operational Managers accomplishing this without FLM/STMC input?****

This has the capacity to eventually morph into random assignments unless explicit guidelines are formulated that adhere to the Vice President Air Traffic Services original Statement. Areas of "familiarity" will eventually multiply for affected FLMs at ZAU. Familiarity does not apply to ATCSs. Currency does. Perhaps ZAU is in experiencing a local emergency.

**The cross-aisle concept is completely flawed.** FLM's have routinely been assigned to the OMIC position without this information. It is not an unreasonable assumption that this guidance should have been communicated to anyone responsible for working the OMIC position regarding this subject.

**Direction to the OM's from the former ATM's was contradictory.** The message stated you can use supervisors to do cross aisle supervision.

There are **several new FLM's** that have come here from **terminal facilities** who have been here less than a year **who have limited experience managing their own area.** A few have only started managing their areas a few months ago. Yet these new individuals were being put in situations (cross-aisle) regardless to complexity and weather conditions adversely impacting the operation. These **terminal background only personnel:**

- a. Lack the trust and respect of the controllers in the other (cross-aisle) area because they are not certified in that area.
- b. They get challenged.
- c. They can't give operational support when it's necessary because they lack the knowledge and experience.
- d. They are disadvantaged. They are being mandated to work in this capacity with little exposure to the operation.
- e. These FLM's are speaking to their peers saying how unsafe it is and how they don't know what's going on when assigned to cross-aisle (they are new to ZAU).
- f. These FLM's are new to the facility and won't speak up for themselves. They are all allowing themselves to be put in these situations because it is an assignment of work.
- g. They are on probation status. They operate out of fear of reprisal if they speak up about their apprehension.
- h. They are in a sense being bullied by their OM's to work in this capacity. FLMs are being "written up on personnel issues for administrative tasks, briefing items, etc.
- i. In thunderstorm events, these FLMs are setup to fail due to ineptness. It is exactly these situations where a "guest" supervisor introduces risk into the ATC system.

The more important question remains, *if an FLM is not certified in that area on at least two (2) positions in that cross aisle, or has not held previous certifications (lost currency) in that cross aisle Area, are they still allowed to supervise air traffic control operations in that area? When an FLM loses currency they cannot supervise. Therefore, how is this allowable in a cross-aisle?*

Assignments simply because another Area is physically across the aisle has no validity.

Holding an FLM accountable for ATC in another specialty without specialized training poses significant ineffectiveness and compromises safety as a Supervisory ATCS in that area (at the very least, it introduces risk). And, *the physical "across-the-aisle concept has no bearing in most cases, with the function of the "Cross Aisle".*

For example at ZAU:

**The Northeast Area is an Arrival Area predominately, its cross aisle is a departure area (East Area).**

**The Southwest Area is an Arrival Area predominately, it's cross aisle component is the North Area (Departure Area).**

**The West Area is a EnRoute/Departure Area (all high altitude), it's cross aisle is the South Area which is predominately a Departure Area.**

**The Southeast Area is mainly an Arrival Area, it's cross aisle is the Northwest Area which is both an Arrival and Departure Area.**

**The Traffic Management Unit is an Area of it's own. Recently, and Area FLM (with no traffic management background ) was sent to manage the Traffic Management Unit as STMC. This goes beyond cross aisle.**

The dynamics of the operation are not being considered. Even an experienced FLM may NOT know the dynamics of what's across from them. Factor in severe weather and tactical traffic management initiatives, and an FLM can easily be a detriment to the operation trying to manage that foreign area and /or approve something without fully knowing the consequences.

Allowing ATC supervision on the basis of the physical location of an area simply because it's "across the aisle" seemingly does not promote safety.

Recently, an FLM was decertified in an operational area for not meeting prescribed currency requirements. That person was required to recertify in order to perform supervision as appropriate. This decertified FLM was certified on a RADAR position by a new FLM (at ZAU less than a year) from "across the aisle" who has a terminal only background. This new FLM has never been certified on a radar position in an ARTCC. This person is only certified on radar associate positions in their assigned area. The Joint Order does not prohibit this practice but this was allowed to happen. Where do we draw the line with cross aisle issues?

Another issue for thought:

It appears that no steps were taken at ZAU, to determine allowable medications and conditions FLM's/STMC's may be experiencing that have been medically disqualified (DQ'd), and the affect that may have on their assignment to the OMIC position. FLM's/STMC's have to have a valid medical to perform their duties, but when they are DQ'd, these personnel have been assigned OMIC duty regardless to condition/meds.

Even though OM's DO NOT have to have a medical, what limitations are placed on these personnel to work as OMIC. Is it without regard to their condition and/or medication(s). One FLM advised of having seizures from a condition the night before coming to work and informed an OM, yet that person was still assigned to the OMIC position. This person supposedly communicated this experience to the on duty OM. OMs need guidance on this matter.

A person can be on debilitating medications yet they are still allowed to perform in an OMIC capacity? Recently there was an FLM here who was medically DQ'd who had been assigned OMIC duties for an extended period of time. This person was on meds. This person advised that no one had asked what meds were being taken. Should the flight surgeon not be involved in these matters? How can this be allowed? What if the Rx is Vicodin or some other major drug? For that matter, what constraint is placed on OMs that are on medications?

It would appear appropriate even for an OM to have to report medications they themselves are prescribed that may impair their judgment at such an important position (OMIC). Are there limitations? If not, this should be looked into. However, it doesn't state in the Joint Order that this is allowable, nor does *it* prohibit this practice.

### **Recommendations:**

Anyone that wants an understanding of the challenges and responsibilities of the FLM should read the Report to Congress by the FAA Administrator "Front Line Manager Staffing Requirements Study dated May 2014; it is extremely comprehensive.

**Remove all ambiguity regarding supervision performed by OS's/FLM's/STMCs in JO 7210.3 to mirror the language as "it" does for CIC's.** Add in the next JO 7210.3 change: FLMs must be certified and operationally current "in their assigned operational area to perform supervision". Make the Order specific and Clear.

**Ensure an adequate ratio of Full Time Permanent (FTP) STMC and TMC positions with temporary positions. ZAU permanent STMCs is currently at zero (0).** The previous ZAU Manager removed FTP STMCs and supplanted them with temporary appointees and created a deficiency and simultaneously neglected to timely solicit FTP and temporary TMC positions to ensure an adequate balance of personnel and continuity of experience due to rotation of some temporaries.

Initiate/encourage a Dual Currency Program:

Encourage dual-certification in accordance with facility training guidelines for FLMs if feasible.

TMU - STMC's: to maintain optional (highly encouraged) Dual Currency - currency both inside the TMU and in an assigned operational area would be a benefit to at least a few Areas.. If Temporary TMC's that return back to the operations floor could somehow be motivated to maintain dual currency within their area and the TMU, this would be a benefit to supplementing shortages in the TMU.

Since Quality Step Increase (QSI) no longer exists, one such motivation could be in the form of a formula of earning Time-off -Award for maintaining dual currency. This would benefit the TMU tremendously. The above would possibly require a modification to JO 7210.3 (currency requirements) and/or local training order(s).

JO 7210.3 used to require TMCs in addition to positions in the TMU to maintain currency on the operations floor. ZAU used to operate on a waiver to that requirement, that requirement no longer exists as TMC's now only maintain currency within the TMU.

Promote Dual currency requirements for Temporary STMC's that return to an operational area and an Dual Currency requirements (option) for Permanent TMC's to maintain certifications in an operational area would be a huge benefit for Areas in ARTCC's.

All of the above presupposed balanced staffing within the facility.

Actively engage to recruit ATCS's to the FLM/TMC ranks. Re-convey the TMU as a stepping stone to FLM/STMC positions (ATO Career Map). ZAU has typically promoted FLM's outside the TMU to STMC and not TMC's to STMC. Nevertheless, the TMC uni-directionally models toward the STMC position according to the ATO career Planning Program "Career Map". They remain useable in the TMU as a certified resource only

requiring management training elements.

Better encourage/promote Individual Development Plans (IDP) within facility. It is typical at ZAU to promote an FLM from the controller ranks and not keep that FLM in their same operational area. Perhaps the practice should be re-evaluated. Page 109 of the study in the FAA Administrators report to Congress on FLM staffing:

**Begin Excerpt:**

**The workload for new frontline managers in En Route Centers can depend on the area where they are assigned when they start the position.** The opinion of frontline managers and upper management relating to how new frontline managers should be assigned generally differed at the En Route Centers visited. **Frontline managers indicated that new frontline managers could, and should, supervise controllers in the same area(s) from which they had been promoted. They noted that the overall familiarity and experience with the specific airspace being managed should be considered, and that remaining in the same area made it easier to transition because they already knew the “trouble spots” and challenging times of the day for that area. One longtime frontline manager stated that the goal for a new frontline manager is to become an expert in their assigned area so that they can instinctively rely on their situational awareness to resolve challenges as they arise. This ability to troubleshoot, and not having to learn a completely new area, allows new frontline managers to concentrate on improving management skills, while also providing time to complete the volume of new administrative work that is required of them. Another advantage to supervising controllers in the area where they previously worked as a controller was that frontline managers were more likely to already be checked out on all positions in the area, making it easier for them to maintain currency.**

While the aforementioned benefits to new frontline managers being assigned to work in areas that they had worked as ATCs are significant, the benefits need to be considered along with the interpersonal dynamics that could result from former supervising colleagues. Members of upper management at En Route Centers preferred to avoid any potential conflict of interest that could arise from supervising former peers in the same area, so they assigned recently promoted frontline managers to new areas as part of local facility policy. In the end, the decision is dependent on the perspective of upper management at a given facility.

**End Excerpt**

Today, the CIC has the technical competence and respect of their peers when performing supervision. This should be the standard in the absence of a qualified area FLM preferable to any “cross aisle” / “Guest Supervisor” FLM. An ATCS promoted to FLM from within an area and retained in the same operational area has huge upside when it’s feasible.

Again:

I applaud the Vice President of Air Traffic Services directing the facility to **limit the practice of assigning FLMs to areas in which they have no familiarity except in extraordinarily unusual circumstances such as a national or local emergency (effective**

July 28, 2015). FLM overtime and CICs will be utilized to cover shortages and to maintain area familiarity. I applaud the fact that the Air Traffic Organization (ATO) will issue new national policy guidance on this matter to all air traffic facilities by September 30, 2015. The JO 7210.3 should be evaluated to clarify expectations of the FLM and clear out ambiguities.

Despite the report findings stating that no violations of orders or rules have taken place; **The Vice President of Air Traffic Services and ATO as a whole, has taken a drastic action and a significant step forward to send a clear message to other facilities and "right the ship" at ZAU.** As stated earlier in the report by the OFFICE OF AUDIT AND EVALUATION, "*This practice is also in conflict with traditional FLM staffing philosophy in large facilities like ZAU.*"

In general, I feel mixed about the reports comments to discredit the allegations. When reviewing compliance with Orders we look for definitive information. The OFFICE OF AUDIT AND EVALUATION had to see a specific violation to a rule or regulation or Order. Therefore, we get to the dialogue of: *IT* doesn't say that you can't do this or that. Even though the report seemingly aligned with ZAU's - *IT doesn't say you can't do that* philosophy, the report also distanced itself from ZAU's management approach.

Sometimes the "IT" information is not contained in a single source, sometimes "IT" is. Sometimes information is subjective. The statement that "no violation to orders occurred" is subjective. As far as the report stating safety was not compromised, I submit that this also is subjective. The Order should be changed to remove all ambiguity.

At the very least, the spirit and/or intent of sections contained in Joint Order 7210.3 in this matter was not followed hence violated. Enough said. **The situations occurring at ZAU was subjective enough to warrant quick decisive, and definitive action on the part of senior FAA leadership.** The OSC and Senior Leadership saw through it all and I applaud that. An intervention was necessary and an intervention occurred.

Apparently, there are individuals within Senior Leadership who were Air Traffic Control Supervisors at some time in their careers or have advisors that were that know we do not/should not operate in the way ZAU has. As stated in the report, It is *not* traditional. They know that there is an inherently unsafe potential for something disastrous to occur by operating in the manner ZAU has. This is exactly what WE are trying to do by coming forward: prevent accidents and enhance safety.

Sometimes governing information is fragmented yet *it* is contained in several other sources of governing information.

If we look at all the pieces to a puzzle and not just a fragment we can put *it* together and see the whole picture.

**I applaud National Guidance on this matter.**

All of the above comments and content are provided as part of Employee Responsibilities under Order 1600.38 item 9 and the Secretary of Transportations Policy Statement on Whistleblowing.

End all Comments

Anonymous