



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
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September 3, 2025

Mr. Charles N. Baldis
U.S. Office of Special Counsel
1730 M Street, N.W. Suite 300
Washington, D.C. 20036-4505

SUBJECT: Whistleblower Investigation-
Alleged violation of law, rule, or regulation at
Fort Polk, Louisiana (Office of Special Counsel
File Number DI-25-000151)

Dear Mr. Baldis:

In accordance with Title 5, United States Code, Sections 1213(c) and (d), the enclosed report is submitted in response to the Special Counsel's letter of December 4, 2024, referring a whistleblower disclosure for investigation. The Secretary of the Army has delegated to me his authority, as Agency head, to review, sign, and submit to you the statutorily required report.

The Department of the Army takes its responsibility to address, in a timely and thorough fashion, matters referred by OSC very seriously. In this case, the Army conducted a thorough and comprehensive investigation in response to the OSC's referral of the allegation submitted by the whistleblower, [REDACTED] in which she asserted that employees are not properly manning positions at the Fort Polk Army Radar Approach Control Facility (ARAC) to ensure the safe and efficient use of Maks Army Airfield airspace in accordance with Army and Federal Aviation Administration requirements. Specifically, she alleged that Air Traffic Controllers (ATC) are not properly manning their positions, are not performing duties for the required duration of their assigned shift, and that ARAC leadership is not properly documenting consolidated or combined positions and allowing one ATC to cover all positions.

[REDACTED] was given the opportunity to provide additional evidence in support of her allegation when she was interviewed on February 10, 2025, and she provided a sworn statement supplementing her allegation to OSC. The investigating officer (IO), with an assistant IO, interviewed 20 people, including [REDACTED] toured the ARAC, and reviewed regulations, policies, and other relevant documentation.

The IO determined the allegation that ATCs are not properly manning their positions is unsubstantiated. Based on the testimony of 11 of 12 ATCs and 4 of 4 supervisors, the IO found that when assigned to a controller position, ATCs are manning their assigned controller positions except during short breaks to the restroom or breakroom. The IO determined that when not physically seated in position, the ATC's use headsets which enable their continued monitoring of air traffic activity.

The IO determined the allegation that ATCs are not performing duties for the required duration of their assigned shift is partially substantiated. The IO determined that, as a result of all controllers on duty rotating through the controller positions during a shift, it is common practice for a controller to be signed onto a position for six hours of an 8-hour shift and remain on duty in standby status for the remaining two hours during which period they remain immediately available if needed.

The IO determined the allegation that ARAC leadership is not properly documenting consolidated or combined positions is unsubstantiated. The IO determined ARAC management is combining controller positions in accordance with established policy. Based on interviews with ATC management and ATCs, the IO determined that all ATCs remain in their position for the duration of their assignment except for short periods when they go to the bathroom or breakroom. The IO confirmed this practice by reviewing randomly selected position logs from January, February and March 2025, which indicated the facility is combining positions in accordance with the Facility Memorandum #24-17. The IO also verified the accuracy of the position logs by comparing the position assignments documented on the logs to the corresponding daily air traffic activity recordings.

The IO determined the allegation that ATCs are allowed to cover all positions, thereby creating a substantial and specific danger to public safety, is unsubstantiated. The IO found that one ATC covers all positions on only two occasions: during the mid-shift (0000-0800) when the traffic density is very low and also during breaks of short durations to the restroom or kitchen. The IO found that these short durations do not create a substantial and specific danger to public safety.

Based on the findings of the investigation, the command is conducting a manpower study of the ARAC to determine the appropriate ATC manning requirements and will consider revising staffing policies as appropriate.

I am satisfied that the IO's conclusions constitute an appropriate outcome in this matter. Accordingly, the Army has made no referral of alleged criminal violation to the Attorney General pursuant to Title 5 U.S.C. §1213(d)(5)(d). This report is submitted in satisfaction of my responsibilities under Title 5 U.S.C. §§1213(c) and (d). Please direct any further questions you may have concerning this matter to Mr. Joseph A. Fedorko, Office of The Army General Counsel, at 703-693-3668.

Sincerely,



Derrick Anderson
Acting

SUMMARY OF THE REPORT OF INVESTIGATION

I. INFORMATION INITIATING THE INVESTIGATION

By correspondence dated December 4, 2024, the Office of Special Counsel (OSC) forwarded to the Secretary of the Army allegations from a named whistleblower, a former Air Traffic Controller for the Directorate of Plans, Training, Mobilization and Security (DPTMS), at Fort Polk (formerly Fort Johnson), Louisiana. The whistleblower alleged that DPTMS employees have engaged in activity that may constitute a violation of law, rule, or regulation; gross mismanagement; and a substantial and specific danger to public safety.

The whistleblower alleges that employees are not properly manning positions at the Fort Polk Army Radar Approach Control Facility (ARAC) to ensure the safe and efficient use of Maks Army Airfield airspace in accordance with Army and Federal Aviation Administration requirements. The specific allegations are:

- (1) Air Traffic Controllers are not properly manning their positions.
- (2) Air Traffic Controllers are not performing duties for the required duration of their assigned shift.
- (3) Fort Polk ARAC leadership is not properly documenting consolidated or combined positions.
- (4) Allowing one Air Traffic Controller to cover all positions creates a substantial and specific danger to public safety.

II. CONDUCT OF THE INVESTIGATION

On December 17, 2024, the Office of the Army General Counsel forwarded the OSC referral to the Commanding General, United States Army Installation Management Command (IMCOM) for appropriate action, including the initiation of an investigation into the allegations pursuant to Army Regulation (AR) 15-6, Procedures for Investigating Officers and Boards of Officers, and the implementation of appropriate corrective actions as necessary.

On January 6, 2025, the IMCOM Chief of Staff, on behalf of the Commanding General, appointed an investigating officer (IO) to conduct the AR 15-6 investigation and to prepare the Army report addressing the allegations made by the whistleblower to the OSC. The purpose of the investigation was to inquire into the allegations made to OSC

and to make findings concerning whether any wrongdoing occurred, and if so, by whom, and whether adequate policies and procedures are in place to preclude any recurrence of any improprieties, irregularities, or misconduct.

The IO, and assistant IO, interviewed 20 people, including the whistleblower. Specifically, the IO conducted an in-person interview with the whistleblower in Enid, Oklahoma on February 10, 2025. Between March 3 and 6, 2025, the IO conducted in-person interviews with Fort Polk DPTMS personnel, including:

- Director, DPTMS
- Airfield Manager
- Chief, Air Traffic Control and Airspace Officer
- Chief, ARAC
- 4 of 4 ARAC Supervisors
- 11 of 12 ARAC Air Traffic Controllers – One controller was unavailable for interview; 2 of the 11 ARAC Controllers were interviewed via MS TEAMS as they were on leave during the Fort Polk site visit

The investigation also included a tour of the Fort Polk ARAC Facility and a review of regulations, policies and other relevant documentation.

III. APPLICABLE RULES, REGULATIONS, AND POLICIES

1. Army Regulation 95-2, Air Traffic Control, Airfield/Heliport, and Airspace Operations, 31 March 2016. This regulation prescribes Army policy, responsibilities, procedures and rules for air traffic services (ATS), Army airfields/heliports (AAFs/AHPs), and airspace operations. Navigational aids (NAFAIDs), flight activities, nonmilitary aircraft operations, and other related functions are also covered within the applicable portions of this regulation. This regulation applies to all personnel who perform duties in Army air traffic control facilities and support facilities.

2. Department of the Army Training Circular No. 3-04.15, Air Traffic Control Facility Operations, Training, Maintenance, and Standardization, 8 October 2019. Training Circular (TC) 3-04.15 provides doctrinal administrative and operational standards for United States (U.S.) Army air traffic control (ATC) facilities, and units. This publication is used by all Active Army, Army National Guard, United States Army Reserve, Department of the Army civilians, and contract personnel who perform ATC duties for the U.S. Army.

3. U.S. Department of Transportation, Federal Aviation Administration, Air Traffic Organization Policy Order JO 7110.65BB, Air Traffic Control, 20 February 2025.

This order prescribes air traffic control procedures and phraseology for use by personnel providing air traffic control services.

4. U.S. Department of Transportation, Federal Aviation Administration, Air Traffic Organization Policy Order JO 7210.3DD, Facility Operation and Administration, 20 April 2023. This order provides direction and guidance for the day-to-day operation of facilities and offices under the administrative jurisdiction of the Federal Aviation Administration's Air Traffic Organization.

IV. FINDINGS

A. OSC REFERRED ALLEGATION 1: The whistleblower alleged that Air Traffic Controllers are not properly manning their positions.

RESULTS. The IO determined the allegation that Air Traffic Controllers are not properly manning their positions is **UNSUBSTANTIATED**.

DISCUSSION. During the interview of the whistleblower, she alleged that the Fort Polk Air Traffic Controllers are not always seated in their positions for the duration of their shifts. Specifically, she alleged that controllers are often signed onto positions for two-hour durations, but they are not always present in the room and seated at the scope. She cited a specific example, when on June 9, 2024¹, she and two other controllers were on shift, each assigned to positions for two-hour durations. The whistleblower was assigned to the Radar Polk (RP) position. Another controller² was assigned to the Radar Polk Assist (RPA) position, which, as the name suggests, aids the controller in the RP position. The third controller was assigned to the Flight Following (FF) position. The whistleblower alleged that the controller on the RPA position was not seated in the position next to her; rather, she engaged in other activities including taking care of phone calls, preparing logs for the next shift, and multiple visits to the facility's kitchen. The whistleblower also alleged that the third controller was not physically present in the FF position. The whistleblower stated that this is a common occurrence at the facility.

The IO interviewed 11 of 12 Fort Polk Air Traffic Controllers and 4 of 4 supervisors. The IO found all of their testimony consistent with respect to shift staffing and controller position manning at the ARAC. They all described current staffing and position manning generally consistent with the ARAC's policy on manning, Facility Memorandum #24-17, Subject: Position Consolidation/Manning Requirements, 23 February 2024. Four Air

¹On this date, the whistleblower was involved in a safety incident which resulted in the whistleblower losing her credentials. The controller in the RPA position temporarily lost her credentials but regained them after undergoing retraining.

²This controller was also acting in the controller-in-charge (CIC) position. The CIC is responsible for executing administrative duties within the facility.

Traffic Controllers are required during day shifts (0800-1600) and swing shifts (1600-000) and two are required during mid shifts (0000-0800). During each shift, each Air Traffic Controller is assigned/signed onto one of several controller positions typically for a 2-hour period. During the course of a work shift, they rotate through the different controller positions. The number of controller positions and Air Traffic Controllers on duty typically results in each Air Traffic Controller rotating through a “standby” period during each shift when they are not signed onto a controller position, but are immediately available to perform duties as necessary. All Air Traffic Controllers stated that the only time they are not seated in their assigned positions when signed onto a position is to take short breaks to the restroom or kitchen³ to retrieve their lunch. They further indicated that when signed onto a position, they use headsets which enable their continued monitoring of air traffic activity during the brief periods when they are not seated.

Review of Army Regulation 95-2 and discussion with subject matter experts from the U.S. Army Aeronautical Services Agency and U.S. Army Air Traffic Services Command (ATSCOM) indicated there is no regulatory requirement for controllers on radar or non-radar controller positions to be physically “plugged in” and seated.

The whistleblower’s specific concerns with respect to the incident that occurred on June 9, 2024, are addressed in the discussion below about OSC Referred Allegation 4.

The whistleblower also alleged there is a requirement to conduct recorded position relief briefings and alleged that ninety percent of the controllers do not perform them. Department of the Army Training Circular (TC) No. 3-04.15 requires position responsibility be transferred according to Federal Aviation Administration Order (FAAO) JO 7110.65 and appropriate facility directives. This order prescribes a four-step process to execute position relief transfers:

- **Preview the Position** – The Relieving Controller observes the current conditions to obtain an understanding of the current operational situation, including weather, air traffic, and any other relevant information.
- **Verbal Briefing** – The controller being relieved briefs the relieving specialist on current conditions, including weather, traffic (if applicable), and communications status. The controller being relieved also answers any questions the relieving controller asks.
- **Assumption of Position Responsibility** – The relieving controller indicates to the controller being relieved that the position has been assumed. The controller being relieved releases the position to the relieving specialist.

³The IO toured the Fort Polk facility and noted the kitchen is adjacent to the radar area and may be accessed in a short period of time.

- **Review the Position** – The relieving controller checks, verifies, and updates the information obtained during the Preview and Briefing steps, including a check of position equipment. The controller being relieved ensures all pertinent information has been relayed and assists the relieving controller if needed.

The FAAO 7110.65 does not require position relief briefings to be recorded, and it also acknowledges that the contents, methods, and practices used vary among personnel. During their interviews, the Fort Polk controllers, including the supervisory staff, demonstrated an understanding of the position transfer process, many of whom referring to it as “PBAR” – Preview, Brief, Assume, Review. Their descriptions of how they execute position transfer briefs are fundamentally the same as what FAAO 7110.65 requires, and they are done whenever they are being relieved. They stated that during short breaks (i.e., restroom), the briefings may not be as formal, but they ensure adequate coverage.

B. OSC REFERRED ALLEGATION 2: The whistleblower alleged that Air Traffic Controllers are not performing duties for the required duration of their assigned shift.

RESULTS. The IO determined the allegation that Air Traffic Controllers are not performing duties for the required duration of their assigned shift is **PARTIALLY SUBSTANTIATED**.

DISCUSSION. The whistleblower alleged the Fort Polk controllers are not working full 8-hour shifts. Specifically, she explained that controllers are signed onto position for six hours; however, they work for only two hours. In addition, she stated that they are on break for the remaining two hours of the 8-hour shift.

As described above, interviews with the Fort Polk controllers indicated that, as a result of all controllers on duty rotating through the controller positions during a shift, it is common practice for a controller to be signed onto a position for six hours of an 8-hour shift. For the remaining two hours, the controllers are considered on “standby” during which time they remain immediately available if needed. All witnesses agreed that they are not signed on position when they are in “standby” status.

Discussion with the Fort Polk ARAC Facility Chief indicated that controllers in “standby” status is normal practice for that facility. He defined it as the controller being on shift, but not in position; rather, they are on “standby” or break. He further stated that during this time, the controllers are working other duties in the instrument flight rules (IFR) room or doing training, and they are on standby if needed on position. Consistent with

the controllers' statements, he explained that controllers are usually in the IFR room or in the breakroom next door when on "standby". Additionally, the Fort Polk Airfield Manager stated that a controller may perform duties in a controller position for two to seven hours per shift, but that eight hours on a position is generally prohibited.

Reviews of the Fort Polk ARAC Position Logs confirmed the controllers' statements. The IO randomly selected four position logs from January, February and March 2025 and determined the controllers were consistently documented on controller positions for only 4-6 hours per shift. The IO also reviewed the position log for June 9, 2024.

Army guidance does not address controllers in "standby" status. Army Regulation (AR) 95-2, states that "an 8-hour continuous shift is standard" but does not prescribe minimum periods during which Air Traffic Controllers must be at a controller position. (Chapter 3, Paragraph 3-2). AR 95-2 addresses "rest periods" and requires a 15-minute rest period after every 4 hours of continuous ATC work, if traffic density and facility operations permit. The regulation further states that the chain of command will establish written risk management procedures to address any deviations (extension) to work periods. Army Training Circular No. 3-04.15 provides the same regulatory guidance as AR 95-2 for rest periods.

The IO discussed the 2-hour "stand-by" practice with subject matter experts at ATSCOM. They recommended a manpower study be conducted to determine the appropriate manning requirements for this facility.

C. OSC REFERRED ALLEGATION 3: Fort Polk Radar Approach Control Facility leadership is not properly documenting consolidated or combined positions.

RESULTS. The IO determined the allegation that Fort Polk Radar Approach Facility leadership is not properly documenting consolidated or combined positions is **UNSUBSTANTIATED.**

DISCUSSION. The whistleblower alleged that controllers are working multiple positions (combined) although the facility's position logs indicate individual controllers assigned to each position. She stated that this is a regular occurrence and is considered "normal operations".

Interviews with the Fort Polk Air Traffic Control management and controllers did not support this claim. All controllers stated they remain assigned to a position for the duration of their assignment except for short periods when they go to the breakroom

(adjacent to the IFR). If they need to take a short restroom break, they ensure another controller manages the position on their behalf.

Management and the controllers stated they are not required to remain physically in front of the scope, especially when there is light traffic. Additionally, they use headsets to ensure they maintain awareness of air traffic conditions. Subject matter experts at the United States Army Aeronautical Services Agency confirmed there is no regulatory requirement for controllers to remain physically “plugged in” and “in the seat” when signed onto a position.

Facility Memorandum #24-17, Subject: Position Consolidation/Manning Requirements, 23 February 2024, established policy for minimum manning and position combination. The IO determined that a comparison of the combination requirements to randomly selected position logs from January, February and March 2025, indicated the facility is combining positions in accordance with the Facility Memorandum.

The IO also audited the accuracy of the position logs by comparing the position assignments documented on the logs to the corresponding daily air traffic activity recordings. The audit was conducted with the assistance of the ARAC and Airfield managers who were able to perform voice recognition. Voice recordings are only maintained for 90 days, so testing was limited to the 90-day period during the site visit in March 2025. To conduct the audit, the IO performed the following steps:

- Randomly selected position logs for 5 days during January – March 2025.
- Randomly selected positions and time durations and provided to the ARAC and Airfield Managers.
- Listened to voice recordings for the dates selected. ARAC and Airfield Managers advanced the voice recording to the time range specified above to identify the controller’s voice. The managers identified the voice and provided the controller’s name to us.
- The IO used Facility Memorandum #25-01, Subject: Controller Operating Initials, 4 March 2025, to confirm the accuracy of the managers’ voice recognition

The IO did not identify any discrepancies. In lieu of physically observing ARAC operations to determine if positions are improperly combined, this test, in addition to the IO’s interviews and review of other documentation, supports the IO’s conclusion that Allegation 3 is not substantiated.

D. OSC REFERRED ALLEGATION 4: Allowing one ATC to cover all positions creates a substantial and specific danger to public safety.

RESULTS. The IO determined the allegation that Air Traffic Controllers are allowed to cover all positions, thereby creating a substantial and specific danger to public safety is **UNSUBSTANTIATED**.

DISCUSSION. On June 9, 2024, the whistleblower was involved in a safety incident. She alleged that there were two other controllers on shift who were signed on position at the time of the incident. She stated the other controllers were not in position which resulted in her working all three open positions (i.e., Radar Polk, Radar Polk Assist, and Flight Following). The whistleblower was working the Radar Polk position, the main radar.

The IO reviewed the investigation of the incident which revealed that the incident occurred while the controller in the Radar Polk Assist position, who was also acting as the Controller-in-Charge (CIC), was in the IFR room but performing duties to prepare for the incoming shift. Because there was low traffic density, the third controller, assigned to the Flight Following position, was in the breakroom but immediately available if needed. The investigation attributed the incident to the whistleblower's significant miscommunication and a lack of situational awareness and the CIC's failure to exercise adequate oversight in anticipating and managing the holding pattern and descending trajectory of aircraft. Both the whistleblower and the CIC temporarily lost their ratings (credentials) and were required to reenter Approach and Assist control training and CIC training, respectively. In addition, [REDACTED] was removed from her position on January 24, 2025.

Besides the circumstances of this single incident, which was investigated and resulted in corrective actions, the IO did not find evidence that Air Traffic Controllers are allowed to cover all positions in a manner that creates a substantial and specific danger to public safety. During their interviews, the consensus of all the Air Traffic Controllers was that the only instance where one controller may cover all positions is during the mid shift (0000-0800) when the traffic density is very low. They also indicated that there may be short periods during which there is only one controller (i.e. short restroom breaks or short breakroom trips to retrieve their meals or snacks). Further, they emphasized that these short durations do not create a substantial and specific danger to public safety.

V. INVESTIGATING OFFICER'S RECOMMENDATIONS

Based on the findings in this investigation, the IO made the following recommendations:

- **Recommendation 1:** The Acting Commanding General, IMCOM, should direct a manpower study of the Fort Polk ARAC Facility to determine the appropriate manning requirements for Air Traffic Controllers.
- **Recommendation 2:** The Garrison Commander, Fort Polk, should direct the Radar Approach Manager to establish local manning policy consistent with the requirements AR 95-2, Chapter 3.

VI. APPROVING AUTHORITY'S ACTIONS

On August 28, 2025, the IMCOM Acting Commander approved the IO's findings and Recommendation 1 and referred Recommendation 2 to the Fort Polk Garrison Commander for consideration of appropriate action.