



# **THE FEDERAL BUREAU OF INVESTIGATION'S AVIATION OPERATIONS**

U.S. Department of Justice  
Office of the Inspector General  
Audit Division

**Audit Report 12-21**

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# AUDIT OF THE FEDERAL BUREAU OF INVESTIGATION'S AVIATION OPERATIONS

## EXECUTIVE SUMMARY\*

The Federal Bureau of Investigation's (FBI) Aviation Program is a valuable component of the FBI's counterterrorism, counterintelligence, and criminal investigative operations. According to FBI personnel, aviation support significantly benefits FBI investigative and intelligence efforts and enhances the safety, anonymity, and effectiveness of its operations. Predominantly, FBI aviation resources are used to support [REDACTED] operations. In addition, the FBI uses aviation assets [REDACTED] during crisis response activities, and to transport personnel, equipment, and evidence when necessary.

The FBI's Surveillance and Aviation Section manages most of the FBI's aviation operations and resources, and its aviation program budget for FY 2011 was [REDACTED].<sup>1</sup> As of July 2011, the section's aviation fleet included [REDACTED] single and multi-engine fixed-wing aircraft and helicopters. The section's Field Flight Operations Unit oversees aviation resources and operations in the FBI's 56 domestic field divisions. The unit manages 97 percent of the section's aircraft.<sup>2</sup>

As of May 2011, the FBI employed [REDACTED] Special Agent Pilots, including [REDACTED] full-time and [REDACTED] part-time pilots. During fiscal years (FY) 2009 and 2010, FBI data indicated that pilots flew [REDACTED] flight hours. Nearly [REDACTED] 79 percent, of these hours were flown in support of FBI operational activities.<sup>3</sup>

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\* The FBI identified within the full version of this report classified and other information that if released publicly could compromise national security interests and the FBI's operations. To create this public version of the report the OIG redacted (blacked out) these portions of the full report.

<sup>1</sup> This amount does not include the salaries of Special Agent Pilots in the field, which are budgeted with all special agent salaries at the headquarters level.

<sup>2</sup> Other aircraft are managed by the Special Flight Operations Unit which consists of larger transport aircraft, which are predominantly modern jet airplanes used to transport hazardous and explosive materials, evidence, and high-profile subjects.

<sup>3</sup> The remaining 21 percent of flight hours were flown for training and maintenance purposes.

Of these [REDACTED] operations-related flight hours, FBI field division operations accounted for 93 percent of the flight time.<sup>4</sup> Further, FBI data indicates that [REDACTED] percent of the field-based aviation flight time was flown in support of [REDACTED].

In FBI field divisions, two types of specialized teams provide ground surveillance support to FBI investigations.<sup>5</sup> [REDACTED]

[REDACTED] When surveillance teams are not available to field divisions, field division investigative personnel may perform the ground surveillance operation.

### **OIG Audit Approach**

The objective of this audit was to assess the FBI's management of its aviation operations. Specifically, we analyzed the usage, prioritization, and availability of FBI aviation assets, focusing on the FBI's use of aviation resources in FBI field divisions during FYs 2009 and 2010. To accomplish our objective we performed work at FBI headquarters in Washington, D.C., as well as the headquarters offices of the Aviation Surveillance Branch. We also visited FBI divisions in [REDACTED].

[REDACTED]. We interviewed the Assistant Director of the FBI's Critical Incident Response Group, the Section Chief of the Surveillance and Aviation Section, and Aviation Surveillance Branch managers. Additionally, at field locations, we interviewed FBI management and personnel responsible for an office's aviation operations, including Assistant Special Agents in Charge, surveillance and aviation supervisors, and pilots. We also interviewed field division management and Special Agents in various program areas who request and benefit from aviation support.

In addition, we examined the FBI's procedures for requesting aviation support and FBI flight activity data to determine how aviation resources

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<sup>4</sup> The remaining 7 percent of operational-related flight hours were provided by aircraft located at the Aviation Surveillance Branch headquarters.

<sup>5</sup> [REDACTED]

were used to support FBI operations. Appendix I contains a detailed description of our audit objective, scope, and methodology.

## **Results in Brief**

The FBI must strategically utilize its aviation resources to ensure its priority cases receive sufficient support. When deciding how to prioritize the use of its limited aviation resources, FBI field divisions considered the FBI's national priorities and the most significant threats in an office's geographic jurisdiction, along with the safety of the operation and other mission-related factors. The FBI's overall data on field division aviation activity indicates that aviation resources supported the FBI's counterterrorism efforts, which is its number one priority, in ██████████ of its missions during FY 2009 and in ██████████ during FY 2010.

We found that the four FBI field divisions we visited complied with FBI policy for requesting and approving requests for aviation support, submitting requests in writing, and authorizing the usage of aviation resources at an appropriate level. Three of the four offices we visited had developed electronic forms to request surveillance and aviation support, and we observed that one field division's form included a "dropdown menu" listing the office's most significant threats. Currently, the FBI is deploying its centralized Surveillance Program Integrated Reporting and Intelligence Tool (SPIRIT) that all offices will use to request surveillance and to record surveillance operation information and data. We recommend that SPIRIT include the functionality to identify whether a surveillance request pertains to a field division priority threat.

While the FBI offices we visited correctly required personnel to submit requests and approvals for aviation support in writing, we found that the FBI can improve field division processes to best ensure that aviation support managers consider all surveillance operations when prioritizing the use of the FBI's limited aviation resources. The ██████████ Division's procedures involved a centralized request process where all approved surveillance operations were considered for aviation support. However, we found that in other offices such as the ██████████ and ██████████ Divisions, procedures were segmented and did not consider all surveillance operations when deciding the use of aviation resources. We determined that this segmentation created a risk that all matters might not be considered for aviation support. Given the different sizes, structures, and operating environments of FBI field divisions, it is appropriate to have different procedures for requesting and deciding how to use aviation resources. However, we recommend, and the FBI Surveillance and Aviation Section

management agreed, that field divisions should review and prioritize aviation support while considering all surveillance operations that would benefit from aviation involvement.

Additionally, we found that by capturing complete and consistent data related to surveillance operations that would benefit from aviation support but that did not receive support, the FBI could better understand the need for aviation resources and better inform its decisions as to how it allocates aviation resources. In the offices we visited, we found that the practices varied for reporting this data. For example, the [REDACTED] Division captured only the number of unsupported aviation missions that were *scheduled* but not flown, which results in underreporting the complete need for aviation resources. We believe this process does not capture [REDACTED] operations determined to benefit from aviation support but not scheduled due to aviation resource unavailability. This differed from other offices such as the [REDACTED] Division, which has procedures to report unaddressed aviation support for [REDACTED] operations for which aviation support was determined beneficial but not flown.

We also found that by expanding the categories field divisions use in reporting the reasons for not providing aviation support, such as noting whether an "unavailable aircraft" was due to maintenance or to the aircraft not being available for another reason at the time of the request, the FBI could better understand the causes of unfulfilled requests. In April 2011, the FBI issued guidance to its field divisions standardizing the submission of data related to unaddressed aviation requests. While this standardized reporting will assist the FBI in more easily analyzing the reported unaddressed aviation request data, we do not believe it will ensure consistent reporting and collection of this data at the field division level. Accordingly, we recommend that the FBI ensure that field divisions report unaddressed aviation requests in a manner that consistently and completely captures the unmet need for aviation support for each office. This data will allow the FBI to better understand the need for aviation resources and to better analyze the causes for and effects of not being able to fulfill the need.

Between October 2009 and June 2010 field divisions reported that over [REDACTED] aviation requests were unaddressed because flight crews were unavailable, which was 52 percent of all unaddressed requests for aviation support. FBI officials stated that it has been difficult for the FBI to recruit qualified pilots. The FBI is attempting to address the shortage of pilots by changing its recruitment practices, allowing new agents to become pilots immediately following graduation from the FBI Academy, and hiring non-agent personnel to pilot positions. Additionally, FBI officials stated that its

new avionics system [REDACTED]

[REDACTED] would help increase the availability of pilots to fly more missions.

In addition, we found that the FBI should improve certain practices for securing aircraft and ensuring the safety of its aviation personnel.

[REDACTED] FBI headquarters officials said they recognized the potential security risks posed by these arrangements and plan to examine the [REDACTED]

[REDACTED]. We recommend that the FBI ensures that it examines the possibility [REDACTED].

Further, we found that FBI pilots in the field divisions we visited generally completed the FBI's pre-flight risk assessment form. We also found that some aviation personnel believed that these forms were mandatory, while others suggested they were optional. In addition, at least one pilot admitted that, at times, the risk assessment may not be prepared by pilots until after the flight. At the audit close-out meeting, FBI aviation officials clarified that completing risk assessment forms before take-off is mandatory and required by FBI policy. However, because these forms are reviewed after a mission is completed, we recommend that the FBI develop a means to ensure that these forms are always completed before an aviation operation.

In our report we make 10 recommendations to assist the FBI in the management of its aviation operations. Our full report contains detailed information on the results of our review. The remaining sections of this Executive Summary summarize our audit findings.

### **Overall FBI Aircraft Usage**

Due to the funding and specialized skills required to operate an aviation program, FBI aviation assets are a limited resource whose use must be prioritized to most effectively assist the FBI in preventing and disrupting terrorism, criminal activity, and foreign intelligence efforts. The Assistant Section Chief of the Surveillance and Aviation Section stated that of the FBI's three most resource intensive program areas — counterterrorism, counterintelligence, and criminal [REDACTED]

[REDACTED]. As shown

in the following exhibit, in FY 2009 [REDACTED] received [REDACTED] the aviation support provided to field divisions, and in FY 2010 this proportion increased to [REDACTED].

**Aviation Flight Hours in Support of FBI Field Divisions  
By FBI Program  
Fiscal Years 2009 and 2010**



Source: OIG analysis of FBI Aviation Surveillance Branch data

In addition to the FBI's overall national priorities, field divisions determine the most significant threats within their jurisdiction and develop more specific local priorities which may not mirror the FBI national priorities. In April 2011 guidance to field divisions, the Section Chief of the Surveillance and Aviation Section stated that a field division's use of aviation resources generally should align with a field division's most significant threats. For example, in FYs 2009 and 2010 the [REDACTED] Division devoted [REDACTED] of its aviation support to [REDACTED]. This level of support aligned the office's significant threat priorities and its investigative effort. [REDACTED]

Additionally, FBI field division personnel responsible for surveillance and aviation operations consider factors beyond identified threats, [REDACTED]

In FYs 2009 and 2010 the [REDACTED] Division devoted [REDACTED] of its aviation operations to support [REDACTED]. In addition, the [REDACTED] Division dedicated [REDACTED] of its field agent resources and [REDACTED] of its active caseload [REDACTED] in FY 2010.

As we discuss in more detail below, while the FBI's national and local priorities along with safety and mission-specific factors help guide decisions regarding the use of aviation assets, we found that the FBI should improve field division processes to best ensure all [REDACTED] operations are considered when prioritizing the use of the limited aviation resources. Additionally, by capturing complete and consistent data related to the need for aviation support, the FBI can better understand the demand for aviation resources and better inform its decisions as to how aviation resources are allocated.

### **Aviation Support Requests**

We found that the four offices we visited complied with FBI policy requiring requests for aviation support to be submitted in writing. In the [REDACTED] Division, a smaller field division with a relatively less active aviation program, agents typically requested aviation support directly from the office's only Pilot in Command via email or in official FBI internal correspondence. We found that the Divisions in [REDACTED] each used electronic forms to request surveillance and aviation support. These forms required information such as the case number, case agent, timeframe for the requested mission, and the mission objectives. One office's form also included a dropdown menu with the field division's highest priority threats, from which the requestor selected the appropriate designation if applicable. We believe this type of feature is helpful when deciding between competing requests for aviation support.

The FBI is deploying its Surveillance Program Integrated Reporting and Intelligence Tool (SPIRIT) system – a centralized information system for tracking surveillance activities and capturing the intelligence obtained during

FBI surveillance operations.<sup>6</sup> All FBI field divisions will use this system, which will include a standard electronic form for requesting surveillance and aviation support. We recommend that the FBI ensure that SPIRIT also includes the functionality to identify whether a request pertains to a field division priority threat.

### **Prioritization of Aviation Support**

FBI policy states that FBI field division Special Agents in Charge or their designees have the authority to approve and prioritize aviation missions. In each of the four field divisions we visited, a Supervisory Special Agent was designated to approve and prioritize aviation support. Procedures for prioritizing aviation requests varied in the offices we visited based on the field divisions' sizes, structures, and resources.

In the [REDACTED] Division, personnel make all requests for surveillance, whether ground or aviation, in a standardized electronic form directed to the Coordinating Supervisory Special Agent (CSSA) for the office's Surveillance Branch. This CSSA is responsible for reviewing and prioritizing all requests, assigning surveillance operations to a Mobile Surveillance Team (MST) or Mobile Surveillance Team-Armed (MST-A), and determining whether to apply aviation support to a surveillance operation. Each Friday, the CSSA developed the following week's surveillance schedule and identified which surveillance operations should receive aviation support. The supervisor of the [REDACTED] Division's aviation program then scheduled aviation support missions with the available aviation resources. We found that the [REDACTED] Division's process for assigning and prioritizing aviation requests appropriately includes all surveillance requests.

However, we found that the [REDACTED] Divisions could improve procedures to ensure aviation support is considered for all surveillance operations. In both offices enforcement personnel sent requests for surveillance support directly to [REDACTED]

[REDACTED]

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<sup>6</sup> In May 2011, the [REDACTED] Field Division performed a pilot of SPIRIT, and Aviation Surveillance Branch officials stated that the office provided positive feedback on the system. The Aviation Surveillance Branch anticipates SPIRIT being operational in all field divisions by the end of FY 2012.

[REDACTED]

The MST and MST-A supervisors assess the surveillance requests they receive, determine their surveillance schedules, and submit to the Aviation Supervisor requests for aviation support prioritized through the consideration of local threats, national priorities, operation safety, and other mission-related factors. The Aviation Supervisor then schedules aviation support.

FBI Aviation Surveillance Branch personnel agreed that a centralized request and prioritization process for all surveillance requests is the best model for field divisions to practice. This type of process best ensures that decisions to allocate limited FBI aviation resources consider FBI priorities, investigative outcomes, and enhancements to agent safety. We believe that having one individual review all aviation support surveillance requests [REDACTED] best enables the FBI to ensure all relevant factors are considered when prioritizing the use of the FBI's limited aviation resources.

Aviation Surveillance Branch personnel stated that in addition to encouraging a consolidated surveillance request review process, the FBI also is looking at [REDACTED] as we observed in the [REDACTED] Division. Additionally, the Aviation Surveillance Branch is evaluating establishing [REDACTED]

## **Reporting Aviation Support**

After completion of a flight, a flight strip must be completed to document each use of an FBI aircraft. The flight strip, which is normally completed by the Special Agent Pilot that flew the mission, captures both aviation-specific information, such as the pilot, crew, take-off and landing times, and operation-related information, such as the case number and operational results. During our field work, we found that Special Agent Pilots consistently completed flight strips, and aviation supervisors reviewed these

reports as required by FBI policy. Information from the flight strips is entered into the FBI's Professional Flight Management (PFM) system, the FBI's current information system for collecting and maintaining aviation flight data.

In reviewing PFM data, we found that the elimination of an FBI investigative classification code can cause errors in PFM data.<sup>8</sup> Specifically, when the FBI eliminated in FY 2010 an investigative classification code for a specific type of counterterrorism investigative category, flight hours that were undertaken in support of counterterrorism flights but listed under the eliminated code were erroneously classified in support of criminal cases. While aviation personnel stated that proper classification of the flight time can still be obtained by querying its case management system, this would require a burdensome process for verifying the data.

FBI Aviation Surveillance Branch officials told us that the FBI is in the process of upgrading its Bureau Aircraft Operations (BAO) system - the aviation management system it used before implementing PFM. These FBI officials stated that the system's functionality will be tailored to the FBI's specific data collection, analysis, and documentation needs. We recommend that the FBI also ensure that BAO 2.0, the upgraded system, will have the ability to incorporate updates and additions to FBI classification codes and similar data codes that can affect the accuracy of data contained in and reported from the system.

### **Unfulfilled Requests for Aviation Support**

To provide aviation support to FBI operations, FBI pilots, aircraft, and other necessary personnel and equipment must be readily available. However, at times [REDACTED], can prevent the use of aviation assets. In other cases, aviation support may not be provided if Special Agent Pilots are unavailable or an aircraft is undergoing maintenance. In these instances, FBI surveillance teams typically still operate, but do not benefit from the value aviation support can provide, such as enhanced safety and the advantageous aerial viewpoint not otherwise available to a ground team.

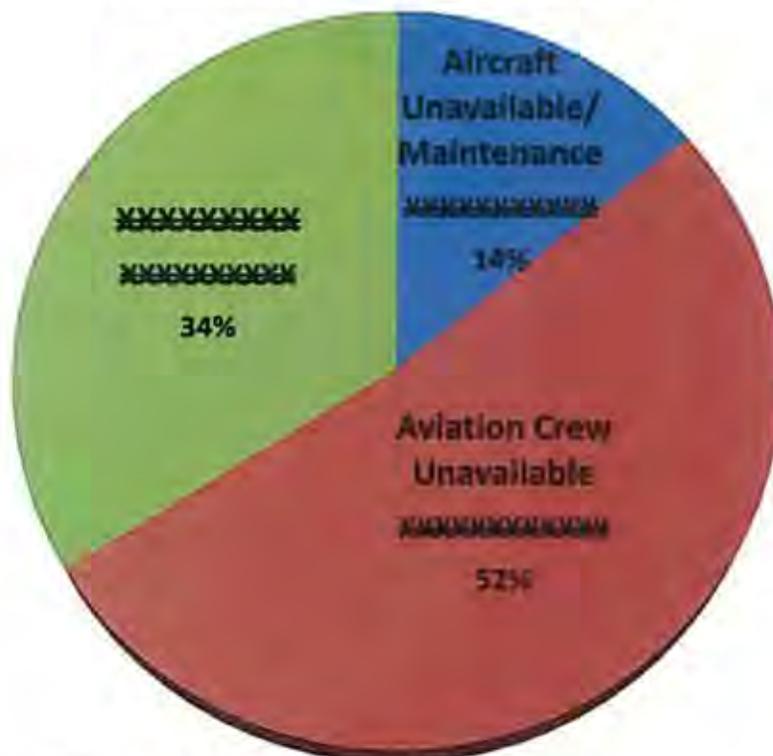
Prior to FY 2010 the FBI only collected data on the number of unaddressed surveillance requests. Unaddressed aviation requests were not specifically recorded until FY 2010 when the FBI required field divisions to

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<sup>8</sup> FBI classification codes represent specific FBI investigative classifications, which enable the FBI to evaluate operations and resource utilization overall and within specific FBI programs, such as counterintelligence, domestic terrorism, or public corruption.

start reporting unaddressed aviation requests in one of three broad categories: [REDACTED] unavailable aircraft, or unavailable aviation crew.<sup>9</sup> According to FBI data for the 9-month period of October 2009 through June 2010 there were [REDACTED] reported instances in which aviation support could not be provided. As shown in the following exhibit, 66 percent of these unaddressed requests were reportedly due to aircraft and aviation crew unavailability.

**FBI Unaddressed Aviation Requests  
October 2009 through June 2010**



Source: OIG analysis of FBI data

*FBI Field Division Reporting of Unaddressed Aviation Requests*

Our review of overall unaddressed aviation request data for the period of October 2009 to June 2010 showed great variation in the number of unaddressed aviation requests that FBI field divisions reported. For example, 4 field divisions with aviation programs reported no unaddressed

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<sup>9</sup> In April 2011, the FBI added a fourth category for unaddressed aviation requests called "higher priority case."

flight requests, while the aviation program in the [REDACTED] Field Division reported [REDACTED] unaddressed flight requests.<sup>10</sup>

In the offices we visited, we found that the practices for collecting and tracking unaddressed aviation support requests varied. The Special Agent Pilots in the [REDACTED] Division used an internally developed database to capture relevant information explaining why scheduled flights did not take place. Likewise, the [REDACTED] Division records aviation missions scheduled but not flown as its unaddressed aviation requests. The [REDACTED] Division recorded unaddressed aviation support requests in an "abort log," and in [REDACTED], the Pilot in Command maintained a paper file of unfulfilled requests for aviation support.

Several aviation personnel in the [REDACTED] Divisions stated that their respective offices lacked a sufficient number of Special Agent Pilots. While the [REDACTED] Division reported that [REDACTED] (98 percent) unaddressed aviation requests were caused by unavailable aviation crew, the [REDACTED] Division reported no unaddressed aviation requests due to unavailable crew. In fact, the [REDACTED] Division only reported [REDACTED] instances of unaddressed aviation requests, all of which were reportedly due to unavailable aircraft.

FBI guidance on reporting unaddressed aviation requests requires field divisions to report "missions requested but not flown." We found that field divisions did not apply this definition consistently in capturing and reporting data on their unaddressed aviation support. For instance, the [REDACTED] Field Division captured data on surveillance operations for which surveillance squads determined that aviation support would be beneficial but that did not receive support. FBI aviation officials stated that the [REDACTED] Division captured the number of unsupported aviation missions that were *scheduled* but not flown. Therefore, the [REDACTED] Division did not capture data on surveillance operations that would benefit from aviation support but were not scheduled. While the [REDACTED] Division's surveillance request and approval procedures appropriately considered all requests when prioritizing aviation support, the process did not capture completely the unmet need for aviation resources.

Consistent practices for collecting and analyzing the reasons for field divisions' unaddressed aviation requests can assist the FBI in identifying individual field division aviation resource deficiencies, such as aircraft and

aviation crew shortages. In April 2011, the FBI issued guidance to its field divisions that standardized the way unaddressed aviation request data is submitted. While this standardized reporting will assist the FBI to more easily analyze reported data on unaddressed aviation requests, the FBI must also ensure that all field divisions accurately and consistently report this information. Part of the standardization in reporting will require field divisions to report whether unaddressed aviation requests were to support a criminal, counterterrorism, or counterintelligence case. We believe this information should assist the FBI in evaluating whether its high priority program areas are being provided adequate support.

### *Aviation Crew Availability and Temporary Duty Assignments*

Between October 2009 and June 2010 field divisions reported that over [REDACTED] aviation requests went unaddressed because a crew was unavailable, which was 52 percent of all unaddressed requests for aviation support. FBI Aviation Surveillance Branch personnel stated that pilot shortage is an issue and it has been difficult for the FBI to recruit qualified pilots. For example, in [REDACTED] we were told that cost of living and commuting issues made it difficult to recruit and retain Special Agent Pilots. In addition, the [REDACTED] Division must recruit part-time pilots willing to maintain a regular case load.

[REDACTED]

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The FBI temporarily deploys [REDACTED] Special Agent Pilots [REDACTED]. FBI officials reported that the usual length of TDY assignments is [REDACTED], and each [REDACTED] generally deploys for one or two TDY assignments a year. The [REDACTED] Division's Surveillance Supervisor stated that when aviation

11 [REDACTED]

resources are deployed on TDY it results in limited aviation support in the [REDACTED] Field Division.

The FBI tracks unaddressed aviation support requests in general categories, such as the "crew not available" category. The FBI does not specifically track how many aviation requests are not fulfilled due to TDY assignments. We believe that improvements to the FBI's collection of data regarding unaddressed aviation missions will better enable the FBI to understand the effect TDY assignments have on the availability of aviation resources in particular field divisions.

The FBI is attempting to address its shortage of pilots through different recruitment practices. For example, the [REDACTED] Division was allowed to transfer a new agent with significant flying experience directly into a pilot position, instead of requiring this individual to serve first on an investigative squad. Other field divisions may want to consider exempting new Special Agents with flying credentials from the FBI's typical practice of first having the agent gain experience as an investigator.

The FBI has also implemented a trial program in two FBI field divisions that would allow non-agent pilots to fly FBI aviation operations in an effort to alleviate Special Agent Pilot shortages. FBI officials told us that being an FBI Special Agent as well as a pilot is beneficial but not required, and that the addition of non-agent pilots will add depth to the FBI's pilot pool. We recommend that the FBI review the results of its non-agent pilot program to determine the initiative's success in alleviating pilot shortages.

### *Aircraft Availability*

Between October 2009 and June 2010, there were [REDACTED] reported instances of unaddressed aviation requests due to unavailable aircraft, (14 percent of all unaddressed aviation requests). However, we found that the FBI does not discern the reason why aircraft was unavailable, such as whether an aircraft was undergoing maintenance or whether an aircraft was not available at the time of the request for other reasons besides maintenance. We also found that the FBI does not centrally track the number of days each FBI aircraft was undergoing maintenance. During our audit, FBI officials told us that they anticipated including maintenance separately from other reasons aircraft was unavailable in the reporting of field division unaddressed aviation request data. Accordingly, we recommend that the FBI implement the anticipated reporting changes to identify when aircraft is unavailable due to maintenance separately from the other reasons why aircraft may be unavailable.

In 2009, the FBI began upgrading its aircraft with a standardized avionics package

The FBI's aviation fleet replacement plan calls for million per year to be expended on new aircraft which FBI officials acknowledged may not be possible with future budgets. Nevertheless, FBI officials believe that the FBI's current replacement initiative will prevent the FBI, several years from now, from having to replace all of its aircraft at the same time. FBI officials stated that the new system should help increase the availability of pilots to fly more missions.

### Aviation Security and Safety

The FBI maintains field division aviation resources in locations across the country.

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FBI

Aviation Surveillance Branch officials recognized the potential security risks posed by the arrangements.

We recommend the FBI ensure that it examines the possibility

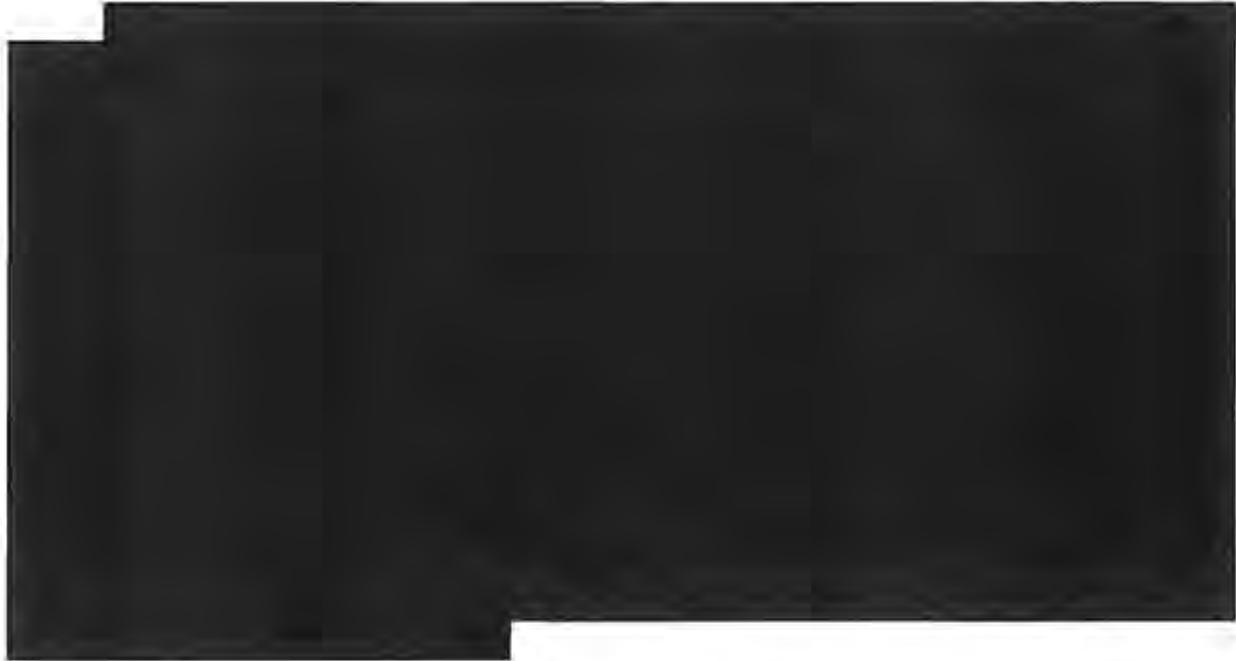
At the audit close-out meeting

the FBI stated that it plans to address the

arrangements

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Another safety aspect we examined is the FBI's use of pre-flight risk assessments. We found that FBI pilots in the field divisions we visited generally documented their pre-flight risk assessments of the safety of an aviation operation using a standardized FBI form. Pilots in the field divisions we visited told us that the risk assessment form is a useful tool that allows pilots to self-evaluate their readiness for the mission, which also helps make the pilot aware of potential risks and be better prepared to mitigate them during the mission. The form assigns a point-value to each potential risk factor and the cumulative point totals are used to categorize the level of risk for the mission. Any mission that is considered to be above the FBI's "minimal risk" level requires escalating levels of supervisory approval. For instance, a "moderate risk" requires the approval of the pilots' assigned Supervisory Special Agent, while a "high risk" flight requires the approval of the field division's Assistant Special Agent in Charge and approval from the Aviation Surveillance Branch.

Pilots attach pre-flight risk assessment forms to the mission's flight strip after the operation is completed. Some aviation personnel believed these forms were mandatory, while others suggested that they were optional. In addition, at least one pilot admitted that, at times, the risk assessment may not be prepared by pilots until after the flight. At the audit



close-out meeting, FBI aviation officials clarified that completing risk assessment forms before take-off is mandatory and required by FBI policy. However, because these forms are reviewed after a mission is completed we recommend that the FBI develop a means to ensure that these forms are always completed before all aviation missions.

## **Conclusion and Recommendations**

We found that in FY 2009 the FBI dedicated the largest proportion of its aviation resources to [REDACTED], and in FY 2010 it supported [REDACTED] most of the time. To best ensure that the limited FBI aviation resources are used to support the highest priority matters, the FBI must ensure that its field divisions are considering all surveillance operations when making these decisions. Further, the FBI can improve its procedures for collecting, in a consistent and complete manner, information on surveillance operations that would benefit from aviation support but that did not receive the support. This improvement will provide the FBI with an understanding of the unfulfilled need for aviation support, enabling the FBI to better assess the need for aviation involvement and to make more informed decisions regarding the allocation and use of its aviation assets. In addition, we believe the FBI can improve the safety of its aviation personnel and assets by evaluating the possibility of [REDACTED], and improving the uniform use of pre-flight risk assessment forms before all aviation missions.

Our audit resulted in 10 recommendations to help the FBI enhance the management of its aviation resources. This report includes recommendations for the FBI to ensure that its field divisions, through a centralized decision process, consider all surveillance operations when prioritizing the use of aviation resources and to improve the data it collects on unaddressed aviation support. We also make recommendations for the FBI to include certain functionality in its new surveillance management and aviation management systems. Further, we make recommendations related to better [REDACTED] ensuring the safety of its aviation personnel.

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**AUDIT OF THE FEDERAL BUREAU OF INVESTIGATION'S  
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# **AUDIT OF THE FEDERAL BUREAU OF INVESTIGATION'S AVIATION OPERATIONS**

## **INTRODUCTION**

The Federal Bureau of Investigation (FBI) protects and defends the United States against terrorist and foreign intelligence threats, enforces the criminal laws of the United States, and provides leadership and criminal justice services to federal, state, local, and law enforcement agencies as well as international agencies and partners. The FBI's aviation program supports these missions by helping to enhance the effectiveness, safety, and efficiency of FBI operations.

FBI aviation resources [REDACTED] are used to support FBI [REDACTED] operations. Additionally, FBI aviation assets are used during crisis response and [REDACTED]. FBI aviation resources also provide support services, such as transporting personnel, equipment, and evidence in a timely and secure fashion.

### **FBI Aviation Resources**

The FBI maintains a fleet of aircraft and employs trained Special Agent Pilots and in-flight support personnel to support the FBI's highest priority missions, including its counterterrorism and counterintelligence efforts. According to FBI personnel, aviation support enhances its operations and helps ensure the safety of FBI personnel and the public.

#### *Aviation Fleet*

As of July 2011, the FBI Surveillance and Aviation Section, which manages most of the FBI's aviation operations and resources, operated [REDACTED] aircraft in multiple aircraft categories, including single and multi-engine fixed-wing aircraft and helicopters. The age of FBI aircraft ranged from [REDACTED]. As of July 2011, FBI aircraft are located in [REDACTED] of the FBI's 56 field divisions. [REDACTED] of the FBI's larger field divisions serve as regional aviation hubs, and house some of the FBI's more specialized

aircraft, such as the [REDACTED] aircraft.<sup>1</sup> Three of these regional hubs also serve as maintenance centers with FBI mechanics.

### *Special Agent Pilots*

As of May 2011, the FBI employed [REDACTED] Special Agent Pilots, including [REDACTED] full-time and [REDACTED] part-time pilots, as well as [REDACTED] non-agent pilots. Before becoming a pilot for the FBI, the FBI prefers Special Agents to receive full-time investigative experience for the first few years of employment. However, on occasion a Special Agent has moved into a pilot position immediately after graduating from the FBI Academy. According to FBI officials, serving as an FBI pilot is strictly voluntary and FBI pilots may transfer out of the aviation program and resume traditional investigative case work at any time.

The FBI generally requires [REDACTED] every flight. The Pilot in Command has primary responsibility for the safe operation of the flight and is the final authority for all flight-related decisions. FBI pilots may only be designated as Pilot in Command for two types of aircraft, and they must comply with specific FBI requirements. The [REDACTED] is designated as the co-pilot and at a minimum must be certified to fly the type of aircraft being flown.

### **FBI Surveillance and Aviation Section**

The Surveillance and Aviation Section of the FBI's Critical Incident Response Group manages the FBI programs and operations involving ground surveillance and aviation resources that support FBI operations. Its aviation program budget for FY 2011 was [REDACTED].<sup>2</sup> The Aviation Surveillance

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<sup>1</sup> FBI regional aviation hubs are located in [REDACTED]

<sup>2</sup> This amount does not include the salaries of special agent pilots in the field which are budgeted with all special agent salaries at the headquarters level.

Branch of the Surveillance and Aviation Section primarily manages the FBI's aviation-specific programs and includes the following three units.<sup>3</sup>

- Aviation Support Unit – This unit is responsible for aircraft maintenance, Special Agent Pilot training, and aircraft safety and security.
- Special Flight Operations Unit – This unit maintains a fleet of four large transport aircraft, which are predominantly modern jet airplanes used to transport hazardous and explosive materials, evidence, and high-profile subjects domestically and, when needed, internationally. This unit also supports natural disaster response efforts, conducts emergency embassy evacuations, and provides air transportation to the Attorney General and FBI Director. In FY 2010, the Special Flight Operations Unit accounted for 7 percent of the FBI's total operational flight time.
- Field Flight Operations Unit – This unit oversees aviation operations within the FBI's domestic field divisions, which provide the vast majority of operational aviation support. This includes managing and monitoring how aviation resources located within the field divisions are used in support of investigative operations. The Field Flight Operations Unit is responsible for distributing and reassigning aircraft among the field divisions to best meet the needs of the FBI. This unit also sets and evaluates field division compliance with bureau-wide requirements on the usage of aviation resources. The Field Flight Operations Unit managed 97 percent of the aircraft in the FBI's aviation fleet, [REDACTED].<sup>4</sup> In FY 2009 and 2010, field division aviation operations accounted for 93 percent of the total FBI operational flight hours.<sup>5</sup> Further, FBI data

<sup>3</sup> The Critical Incident Response Group also includes the FBI's Hostage Rescue Team, which has [REDACTED] its Tactical Helicopter Unit. The use and management of these aviation resources are managed by the Hostage Rescue Team. [REDACTED]

<sup>4</sup> The remaining 3 percent of the FBI's aircraft are managed by the Special Flight Operations Unit.

<sup>5</sup> The remaining 7 percent of operational-related flight hours were provided by aircraft located at the Aviation Surveillance Branch, this includes Special Flight Operations Unit aircraft and Field Flight Operations Unit aircraft not located in the field divisions.

indicates that [REDACTED] of the field-based aviation flight time was flown [REDACTED] activities.

In FYs 2009 and 2010, FBI data indicates that FBI pilots flew [REDACTED] flight hours. As Exhibit I-1 shows, 79 percent of these flight hours supported FBI operational activities, providing [REDACTED], photography, transportation of personnel and equipment, and executive transport of senior FBI officials. The remaining 21 percent were flown for pilot training and aircraft maintenance purposes.

**Exhibit I-1  
FBI Aviation Flight Hours  
Fiscal Years 2009 and 2010**



Source: OIG Analysis of FBI Surveillance and Aviation Branch data

[REDACTED]  
[REDACTED]  
[REDACTED]<sup>6</sup> The Surveillance and Aviation Section's Mobile Surveillance Branch oversees the operation of two types of ground surveillance teams operating in FBI field divisions.

<sup>6</sup> Field division aviation resources were also used for other investigative purposes, such as taking photographs and performing reconnaissance.

- Mobile Surveillance Teams-Armed (MST-A) – [REDACTED]
- Mobile Surveillance Teams (MST) – [REDACTED]

[REDACTED]

**Exhibit I-2  
Surveillance Teams in FBI Field Divisions  
May 2011**

	<b>MST-A</b>	<b>MST</b>
Number of Teams	[REDACTED]	
Number of Field Divisions with Teams	[REDACTED]	

Source: FBI Surveillance and Aviation Section

[REDACTED]

**OIG Audit Approach**

The objective of this audit was to assess the FBI's management of its aviation operations. Specifically, we analyzed the usage, prioritization, and availability of FBI aviation assets, focusing on the FBI's use of aviation resources in FBI field divisions during FYs 2009 and 2010. To accomplish

[REDACTED]

<sup>8</sup> Pilots also are assigned to some field divisions without MST-As and used to fulfill aviation needs for their respective office.

our objective we performed work at FBI headquarters in Washington, D.C., as well as the headquarters offices of the Aviation Surveillance Branch. We also visited FBI Divisions in [REDACTED]. We interviewed the Assistant Director of the FBI's Critical Incident Response Group, the Section Chief of the Surveillance and Aviation Section, and Aviation Surveillance Branch managers. Additionally, at field locations, we interviewed FBI management and personnel responsible for an office's aviation operations, including Assistant Special Agents in Charge, surveillance and aviation supervisors, and Special Agent Pilots. We also interviewed field division management and Special Agents overseeing and performing investigations that benefit from aviation support.

In addition, we examined the FBI's procedures for requesting aviation support and FBI flight activity data to determine how aviation resources were used to support FBI priority operations. Appendix I contains a detailed description of our audit objective, scope, and methodology.

## **FINDING I: USE OF FBI AVIATION ASSETS TO SUPPORT FBI OPERATIONS**

In FY 2009 the highest proportion of FBI field division aviation resources supported [REDACTED], and in FY 2010 most of the aviation support was provided to [REDACTED]. We found that the FBI offices we visited allocated the use of aviation resources according to the threats affecting the office's jurisdiction. We also found that FBI field divisions complied with the requirements for requesting and approving aviation support. However, we determined that some FBI field divisions' procedures did not ensure the consideration of all surveillance operations when prioritizing the use of the FBI's limited aviation assets. In addition, we found that changes to FBI investigative classification codes caused the FBI's aviation activity data to be inaccurate. Accurate information is important for the FBI to evaluate and manage field division use of aviation resources.

### **Use of FBI Aviation Assets**

The FBI maintains a fleet of airplanes and helicopters and employs highly trained Special Agent Pilots and flight support personnel to assist its efforts to prevent and disrupt terrorism, criminal activity, and foreign intelligence efforts. FBI headquarters and field division personnel across FBI programs told us that aviation support significantly benefited FBI operations, significantly enhancing the safety, anonymity, and effectiveness of [REDACTED] operations and increasing the FBI's ability to collect evidence and intelligence.

FBI aviation assets are a limited resource due to funding restrictions and the specialized skills required to manage, fly, and maintain an operationally ready fleet. As with any national program supporting FBI operational efforts, aviation resources should be used to advance the FBI's highest priority operations. Generally, the FBI's national priorities (shown in Exhibit 1-1), as established by the Director, are used to guide the prioritization and measure the appropriate use of FBI field divisions' resources.

**Exhibit 1-1  
FBI Top Investigative Priorities**

<b>Investigative Priority</b>	<b>FBI Program</b>
1) Counterterrorism	Counterterrorism
2) Counterintelligence	Counterintelligence
3) Cyber Crime	Cyber
4) Public Corruption	Criminal
5) Civil Rights	
6) Organized Crime	
7) White-Collar Crime	
8) Violent Crime and Major Thefts	

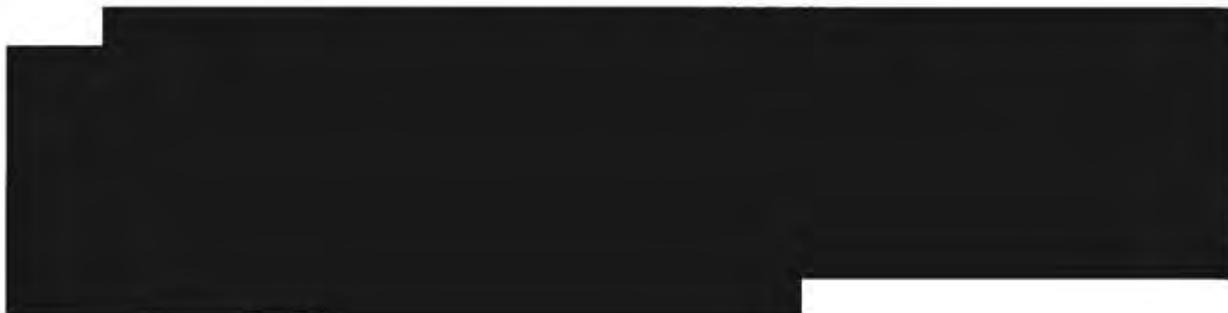
Source: FBI

During FYs 2009 and 2010 FBI Special Agent Pilots flew over [REDACTED] hours during nearly [REDACTED] flight missions to provide aviation support to field division investigative operations. As shown in Exhibit 1-2, in FY 2009 [REDACTED] received the largest share of aviation support provided to field divisions. In FY 2010 [REDACTED] received the majority of aviation support. The Assistant Section Chief of the Surveillance and Aviation Section stated that of the FBI's three most resource intensive program areas — counterterrorism, counterintelligence, and criminal [REDACTED]

**Exhibit 1-2**  
**Aviation Flight Hours in Support of FBI Field Divisions**  
**By FBI Program**  
**Fiscal Years 2009 and 2010<sup>9</sup>**



Source: OIG analysis of FBI Aviation Surveillance Branch data



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<sup>9</sup> Due to rounding the FY 2010 percentages do not add to 100 percent.

**Exhibit 1-3**  
**Fiscal Year 2010 Aviation Flight Hours,**  
**Special Agent Utilization, and Active Cases**  
**By FBI Program<sup>10</sup>**



Source: OIG analysis of FBI Aviation Surveillance Branch data

In FY 2010, [redacted] of the 56 field divisions received aviation support. [redacted] received the highest percentage of support in [redacted] of these field divisions, with [redacted] offices applying [redacted] of their total aviation support to [redacted]. For the remaining field divisions, [redacted] offices devoted the most aviation support to [redacted], and [redacted] offices had the highest proportion of support in [redacted].

*Aviation Support at Field Divisions*

During our audit, we conducted fieldwork at FBI field divisions with aviation resources at [redacted]. As Exhibit 1-4 illustrates, in three of these four offices, [redacted] cases received the most aviation support, while the [redacted] Division provided [redacted] its operational aviation support to [redacted].

<sup>10</sup> Due to rounding the flight hour percentages do not add to 100 percent.

**Exhibit 1-4**  
**Aviation Flight Hours in Support of FBI Divisions**  
**Visited By FBI Program**  
**FYs 2009 and 2010**



Source: OIG analysis of FBI Aviation Surveillance Branch data

In addition to the FBI's overall national priorities, field divisions determine the most significant threats within their jurisdiction and develop more specific local priorities that influence resource-related decisions. Depending on a field division's jurisdiction, its most significant threats may not mirror the FBI's national priorities. Field Intelligence Groups within each of the 56 field divisions determine a field division's highest priority threats.<sup>11</sup> Field division management use local priorities in deciding the expedient use of its resources, including surveillance and aviation assets. The Aviation Surveillance Branch evaluates a field division's use of aviation resources in the FBI's Semi-Annual Program Review to determine whether the prioritization of aviation resources was based on a field division's identified local threats. Further, the Section Chief of the Surveillance and Aviation

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<sup>11</sup> The Field Intelligence Groups is made up of FBI intelligence analysts, special agents, language analysts, and surveillance specialists who conduct a strategic assessment of threats to determine the highest threats within their respective field division.

Section emphasized in April 2011 guidance to field divisions that aviation usage generally should track field division threats.<sup>12</sup>

For example, [REDACTED] it devoted a higher percentage of aviation support to [REDACTED] than the other three field divisions we visited.

Additionally, there are other factors beyond threat level that determine how aviation support should be allocated, [REDACTED]

### **Aviation Support Requests**

FBI policy requires that requests for aviation support be submitted in writing. We found that the four offices we visited complied with this policy. Three of the four divisions, specifically [REDACTED], had active aviation programs and developed electronic forms that enforcement agents and supervisors use to request surveillance and aviation support. These forms required information such as the case number, case agent, timeframe for the requested mission, and the mission objectives. We observed in one office that the electronic form included a "dropdown menu" containing the field division's highest priority threats. If

<sup>12</sup> Semi-Annual Program Reviews were developed by the Inspection Division to examine field division performance in program accomplishments, intelligence production, and utilization of resources. The objective is to strengthen field division implementation of the FBI's national strategy and to increase management oversight of field division performance in achieving the FBI's strategic goals.

the case for which support was requested was a field division priority, the requester selected the appropriate designation in the dropdown menu. We believe this feature is useful in helping to prioritize competing requests for surveillance and aviation support.

The [REDACTED] Division is a smaller office with only one part-time Pilot in Command and a less-active aviation program than the other three offices we visited. We found that aviation requests in this office were made via email or in an electronic communication (an internal FBI correspondence).

During our audit, we learned that the FBI is developing a standard electronic request process for all offices to use when requesting ground and aviation surveillance support. This electronic request process will be one feature of the FBI's new Surveillance Program Integrated Reporting and Intelligence Tool (SPIRIT) system – a centralized information system for tracking surveillance activities and capturing the intelligence obtained during FBI surveillance operations.<sup>13</sup> All FBI field divisions will use this system, which will include a standard electronic form for requesting surveillance and aviation support. We recommend that the FBI ensure that SPIRIT, which it is currently deploying to field offices, also includes the functionality to identify whether a request pertains to a field division priority threat.

### **Prioritization of Aviation Support**

FBI policy states that FBI field division Special Agents in Charge or their designees have the authority to approve and prioritize aviation missions. The four field divisions we visited each designated a Supervisory Special Agent responsible for the aviation program, with the authority to approve and prioritize aviation support. In the offices we visited procedures for prioritizing aviation requests expectedly varied according to a field division's size, structure, and resources. We discuss some of the differences below.

Until FY 2011 the [REDACTED] Division did not have a dedicated ground surveillance team. Therefore, investigative squads performed surveillance operations, or the field division requested the use of another field division's ground surveillance team, and requests for aviation support were provided directly to the office's only part-time Special Agent Pilot with Pilot in

<sup>13</sup> In May 2011, the [REDACTED] Field Division piloted the SPIRIT system, and Aviation Surveillance Branch officials stated that the office provided positive feedback on the system. The Aviation Surveillance Branch anticipates SPIRIT being operational in all field divisions by the end of FY 2012.

Command credentials and to the pilot's Supervisory Special Agent responsible for approving air support. We were told that in most instances, requests for aviation support were approved as long as one of the field division's part-time co-pilots was available [REDACTED]. In addition, we found that for a major counterterrorism case in FY 2010 the [REDACTED] Division requested and received [REDACTED] ground and aviation support from other field divisions to help support this high priority matter.

The [REDACTED] Division's process for assigning and prioritizing aviation requests appropriately includes all surveillance requests. All requests for surveillance, ground or aviation, are forwarded to the Coordinating Supervisory Special Agent (CSSA) for the [REDACTED] Division's Surveillance Branch using a standardized electronic form. The CSSA is responsible for reviewing all requests and prioritizing them according to national and field division priorities. If surveillance is approved, the CSSA determines the type and combination of surveillance that best suits the request, deciding whether to assign the surveillance operation to [REDACTED].<sup>14</sup> The CSSA stated that when there are competing requests for surveillance support that are of relatively equal priority for the [REDACTED] Division, he consulted appropriate operational staff to determine the higher priority need. Each Friday, the CSSA puts together the surveillance schedule for the following week and identifies on the schedule which surveillance operations should receive aviation support. Upon receipt of the schedule, the aviation supervisor schedules aviation support missions with available aviation resources.

As illustrated in Exhibit 1-4, the [REDACTED] Division applied [REDACTED] percent of its aviation support to counterterrorism matters during FYs 2009 and 2010. The [REDACTED] Division identified counterterrorism threats as one of its highest priorities, and the CSSA stated that counterterrorism matters typically receive primary consideration for aviation support given these priorities.

We found that the processes for prioritizing aviation support in the [REDACTED] Division and [REDACTED] Division surveillance requests went directly to either the MST or the MST-A. In the [REDACTED] Division, aviation resources are managed as a separate entity [REDACTED]. Special Agents performing investigations

<sup>14</sup> [REDACTED]

and their supervisors request surveillance support, determine whether to request either MST or MST-A support, and forward their request to the MST or MST-A supervisor. [REDACTED]

[REDACTED] The MST coordinators and MST-A supervisors assess the surveillance requests they receive and determine their surveillance schedules. If the MST coordinators and MST-A supervisors determine that aviation support would be beneficial to the surveillance operation, they forward the requests to the Aviation Supervisor, who then schedules aviation support based on the list of priorities received from both surveillance teams. Since the MST coordinators and MST-A supervisors prioritize their separate surveillance requests for aviation support independently the [REDACTED] Division did not have central point of decision for considering all surveillance requests for aviation support. At the audit close-out meeting, FBI officials stated that the [REDACTED] Division reorganized its surveillance operations by placing both MST-A, MST, and aviation under the authority of a single Assistant Special Agent in Charge (ASAC). This ASAC is responsible for reviewing, prioritizing and shifting surveillance assets to ensure critical, high-threat matters are addressed.

The [REDACTED] Division's MST, MST-A, and aviation resources were assigned under a single ASAC. We found that [REDACTED] Division enforcement personnel submitted requests for surveillance support to either MST or MST-A and that the MST-A supervisor was responsible for assigning aviation resources to surveillance operations. Unlike the [REDACTED] and [REDACTED] Divisions, in the [REDACTED] Division [REDACTED] MST-A surveillance requests receive automatic consideration for aviation resources upon submission, [REDACTED]

[REDACTED] We found that the agents and supervisors handling the investigations that need surveillance support decide whether to send requests to MST-A or MST [REDACTED]

[REDACTED] However, similar to the [REDACTED] Division, the [REDACTED] Division does not have a central point for considering all surveillance operations in prioritizing what operations will receive aviation support. At our audit close-out meeting the FBI stated that the [REDACTED] Division had begun using the SPIRIT system, which the FBI stated allows both the MST-A supervisor and MST coordinator to view all requests for surveillance.

A process for prioritizing the use of aviation assets that includes all surveillance operations best ensures that the use of aviation resources is appropriately prioritized. FBI Aviation Surveillance Branch personnel agreed that a centralized request and prioritization process for all surveillance requests is the best model for field divisions to practice. FBI officials also stated that all field divisions have assigned responsibility for all ground and aviation surveillance resources and operations to the same ASAC, with the [REDACTED] Field Division being the last to effect this consolidation. The [REDACTED] Division had assigned MST and MST-A resources, including aviation assets and personnel, to a single ASAC. However, as discussed previously, the [REDACTED] Division split its surveillance request process and did not have a central point of decision for considering the needs of all surveillance operations when prioritizing the use of aviation resources.

We believe a single point of decision best enables the FBI to ensure all relevant factors are considered when prioritizing the use of the FBI's limited aviation resources. [REDACTED]

[REDACTED] these requests may not always get full consideration without a centralized decision process. Aviation Surveillance Branch personnel stated that in addition to encouraging a consolidated surveillance request review process, the FBI also is looking at [REDACTED]

[REDACTED]. If implemented, this initiative would increase the number of FBI pilots and afford offices greater capacity to provide aviation support [REDACTED]

## Reporting of Aviation Support

After completion of a flight, a flight strip must be completed to document each use of an FBI aircraft. The flight strip, which is normally completed by the Special Agent Pilot that flew the mission, captures aviation-specific information, such as flight crew information, date, time, and length of mission, as well as information regarding the operational aspects of the mission, such as the type of operation, the case number, operational results (if applicable) and other general information. Information from the flight strips is then entered into the FBI's Professional Flight Management (PFM) system, the FBI's aviation flight data collection system. During our field work, we found that Special Agent Pilots consistently completed flight strips for missions flown. Additionally, we found that FBI aviation supervisors oversee mission reporting and its entry into PFM.

PFM is an off-the-shelf corporate aviation software application that the FBI determined was the most cost-effective way to upgrade its aviation information system. However, the FBI has encountered challenges modifying PFM to meet the FBI's operational requirements. PFM was designed to assist an aviation program's efforts to track compliance with aviation-specific requirements, such as aircraft maintenance and pilot training. Though not intended for analyzing the operational use of aircraft, the FBI has modified the PFM software to capture multiple types of investigative data, such as the field division and case classification codes, to help track and analyze the use of aviation assets.<sup>15</sup>

The FBI reviews its case classifications quarterly, and additions, eliminations, and modifications are made as necessary. We found that the elimination of a classification code can cause errors in historical PFM flight data to occur. In one instance, we found that PFM substituted an unrelated case classification code in the FY 2009 flight data when the classification code was eliminated and subsequently removed from PFM in FY 2010. Consequently, flight hours flown in support of counterterrorism flights, but entered into PFM under a classification code that was subsequently eliminated, were erroneously classified in PFM as having been flown in support of criminal cases.

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<sup>15</sup> FBI classification codes represent specific FBI investigative classifications, which are assigned to FBI programs or subprograms. For instance, the FBI has numerous codes associated with specific types of counterterrorism cases and these codes enable the FBI to track and analyze its operations at a very specific level. Additionally, the use of classification codes help the FBI evaluate operations and resource utilization at a higher level, such as we previously presented on the FBI's use of aviation assets in support of criminal, counterterrorism, and counterintelligence matters, overall.

Due to this glitch, analysis of PFM data showed that in FY 2009,

[REDACTED]. The Aviation Supervisor in [REDACTED] stated that he was aware of errors in PFM data and that he relied instead on the actual flight strips when he compiled his field division's aviation statistics.

Aviation personnel stated that proper classification of flight time can still be obtained by querying its case management system. However, this would require verifying all missions in support of cases where the classification code was replaced or eliminated, which is burdensome and severely weakens the utility of PFM in collecting and analyzing aviation data. PFM also poses other issues. FBI officials stated that the software was designed to run on the Internet as opposed to the FBI's secure intranet, resulting in slower accessibility and processing. Additionally, high user-license fees require the FBI to limit access to the system.

Prior to using PFM, the FBI developed and used its Bureau Aircraft Operations (BAO) system. FBI Aviation Surveillance Branch officials told us that the FBI determined that it can upgrade this former system and that funding for an in-house upgrade of BAO (BAO 2.0) by FBI software programmers was approved and modifications are being written. These FBI officials stated that the system will replace PFM, and its functionality will be tailored to the FBI's specific data collection, analysis, and documentation needs. The FBI plans to use BAO 2.0 for aviation mission scheduling as well as to track and analyze important data on completed flight missions. Further, BAO 2.0 is expected to provide real-time flight information to an expanded user base, so that current flight activity, such as missions in progress, is readily accessible. We recommend that the FBI also ensure that BAO 2.0 has the ability to incorporate updates and additions to FBI classification codes and similar data codes that can affect the accuracy of the system's reporting.

## **Conclusion**

Aviation resources, like all FBI operational resources, must be used to support the areas of highest priority and greatest value to the FBI. The FBI's national priorities and each field division's local priority threats are supposed to be used to guide this decision making. We found FBI field divisions were using these priorities and considering the safety of an operation and other mission-specific factors when prioritizing the use of aviation resources.

However, we found that in some field divisions surveillance requests went to either an MST-A or MST team instead of single point for consideration and prioritization of aviation support. Consequently, these offices did not consider all surveillance requests as a whole when deciding which operations aviation assets would support. [REDACTED]

[REDACTED] We believe, and FBI Surveillance and Aviation Section management agrees, that field divisions should review and prioritize aviation support considering all surveillance operations that would benefit from aviation involvement.

### **Recommendations**

We recommend that the FBI:

1. Ensure that its SPIRIT system includes the functionality to identify whether a surveillance request pertains to a field division priority threat.
2. Ensure that field divisions, through a centralized decision process, consider all surveillance operations when prioritizing the use of its aviation resources.
3. Ensure that BAO 2.0 has the ability to incorporate updates and additions to FBI investigative classification codes and similar data codes that can affect the accuracy and utility of the system's reporting.

## **FINDING II: FBI AVIATION RESOURCES**

We found that FBI field division data indicated and FBI field division procedures demonstrated that the FBI does not capture in a consistent manner data on its field divisions' unmet need for aviation support. Inconsistent reporting of this data prevents the FBI from effectively identifying field division aviation resource needs and deficiencies. We believe the FBI can improve its data on surveillance operations that would benefit from aviation support but did not receive support. For instance, more complete and consistent reporting of this data could help the FBI better identify trends in aviation crew unavailability and determine the appropriate number of pilots assigned to its field divisions. It could also assist the FBI in determining the effect temporary duty assignments have on the availability of aviation resources. Furthermore, we believe that the FBI should require its field divisions to report when an aircraft is unavailable due to maintenance separate from other causes of aircraft unavailability. This should also assist the FBI in determining the best approach to address aviation resource needs and deficiencies in its field divisions.

In addition, we believe the use [REDACTED] poses an additional safety risk to FBI aviation assets and personnel. The FBI should examine the possibility [REDACTED] while also helping maximize security.

### **Unfulfilled Requests for Aviation Support**

To provide aviation support to FBI operations, FBI pilots, aircraft, and other necessary personnel and equipment must be readily available. [REDACTED], can prevent the use of aviation assets and in those instances FBI surveillance teams typically still operate but do not benefit from the value aviation support can provide, such as enhanced safety and the advantageous aerial viewpoint not otherwise available to a ground team.

For FY 2009, the FBI only collected data on the number of unaddressed surveillance requests, which included both unaddressed aviation and ground surveillance requests. The FBI did not record data separately on unfulfilled aviation support. Because the FBI collected only the number of unaddressed surveillance requests in FY 2009, it could not use the data to assess the reasons why aviation requests went unsupported. Beginning in FY 2010, the FBI required field divisions to start reporting unaddressed aviation requests in one of three broad categories: [REDACTED] unavailable aircraft, or unavailable aviation crew.<sup>16</sup>

According to FBI data covering October 2009 through June 2010, there were [REDACTED] reported instances in which aviation support could not be provided. Exhibit 2-1 shows the breakdown of these unaddressed aviation support requests in the reporting categories established by the FBI.

**Exhibit 2-1  
FBI Unaddressed Aviation Requests  
October 2009 through June 2010**



Source: FBI

<sup>16</sup> In April 2011, the FBI added a fourth category for unaddressed aviation requests called "higher priority case."

As shown in Exhibit 2-1, [REDACTED] was the second greatest reason for unaddressed aviation support. Because [REDACTED] we excluded these instances from our analyses of the FBI's unaddressed aviation support requests. Of the remaining [REDACTED] unaddressed aviation support requests, 21 percent were reported to be due to aircraft unavailability and 79 percent were reported to be due to aviation crew unavailability.

#### *FBI Field Division Reporting of Unaddressed Aviation Requests*

We found the four FBI field divisions we visited used different methods to collect and track unaddressed aviation support requests. For example, in the [REDACTED] Division, we were told that an "abort log" was maintained for requested flights that were not supported. The Pilot in Command in the [REDACTED] Division maintained a paper file for requested flights that were unfulfilled. In the [REDACTED] Division, when a scheduled flight was not flown, the Special Agent Pilots generated a "no fly strip" using an internally developed flight database. Likewise, the [REDACTED] Division records aviation missions scheduled but not flown as its unaddressed aviation requests. Exhibit 2-2 shows the breakdown of the reported reasons for unaddressed aviation support requests for each of these FBI field divisions.

**Exhibit 2-2**  
**Reasons for Unaddressed Aviation Requests**  
**for Divisions Visited**  
**October 2009 to June 2010**



Source: FBI

While the [REDACTED] Division reported no instances of unaddressed aviation requests due to unavailable crew, several aviation personnel in the [REDACTED] Division informed us that they were short Special Agent Pilots. One supervisor specifically told us that the [REDACTED] Division "lacks pilot depth." Another supervisor stated that although the [REDACTED] Division had [REDACTED] Special Agent Pilots at the time of our interview, he thought [REDACTED] pilots would be optimal. However, as the data in Exhibit 2-2 indicates, the [REDACTED] Division reported [REDACTED] instances of unaddressed aviation requests, all of which it attributed to unavailable aircraft. None of the instances reported were due to lack of available aviation crew.

During our audit we met with FBI aviation officials and asked for an explanation as to why the [REDACTED] Division's reported number of unaddressed aviation requests appeared low. According to these officials, the [REDACTED] Division's unique [REDACTED] procedure may not adequately capture all unaddressed aviation requests. As noted in Finding I, in the [REDACTED] Division, one individual is responsible for prioritizing all

surveillance requests and then deciding which surveillance operations will receive aviation support. We believe this centralized decision-making process is beneficial in helping to ensure that the use of surveillance and aviation resources is properly prioritized. However, when reporting on its unaddressed aviation support, the [REDACTED] Division captures only the number of aviation missions that are scheduled and then not flown. Therefore, the [REDACTED] Division does not capture surveillance missions that would have benefited from aviation support but were not scheduled to receive aviation support, whether it was due to insufficient resources to cover the demand or an issue such as aircraft maintenance or a pilot being on approved leave. In short, we do not believe the data reported allows the FBI to understand the [REDACTED] Division's true, unmet need for aviation support.

Like the [REDACTED] Division, aviation personnel in the [REDACTED] Division told us that they were short Special Agent Pilots. According to a [REDACTED] Division official, as of June 2010, the [REDACTED] Division had [REDACTED] Special Agent Pilots, although its optimal number of pilots was [REDACTED]. In contrast to the [REDACTED] Division, the [REDACTED] Division reported that [REDACTED] of its [REDACTED] (98 percent) unaddressed aviation requests were caused by unavailable aviation crew. Although the [REDACTED] Divisions [REDACTED] reported to us similar concerns regarding the shortage of Special Agent Pilots, the total number of, and the reasons for, reported instances of unaddressed aviation requests varied greatly. In the [REDACTED] Division, one person does not prioritize all surveillance requests; instead, surveillance teams determine the need for aviation support and submit requests directly to the aviation squad. The aviation squad then prioritizes the aviation support requests as we discussed in Finding I. Accordingly, the [REDACTED] Field Division's aviation squad is in a position to capture the need for aviation support as it is aware of surveillance operations for which surveillance squads have determined that aviation support would be beneficial.

In addition to reviewing the data for the field divisions we visited, we also reviewed the overall unaddressed aviation request data for the period of October 2009 to June 2010. The data showed great variation among the number of unaddressed aviation requests reported by FBI field divisions. For example, 4 field divisions with aviation programs reported no unaddressed flight requests, while the aviation program in the [REDACTED] Division reported [REDACTED] unaddressed flight requests.<sup>17</sup>

<sup>17</sup> [REDACTED]

We believe that it is unlikely that an FBI aviation program operates without any unaddressed aviation requests, including those caused by [REDACTED]. We also believe that due to the varying application of the criteria for reporting unaddressed aviation support many of these field divisions may have understated the number of unaddressed aviation requests, while others may have overstated the number. Aviation personnel in the [REDACTED] Divisions informed us that aviation personnel in some field divisions may not submit statistical data regarding unaddressed aviation requests due to concerns that this data would reflect negatively on the field division when the allocation of aviation resources is considered. In addition, these aviation managers told us that FBI management does not emphasize the importance of collecting statistical data regarding unfulfilled aviation requests. When we met with FBI officials in May 2011, they stated that unaddressed aviation requests have been particularly difficult to capture. According to these officials, they are continuing to revise the collection procedures for this data and they recognize that continued improvement is necessary. Further, we believe capturing data that reflects accurately on each field division's need for aviation support will afford the FBI important information to use in making decisions on the allocation of its limited aviation resources.

Accurate and consistent collection and analysis of the reasons for field divisions' unaddressed aviation requests can assist the FBI in identifying individual field division aviation resource deficiencies, such as aircraft and aviation crew shortages. We note that in April 2011, the FBI issued guidance to its field divisions regarding unaddressed aviation requests. This memorandum defined unaddressed aviation requests as missions "requested and then not flown." The memorandum further provided guidance on the standardized submission of unaddressed aviation request data. While standardized reporting will assist the FBI in more easily analyzing the reported unaddressed aviation request data, we do not think it will ensure consistent reporting and collection of this data at the field division level. Furthermore, we do not believe the use of the unaddressed aviation request definition will allow the FBI to capture the true, unmet need for aviation support. Accordingly, we recommend that the FBI ensure that field divisions are capturing, in a consistent manner, data on and the appropriate reason for [REDACTED] operations that would benefit from, but that did not receive, aviation support.

As previously noted, beginning in FY 2010 FBI field divisions only reported the number of instances of unaddressed aviation requests in three broad categories. However, the type of case that did not receive aviation support was not recorded. According to the guidance issued in April 2011,

field divisions must now include whether unaddressed aviation requests were for a criminal, counterterrorism, or counterintelligence case. This information should allow the FBI to better determine if it is adequately supporting its high priority program areas.

### **Aviation Crew Unavailability**

FBI officials told us that the FBI does not specifically allocate a certain number of Special Agent Pilot positions for each field division. Instead, the FBI allocates a specific number of positions for its armed mobile surveillance teams (MST-A) for each field division. From that allocation, [REDACTED]. As of March 2011, the FBI reported there were [REDACTED] MST-As which at the full recommended complement would require [REDACTED] full-time Special Agent Pilots. However, the FBI reported that there were [REDACTED] full-time Special Agent Pilots as of May 2011.<sup>16</sup> Furthermore, as of May 2011, of the [REDACTED] field divisions with MST-A teams, [REDACTED] (31 percent) had fewer than [REDACTED] full-time Special Agent Pilots on each MST-A team.<sup>19</sup>

### *Special Agent Pilot Shortages*

The composition of each MST-A is generally left to the discretion of field division management based on personnel needs. Exhibit 2-3 shows the MST-A allocation and the number of Special Agent Pilot positions filled in the four field divisions we visited.

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<sup>16</sup> The FBI also utilizes part-time Special Agent Pilots. These positions are not filled through MST-A allocations. Instead, these pilots are Special Agents who fly as a collateral duty in addition to managing a full-time case load. As of May 2011, the FBI had [REDACTED] part-time Special Agent Pilots.

<sup>19</sup> [REDACTED]

**Exhibit 2-3**  
**MST-A Resource Allocation**  
**for Divisions Visited During Fieldwork with MST-As**  
**May 2011**

Source: FBI Surveillance and Aviation Section Field Resource Allocations

The [REDACTED] Division was below the allotted MST-funded staffing level, while the [REDACTED] Divisions were fully staffed. The [REDACTED] Divisions stated that they had a shortage of Special Agent Pilots. In our review of unaddressed aviation requests, we found that the [REDACTED] Division reported [REDACTED] instances of unfulfilled aviation requests due to unavailable aviation crew between October 2009 and June 2010. While the [REDACTED] aviation program did not report any instances of unfulfilled aviation requests due to unavailable aviation crew, FBI officials stated that the [REDACTED] Division's unique surveillance request procedure may not adequately capture all unaddressed aviation requests.

In addition to the field divisions we visited, we also reviewed pilot staffing and unaddressed aviation requests for other FBI field divisions. We found that the [REDACTED] Divisions had [REDACTED] pilots for each of its MST-As, but these offices still reported a large amount of unfulfilled aviation requests due to unavailable aviation crew. Specifically, between October 2009 and June 2010 the [REDACTED] Division reported [REDACTED] unfulfilled requests due to unavailable aviation crew and the [REDACTED] Division reported [REDACTED] instances. In addition, the [REDACTED] Divisions reported high numbers of unfulfilled aviation requests due to unavailable aviation crew, [REDACTED] and [REDACTED] unfulfilled requests, respectively. These two divisions operate aviation programs with part-time pilots, only.

Unavailable aviation crew affects the FBI's ability to provide aviation support. As noted above, consistent and accurate reporting of unaddressed aviation requests should give the FBI a clearer picture of why aviation requests in certain field divisions go unaddressed. If this data suggests consistent crew unavailability in a field division, the Surveillance and Aviation Section should work closely with that field division to determine the appropriate number of pilot positions.

## FBI Initiatives to Address Special Agent Pilot Shortages

When we asked aviation personnel why recruiting pilots was difficult, they provided a number of reasons. We were told that for the [REDACTED] Divisions cost of living and commuting issues make it difficult to recruit and retain Special Agent Pilots. In [REDACTED], the office has the difficult task of finding qualified pilots willing to fly on a part-time basis while also maintaining a regular case load. The FBI has recently attempted to address its shortage of pilots through the use of trial initiatives implemented in selected field divisions. FBI officials said that if these initiatives prove to be effective, they could be expanded throughout the FBI.

The first initiative relates to the FBI's efforts to ensure that its pilots are fully integrated as FBI agents prior to becoming Special Agent Pilots. According to aviation personnel, this effort has at times been detrimental to the aviation program because a new recruit who possesses pilot credentials could see those credentials expire while serving as a new Special Agent.

In an attempt to address this concern, when a former military pilot with significant flight credentials was graduating from the FBI Academy, the [REDACTED] Division requested approval to allow this individual to begin flying for the office immediately instead of assigning this individual to an operational squad. FBI officials in the [REDACTED] Division told us that there is a need to recruit new agents with pilot experience and to provide an opportunity for Special Agents to maintain their flight credentials. These officials said they recognized that investigative training and experience is important; however, they said they believe that allowing new Special Agents to maintain flight credentials could increase the FBI's pilot pool.

In an effort to alleviate Special Agent Pilot shortages, the FBI has also implemented a trial program in two FBI field divisions that would allow non-agent pilots to fly FBI aviation operations. This initiative required the FBI to create a new job description titled "Investigative Specialist – Aerial" with two primary conditions for candidates: (1) Investigative Specialists-Aerial will receive the same training as regular Investigative Specialists and when not flying, will be expected to work "on the street," and (2) all Investigative Specialists-Aerial will be capable of operating the [REDACTED] the aircraft [REDACTED] platforms.

FBI officials told us that being an FBI Special Agent as well as a pilot is beneficial but not required, and that the addition of non-agent pilots will add depth to the FBI's pilot pool. They believe that as long as a pilot is qualified and safe the pilot should be able to fly FBI aircraft. At the conclusion of the

audit, FBI aviation officials told us of a proposed plan to [REDACTED] surveillance teams under the same management. According to these officials, the hiring of non-agent pilots could benefit the FBI's surveillance teams by increasing the number of pilots available to support all investigative activities.

As we note above, better collection of unaddressed aviation request data should help the FBI identify the causes of pilot unavailability in its field divisions. We also believe that the non-agent pilot program has the potential to address pilot unavailability in field divisions with identified pilot shortages. As such, we recommend that the FBI review the results of its non-agent pilot program to determine the initiative's success in alleviating pilot shortages.

In addition, the FBI's current practice [REDACTED] increases the demand for Special Agent Pilots in offices already strained by pilot shortages. Another initiative that the FBI is considering is a review of the [REDACTED]

[REDACTED] standardized avionics package that consists of [REDACTED]

[REDACTED] system should [REDACTED]

According to FBI officials, this new [REDACTED]

[REDACTED] thereby increase the number of pilots available to fly in support of FBI investigations. [REDACTED]

We believe that eliminating the need for [REDACTED] Special Agent Pilots for aviation operations could help alleviate FBI Special Agent Pilot shortages and increase efficient use of FBI aviation resources. Accordingly, we recommend, as the FBI expands the use of the [REDACTED] system, that it continually assess the effect of the system on its aviation program to better determine personnel and operational needs.

### *Special Agent Pilot Temporary Duty*

The FBI deploys MST-As from their permanent assigned offices to assist other offices on a temporary basis – a temporary duty assignment (TDY) – helping fulfill the other field divisions' operational needs.

[REDACTED]  
[REDACTED] . When an MST-A is sent on a TDY assignment, [REDACTED]  
[REDACTED] Special Agent Pilots and air assets travel [REDACTED] for an aviation-only TDY assignment.

FBI officials reported the usual length of TDY assignments is [REDACTED] [REDACTED], and each team generally conducts one or two TDY assignments a year. FBI offices with specialized aircraft and equipment may receive more TDY requests than FBI offices with standard aircraft. FBI TDY assignments are generally determined on a volunteer basis. However, in the event volunteers are not secured, the FBI Aviation Surveillance Branch will select an office for the TDY. FBI officials said they do not formally track the TDY hours by pilot or by office. However, the FBI provided us with information describing which field divisions requested assistance, which field divisions provided assistance, and the length of deployment. Exhibit 2-4 below provides general information on FBI TDY activity for FYs 2009 and 2010.

#### **Exhibit 2-4**

#### **Temporary Duty Activity For Fiscal Years 2009 and 2010**

[REDACTED]

Source: FBI Surveillance and Aviation Branch

[REDACTED]. The [REDACTED] Division's MST-A Surveillance Supervisor stated that when aviation resources are deployed on TDY, it results in limited aviation support in the [REDACTED] Division during the TDY deployment. According to FBI officials in the [REDACTED] Division, its MST-As are deployed more frequently on TDY assignments because of the high number of MST-As in that office. We reviewed the TDY assignment

data for FYs 2009 and 2010 for the divisions we visited during field work as shown in Exhibit 2-5.

**Exhibit 2-5**

**Number of TDY Assignments Involving Aviation Resources<sup>20</sup>  
For Divisions Visited  
Fiscal Years 2009 and 2010**



Source: FBI Surveillance and Aviation Branch

As Exhibit 2-5 shows, the [redacted] and [redacted] Divisions had more TDY deployments to assist other offices than the [redacted] and [redacted] Divisions; however, these offices also have more surveillance teams. After reviewing the overall aviation TDY deployments for FYs 2009 and 2010, we found that the [redacted] Division also had a high number of aviation-only deployments in those fiscal years.

When comparing all FBI field divisions we found three divisions with a high number of TDY deployments in FYs 2009 and 2010. Exhibit 2-6 shows the data for these three field divisions.

<sup>20</sup> TDY deployment figures represent [redacted] deployments. [redacted]

[redacted] Therefore, the deploying field division's ability to supply aviation support to surveillance operations may be affected.

## Exhibit 2-6

### Three FBI Divisions with High Number of TDY Assignments Involving Aviation Resources<sup>21</sup> Fiscal Years 2009 and 2010



Source: FBI Surveillance and Aviation Branch

All three of these divisions reported that at least 98 percent of their unaddressed aviation requests were due to unavailable aviation crew. However, as mentioned earlier, the FBI tracks unaddressed aviation support requests in general categories, including an "unavailable crew" category. The FBI does not specifically track how many aviation requests were not fulfilled due to TDY assignments. We believe that once the FBI improves its collection of unsupported aviation mission data, it will have a better idea of the effect TDY assignments have on the availability of aviation resources.

#### Unavailable Aircraft

As of July 2011, the FBI's Aviation Surveillance Branch operated [REDACTED] aircraft in [REDACTED] division offices and headquarters units.<sup>22</sup> Between October 2009 and June 2010, there were [REDACTED] reported instances of unaddressed aviation requests due to unavailable aircraft, (14 percent of all unaddressed requests).

<sup>21</sup> TDY deployment figures represent [REDACTED] deployments. [REDACTED]

[REDACTED] Therefore, the deploying field division's ability to supply aviation support to surveillance operations may be affected.

<sup>22</sup> The FBI has an additional 41 aircraft which are designated as "soon to be sold"; however, soon to be sold aircraft are not utilized for operations.

FBI aircraft are maintained in accordance with Federal Aviation Regulations and aircraft manufacturer guidelines.<sup>23</sup> FBI officials stated that for both modern and legacy aircraft, the appropriate maintenance schedule can be used to calculate an expected number of days for scheduled maintenance in a calendar year.<sup>24</sup> The FBI does not centrally track the number of days each FBI aircraft was in maintenance. Exhibit 2-7 shows the FBI's estimated days of scheduled maintenance.

**Exhibit 2-7  
Estimated Days of Scheduled Maintenance  
by Number of Flight Hours Completed**

Flight Hours Completed	Estimated Number of Days of Scheduled Maintenance by Aircraft Type	
	Modern Aircraft	Legacy Aircraft
<b>50</b>	1	1
<b>100</b>	3	5
<b>150</b>	1	1
<b>200</b>	3	5
<b>250</b>	1	1
<b>300</b>	3	5
<b>350</b>	5	1
<b>Total</b>	<b>17</b>	<b>19</b>

*Source: FBI*

After analyzing the reported reasons for unaddressed aviation requests, we found that three field divisions reported that 100 percent of their [REDACTED] related unaddressed aviation requests resulted from aircraft unavailability.<sup>25</sup> In the [REDACTED] Division, all [REDACTED] reported instances of unaddressed aviation requests were reportedly due to aircraft unavailability. Likewise, the [REDACTED] Divisions reported

<sup>23</sup> In addition, the FBI's modern aircraft will be subject to the FAA approved progressive inspection program. Legacy aircraft will be maintained using a generic system of annual 50 and 100 hour inspections. Where no 100 hour annual inspection checklist exists, FBI mechanics will follow Appendix D to 14 C.F.R. § 43 and manufacturer guidance.

<sup>24</sup> [REDACTED]

<sup>25</sup> In addition two FBI field divisions without aviation programs, [REDACTED], also reported 100 percent of their [REDACTED] unaddressed aviation requests resulted from aircraft unavailability.

that all unaddressed aviation requests ([REDACTED], respectively) were due to unavailable aircraft.

When we reviewed the FBI's reported unaddressed aviation request data due to unavailable aircraft, we found that the FBI does not discern the reasons why aircraft were unavailable. For example, aircraft may be unavailable due to maintenance or because there are an insufficient number of aircraft available at the time of the request; however, the FBI cannot quantify how often these situations occur. Because the FBI cannot quantify these situations, it is unable to identify the best approach to address the various causes for aircraft unavailability. During our audit, FBI officials told us that they anticipate changing the reporting of unaddressed aviation request data to include maintenance and other aircraft unavailability reasons separately. Accordingly, we recommend that the FBI implement the anticipated reporting changes to identify when an aircraft is unavailable due to maintenance separately from the other reasons why aircraft may be unavailable.

### **Aviation Fleet**

The current Aviation Surveillance Branch fleet consists primarily of [REDACTED]. The majority of the FBI's fleet consists of [REDACTED]. Exhibit 2-8 contains more information on the fleet operated by the Aviation Surveillance Branch.

**Exhibit 2-8  
FBI Aviation Surveillance Branch Aircraft Types**

<b>Aircraft<sup>26</sup></b>	<b>Aircraft Type</b>	<b>Number of Aircraft November 2010</b>	<b>Number of Aircraft July 2011</b>
[REDACTED]			

Source: FBI

As noted above, in 2009, the FBI began the process of upgrading its aircraft with the [REDACTED] system. The overall project is divided into three stages: (1) the installation of an [REDACTED] system in FBI aircraft; (2) the development of aircraft for concept and usability testing; and (3) the final integration, training, and field deployment.

[REDACTED]

The FBI's fleet replacement plan calls for spending [REDACTED] million per year for new aircraft which FBI officials acknowledge may not be possible with future budgets. Nevertheless, FBI officials believe that the FBI's current replacement initiative will prevent the FBI, several years from now, from having to replace all of its aircraft at the same time. In addition, FBI

<sup>26</sup> [REDACTED]

officials believe the standardization of the avionics systems in the FBI's fleet will allow the FBI to operate and utilize its resources more efficiently and effectively. [REDACTED]

[REDACTED]

[REDACTED]

When we told FBI officials that we determined that [REDACTED], they said they recognized the potential security risks posed by these arrangements. We agree that the practice of [REDACTED].

[REDACTED] the FBI stated that it plans to address the [REDACTED] arrangements [REDACTED]<sup>27</sup>. We recommend that the FBI ensure that it examines the possibility of [REDACTED].

<sup>27</sup> The FBI provided documentation after our audit close-out meeting indicating that it was in, or at some point in FY 2012 would be in, a position to examine [REDACTED].


## **Pre-Flight Risk Assessments**

During our audit we found that FBI pilots in the field divisions we visited generally documented their pre-flight risk assessment on a standardized FBI pre-flight risk assessment form. This pre-flight risk assessment form assigns a point-value to each potential risk factor and the cumulative point totals are used to categorize the flight as "minimal risk", "low risk", "moderate risk", or "high risk." If a pre-flight risk assessment determines that a mission is "minimal risk," the mission may proceed as long as all pilots involved in the mission concur with the assessment. A "low risk" determination requires the approval of the Aviation Coordinator, while a "moderate risk" requires the approval of the pilots' assigned Supervisory Special Agent. A "high risk" flight requires the approval of the ASAC and the Aviation Surveillance Branch. However, the Unit Chief of the Field Flight Operations Unit told us that the Aviation Surveillance Branch has never approved a "high risk" flight during his tenure. At the conclusion of the particular mission, pre-flight risk assessment forms are attached to the pilots' flight strip and become part of the flight record.

When we discussed the pre-flight risk assessment with the pilots in the field divisions we visited, the pilots told us that the risk assessment form is a useful tool that allows pilots to self-evaluate their readiness for the mission and helps make the pilot aware of potential risks and better prepared to

mitigate them during the mission. We found that some aviation personnel believed these forms were mandatory, while others suggested they were optional. In addition, at least one pilot admitted that, at times, the risk assessment may not be prepared by pilots until after the flight. At the audit close-out meeting, FBI aviation officials clarified that completing risk assessment forms before take-off is mandatory and required by FBI policy. However, because these forms are reviewed after a mission is completed we recommend that the FBI develop a means to ensure that these forms are completed before all aviation missions.

## **Conclusion**

After reviewing the FBI's unaddressed aviation request data for the period of October 2009 and June 2010 and FBI field divisions' procedures for reporting this data, we do not believe the FBI is capturing the true, unmet demand for aviation support. The FBI should emphasize the capturing of surveillance operations that would benefit from aviation support but that did not receive the support due to unavailable aviation resources or other reasons. Complete and consistent reporting of this data will allow the FBI to identify and address the causes of aviation resource deficiencies in its field divisions. In addition, collecting the case classifications for unaddressed aviation requests should allow the FBI to better determine if it is adequately supporting high priority program areas. In all, the data will allow the FBI to better understand the demand for aviation resources and to better analyze the causes for and effects of not being able to fulfill the demand.

Consistent and accurate reporting of data regarding the unmet demand for aviation support could also help the FBI identify field divisions with routine aviation crew unavailability, so that the Aviation Surveillance Branch can work with field divisions to determine the appropriate number of pilots needed. In addition, such data could also assist the FBI in determining the effect temporary duty assignments have on the availability of aviation resources. Further, requiring field divisions to report when an aircraft is unavailable due to maintenance separately from other causes of aircraft unavailability should assist the Aviation Surveillance Branch in determining the best approach to address this aviation resource deficiency in its field divisions.

[REDACTED]

[REDACTED] To increase the safety and security of its aviation assets, we recommend that the FBI ensure it examines the possibility of [REDACTED]

[REDACTED]. Finally, the FBI should develop a means to ensure that pre-flight risk assessments are completed before all aviation missions.

## **Recommendations**

We recommend that the FBI:

4. Ensure that field divisions are capturing, in a consistent manner, data on and the appropriate reason for all surveillance operations that would benefit from, but that did not receive, aviation support.
5. Ensure that new Special Agents who are licensed pilots and interested in becoming Special Agent Pilots for the FBI are given the opportunity to maintain their flight qualifications.
6. Review the results of its experimental non-agent pilot program to determine its success in alleviating pilot shortages.
7. Continually assess the effect of the new [REDACTED] system on its aviation personnel and operational needs.
8. Implement the anticipated reporting changes to identify when aircraft is unavailable due to maintenance separately from the other reasons why aircraft may be unavailable.
9. Ensure that it examines the possibility of [REDACTED].
10. Develop a means to ensure that pilots always complete pre-flight risk assessment forms before all aviation missions.

## STATEMENT ON INTERNAL CONTROLS

As required by the *Government Auditing Standards* we tested as appropriate, internal controls significant within the context of our audit objectives. A deficiency in an internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to timely prevent or detect: (1) impairments to the effectiveness and efficiency of operations, (2) misstatements in financial or performance information, or (3) violations of laws and regulations. Our evaluation of FBI's internal controls was *not* made for the purpose of providing assurance on its internal control structure as a whole. FBI's management is responsible for the establishment and maintenance of internal controls.

Through our audit testing, we did not identify any deficiencies in the FBI's internal controls that are significant within the context of the audit objectives and based upon the audit work performed that we believe would affect the FBI's ability to effectively and efficiently operate, to correctly state financial and performance information, and to ensure compliance with laws, regulations, and other applicable requirements.

Because we are not expressing an opinion on the FBI's internal control structure as a whole, this statement is intended solely for the information and use of the auditee. This restriction is not intended to limit the distribution of this report, which is a matter of public record.

## **STATEMENT ON COMPLIANCE WITH LAWS AND REGULATIONS**

As required by the *Government Auditing Standards* we tested, as appropriate given our audit scope and objective, selected transactions, records, procedures, and practices, to obtain reasonable assurance that the FBI's management complied with federal laws and regulations, for which noncompliance, in our judgment, could have a material effect on the results of our audit. FBI management is responsible for ensuring compliance with applicable federal laws and regulations. In planning our audit, we identified the following regulations that concerned FBI's aviation operations and that were significant within the context of the audit objectives.

- 41 C.F.R. § 101-37
- 41 C.F.R. § 102-33

Our audit included examining, on a test basis, FBI's compliance with the aforementioned regulations that could have a material effect on FBI's aviation operations, through interviewing personnel, analyzing data, assessing internal control procedures, and examining procedural practices. Nothing came to our attention that caused us to believe that the FBI was not in compliance with the aforementioned regulations.

**OBJECTIVE, SCOPE, AND METHODOLOGY**

**Objective**

The objective of this audit was to assess the FBI's management of its aviation operations. Specifically, we analyzed the usage, prioritization, and availability of FBI aviation assets, primarily focusing on its domestic-based aviation operations for FYs 2009 and 2010.

**Scope and Methodology**

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

To accomplish our objective we performed work at FBI headquarters in Washington, DC, and at the FBI Aviation Surveillance Branch in [REDACTED]. We also visited Aviation Operations in [REDACTED], as well as FBI field divisions in [REDACTED]. We conducted interviews with the Surveillance and Aviation Section Chief, Aviation Surveillance Branch management, and other headquarters-level officials and personnel. Additionally, at field locations, we interviewed FBI aviation personnel, such as Assistant Special Agents In Charge, Supervisory Special Agents, Aviation Coordinators, and Special Agents Pilots, as well as enforcement personnel who benefit from FBI aviation support, including field division management and Special Agents.

In addition, we examined the FBI's procedures for requesting aviation support and flight activity data to determine how resources were used to support priority investigations.

*Data Analysis*

We also examined FYs 2009 and 2010 FBI aviation data where appropriate within the scope of our audit. This data was maintained within Professional Flight Management (PFM), the software program the FBI uses to

maintain records of aviation usage. We obtained from the FBI four files- two each for FYs 2009 and 2010 – that contained FBI aviation activity data from PFM. One set contained a summary of flight hours provided by each field division categorized by type of mission. The second set contained more detailed information on each flight mission including the provider of support, case file number of the case supported, flight hours for the specific mission, and aircraft utilized. We found no issues with recording and input of data into PFM; however, our report describes one glitch in the PFM system that caused errors in data reporting. However, with the additional information in our report and within the context of our audit objective which examines trends in aggregate data as opposed to individual entries, we believe the data provided by the FBI can be used to support appropriately our audit findings, recommendations, and conclusions.

Our analysis included categorizing aviation data by the type of operation: operational, training, and maintenance. We identified the missions flown in support of ██████████ FBI field divisions in FYs 2009 and 2010, which is tracked in PFM. The majority of our analysis included more detailed analysis of the operational data, including categorization by FBI program the support provided to all field divisions and the individual field divisions visited. In order to classify operational-related aviation data, we classified the flight hours according to the investigative classification of the case supported. The FBI assigns each investigative classification to a respective FBI program. Finally, we obtained unaddressed aviation support work data from the FBI covering October 2009 through June 2010 and determined that they are in the process of enhancing the precision of the data collected by the field divisions.

### **Prior OIG Report**

The OIG previously reviewed aviation operations for FBI in 1994.<sup>41</sup> Similar to this audit, its objective was to assess the operations of the FBI aviation program, and to determine areas where FBI could improve the efficiency, effectiveness, and safety of its aviation operations. This 1994 audit was part of the President’s Council on Integrity and Efficiency’s review and assessment of civilian aircraft in the Executive Branch. No significant deficiencies were found in the executive and administrative use, inventory and disposals, continuing need, and proper operation of aircraft. However, the audit found that the FBI aviation program lacked a comprehensive safety program and the FBI cost of aircraft operations reported to the General

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<sup>41</sup> U.S. Department of Justice Office of the Inspector General (OIG), *Audit of the Federal Bureau of Investigation Management of Aviation Operations*, Audit Report 95-9 (December 1994).

Services Administration for FY 1993 was understated by approximately \$2 million.

## APPENDIX II

### THE FEDERAL BUREAU OF INVESTIGATION'S RESPONSE TO THE REPORT



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D. C. 20535-0001

January 24, 2012

Cynthia A. Schneider  
Office of the Inspector General  
U.S. Department of Justice  
950 Pennsylvania Avenue, Northwest  
Washington, D.C. 20530

Dear Ms. Schneider:

The Federal Bureau of Investigation (FBI) appreciates the opportunity to review and respond to your report entitled, "Audit of the Federal Bureau of Investigation's Aviation Operations" (hereinafter, "Report").

We are pleased you determined that "when deciding how to prioritize the use of its limited aviation resources, FBI field divisions considered the FBI's national priorities and the most significant threats in an office's geographic jurisdiction, along with the safety of the operation and other mission-related factors." As your auditors found, the assignment of aviation resources is a dynamic process influenced by multiple factors.

Based upon a review of the Report, the FBI concurs with all ten recommendations. The FBI appreciates the professionalism exhibited by your staff to complete this audit. Enclosed herein is the FBI's response to the recommendations in the Report. Please feel free to contact me should you have any questions.

Sincerely yours,

Robert A. Blecksmith  
Assistant Director  
Critical Incident Response Group

Enclosure

[REDACTED]

**AUDIT OF THE  
FEDERAL BUREAU OF INVESTIGATION'S  
AVIATION OPERATIONS**

**Report Recommendation #1** - "Ensure that its SPIRIT system includes the functionality to identify whether a surveillance request pertains to a field division priority threat."

**FBI Response to Recommendation #1:** Concur. The FBI will ensure that its SPIRIT system includes the functionality to identify whether a surveillance request pertains to a field division priority threat.

**Report Recommendation #2** - "Ensure that field divisions, through a centralized decision process, consider all surveillance operations when prioritizing the use of its aviation resources."

**FBI Response to Recommendation #2:** Concur. The FBI will ensure that field divisions, through a centralized decision process, consider all valid surveillance operations requests when prioritizing aviation resources.

**Report Recommendation #3** - "Ensure that BAO 2.0 has the ability to incorporate updates and additions to FBI investigative classification codes and similar data codes that can affect the accuracy and utility of the system's reporting."

**FBI Response to Recommendation #3:** Concur. The FBI will ensure that BAO 2.0 has the ability to incorporate updates and additions to FBI investigative classification codes and similar data codes.

**Report Recommendation #4** - "Ensure that field divisions are capturing, in a consistent manner, data on and the appropriate reason for all surveillance operations that would benefit from, but that did not receive, aviation support."

**FBI Response to Recommendation #4:** Concur. The FBI will ensure that field divisions are capturing, in a consistent manner, data on and the appropriate reason for all surveillance operations that would benefit from, but that did not receive, aviation support.

**Report Recommendation #5** - "Ensure that new Special Agents who are licensed pilots and interested in becoming Special Agent Pilots for the FBI are given the opportunity to maintain their flight qualifications."

**FBI Response to Recommendation #5:** Concur. The FBI agrees new Special Agents who are licensed pilots and interested in becoming Special Agent Pilots for the FBI should be given the opportunity to maintain their flight qualifications. This is accomplished in two ways: First, the FBI's Aviation Support Unit regularly reaches out to new agents in training when an FD-586 Aviator Qualifications Form is completed by a new agent. This outreach provides the new agent with immediate, valuable information regarding the FBI's flight program before they reach their first office of assignment and how they can become involved in flying with

[REDACTED]

the FBI. (See attached e-mails at Tab A). Second, on an as needed basis, FBI field offices canvass for pilots interested in joining the FBI's aviation program. (See Tab B).

**Report Recommendation #6** – "Review the results of its experimental non-agent pilot program to determine its success in alleviating pilot shortages."

**FBI Response to Recommendation #6:** Concur. As described in the attached White Paper (See Tab C), the FBI has reviewed the results of the experimental non-agent pilot program and determined it was successful in alleviating pilot shortages. As funded staffing levels permit at each field office, this program will be further expanded to alleviate the need for increased [REDACTED]

**Report Recommendation #7** – "Continually assess the effect of the new [REDACTED] system on its aviation personnel and operational needs."

**FBI Response to Recommendation #7:** Concur. The FBI will continue to assess the effect of the new [REDACTED] system on its aviation personnel and operational needs.

**Report Recommendation #8** – "Implement the anticipated reporting changes to identify when aircraft is unavailable due to maintenance separately from the other reasons why aircraft may be unavailable."

**FBI Response to Recommendation #8:** Concur. The FBI will implement reporting features to identify when aircraft is unavailable due to maintenance separately from other reasons why aircraft may be unavailable.

**Report Recommendation #9** – "Ensure that it examines the possibility of [REDACTED]"

**FBI Response to Recommendation #9:** Concur. The FBI will ensure that it examines the possibility of [REDACTED]

To that end, by communication dated 1/18/2012 (Attached at Tab D), the FBI's Surveillance and Aviation Section, Field Flight Operations Unit (FFOU) instructed [REDACTED]

[REDACTED] FFOU will coordinate same upon notification from each of the field offices.

**Report Recommendation #10** – "Develop a means to ensure that pilots always complete pre-flight risk assessment forms before all aviation missions."

**FBI Response to Recommendation #10:** Concur. To ensure compliance with pilots completing pre-flight assessment forms before all aviation missions, personnel from the Critical Incident Response Group will begin checking this requirement during on-site inspections by aviation program managers.

[REDACTED]

## APPENDIX III

### OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT

The OIG provided a draft of this audit report to the FBI. The FBI's response is incorporated in Appendix II of this final report. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

#### Recommendation Number:

1. **Resolved.** The FBI concurred with our recommendation to ensure that its SPIRIT system includes the functionality to identify whether a surveillance request pertains to a field division priority threat.

This recommendation can be closed when we receive evidence that the FBI's SPIRIT system includes the functionality to identify whether a surveillance request pertains to a field division priority threat.

2. **Resolved.** The FBI concurred with our recommendation to ensure that field divisions, through a centralized decision process, consider all surveillance operations when prioritizing the use of its aviation resources.

This recommendation can be closed when we receive evidence that FBI field divisions, through a centralized decision process, consider all valid surveillance operation requests when prioritizing the use of their aviation resources.

3. **Resolved.** The FBI concurred with our recommendation to ensure that BAO 2.0 has the ability to incorporate updates and additions to FBI investigative classification codes and similar data codes that can affect the accuracy and utility of the system's reporting.

This recommendation can be closed when we receive evidence that BAO 2.0 has the ability to incorporate updates and additions to FBI investigative classification codes and similar data codes.

- 4. Resolved.** The FBI concurred with our recommendation to ensure that field divisions are capturing, in a consistent manner, data on and the appropriate reason for all surveillance operations that would benefit from, but that did not receive, aviation support.

This recommendation can be closed when we receive documentation that field divisions are capturing, in a consistent manner, data on and the appropriate reason for all surveillance operations that would benefit from, but that did not receive, aviation support.

- 5. Resolved.** The FBI concurred with our recommendation to ensure that new Special Agents who are licensed pilots and interested in becoming Special Agent Pilots for the FBI are given the opportunity to maintain their flight qualifications. The FBI stated that it accomplishes this in two ways. One, the FBI stated that its Aviation Support Unit regularly reaches out to new agents in training who complete the FBI's Aviator Qualifications Form. The FBI stated that this outreach provides new agents with information regarding the FBI's aviation program before they reach their first office of assignment. The FBI provided examples of communication between aviation program staff and new agents in training who completed the FBI's Aviator Qualifications Form. In addition to these examples we request that the FBI provide the OIG documentation on the FBI's procedure to ensure that all new trainees receive the Aviator Qualifications Form and are provided basic instructions on becoming a pilot for the FBI.

Two, the FBI stated in its response that, on an as needed basis, FBI field divisions solicit agents interested in joining the FBI's aviation program. With its response to the report, the FBI provided evidence that this type of solicitation recently occurred in one field division.

This recommendation can be closed when we receive documentation of the process by which the FBI regularly solicits Aviator Qualifications Forms from new agents in training and additional evidence that, on an as needed basis, the FBI attempts to recruit agents with flight experience to help address pilot shortages in its field divisions.

6. **Closed.** The FBI concurred with our recommendation to review the results of its experimental non-agent pilot program to determine its success in alleviating pilot shortages. The FBI provided with its response a summary of its review of the non-agent pilot program, which included specifics on the FBI's ability to address pilot shortages in certain field offices and its plan for expanding the program to other offices. The FBI further stated that it will expand its non-agent pilot program at each field office as funded staffing levels permit.

Based on our review of the information provided by the FBI, we determined that the FBI adequately addressed our recommendation. Therefore, this recommendation is closed.

7. **Resolved.** The FBI concurred with our recommendation to continually assess the effect of the new [REDACTED] system on its aviation personnel and operational needs.

This recommendation can be closed when we receive documentation of the FBI's assessment of the effect of the new [REDACTED] system on its aviation personnel and operational needs over the course of a 12-month period.

8. **Resolved.** The FBI concurred with our recommendation to implement the anticipated reporting changes to identify when aircraft is unavailable due to maintenance separately from the other reasons why aircraft may be unavailable.

This recommendation can be closed when we receive documentation of the reporting features that identify when aircraft are unavailable due to maintenance separately from other reasons why aircraft may be unavailable.

9. **Resolved.** The FBI concurred with our recommendation to ensure that it examines the possibility of [REDACTED]. Specifically, the FBI's Surveillance and Aviation Section, Field Flight Operations Unit, has instructed [REDACTED] in FY 2012.

This recommendation can be closed when we receive documentation that the [REDACTED].

- 10. Resolved.** The FBI concurred with our recommendation to develop a means to ensure that pilots always complete pre-flight risk assessment forms before all aviation missions. The FBI stated in its response that, to ensure compliance with pilots completing pre-flight assessment forms, personnel from the Critical Incident Response Group will begin checking this requirement during on-site inspections by aviation program managers. We believe this is a good addition to an on-site inspection of a field division's aviation program. However, a periodic review such as an on-site inspection does not best ensure that each risk assessment is performed *before* each take off. We believe that the FBI should institute a control that better enables it to ensure its pilots are completing risk assessment forms before aviation missions. As we noted in our report, we found during our review that risk assessments may not be prepared by pilots until *after* the flight.

This recommendation can be closed when we receive evidence that the FBI has developed a means for better ensuring that pilots are completing pre-flight assessment forms before all aviation missions.