Memorandum

Subject:	**ACTION:** Program Guidance Letter 12-11 AIP Eligibility for Geographic Information Systems (GIS) and FAA Airports GIS (AGIS) Data Collection	Date:	August 17, 2012
From:	Frank San Martin *Joe Bebert for* Manager, Airports Financial Assistance Division, APP-500	Reply to Attn. of:	Nancy S. Williams 202-267-8822
To:	PGL Distribution List		

This Program Guidance Letter:

1. Establishes parameters for the eligibility of costs involved with aeronautical surveys in support of the FAA's Airports GIS program.

2. Explains the ineligibility of acquisition, license or subscription fees for either stand-alone GIS hardware and software or commercially available GIS data management systems.

3. Describes certain circumstances when specific software costs may be eligible for a limited duration in support of an approved planning purpose.

SOAR Code: Varies (Project
Code PL PL GI is only valid for
airports in the GIS Pilot Program
and may not be used for other
projects.)

A. BASIC ELIGIBILITY GUIDANCE

1. Surveying costs and data collection, including data collection in support of the Airports GIS program, is not eligible as a stand-alone AIP project.

2. Data collection in support of the Airports GIS program is eligible as an allowable cost of an AIP project under any one of the following three circumstances:

   a) The scope of the data collection is directly required by a specific AIP-funded project or master planning project, and the collection of the data is required under AC 150/5300-18 to complete the project[1];

   b) Limited data collection for anything beyond the scope of the AIP-funded project, before being required to do so by the FAA Transition Policy, may be eligible only if *all* of the following conditions are met:

      i)   The airport is already collecting data for a specific AIP funded project.

      ii) The grant in which the data collection is to be included includes the following special condition:

      "The sponsor recognizes, understands and agrees that they are undertaking data collection in advance of being required to do so, and before the FAA finalizes the data collection requirements through the Airports GIS Pilot Program. Therefore, there is a risk that portions of the data collection may have to be repeated at a later time if the requirements change. The costs of the repeated data collection may not be eligible for reimbursement."

      iii) The extent of data collection that will be funded with AIP must be limited to the collection of data required for an electronic ALP. Data collection beyond that is not allowable and the costs associated with collecting these data are not allowable.

      iv) The airport has received approval in advance of issuing the grant from the Regional Office or Airports District Office program manager to collect data beyond the scope of the AIP project. In order to approve an airport's request, the Regional Office or Airports District Office must have determined that the scope of work associated with the data collection effort to ensure that only allowable items are included for grant funding and that any proposed proration of common items is fairly prorated. The scope of work must specifically identify the proposed data collection that is beyond the needs of the safety-critical data requirements.

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[1] For AIP-funded projects, as-built information must also be submitted consistent with the requirements for geospatial data.

       The Regional Office or Airports District Office program manager must initial and date a note to the file indicating that they have reviewed the scope of work and cost proration and concur with the scope and proration.

   c) If the airport was given a grant in Airports GIS Pilot Program and the work is part of that grant. Note that SOAR Project Code PL PL GI that was used to indicate projects in the Airports GIS Pilot Program must not be used for future projects.

3. A specifically allocated portion of the costs of software licensing and/or subscription may be an allowable cost in an AIP funded project, but only for that portion of the cost that is directly attributable to a specific, FAA-approved planning purpose—and only for the duration of the approved planning effort. See additional requirements under Section D.

4. Most airport sponsors rely upon consultants to professional surveying, planning and engineering services to assist in such data collection. In turn, most consultants use hardware and software that they have already acquired, and include an allocated portion of the costs of the hardware and software in their billing rates. This PGL does not change the way that allowable costs for consultant services are calculated. Therefore, the associated costs of such consultant services are generally eligible for AIP or PFC funding if approved in advance as part of an approved planning project or as part of the design of a development project.

5. In accordance with current requirements, an airport that proposes providing the data collection using its own personnel must meet the requirements for the use of Sponsor's Force Account, as outlined in Section 13 of Chapter 12 of FAA Order 5100-38, the Airport Improvement Program Handbook before the Regional Office or Airports District Office program manager can approve the data collection effort.

The following costs are not eligible for AIP funding:

1. Data collection beyond what is required for either a comprehensive planning study or an AIP-funded project, except as provided under Paragraph 2.b).

2. Acquisition (purchase or lease) of computer hardware or software for GIS applications, except as provided under Paragraphs 3 and 4.

B. BACKGROUND

Geographic Information Systems (or Geospatial Information Systems, both commonly referred to as "GIS") have become widely recognized for the many benefits they offer to airport owners and operators. GIS supports a broad range of capabilities including facility planning, engineering, facility management, concessions and revenue management, environmental coordination and a full range of operational functions. Providers of GIS software are increasingly combining GIS capabilities with operational simulation and real-time operations systems as well.

The hardware and software platforms that support GIS are continuing to evolve rapidly. Many airports have established internal GIS capabilities, purchasing the necessary hardware and software and hiring staff or consultants to collect, enter and manage the associated data. At least one entity is providing web-based GIS capability for airports that do not have the resources to establish a full in-house capability.

C. INELIGIBILITY OF GIS HARDWARE AND SOFTWARE

The statutory requirements for acquisition of equipment are clear. Under Title 49 USC, Section 47102(3)(b) equipment is not eligible for AIP funding, except where specifically provided for in the statute, unless it is required by regulation or approved by the Secretary as "contributing significantly to the safety or security of individuals and property at the airport."

GIS hardware and software are not expressly provided for in the AIP statute, nor required by regulation nor approved by the Secretary as significantly contributing to on-airport safety or security. Therefore, AIP funds (and, by extension, PFC funds) cannot be used for the acquisition (purchase or lease) of computer hardware or software for GIS applications.

D. SHORT-TERM ELIGIBILITY OF SOFTWARE FOR PLANNING PROJECTS

FAA Order 5100.38C, Para. 405(u) provides (in part) eligibility for:

> Acquisition, licensing, and use of commercially available computer software including simulation models and other applications dedicated to the study when warranted to accomplish an approved planning purpose. For instance, an information management system may be eligible if directly related to eligible airport planning elements.

Therefore, the FAA Regional Office or Airports District Office program manager may approve sponsor requests, on a case-by-case basis, to include a specifically allocated portion of the costs of software acquisition, licensing and/or subscription, but only for that portion of the cost that is directly attributable to a specific, FAA-approved planning purpose—and only for the duration of the approved planning effort.

Because most planning efforts are conducted by a design or planning consultant, it is anticipated that the costs of this software would be included in the planning consultant's fees to complete the planning project. Unless the airport itself is preparing the specific planning study (without the assistance of a planning consultant), the costs for *airport* acquisition of software is not allowable.

The FAA program manager must include an initialed and dated note to the project file indicating that the program manager has reviewed the proposed costs of software acquisition, licensing and /or subscription and has determined that the costs are allowable.

E. FAA AIRPORTS GIS DATA COLLECTION

The FAA is required by both statute and regulation to provide a number of functions and services that require highly accurate geospatial information about airfield infrastructure and particularly the aircraft movement area. The FAA is also required by Executive Order to transform outdated, inconsistent data standards and practices to take full advantage of available technologies to enhance consistency and accuracy.

Therefore, in June 2010, the FAA published initial interim guidance[2] for the implementation of the FAA Airports GIS, as part of its plan to implement GIS and related

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[2] The latest version of the *Implementation Guidance for Airports GIS* can be found online at:
http://www.faa.gov/airports/planning_capacity/airports_gis_electronic_alp/

standards into all parts of the FAA.

The FAA's Airports GIS Transition Policy outlines a phased approach to implementing the Airports GIS requirements. Under that policy, all projects involving safety-critical data and commencing must fully comply with the FAA Airports GIS standards. Other projects would have to comply with Airports GIS standards based on the following timetable, for planning or design work starting after the FAA issues the Transition Policy:

- FY 2012 – Large Hub and Medium Hub Airports
- FY 2013 – Small Hub Airports
- FY 2014 – Nonhub Airports
- FY 2015 – Nonprimary Airports certificated under Part 139 or with an ATCT
- Other Nonprimary Airports in the National Plan of Integrated Airport Systems (NPIAS) are exempt from incorporating AC 150/5300-18 standards for projects not including safety-critical data until further notice.

AC 150/5300-18 established standard formats for the collection and input of airport data, in order to integrate that data in a central repository that will enable FAA and users to make real-time decisions based on best available data, which supports safe and efficient aviation activities across the national airspace system and its supporting navigation and airport infrastructure.

Among other steps, the FAA's implementation guidance reiterates earlier changes in aeronautical surveying requirements, and established standards and procedures for collecting, validating and submitting that data to the FAA.

The FAA recognizes that some airport sponsors may wish to integrate the FAA-required data with additional datasets to support broader facility management, operational, financial and environmental coordination activities and functions. The FAA is taking steps to make its Airports GIS data available to airport owners and operators (as well as consultants) through a web-based portal.

Therefore, if an airport wishes to integrate the FAA-required data with other GIS datasets, then the airport must secure the necessary platform to do so at their own expense, as with any other airport operating expense.

F. FAA AIRPORTS GIS PILOT PROGRAM

The FAA's June 2010 interim guidance established parameters for the Airports GIS Pilot Program. Under the Pilot Program, the FAA provided AIP grants to several airports in varying categories to undertake a variety of data collection efforts.

In all cases, the Pilot Program grants funded data collection through professional consultant services. The purpose of the Pilot Program is to help validate and refine the FAA's technical standards and associated guidance; verify assumptions about benefits, costs, resources and timeframes; and refine the FAA's comprehensive transition plan. As the Pilot Program studies are completed, the FAA will publish updated and/or supplemental guidance.