



U.S. Department
of Transportation

**Federal Aviation
Administration**

Office of the Administrator

800 Independence Ave., SW.
Washington, DC 20591

August 19, 2020

The Honorable Roger Wicker
Chairman, Committee on Commerce,
Science, and Transportation
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

As required by Section 216 of the Federal Aviation Administration Reauthorization Act of 2018 (Public Law 115-254), the Administrator of the Federal Aviation Administration (FAA) is to provide a report to the appropriate committees of Congress on the Administration's progress with respect to: (1) determining what additional model input and labor distribution codes are needed to identify Organization Designation Authorization (ODA) oversight staffing needs; (2) developing and implementing system-based evaluation criteria and risk-based tools to aid ODA team members in targeting their oversight activities; (3) developing agreements and processes for sharing resources to ensure adequate oversight of ODA personnel performing certification and inspection work at supplier and company facilities; and (4) ensuring full utilization of ODA authority. This letter provides the report.

The ODA program is the means by which the FAA authorizes an organization to act as a representative of the FAA, allowing the organization to conduct inspections and tests, and to issue certificates on behalf of the FAA. ODA holders must meet certain qualification requirements, including sufficient experience and expertise in FAA certification processes, in order to receive such authorization. They must have a staff of qualified individuals and comply with an approved ODA procedures manual. The FAA monitors ODA performance through a rigorous oversight program.

1) Additional Model Input and Labor Distribution Codes Needed to Identify ODA Oversight Staffing Needs

The need for this information was identified in recommendation 1 of the October 15, 2015 Department of Transportation Office of Inspector General (OIG) Audit Report, *FAA Lacks an Effective Staffing Model and Risk-Based Oversight Process for Organization Designation Authorization* (AV-2016-001).

In its report, the OIG recommended that the FAA, “[d]etermine what additional model inputs and labor distribution codes are needed to identify ODA oversight staffing needs and report the results to the Aircraft Certification Management Team.” The OIG closed this item on September 5, 2017, based on the FAA’s identification of ODA oversight staffing model inputs and labor distribution codes needed to identify staffing needs. The closure was accomplished through a revision to the FAA Office of Aviation Safety (AVS) Staffing Tool and Reporting System (ASTARS) for Aircraft Certification Service field offices and the Boeing Aviation Safety Oversight Office (BASOO). The updated ASTARS model includes additional input and labor distribution codes to improve identification of ODA oversight activities and the hours of work performed by FAA employees involved in ODA oversight. For example, new labor distribution codes were added to identify Aircraft Certification Office activities. These include designee management, designee training, delegated organization certification activities, technical issue resolution, procedures manual reviews, program notification letter/certification plan review, notification of noncompliance, policy development, and oversight/surveillance. Additionally, the ASTARS model was expanded to include oversight activities for the BASOO.

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3) Development of Agreements and Processes for Resource Sharing

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4) Full Utilization of ODA Authority

In addition to the Section 216 requirement to report on the FAA's progress in ensuring full utilization of ODA authority, Section 212(a) of the FAA Reauthorization Act of 2018 added 49 U.S.C. § 44736(a), which directs the FAA to "delegate fully to the ODA holder each of the functions to be performed as specified in the procedures manual, unless the Administrator determines ... that the public interest and safety of air commerce requires a limitation ...".

Since the inception of the ODA program, the FAA has sought to achieve an effective and efficient level of delegation for those functions for which ODA holders have demonstrated capability. Through the ODA scorecard initiative, which began in 2015, the FAA and industry have endeavored to improve their working relationships and make the program more efficient. The ODA scorecard is an initial initiative used to promote ongoing efforts between the FAA and ODA holders to identify and address issues that might impede the efficient use of ODA delegation, while ensuring safety. The FAA will continue to adjust the means by which performance and risk are assessed for the level of delegation, as well as for ODA oversight, based on any recommendations resulting from the work of the ODA Expert Review Panel recently formed per section 213 of the FAA Reauthorization Act of 2018. Additionally, we are already addressing ODA related recommendations included in our April 2020 response to the Official Report of the Special Committee to Review the FAA's Aircraft Certification Process. Recommendations from other evaluations currently underway may also be considered.

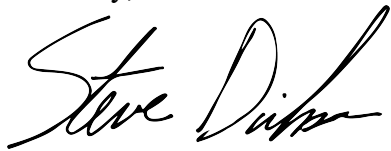
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Additionally, to support implementing section 212(a) of the FAA Reauthorization Act of 2018, the FAA is developing new policy and guidance for FAA personnel on how to properly "delegate fully" and work with ODA holders to remove unnecessary limitations as directed by Congress.

We have sent identical letters to Chairman DeFazio, Senator Cantwell, and Congressman Graves.

If I can be of further assistance, please contact me or the Office of Government and Industry Affairs, at (202) 267-3277.

Sincerely,

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Steve Dickson
Administrator



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The Honorable Peter A. DeFazio
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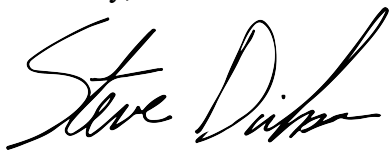
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