

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8100.20

National Policy

Effective Date:
March 2, 2026

Cancellation Date:
March 2, 2027

SUBJ: Organization Designation Authorization (ODA) Holder Ethics Training for Unit Members (UM) and Administrators

1. Purpose of this Notice. This Notice provides initial implementation of a new statutory requirement for ODA holders to develop and provide ethics training for all ODA unit personnel. The FAA intends that the policies contained in this Notice will be incorporated into a future revision of FAA Order 8100.15, Organization Designation Authorization Procedures. To the extent that this Notice conflicts with FAA Order 8100.15, the contents of this Notice supersede that of the Order.

2. Audience. The audience for this Notice includes ODA applicants, holders, UMs, and administrators; and the FAA offices that provide ODA oversight.

3. Where can I Find This Notice? FAA employees can find this Notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices/ and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>. The public can find this Notice on the FAA's website at https://www.faa.gov/regulations_policies/orders_notices/ and DRS.

4. Background.

a. The FAA has statutory authority to delegate, to qualified persons and their employees, certain functions related to the issuance of certificates per Title 49 of the United States Code (49 U.S.C.) section 44702(d). Such persons may include organizations, and 49 U.S.C. § 44736, Organization Designation Authorizations, places certain obligations on the FAA and on ODA holders. Additionally, Title 14, Code of Federal Regulations (CFR) Section 183.53 requires each ODA holder to have an FAA-approved procedures manual, and that such manual includes the training requirements for ODA unit personnel.

b. The FAA Reauthorization Act of 2024, Pub. L. No. 118-63 (May 16, 2024) (the Act) added several provisions specific to the FAA's oversight of ODA holders. Section 304 of the Act, Training of Organization Delegation Authorization Unit Members, amended 49 U.S.C. § 44736 by adding paragraph (g), Ethics Training Requirement for ODA Holders. 49 U.S.C. § 44736(g) requires the FAA to ensure that each ODA holder has in effect a recurrent training program, reviewed by the FAA, for all ODA UMs. 49 U.S.C. § 44736(g) also requires each ODA unit member to complete such ethics training within 60 business days of appointment and annually thereafter. 49 U.S.C. § 44736(g) also requires the FAA to establish the necessary processes to ensure that this training occurs.

c. This Notice implements 49 U.S.C. § 44736(g) for all ODA holders and UMs and extends such ethics training to ODA administrators.

5. ODA UMs and Administrators Ethics Training Program Requirements.

a. ODA holders must develop and provide recurrent annual ethics training to all ODA UMs and administrators. The training must address the following:

(1) UM Professional obligations and responsibilities;

(a) Commitment. Each ODA UM and administrator understands and supports the ODA holders' commitment to ensure that authorized functions are properly performed and must use the same care, diligence, judgment, and responsibility when performing the functions as the FAA would use in performing them.

(b) Conduct Authorized Functions. Each UM must conduct only those authorized functions approved in the ODA PM.

(c) Follow Guidance. UMs must follow all requirements found in regulations, orders, and other guidance related to the functions they perform.

(d) Maintain Skills and Knowledge. UMs must maintain technical skill and knowledge of subject matter specific to the designation held.

(e) Exhibit Sound Judgment. UMs must display sound judgment.

(f) Exhibit Integrity. UMs must show a high degree of integrity, responsibility, and professionalism.

(2) ODA holders with an organization that has an existing safety management system (SMS) required by 14 CFR Part 5, or an SMS implemented under the FAA SMS Voluntary Program (SMSVP), or an SMS implemented under any other requirements, must provide training on the code of ethics contained within the Safety Policy of the SMS. The ODA holder must ensure the training includes clarification that safety is the organization's highest priority;

(3) ODA holders with an organization that is not required to have an SMS must develop and provide training on the ODA holder's code of ethics that identifies that safety is the organization's highest priority;

(4) Procedures for reporting safety concerns, as described in the respective FAA approved procedures manual for the delegation (14 CFR §§ 183.63 and 183.65 as applicable);

(5) The prohibition against and reporting procedures for interference described in 49 U.S.C. § 44742 and revision C to FAA Order 8100.15; and

(6) Safety management systems training that includes;

(a) Training that promotes a clear understanding among ODA UMs and administrators about the purpose of and procedures associated with SMS.

(b) The provisions of the third edition of the Safety Management Manual (SMM) issued by the International Civil Aviation Organization (Doc 9859) (or any successor edition).

b. The ODA holder's procedures manual (PM) training section must specify:

(1) Once the Organization Management Team (OMT) approves the ODA holder's revised PM incorporating ethics training, existing ODA UMs and administrators must complete the required ethics training within 60 business days, prior to performing authorized functions and responsibilities under the ODA.

Note: For ODA holders with existing training material that the OMT determined as having satisfied the requirements outlined in paragraph 5 of this Notice, the ODA UMs and administrators do not need to retake the training if it was completed in the previous 12 months. However, ODA UMs and administrators must meet the annual recurrent training requirement established by this Notice prior to performing authorized functions and responsibilities under the ODA.

(2) A newly appointed ODA UM or administrator must complete the required ethics training within 60 business days after being appointed as an ODA UM or administrator.

(3) To continue to meet the annual ethics training requirements, the ODA UM or administrator must have completed the ethics training in the previous 12 months prior to performing authorized functions and responsibilities under the ODA.

(4) Actions that the ODA holder must take to preclude any ODA UM or administrator who does not complete the required ethics training from performing authorized functions and responsibilities under the ODA until the training is completed.

c. Within 90 calendar days of this Notice issuance, the ODA holder must provide ethics training material and a proposed revision of the ODA holder's PM training section to their respective OMT lead.

6. FAA Actions.

a. Within 60 calendar days of receiving the ODA holder's proposed ethics training materials and proposed PM revision, the OMT will review the submission for compliance with the requirements of 49 U.S.C. § 44736(g), as detailed in paragraph 5 of this Notice. The OMT will upload the proposed training material accompanied by the OMT's comments to the ODA Office's (AVS-60) OMT Data Portal.

(1) If acceptable, the OMT will notify AVS-60 per paragraph 8 of this Notice.

(2) If not acceptable, the OMT will notify the ODA holder in accordance with FAA Order 8100.15 and return the ethics training program or PM to the ODA holder for correction and resubmittal.

b. Within 30 calendar days of receipt, AVS-60 will review, evaluate, and determine if the ODA holder's training material is compliant with the requirements of 49 U.S.C. § 44736(g) as detailed in paragraph 5 of this Notice, and notify the corresponding OMT.

c. Within 14 calendar days of AVS-60 notification specified in paragraph 6.b of this Notice, the OMT will inform the ODA holder whether the training material and proposed revision of its ODA PM are compliant with requirements of paragraph 5 of this Notice.

(1) If acceptable, the OMT will approve the proposed PM revision in accordance with FAA Order 8100.15, indicating ethics training is approved and will notify AVS-60 per paragraph 8 of this Notice.

(2) If not acceptable, the OMT will notify the ODA holder in accordance with FAA Order 8100.15 and return the ethics training program and PM to the ODA holder for correction and resubmittal.

7. Accountability.

a. If an ODA holder fails to submit its proposed ethics training materials and proposed PM revision within 90 calendar days of the issuance of this Notice, the ODA holder may request an extension. The OMT lead will notify the appointing office manager to request an extension. In the event an extension is not approved or appropriate, the OMT lead will initiate the suspension process.

b. If the OMT is unable to approve the ODA holder's PM within 194 calendar days of the issuance of this Notice, the OMT lead will notify the appointing office manager to request an extension or initiate the suspension process.

c. The OMT must notify AVS-60 when an ODA holder's PM has been approved, or of any suspension or extension requests.

8. AVS-60 Data Needs Supporting Implementation. To support the successful implementation of this policy, OMT leads (or delegates) are required to submit the following information to AVS-60 via the OMT Data Portal:

- Whether ODA holder is required to have an SMS;
- Date ODA holder proposed ethics training materials and proposed PM revision submitted to OMT;
- Date OMT completes its review;
- ODA holder proposed ethics training materials;
- Date OMT approved revised ODA holder's PM; and
- Date ODA holder notified of PM approval.

9. Deviations. It is necessary to adhere to the procedures contained in this Notice in order to achieve uniform administration of this directive material. Any deviation to this Notice must be approved by AVS-60.

10. Disposition. Direct questions or comments concerning the information in this Notice to 9-AVS-ODA-OFFICE@faa.gov. AVS-60 welcomes and will consider all suggestions or comments regarding this Notice.

 Digitally signed by Tina Amereihn
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