



**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION**

National Policy

**ORDER  
VS 1100.2C**

Effective date:  
02/29/2024

**SUBJ:** Managing AVS Delegation Programs

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- 1. Purpose of This Order.** This order provides direction for the management of Aviation Safety (AVS) delegation programs.
- 2. Audience.** This order applies to AVS services, offices, and personnel involved in the development of designee policy, tools, training, and the management of designee programs.
- 3. Where Can I Find This Order.** You can find this order on the [Orders and Notices](#) website on the MyFAA employee website. FAA employees can access this order through the [Dynamic Regulatory System](#) (DRS). This order is available to the public on the FAA's [Orders and Notices](#) website.
- 4. What This Order Cancels.** FAA Order VS 1100.2B, Managing AVS Delegation Programs, dated November 3, 2014, is canceled.
- 5. Definitions.** For the purposes of this order, the following definitions apply.
  - a. Delegation.** Authorizing an organization or individual to perform functions on behalf of the FAA Administrator in accordance with title 49 U.S.C., section 44702(d).
  - b. Designee.** Private persons (i.e., individuals or organizations) delegated to act as representatives of the Administrator in accordance with title 49 U.S.C., section 44702(d).
  - c. Oversight.** Act of reviewing designee performance to determine sufficiency.
  - d. Risk.** An expression of the impact of an undesired event in terms of event severity and event likelihood.
  - e. Risk Management.** Any activity designed to ensure that risk is identified and eliminated or controlled within established risk parameters.
  - f. Risk-Based.** A term used to imply the use of risk management techniques and tools.
  - g. Appointing Official.** The person with authority to issue the Letter of Designation or Certificate Letter of Authority (CLOA). This person may or may not be the selecting official.
  - h. Selecting Official.** The person with authority to determine the eligibility of a designee for consideration of appointment. This person may or may not be the appointing official.

**i. Specialist.** The person assigned as a Managing Specialist (MS) for individual designees, or an FAA Organization Management Team (OMT) member for an Organization Designation Authorization (ODA). This also includes OMT leads, which are specialists that serve as the focal point for communication with an ODA holder.

**6. Delegation Vision.** AVS delegation programs leverage agency resources; respond to changes in workloads and aviation industry needs; demand the highest technical and ethical standards from designees; and ensure public, governmental, and industry confidence in aviation safety through strict compliance with certification policies and regulations. AVS delegation programs are to be designed to create and maintain the use of delegation as an efficient and effective tool for leveraging industry expertise in support of the Administrator's roles in accordance with title 49 U.S.C. section 44702(d).

**7. Delegation Principles.** The principles on which this vision is based should be implicit in the development and implementation of policy, tools, and training, as well as in the day-to-day management of AVS delegation programs:

**a. Delegation is Essential to AVS.** Delegation programs are essential to the AVS mission, and the integrity of the delegation system must be maintained. Therefore, management of delegation programs is inherently governmental and must be a top priority within AVS.

**b. Designation is a Privilege.** Designees serve the needs of the FAA in fulfilling its safety mission, allowing the FAA to leverage its resources. Designation is a privilege that conveys responsibilities but does not imply employment or other rights unrelated to FAA needs. Pursuant to 49 U.S.C. section 44702(d)(2), the FAA may rescind a delegation at any time for any reason the FAA considers appropriate.

**c. Designees Must Be Knowledgeable, Qualified and Competent.** All designee qualifications must be defined in objective standards that guide selection, oversight, training, and termination decisions; designees have responsibility for maintaining their knowledge and qualifications. The FAA must evaluate designee competence at time of selection and, if appointed, on an on-going basis.

**d. Administration of Delegation Programs Must Employ a Risk Management Approach.** Effective use and oversight of designees requires a risk management approach that utilizes oversight based on differences in the potential impact on safety and the likelihood of error. Sufficient resources must be allocated to ensure effective management and efficient oversight of designees. Resources include, but are not limited to, clear policy, appropriate databases and surveillance tools, and training for oversight personnel and designees.

**e. Delegation Program Evaluations are Essential.** Regular evaluations of each delegation program are required to improve designee and oversight staff performance. These evaluations will be accomplished at all levels of the organization to assess program effectiveness and efficiency.

## 8. Roles and Responsibilities.

**a. ODA Office, AVS-60.** AVS-60 is tasked to enhance aviation safety and efficiency by partnering with FAA and industry stakeholders to improve the health and effectiveness of all AVS delegation programs. AVS-60 will define what constitutes a healthy and effective delegation system and implement corresponding measures; promote the sharing of best practices with internal stakeholders through communities of practice and other forums; set strategic direction for AVS delegation programs with input from key FAA and external stakeholders; and develop, issue, and ensure effective and consistent implementation of AVS delegation policy. AVS-60 has overall responsibility for the management of foundational AVS delegation program policies, foundational information technology (IT) tools, and foundational training, as noted below:

(1) Policy. In addition to the foundational policy directives identified below, AVS-60 will issue associated directives, policy statements, guidance documents, and memoranda necessary to enhance AVS delegation programs.

(a) FAA Order VS 1100.2, Managing AVS Delegation Programs. The authority to revise, deviate, or cancel material in this order resides with AVS-60. AVS-60 will coordinate changes with the Office of Aerospace Medicine (AAM), Air Traffic Safety Oversight Service (AOV), Aircraft Certification Service (AIR), and Flight Standards Service (FS).

(b) FAA Order 8000.95, Designee Management Policy. AVS-60 will be responsible for coordinating and managing order revisions. AVS-60 will be responsible for the content of Volume 1.

**Note:** AVS-60 will coordinate and approve deviations to Volume 1, notifying the service/offices. Service/offices identified in Table 1-1 of FAA Order 8000.95 will be responsible for the content of Volumes 2 through 10. Specific changes requested by service/offices must be provided to AVS-60, which will coordinate with the other organizations to ensure consistency and alignment with Designee Management System (DMS) policy.

(c) FAA Order 8100.15, Organization Designation Authorization Procedures. The authority to revise, deviate, or cancel material in this order resides with AVS-60, in coordination with AIR and FS, as appropriate. Improvements associated with this order will establish a risk-based decision-making process, which may be in a document separate from the order. AVS-60 is responsible for having subject matter experts (SME) to support field office inquiries related to this foundational policy. This includes support for evaluation panels when determined necessary.

(2) Information Technology Tools. IT systems are necessary to support AVS designee management programs. AVS-60 is responsible for managing the foundational designee data management tools, as well as applicable historical delegation program data system archives. AVS-60 shall develop new tools or update existing tools as necessary to enhance the health and effectiveness of the AVS delegation system. The foundational IT tools include, but are not limited to, the DMS and the Designee Registration System. AVS-60 will also provide analytical

analysis of the data collected and provide reports to the services/offices, as determined necessary.

(3) **Training.** AVS-60 will manage and maintain the foundational initial and recurrent training courses that have overall applicability to FAA employees and managers that manage designee programs. AVS-60 will coordinate with the AVS Delegation Steering Group (DSG) and the appropriate AVS service/office training branches on the development of any new or updated training content and course requirements separate from this order. Training programs may include web-based training or real-time instructor led training (e.g., classroom, distance learning, virtual, or on-the-job training), as appropriate.

(4) **Additional AVS-60 Responsibilities.** AVS-60 will:

(a) Provide service/offices with any training content necessary for ensuring the consistent application of delegation-related training across AVS;

(b) Provide leadership of the AVS DSG, including scheduling regular meetings and maintaining a DSG charter, if one is determined necessary;

(c) In coordination with the DSG, task and/or charter teams to make proposals on specific issues or areas needing improvement; and

(d) Maintain a means to receive and respond to feedback.

**b. AVS Delegation Steering Group.** This order establishes an AVS DSG consisting of representatives from AVS-60 and each AVS service/office with individual or organizational delegation programs. DSG members are responsible for representing the needs and issues of their service/office in support of continuous improvement of AVS delegation programs. Additional details may be defined in a DSG charter, if determined necessary.

**c. Service/Office Level Roles and Responsibilities.**

(1) FAA Order 8000.95, Designee Management Policy. Each service/office identified in Table 1-1 of FAA Order 8000.95 will coordinate and approve deviations to Volumes 2 through 10. Such deviations do not require pre-coordination with AVS-60. Once a deviation is granted, the issuing service/office must provide an electronic copy of the initiating request and the deviation memorandum to AVS-60 at [9-AVS-ODA-Office@faa.gov](mailto:9-AVS-ODA-Office@faa.gov). Deviation requests affecting more than one organization or that may require changes to DMS automation must be coordinated across the affected organizations and with AVS-60.

(2) **Management and Oversight of Designees.** Each service/office is responsible for managing their designees in accordance with section 9 below and for conducting designee oversight in accordance with the AVS-60 managed foundational policy and documenting oversight within the foundational IT tools. Foundational designee policies include the current edition of FAA Order 8000.95 and Order 8100.15, which are managed by AVS-60 with support from service offices to ensure consistency and alignment across FAA delegation programs.

(3) Information Technology. As part of the continuous improvement process, each service/office will review the effectiveness of delegation program automation tools to determine if improvements are necessary. Improvement recommendations impacting automation should be submitted to AVS-60.

(4) Oversight Staff Qualifications. Each service/office must ensure qualification requirements are met. Depending on the complexity or risk associated with the work performed, additional requirements may be identified.

(5) Oversight Staff Training. Each service/office must ensure their specialists receive the foundational initial and recurrent delegation training required by AVS-60 policy. Each service/office must also ensure those who manage the specialists complete required training. Service/offices may supplement the above referenced training with any additional training they determine necessary.

(6) Designee Training. Each service/office will develop initial and recurrent training for their designees in accordance with paragraph 9.g. below. They are also responsible for ensuring that their designees complete all required training by the due dates required.

(7) Subject Matter Experts. Each service/office will provide SMEs for each individual designee type managed by their service/office. SMEs are responsible for responding to incoming requests from specialists, designees, and applicants for their individual designee type and providing user support for related policy and DMS business process needs.

(8) Data Analysis. Each service/office will conduct quality assurance (QA)/data analysis risk assessments for designees it manages.

(9) Continuous Improvement. Each service/office must have mechanisms to receive feedback about its delegation program(s). The responsible service/office must establish a process to evaluate and respond to feedback regarding its use of AVS delegation program(s).

(10) Delegation Program Evaluation. Each service/office must develop, manage, and administer an evaluation process for its delegation program(s). The delegation system consists of two levels: management of the delegation program and management of designees. Each service/office must develop and maintain methodologies to evaluate their delegation program(s) using risk management principles. In addition, all aspects of the delegation program(s), including sufficiency of policy, process, documentation, training, tools, and audits, will be periodically evaluated. Evaluations must include assessment of both delegated organizations and individual designees on performance, technical proficiency, and judgment.

## **9. Managing Designees.**

### **a. General.**

(1) For Individual Designees. The primary responsibility for managing individual designees resides with the specialist. The specialist's first level supervisor is responsible for

evaluating the specialist's performance and ensuring adherence to policy. Additional levels of accountability may be necessary depending on the service/office's organizational structure.

(2) For Delegated Organizations. The primary responsibility for managing delegated organizations will be an assigned team of specialists qualified to provide oversight for all aspects of the organization's authority. The team leader is responsible for the oversight of the delegation and reports to the next level of management.

(3) AVS-60 managed foundational policies must address the following elements:

- (a) Application, selection, appointment;
- (b) Training and orientation;
- (c) Oversight;
- (d) Extension of expiration date or renewal;
- (e) Suspension; and
- (f) Termination.

(4) Each process for managing designees should be data-driven and based on objective evidence. Decisions must be documented.

(5) Former FAA employees must be managed using the same processes as any other applicant or designee.

**b. Need and Ability to Manage.** It is the responsibility of each appointing office to determine, considering aviation industry needs and all resources of the service/office, if it has a need for a designee and whether it possesses the ability to manage the designee.

**c. Selection of Individual Designees.** Selection is the process of determining eligibility once the service/office has established a need and ability to manage the designee. Selection involves the evaluation of an applicant's technical skills and competence in applying those skills in their area of expertise as well as their understanding of FAA policy and guidance. The selection process must also consider the interpersonal skills of the applicant and how they would contribute to the applicant's ability to perform as a designee. While the selecting official's past personal knowledge of an applicant's performance can be considered, the selection must not be based solely on past personal knowledge.

**d. Selection of Delegated Organizations.** Selection is the process of determining eligibility once the service/office has established a need and ability to manage the designee. An applicant for appointment as a delegated organization must provide substantiating data to show they have past experience with the FAA in the type of certification work requested. In accordance with Title 14, Code of Federal Regulations (CFR) section 183.47(a), holders must



also provide documentation validating they have qualified staff to perform all the requested functions. Selection and appointment of a delegated organization may involve multiple FAA offices from different FAA services, however a lead office must be appointed to manage the evaluation process.

(1) Each service/office will follow a formal application and selection process, and specific criteria for selection.

(2) Selection and appointment may be separate processes. Selection must be time limited and does not necessarily guarantee appointment. The service/office must define the duration for which the selection is valid, but the period of time on a selection list is not an appointment criteria.

(3) The service/office must consider the past performance in the aviation industry, such as an FAA certificate holder or design approval holder.

**e. Appointment.** Appointment is the action by the FAA to officially designate qualified individuals or organizations as representatives of the Administrator.

(1) Each service/office will manage the appointment process, identifying appointing officials, specifying the extent of the authority given to each designee and defining the duration of the appointment (where applicable).

(2) Each service/office must require all designees, upon appointment, to acknowledge that designation is a privilege, not a right, and that they understand they may be terminated at any time for any reason at the discretion of the Administrator.

**Note:** For ODA holders this is accomplished as specified in FAA Order 8100.15.

**f. Oversight.** Oversight is a series of tasks that ensure that a designee performs within established guidelines.

(1) Each service/office must conduct certain required surveillance and oversight activities as established in foundational FAA Orders 8100.15 for ODA, 8000.95 for individual designees, and any other supplemental policy that may be issued. Oversight includes:

- (a) Reviewing the work performed;
- (b) Evaluating performance for QA;
- (c) Ensuring required training has been completed;

(d) Verifying the designee knows how to obtain and complies with current guidance and policy;

(e) For individual designees, providing constructive feedback and taking corrective action, as necessary; and

(f) For delegated organizations, providing a process to validate compliance with all approved procedures.

(2) Each service/office is responsible for efficiently collecting and analyzing information used to oversee the performance of designees and updating the necessary delegation program IT tools (e.g., DMS), when required.

(3) Risk-based criteria must be used to define the frequency and scope of oversight. Specific minimum requirements may be identified in foundational FAA Orders 8100.15 for ODA and 8000.95 for individual designees.

**Note:** For individual designees, while an individual specialist has management responsibility for a given individual designee, any FAA employee working with the designee or a designee's work product may provide input to the specialist on the designee's performance.

**g. Individual Designee Program Related Training.** Individual designee and specialist training is the responsibility of each service/office with individual designees. Training programs may include web-based training and/or real-time instructor led training (e.g., classroom, distance learning, virtual, or on-the-job training), as appropriate.

(1) Initial Designee Training. Each delegation program must have a defined initial training curriculum, to include:

(a) Amount of training (technical and procedural) that must be completed before performing a delegated function whether expressed in number of hours or completion of required course(s);

(b) Attendance and testing criteria; and

(c) Record of completion.

(2) Recurrent Designee Training. Each delegation program must have a defined recurrent training program, to include:

(a) Frequency, type (technical and procedural), and length of training;

(b) Attendance and testing criteria; and

(c) Record of completion.

**h. Delegated Organization Provided Training.** Delegated organizations must provide training to their ODA administrator and unit members to ensure continued compliance with the approved procedures manual, FAA regulations, and applicable FAA policies.



**i. Annual Extension of Individual Designee's Designation.** If an individual designee is in good standing and continues to meet the qualification requirements for their designation, the designee may request an extension of its designation. Designee oversight requirements have defined intervals, and extensions should not be contingent upon a particular scheduled oversight activity.

**j. Renewal of Delegated Organizations.** Delegated organizations will request renewal in accordance with FAA Order 8100.15, as amended.

**k. Termination.** Termination is the action by the FAA to rescind a designation at any time for any reason the Administrator considers appropriate. AVS-60 foundational policy provides a process for fair and equitable treatment of the designee, while maintaining the integrity, quality, and efficiency of the service/office's overall delegation system.

(1) For Individual Designees. An individual designee may be terminated for any reason and at any time. Termination decisions must be formally documented in DMS. To ensure fair and equitable treatment, for individual designees who are being terminated "for cause," the proposed termination decision will be reviewed by a termination for cause review panel prior to the termination becoming final. Each service/office will follow the termination procedures listed in FAA Order 8000.95.

(2) For Delegated Organizations. A delegated organization may be terminated for any reason and at any time. Termination reasons differ from the termination of an individual designee in that the organization as a whole must meet acceptable standards. The decision to terminate a delegated organization must be substantiated with documentation showing the failure(s) of the organization to comply with approved procedures. If a termination decision results in permanently prohibiting the delegated organization to apply for designation in the future, an appeal process must be made available. Each service/office will follow the process in FAA Order 8100.15, as applicable, to allow a delegated organization to appeal the FAA's termination decision unless the decision is based on need and ability to manage, loss of a prerequisite certification, or failure to meet training requirements.

(3) When termination for cause is warranted, the process must begin immediately.

**10. Distribution.** This order is distributed to AAM, AIR, FS, and AOV.

**11. Authority to Change This Order.** The authority to revise, deviate, or cancel material in this order resides with AVS-60. AVS-60 will coordinate with AAM, AIR, FS, and AOV as necessary. Requests for changes initiated by AAM, AIR, FS, or AOV must be coordinated with AVS-60.


**12. Directive Feedback Information.**

a. Direct questions or comments to the ODA Office (AVS-60) at [9-AVS-ODA-Office@faa.gov](mailto:9-AVS-ODA-Office@faa.gov). For your convenience, FAA Form 1320-19, Directive Feedback Information, is the last page of this order. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this order on FAA Form 1320-19.

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b. Use the “Other Comments” block of FAA Form 1320-19 to provide a complete explanation of why the suggested change is necessary. You may correct, as necessary, a copy of the pertinent information or provide a handwritten note for consideration.

 Digitally signed by  
David H. Boulter  
Date: 2024.02.29  
07:36:57 -05'00'

David H. Boulter  
Associate Administrator for Aviation Safety

**Appendix A. Directive Feedback Information**

Please submit any written comments or recommendations for improving this directive or suggest new items or subjects to be added to it. Also, if you find an error, please tell us about it.

Subject: Order \_\_\_\_\_

To: Directive Management Officer, \_\_\_\_\_

*(Please mark all appropriate line items)*

☐ An error (procedural or typographical) has been noted in paragraph \_\_\_\_\_ on page \_\_\_\_\_.

☐ Recommend paragraph \_\_\_\_\_ on page \_\_\_\_\_ be changed as follows:  
*(attached separate sheet if necessary)*

☐ In a future change to this order, please include coverage on the following subject:  
*(briefly describe what you want added):*

☐ Other comments:

☐ I would like to discuss the above. Please contact me.

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Routing Symbol: \_\_\_\_\_