



# Federal Aviation Administration

**SUBJ:** External Frequently Asked Questions (FAQ): Airmen Certification (AC) Organization Designation Authorization (ODA) policy introduced in FAA Order 8100.15C, “Organization Designation Authorization Procedures”

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**Purpose:** These external FAQs are intended as a guide only and are based on information available at the time this revision was published. Refer to the Document Revision History table for the effective date of this FAQ and a description of changes. Refer to the most current, published regulation and policy found at [Electronic Code of Federal Regulations \(eCFR\)](#) and [Dynamic Regulatory System \(DRS\)](#).

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## Section 1. The FAA ODA Program

### 1.1 What regulation is associated with ODA?

Title 14 Code of Federal Regulations (CFR) Part 183 Subpart D - Organization Designation Authorization (Federal Acquisition Regulations (FAR) Part 183 Subpart D) contains the procedures required to obtain an ODA, which allows an organization to perform specified functions on behalf of the Administrator related to engineering, manufacturing, operations, airworthiness, or maintenance:

- § 183.41 Applicability and definitions.
- § 183.43 Application.
- § 183.45 Issuance of Organization Designation Authorizations.
- § 183.47 Qualifications.
- § 183.49 Authorized functions.
- § 183.51 ODA Unit personnel.
- § 183.53 Procedures manual.
- § 183.55 Limitations.
- § 183.57 Responsibilities of an ODA Holder.
- § 183.59 Inspection.
- § 183.61 Records and reports.
- § 183.63 Continuing requirements: Products, parts or appliances.

### 1.2 What FAA Order contains ODA policy?

ODA policy is found in [FAA Order 8100.15](#), "Organization Designation Authorization Procedures." The Order is arranged into the following chapters and appendices. For AC ODA, the ODA Office suggests searching for key words such as "AC ODA" to find AC ODA notes and requirements throughout the Order.

FAA Order 8100.15C content, with emphasis on the bold chapters below:

Chapter 1 – Introduction

Chapter 2 – ODA Program Overview

**Chapter 3 – ODA Applicant and ODA Holder Responsibilities**

**Chapter 4 – FAA Roles and Responsibilities for ODA Oversight**

**Chapter 5 – ODA Types, Authorized Functions, and Program Requirements**

**-Section 8, Airmen Certification ODA (AC ODA) – Functions and Limitations**

Appendix A – Sample Forms and Letters

Appendix B – Sample ODA Procedures Manual

Appendix C – Delegated Organization Surveillance

Appendix D – Related FAA Publications

Appendix E – Definitions

Appendix F – Acronyms

Appendix G – Administrative Information

### 1.3 What are some of the key FAA controls that ensure safety standards are being met and maintained by an ODA holder?

When an organization is appointed by the FAA, ODA holders may conduct specific FAA authorized certification, evaluation, testing, and tasks associated with the airmen certification process. The key FAA controls for ODA are:

- ODA is delegation (not certification); ODA is a privilege, not a right.
- In accordance with 14 CFR § 183.45, the FAA may issue an ODA Letter of Designation if a need exists for delegation of the function and the applicant meets the requirements of Subpart D.
- In determining FAA need, the FAA will consider factors such as the FAA workload with the organization, the benefit to the FAA in granting the ODA, and FAA resources available to manage the authorization.
- ODA oversight includes all the activities conducted by the FAA to select, appoint, manage, surveil, renew, suspend, or terminate an ODA.
- To ensure that authorized functions are properly performed, an ODA holder must use the same care, diligence, judgment, and responsibility when performing the functions as the FAA would use in performing them.
- In carrying out the authorized functions, ODA holders and units must follow all applicable FAA regulations, directives, policies, guidance, and procedures.
- An ODA holder's commitment starts at the senior management level of the ODA holder and extends through the ODA administrator, ODA unit, and the rest of the holder's organization.
- To ensure ODA holder company-wide support of commitment, senior management of the organization will sign a Memorandum of Understanding (MOU) that outlines the charter, authority, and responsibility of the ODA holder. This MOU sets forth the ODA holder's understanding that the ODA holder and ODA unit will act in accordance with the public interest in aviation safety when carrying out authorized functions.
- ODA applicants must have demonstrated integrity in their experience with the FAA in addition to a safety culture that is promoted by senior management's commitment to safety, realistic practices for handling hazards, continuous organizational learning, and care and concern for hazards shared across the workforce.
- The FAA will identify the authorized ODA type(s) in the Letter of Designation and specify the authorized functions and limitations in the ODA procedures manual.
- There is an ODA renewal process which occurs every two to five years based on ODA experience and complexity.
- The FAA may suspend or terminate an ODA at any time.

*Reference:*

*FAA Order 8100.15C, Chapter 2 - ODA Program Overview*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

*FAA Order 8100.15C, Chapter 4 - FAA Roles and Responsibilities for ODA Oversight*

### 1.4 Is implementation of ODA mandatory?

ODA is delegation, not certification. Delegation is a privilege and not a right. Under [Title 49 United States Code \(U.S.C.\) 44702: Issuance of certificates \(house.gov\)](#), the FAA has broad authority to delegate to a qualified private person, or to an employee under the supervision of that person, a matter related to issuing certificates, or related to the examination, testing, and inspection necessary to issue a certificate on behalf of the FAA Administrator.

As established in the [Final Rule - Establishment of Organization Designation Authorization Program](#) (70 FR 59932), "A fundamental principle of delegation is the FAA's discretion in appointing designees and delegated organizations. Even if qualified, an organization is not entitled to an authorization, and

the FAA does not make delegation decisions based solely on an applicant's desire to have an authorization. Authorizations will be based on the need for the functions requested. The FAA expects to give priority to organizations with demonstrated expertise and a large workload. In some cases, it may be beneficial for the FAA to manage an organization's activity using individual designees. It is not possible to state all the reasons that the FAA might have to deny an application. The primary considerations will always be the need for the authorization and the ability of the FAA to oversee the organization's activity."

## 1.5 What ODA types currently exist?

[Types of Organization Designation Authorizations | Federal Aviation Administration \(faa.gov\)](#)

There are now eight ODA types:

1. Type Certification (TC) ODA
2. Supplemental Type Certification (STC) ODA
3. Production Certification (PC) ODA
4. Parts Manufacturer Approval (PMA) ODA
5. Technical Standard Order Authorization (TSOA) ODA
6. Major Repair, Alteration, and Airworthiness (MRA) ODA
7. Air Operator (AO) ODA
8. **Airmen Certification (AC) ODA**

AC ODA is the eighth ODA type. This is the first time that the FAA will use the ODA program for airmen certification. The FAA recognizes that this is a big change and consequently the FAA has developed change management led initiatives to help ensure effective implementation of AC ODA. Please bookmark the ODA webpage for future updates and additional resources at [Delegated Organizations - Information for ODAs](#)

The FAA ODA Office provides information, education, and ongoing support during preapplication, application, and implementation of AC ODA. Please contact the AC ODA Implementation Team for any questions support at [9-AVS-AC-ODA-Info@faa.gov](mailto:9-AVS-AC-ODA-Info@faa.gov).

## 1.6 What commitment is required by an ODA holder?

An ODA holder agrees to use the same care, diligence, judgment, and responsibility when performing the authorized functions as the FAA would use in performing the function. ODA holders and units must follow the FAA regulations, directives, policies, guidance, and procedures as applicable to the delegation and the authorized functions. This commitment starts at the senior management level of the ODA holder and extends through the ODA administrator, ODA unit, and the rest of the applicant's organization. As proof of that commitment, senior management of the organization will sign a MOU that outlines the charter, authority, and responsibility of the ODA holder.

For an organization to implement ODA, they must commit the necessary resources. Per 14 CFR § 183.47(a), each applicant must have sufficient administrative and technical resources to satisfy all the requirements of the requested authorization.

### *Reference*

*FAA Order 8100.15C, Chapter 2 - ODA Program Overview*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

## 1.7 When there are multiple ODA types involving multiple offices, who is the appointing office and who is the managing office?

The FAA appoints ODAs at its discretion. An organization must begin discussions with the coordinating offices before applying. When a prospective ODA applicant or ODA holder requesting expansion communicates their intention to apply, each of these coordinating offices are responsible for making preliminary assessments of the need for that ODA and the ability to manage that ODA holder, as well as making a preliminary assessment of their proposed organizational structure.

After the preliminary assessment of need and ability, the coordinating office managers must agree to what ODA types they can support and whether an appointment will be considered. The coordinating office managers will establish an appointing office responsible for accepting the application and managing the evaluation.

If more than one ODA type is being sought, or an existing ODA holder is seeking to expand their authorization to include a new ODA type or the authorized functions from an additional CFR Part to an existing AC ODA, the applicant may make a proposal to the FAA to have separate authorizations. The FAA will decide if separate authorizations would be beneficial, and if so, the applicant should submit separate applications. All determinations by the FAA for separate authorizations must involve any applicable coordinating/managing offices. Proposals must be approved by AVS-60 and will be documented in correspondence to the manager(s) of the coordinating/managing office(s).

Definitions:

- The FAA coordinating office(s) is responsible for preapplication and involved in selection and appointment of ODA holders. When multiple offices are involved, a lead office will be identified.
- The FAA appointing office is responsible for selection and appointment of ODA holders.
- The FAA managing office(s) is responsible for oversight of ODA holders. When multiple offices are involved, a lead office may be identified.

*Reference*

*FAA Order 8100.15C, Chapter 4 – FAA Roles and Responsibilities for ODA Oversight*

*FAA Order 8100.15C, Appendix E – Definitions*

#### **1.8 Are there specific procedures for removal of an ODA unit member (UM)?**

The ODA holder must have procedures to select ODA UMs and administrators, as well as procedures to remove ODA UMs. These procedures must also include how to coordinate these selections with the FAA, when required.

*Reference*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

#### **1.9 Does ODA policy address remote and international facility oversight?**

The location of an ODA holder and its facilities must not exceed the FAA's resources or ability to conduct effective oversight or impose an undue burden on the FAA. ODA UMs may be located apart from the ODA holder's facility if agreed to by the OMT.

For AC ODA holders who plan to conduct testing at offsite facilities outside the United States, the AC ODA holder must have procedures to ensure the facilities comply with all established and applicable international approval(s), regulation, policy, and guidance specific to the authorized function.

*Reference*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

#### **1.10 Does the FAA still have roles and responsibilities in selecting ODA UMs?**

For a period of two years after the initial ODA appointment (except the product related TC ODA type), selection decisions or proposed ODA UMs, who are not currently designees or ODA UMs at other delegated organizations, must be reviewed by the OMT prior to the ODA UM performing any authorized function for the ODA unit.

After two years, the FAA anticipates that the OMT will not need to review any ODA UM selection decisions unless the ODA holder has not had sufficient activity appointing ODA UMs or there are documented problems with the ODA holder's selection process or performance.

FAA Aviation Safety Inspectors (ASI) will still play a role in background checks utilizing the Designee Management System (DMS) and Safety Analysis Performance System (SPAS) for prescreening potential UMs. In addition, the OMT conducts surveillance of the UMs and the ODA holder's UM selection process.

*Reference*

*FAA Order 8100.15C, Chapter 4 - FAA Roles and Responsibilities*

**1.11 Is there a limit on how many UMs an ODA holder could have?**

There is no limit in policy currently. However, there must be communication from the ODA holder to the OMT regarding any proposed changes to the approved ODA holder's program. It is imperative that the FAA has the need and the ability to oversee the delegation.

The ODA holder must communicate with the OMT if a change in the facilities, resources, or organizational structure affects how the ODA holder performs that function.

In order to ensure that adequate resources are available for the management and surveillance of the ODA holder, the lead managing office must obtain a written OMT Resource Agreement from all the offices needed to provide OMT personnel. OMT Resource Agreements must be created or revised based on the addition of locations where functions will be performed or updated when surveillance planning identifies significant changes in the scope of support required.

*Reference*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

**1.12 Will the FAA surveil the ODA holder only at the organizational level, or is surveillance of the ODA UMs achieved also while they are performing authorized functions?**

The FAA's surveillance program for delegated organizations is based on a systems approach centered on compliance with approved procedures and processes, as well as evaluating the organization's performance when carrying out authorized functions. Minimum organization surveillance activities are determined by a risk-based process that considers both the ODA holder's past performance as well as their complexity and the safety impact of their parts, articles, products, approvals, or certificates (or any combination of these). These minimums are supplemented with additional activities based on risk determined by the OMT on an ongoing and annual basis to ensure effective management and efficient oversight of ODA holding organizations. Following these requirements will result in an FAA audit of the ODA holder over the surveillance window prescribed by the risk-based oversight process.

The ODA holder surveillance program has eight system elements. One of the system elements is "Unit Members." In addition, the OMT conducts surveillance of UMs performing authorized functions.

*Reference*

*FAA Order 8100.15C, Chapter 4 - FAA Roles and Responsibilities for ODA Oversight*

**1.13 Does an ODA holder require an FAA approved Safety Management System (SMS) program?**

Per Chapter 3 of FAA Order 8100.15C, the description of responsibilities for ODA holder management includes establishing corporate policies that will not conflict with FAA regulations or policy. Any certificate holder required to have a SMS, who may also be an authorized ODA holder, must incorporate the ODA Program in its SMS. In addition, reference 14 CFR Part 5 Safety Management Systems [§ 5.1 Applicability](#).

*Reference*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

*14 CFR § 5.1, Applicability*

[FAA Requires Aviation Organizations to Detect, Address Safety Risks Early | Federal Aviation Administration](#)

**1.14 Could an ODA holder employ UMs with less qualifications or experience than currently required by the FAA?**

Any request from an ODA holder to employ UMs with less than the required qualification and experience necessary would follow established FAA deviation or exemption policy, as appropriate.

**1.15 What requirements are there for an ODA holder to remain impartial?**

An ODA administrator and UMs must possess demonstrated integrity in their experience with the FAA prior to becoming an ODA administrator (see Chapter 3 of FAA Order 8100.15C). An ODA holder is required to sign a MOU with the FAA stating that they will act in accordance with the public interest in aviation safety when carrying out authorized functions (see Chapter 2 of FAA Order 8100.15C). ODA holder UMs are required to take interference training and must report any interference either to the ODA administrator or to the FAA.

One key to the success of the ODA system is that the ODA holder's executive management fully supports the ODA unit and conducts itself with the clear expectation that ODA UMs will conduct authorized functions dispassionately, impartially, and in the interest of aviation safety as opposed to the financial or commercial interests of the ODA holder. The organizational model for ODAs will vary depending on the ODA holder's functions, size, and corporate structure. The model must meet the following:

- The ODA administrator must be in a position that provides authority to act on the FAA's behalf. The ODA administrator must ensure that the ODA unit performs all authorized functions in accordance with the regulations and applicable FAA policy. The ODA administrator must also ensure that the ODA holder complies with its ODA procedures manual.
- Each ODA UM must be in a position that provides enough authority and time to perform authorized functions.
- An ODA UM must have no conflicting non-ODA unit duties or other interference that affects the performance of authorized functions. Additionally, an ODA UM must not have responsibilities that conflict with those of the ODA unit. Each ODA UM must perform authorized functions with reference to the public interest in aviation safety.

*Reference*

*FAA Order 8100.15C, Chapter 2 - ODA Program Overview*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

**1.16 What surveillance requirements are required for both the ODA holder and the FAA?**

ODA holders must have an internal audit and performance assessment program. The ODA holder's FAA approved procedures manual must have procedures for the internal audit program which audits the ODA holder's compliance to approved procedures and evaluates each ODA UM's performance every calendar year.

The ODA holder must correct issues related to the use of the ODA that are identified through continuing requirements, the internal audit program, FAA surveillance activities, or as otherwise directed by the FAA. This corrective action process should be initiated and completed in accordance with the timeframes identified in the procedures manual processes.

The organization management team (OMT) oversees the ODA holder. ODA oversight includes managing the organization, conducting surveillance, and reauthorizing, suspending, or terminating the organization. Participation will vary depending on the functions the ODA holder is authorized to perform. The OMT members must be knowledgeable and experienced in the functions the ODA unit performs.

The FAA's surveillance program for delegated organizations is based on a systems approach centered on compliance with approved procedures and processes, as well as evaluating the organization's performance when carrying out authorized functions. Minimum organization surveillance activities are

determined by a risk-based process that considers both the ODA holder's past performance as well as their complexity and the safety impact of their parts, articles, products, approvals, and certificates. These minimums are supplemented with additional activities based on risk determined by the OMT on an ongoing and annual basis to ensure effective management and efficient oversight of ODA holding organizations. Following these requirements will result in an FAA audit of the ODA holder over the surveillance window prescribed by the risk-based oversight process. Although this describes the minimum FAA surveillance required for delegated organizations, the FAA's statutory and regulatory oversight authority allows inspection of an ODA holder at any time and for any reason per 14 CFR § 183.59.

*Reference*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

*FAA Order 8100.15C, Chapter 4 - FAA Roles and Responsibilities for ODA Oversight*

## Section 2. The Airmen Certification Organization Designation Authorization (AC ODA) Type

### 2.1 What is AC ODA?

ODA is how the FAA grants designee authority to organizations. ODA policy is found in [FAA Order 8100.15C](#).

AC ODA is an ODA type for certification of airmen (pilots and mechanics) that was introduced in FAA Order 8100.15C. AC ODA policy provides a method for qualified 14 CFR Parts 121, 135, 141, 142, 145, or 147 certificate holders to apply to conduct specific FAA approved airmen testing functions and authorizations leading to the issuance of FAA airmen certificates for pilots or mechanics. AC ODA is an expansion of the FAA delegation system that leverages industry expertise for the certification of pilots and mechanics and provides the opportunity for Flight Standards Service (FS) to focus resources on risk-based safety critical work.

To be eligible to hold an AC ODA, the applicant must hold and maintain the appropriate Air Carrier or Air Agency certificate under 14 CFR Parts 121, 135, 141, 142, 145, and 147. Applicants for 14 CFR Parts 121 and 135 must also have an Aircrew Designated Examiner (ADE) program.

Applicants must have recent and successful history performing airmen certification activity or have responsibility for managing programs leading to the issuance of airman certificates of the same type and complexity as those for which authorization is sought.

### 2.2 Does the expansion of the ODA program to include the new AC ODA type provide less specific technical oversight and less safety?

Nothing in the establishment of the ODA program and AC ODA type changes any authority or responsibility for compliance with the certification, airworthiness, or operational requirements currently in place, such as 14 CFR Parts 61, 65, 121, 135, 141, 145, or 147. No current safety requirements are being removed or relaxed. The ODA program does not introduce any type of self-certification.

ODA program rulemaking in 2005 established 14 CFR Part 183 Subpart D - Organization Designation Authorization. The ODA program expanded the scope of approved tasks available to organizational designees, increased the number of organizations eligible for organizational designee authorizations, and established a more comprehensive, systems-based approach to managing designated organizations. The ODA program is needed as the framework for the FAA to standardize the operation and oversight of organizational designees. The effect of this program increased the efficiency with which the FAA appoints and oversees designee organizations and allows the FAA to concentrate its resources on the most safety-critical matters.

While these persons and organizations are referred to informally as “designees,” under Part 183 they are referred to as “representatives of the Administrator.” When acting as a representative of the Administrator, these persons or organizations are required to perform in a manner consistent with the policies, guidelines, and directives of the Administrator. When performing a delegated function, designees are legally distinct from and act independent of the organizations that employ them. The authority of these representatives to act comes from an FAA delegation and not a certificate. As provided by statute, the Administrator may, at any time and for any reason, suspend or revoke a delegation. This is true even though some parts of the delegation regulations in Part 183 and elsewhere refer to kinds of certificates that denote the authority granted.

As the aviation industry needs continue to expand at a rate exceeding that of FAA resources, the need for the ODA program has become more apparent. The ODA program improves the FAA's ability to respond to its steadily increasing workload by expanding the scope of authorized functions of FAA organizational designees and by expanding eligibility for organizational designees.

### 2.3 Can existing ODA holders add AC ODA to their ODA?

A prospective ODA applicant or ODA holder seeking expansion must discuss with the FAA its desire to obtain an ODA before application. This is called Preapplication Communication. The entire application, selection, and appointment process is outlined in Chapter 3, Section 3 of FAA Order 8100.15C. The FAA may choose to establish separate authorizations for each ODA type, combinations of ODA types, or one ODA type specific to CFR Parts for a single organization, when determined to be a benefit to the FAA (e.g., greater efficiency). Applicants should evaluate any potential benefits and challenges (e.g., resources, knowledge, organizational structure, cross-functionality of UMs, internal audits, or procedures manuals) to separate authorizations and be prepared to discuss during the preapplication communications.

An organization seeking an ODA may apply for as many ODA types for which it qualifies. The appointing office will issue one ODA Letter of Designation and assign one ODA number for each ODA type or combination of ODA types. In order to facilitate efficient FAA oversight, organizations with multiple ODA types under one authorization will usually be required to address all ODA types within a single procedures manual. An organization may have separate procedures manuals for each type of ODA under one authorization, only if required by the FAA.

For this scenario reference [Question 1.7](#) "When there are multiple ODA types involving multiple offices, who is the appointing office and who is the managing office?"

*Reference:*

*FAA Order 8100.15C, Chapter 2 - ODA Program Overview*

### 2.4 What airmen certifications requirements change if an AC ODA holder is appointed?

Airmen certification requirements for pilots or mechanics do not change; 14 CFR Parts 61 and 65 airman certification requirements still apply.

AC ODA provides a new way to delegate airmen (pilot and mechanic) certification functions. It does not change the qualifications or requirements to obtain an airman certificate. AC ODA holder appointment adds a new delegation system for personnel certification. Transition to AC ODA is not mandatory. It is based on FAA need to delegate certification functions and the FAA ability to manage the new ODA holder. Both the individual designee system and the new ODA system remain in place. ODA is a privilege, not a right. If AC ODA is implemented, existing programs managed by FAA Offices, such as ADE, Advanced Qualification Program (AQP), MOUs, etc. are still required. In accordance with 14 CFR Part 183, Subpart D, the FAA will determine whether a need exists for delegation and whether to grant ODA to a qualified applicant.

### 2.5 Does the FAA office formally accept the AC ODA application?

The FAA is not required to formally accept an AC ODA application. The ODA application process is detailed in [FAA Order 8100.15C](#). The FAA must have a need for the ODA and the FAA must have the ability to manage the ODA effectively. Any prospective ODA applicant must discuss with the FAA its desire to obtain an ODA **before formal application**. The FAA appoints ODAs at its discretion.

*Reference*

*FAA Order 8100.15C, Chapter 4 - FAA Roles and Responsibilities for ODA Oversight*

### 2.6 Why is the FAA implementing this new AC ODA type?

The new AC ODA type provides more timely and effective airmen certification services to its stakeholders. In some geographic areas, the FAA does not have the inspector resources to manage designees, leading to longer check ride wait times because of Designated Pilot Examiner (DPE) availability. The implementation of AC ODA should help where the FAA has both the need for the delegation and the ability to manage the ODA.

The aviation industry continues to expand at a rate exceeding that of FAA resources, and the need for the AC ODA type has become more apparent. As the FAA's dependence on designees has increased, so has the need to oversee designated organizations using a system-based approach to management. Using the FAA experience with both individual and organizational designees, the ODA program was designed with these criteria in mind.

## **2.7 Why does AC ODA use the term "airmen"?**

AC ODA policy uses the term "airmen" to encompass the full range of aviation functions that require an FAA certificate or rating. Not all airman certificates and ratings are for pilots or aviators; AC ODA also applies to aircraft maintenance technicians. The term "airmen" (plural) and "airman" (singular) is currently used in regulation to include all aviation functions that require an FAA airman certificate or rating.

## **2.8 Does a specific AC ODA procedures manual have to be developed and maintained separately?**

The procedures manual must address all procedures and limitations regarding functions performed on the FAA's behalf by the ODA holder. The OMT may not use separate documentation to establish agreements or procedures (unless referenced in the procedures manual) for functions performed by the ODA holder. FAA Order 8100.15C, Appendix B provides a sample manual template for format, content location, and sample text. This section details the requirements for the manual content as well as providing guidance for the procedures.

### *Reference*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

*FAA Order 8100.15C, Chapter 4 - FAA Roles and Responsibilities for ODA Oversight*

## **2.9 Are Title 49 U.S.C. § 44709 reexaminations being delegated to appointed AC ODA holders?**

No, delegation of Title 49 U.S.C. § 44709 is not currently available as an authorized function to appointed AC ODA holders.

## **2.10 Is an AC ODA holder authorized to conduct Part 61 certification checks?**

The Authorized Functions and Limitations section of the ODA holder's procedures manual must identify the authorized functions, products, or articles (or any combination of these), and airmen type rating and certification testing capability addressed by the ODA holder's authority. Limitations of the ODA must be clearly defined in accordance with Chapter 5 of FAA Order 8100.15C. Limitations should define the specific authority of the organization in terms of specific products and models, certificates (if applicable), or any other limitations deemed necessary by the OMT. For AC ODA types, this section must list the types of airmen certificates, ratings, and program authorizations based on the underlying 14 CFR operator/agency certificate held by the ODA holder.

### *Reference*

*FAA Order 8100.15C, Chapter 3 – ODA Applicant and ODA Holder Responsibilities*

*FAA Order 8100.15C, Chapter 4 – FAA Roles and Responsibilities for ODA Oversight*

## **2.11 Does the FAA ODA office oversee the AC ODA holders?**

No. The ODA office ensures effectiveness of the FAA's delegation programs. It also establishes standardization and consistency in how the FAA appoints, uses, and oversees designees, including ODA holders. Additionally, the ODA office brings enterprise focus and support to the FAA's ODA program and drives performance improvements.

## **2.12 Why does AC ODA apply to only pilots and mechanics? What about other airmen certificates i.e., dispatchers, repairman, flight engineers, or parachute riggers?**

During the FAA development of AC ODA policy it appeared there was not an immediate FAA need at this time to include dispatchers, repairman, flight engineers or parachute riggers. It is important to emphasize at this time that it may change based on FAA need. In determining need, the FAA considers factors such as the FAA workload with the organization, the benefit to the FAA in granting the ODA, and FAA resources available to manage the authorization.

## **2.13 Do AC ODA UMs need to be current designees?**

During a certificate holder's initial transition to AC ODA, existing and current designees (Aircrew Program Designees (APD), Training Center Evaluators (TCE), Designated Mechanic Examiners (DME), etc.) could transition to UMs. Once the AC ODA holder is established, any future UMs could be appointed that meet the requirements set forth in FAA Order 8100.15C and any other applicable guidance or policy. Requirements for future AC ODA UMs remain the same, and each ODA UM performing airmen certification functions must meet the following (as applicable):

- 14 CFR Part 121 Aircrew Program Designee Unit Member (APD UM) and 14 CFR Part 135 APD UM.
- UMs performing airmen certification functions under AC ODA for 14 CFR Part 121 or 14 CFR Part 135 must meet the same eligibility requirements and maintain the same training and qualifications as would be required for individual APDs accomplishing the same functions. See FAA Order 8000.95, "Designee Management Policy," Volume 6, for additional information. This UM role is referred to as APD UM throughout FAA Order 8000.95, although they are not individual designees.
- UMs accomplishing functions under an approved AQP must meet all requirements of the approved AQP and FAA Order 8900.1, "Flight Standards Information Management System" Volume 3, Chapter 21.
- 14 CFR Part 141. UMs performing airmen certification functions under AC ODA 14 CFR Part 141 must meet the same eligibility requirements and maintain the same training and qualifications as would be required for individual Designated Pilot Examiners (DPE) accomplishing the same functions. See FAA Order 8000.95, Volume 3, for additional information.
- 14 CFR Part 142 Training Center Evaluator Unit Member (TCE UM). UMs performing airmen certification functions under AC ODA 14 CFR Part 142 must meet the same eligibility requirements and maintain the same training and qualifications as would be required for individual TCEs accomplishing the same functions. This UM role is referred to as TCE UM throughout FAA Order 8000.95. See FAA Order 8000.95, Volume 7, for additional information.
- 14 CFR Part 145 and 14 CFR Part 147. UMs performing airmen certification functions under AC ODA 14 CFR Part 145 or 14 CFR Part 147 must meet the same eligibility requirements and maintain the same training and qualifications as would be required for individual DME accomplishing the same functions. See FAA Order 8000.95, Volume 5 for additional information.

### *Reference*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

*FAA Order 8100.15C, Chapter 4 - FAA Roles and Responsibilities for ODA Oversight*

*FAA Order 8000.95, Volume 5 - DME, Designated Parachute Rigger Examiner (DPRE), and Designated Airworthiness Representative—Maintenance (DAR-T) Designee Policy*

**2.14 Why do AC ODA UMs require the same experience and qualification levels as APDs, DPEs, DMEs, or TCEs?**

Currently, the ODA policy provides delegation for organizations for which there is similar delegation for individual designees. The organization's UMs must meet the same training and qualification requirements that an individual designee meets to perform delegated functions. The FAA may consider revising these policies in future revisions after AC ODA is implemented and actual data is available for analysis.

**2.15 If an existing ODA has an Aircraft Certification (AIR) OMT lead, does the addition of the AC ODA type still fall under AIR?**

For expansions to authorizations for existing ODA holders, the managing office(s) will need to determine any changes to the lead managing office for the newly defined authorization, and adjust staffing as needed to oversee the ODA holder.

**2.16 What will happen with certificate holders that have examining authority if they are appointed as an AC ODA holder?**

AC ODA is non-mandatory and if a 14 CFR Part 141 pilot school already has examining authority and they want to also pursue an application for AC ODA, the two systems would be distinctly separate and not connected. FAA Order 8100.15C, Chapter 3, Paragraph 3-6.h.(3)(a) states the following:

“AC ODA procedures are applicable to certification of applicants who qualify through completion of a Part 141 approved training course **without examining authority or for applicants who meet the airman qualification requirements of Part 61**. ODA permits a pilot school to administer a practical test for its own students in courses for which it does not hold examining authority as well as applicants who do not train at the pilot school. A pilot school with ODA is subject to the provisions in Order 8100.15 when exercising its ODA.”

**2.17 Can a provisional 14 CFR Part 141 pilot school apply for AC ODA?**

No, the applicant must maintain an active 14 CFR Part 141 Pilot School Certificate. A 141 school must meet the renewal requirements of § 141.27(a) every 24 months. If the school does not meet these requirements they revert back to provisional school. If they are a provisional school, they would be ineligible to maintain or apply for an AC ODA.

*Reference*

*FAA Order 8100.15C, Chapter 2 - ODA Program Overview*

*FAA Order 8100.15C, Chapter 3 - ODA Applicant and ODA Holder Responsibilities*

**2.18 Are FAA Order 8000.95 direct observation requirements the same as FAA Order 8100.15 requirements?**

No. FAA Order 8000.95 direct observation requirements for individual designees are different from FAA Order 8100.15 UM audit requirements. The AC ODA holder's procedures manual must have procedures for the internal audit program which audits the ODA holder's compliance to approved procedures and evaluates each ODA UM's performance every calendar year. The ODA holder observation of UMs is part of their internal audit program. The ODA holder must evaluate the UM using the Authorized Function Performance Assessment criteria.

The FAA OMT conducts surveillance of the ODA holder's system to ensure they are managing their ODA effectively. The OMT will conduct Authorized Function Performance Assessments, which includes observing a UM performing an authorized function.

*Reference*

*FAA Order 8100.15C, Chapter 3 – ODA Applicant and ODA Holder Responsibilities*

**2.19 Why are there no additional functions under 14 CFR Part 142 that allow for alignment of Check Pilot evaluation observations and FAA testing of 14 CFR Part 135 or 14 CFR Part 121?**

Currently, 14 CFR § 121.413 and 14 CFR § 135.339 do not allow this observation check to be conducted by a TCE. However, it may be conducted by an FAA ASI or an APD. Due to this rule, the authorized function for “Conduct Air Carrier Check Pilot Evaluation” is only available to Part 121 or 135 certificate holders with an ADE program.

This has been referred to FS to consider future rulemaking or ODA holders could utilize the federal exemption process. If an exemption is granted or a new rule is created, the ODA Office will consider adding the authorized function to a future update of FAA Order 8100.15.

**2.20 What guidance must an AC ODA holder follow?**

In addition to FAA Order 8100.15, ODA holders must follow **all** applicable regulations, guidance, and policy including portions of FAA Orders 8900.1 and 8000.95, and the Designee Management System (DMS). The AC ODA holders create their procedures manual for their delegation and references FAA regulations, policy, and guidance as applicable to assure compliance with 14 CFR Part 183.

*Reference*

*FAA Order 8100.15C, Chapter 3 – ODA Applicant and ODA Holder Responsibilities*

**2.21 Are DPEs and DMEs still going to be needed in addition to AC ODA UMs?**

The FAA will still have a need for DPEs and DMEs. The FAA continues to seek ways to expand and maximize delegation; not reduce it. ODA provides an additional avenue to meet the industry need and helps the agency with the ability to manage. Adding the AC ODA type provides another method of delegation for airmen certification and provides an opportunity to increase capacity for airman testing. The intent of FAA Order 8100.15C, Chapter 2, Paragraph 2-2, “Reducing Designees,” is that a company will not need to use individual designees for airman testing once they become an ODA holder. They are expected to use their UMs. They may retain individual designees to operate under standard procedures if the functions needed are not available under the ODA program.

**2.22 Can AC ODA UMs conduct tests at different geographic locations like DPEs?**

There are no geographic boundaries listed in the policy. If the ODA holder trains their UMs then those UMs could go anywhere depending on the organizational structure and procedures manual limitations. The intent is that an AC ODA UM may conduct tests at different locations, similar to how a DPE conducts tests at different locations.

**2.23 Would a person who has been a Designated Manufacturing Inspection Representative (DMIR) for almost 30 years and Designated Airworthiness Representative for Manufacturing (DAR-F) for four years, qualify to be the lead administrator as long as the organization has other administrators that meet the specific technical experience?**

Review of the ODA administrator qualifications is part of the evaluation panel process. The evaluation panel process starts after the FAA has determined there is a need and ability to manage the AC ODA, reviewed the initial application, and accepted the AC ODA application. The evaluation panel will review the AC ODA application which includes the proposed ODA administrator and procedures manual.

The evaluation panel decision will be predicated on the qualifications of the individual(s) and which AC ODA authorized functions the ODA are requesting. The ODA administrator must have technical experience with the functions performed under the ODA.

If an applicant is requesting the AC ODA authorized functions available for Part 147 certificate holders, the ODA administrator needs experience with airmen certification for testing for Airframe and Powerplant rating. If an applicant is requesting the AC ODA authorized functions for Part 141 certificate holders, the ODA administrator needs experience with airmen certification for pilots. If an applicant is

requesting a combination of both, they may need multiple ODA administrators to ensure the technical experience required for all the authorized functions.

**2.24 Does the authorized function for mechanics include the General test or just Airframe and Powerplant?**

The authorized functions match the associated certificate of the test the applicant completes; in this case, the Airframe and Powerplant certificate. The ODA holder will need to have procedures for how they conduct the testing which would include General, Airframe, or Powerplant, or a combination of those three.

## Section 3. AC ODA Support, Resources, and Training

### 3.1 How does a qualified organization apply for AC ODA?

It is important to remember that ODA is delegation, not certification. ODA is a privilege, and not a right. [FAA Order 8100.15](#) details the ODA application process.

Reference FAA Order 8100.15C, Paragraph 3-7, “Preapplication Communication” to start the process. Details for the AC ODA Authorized Functions are found in FAA Order 8100.15C, Chapter 5, Section 8. The OMT lead and the FS office that manages the certificate are the points of contact for the preapplication. The OMT lead and FS office will contact the ODA Office, which will assist with support during preapplication, application, and evaluation.

### 3.2 What training is available to AC ODA holders?

A current list of ODA and AC ODA courses can be found on the [ODA Office website](#).

## Glossary of Acronyms and Abbreviations

AQP	Advanced Qualification Program
ACSA	Air Carrier Safety Assurance
AO ODA	Air Operator
AIR	Aircraft Certification
ADE	Aircrew Designated Examiner
APD UM	Aircrew Program Designee Unit Member
APDs	Aircrew Program Designee
APM	Aircrew Program Manager
AC ODA	Airmen Certification Organization Designation Authorization
AVS	Aviation Safety
ASI	Aviation Safety Inspector
DAR-F	Designated Airworthiness Representative for Manufacturing
DAR-T	Designated Airworthiness Representative—Maintenance
DME	Designated Mechanic Examiner
DMIR	Designated Manufacturing Inspection Representative
DPE	Designated Pilot Examiner
DPRE	Designated Parachute Rigger Examiner
DMS	Designee Management System
DRS	Dynamic Regulatory System
eCFR	Electronic Code of Federal Regulations
FAR	Federal Acquisition Regulation
FTPM	Fleet Training Program Manager
FS	Flight Standards Service
FAQ	Frequently Asked Question
GASA	General Aviation Safety Assurance
MRA	Major Repair, Alteration, and Airworthiness
MOU	Memorandum of Understanding
AFB	Office of Foundational Business
OSS	Office of Safety Standards
OMT	Organizational Management Team
PPM	Partial Program Manager
PMA	Parts Manufacturer Approval
POI	Principal Operations Inspector
PC	Production Certification
SMS	Safety Management System

SRM	Safety Risk Management
STC	Supplemental Type Certification
TSOA	Technical Standard Order Authorization
TCE UM	Training Center Evaluator Unit Member
TCE	Training Center Evaluator
TCPM	Training Center Program Manager
TC	Type Certification
UM	Unit Member

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