Federal Aviation Administration

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

These 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)*.

For further questions, comments, or suggestions, please contact AVS-60 at 9-avs-oda-office@faa.gov.

Document Revision History

Revision	Description of Change	Effective Date
0	Original	01/07/2026
1	Added new questions and updated answers in Sections 1, 2, and 4; Added new Sections 3, 5, 6, 7, 8, 9, 10, and 11	10/16/2026

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Section 1. ODA Program

1.1

Q: What regulation is associated with ODA?

A: Title 14 Code of Federal Regulations (CFR) Part 183 Subpart D - Organization Designation Authorization, 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

Q: What FAA Order contains ODA policy?

A: 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

Chapter 5 – ODA Types, Authorized Functions

Chapter 5, Section 8, Airmen Certification ODA (AC ODA) – Functions and Limitations

Appendix A – Sample Forms and Letters

Appendix B – Sample ODA Procedures Manual

Appendix C – ODA Surveillance

Appendix D – Related FAA Publications

Appendix E – Definitions

Appendix F – Acronyms

Appendix G – Administrative Information

1.3

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

A: 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 Part 183 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 ODA 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

Q: Is implementation of ODA mandatory?

A: No, 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

Q: What ODA types currently exist?

A: Types of Organization Designation Authorizations | Federal Aviation Administration (faa.gov)

There are now eight ODA types (see below).

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 significant change and 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. Delegated Organizations - Information for ODAs

The FAA ODA Office (AVS-60) provides information, education, and ongoing support during preapplication, application, and implementation of AC ODA. Any Flight Standards Service (FS) Office that has a certificate holder who is interested in AC ODA should contact the AC ODA Implementation Team for support at 9-AVS-AC-ODA-Info@faa.gov.

1.6

Q: Are AC ODA applicants subject to the Certification Services Oversight Process (CSOP)?

A: The ODA application is a delegation, not an application for a certificate. The ODA "applicant or holder" follows the processes in FAA Order 8100.15 and is not subject to the CSOP Certification processes.

1.7

Q: What commitment is required by an ODA holder?

A: 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 unit members (UM) 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, it 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

1.8

Q: Are applicants or potential applicants waiting on AVS-60 to move forward with the procedures manual review with the applicant?

A: AVS-60 acts in an advisory role and not an approval role. AVS-60 can assist in discussions between an applicant and a certificate holder, if desired. AVS-60 has additional support and assistance for AC ODA implementation. AVS-60 is available to answer any questions by emailing 9-avs-oda-office@faa.gov.

1.9

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

A: The FAA appoints ODAs at its discretion. In accordance with FAA Order 8100.15C, Chapter 3., Section 2., Paragraph 3-7., an organization must begin discussions with the coordinating offices before applying. When a prospective ODA applicant or ODA holder requesting expansion communicates its 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 its proposed organizational structure.

Note: For the AC ODA type, notify AVS-60 at 9-AVS-AC-ODA-Info@faa.gov during the preapplication coordination process that an organization intends to apply.

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 its 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:

- **Appointing Office**. The FAA office responsible for selection and appointment of ODA holders.
- **Coordinating Office**. The FAA office(s) responsible for preapplication and involved in selection and appointment of ODA holders. When multiple offices are involved, a lead office will be identified. (see Appointing Office).
- **Managing Office**. The FAA office(s) 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

1.10

Q: Are there specific procedures for removal of an ODA UM?

A: The ODA holder must have procedures in its approved ODA holder procedures manual for selection, appointment, and removal of ODA UMs and Administrators. 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, Section 4., Paragraph 3-16.

1.11

Q: Does ODA policy address remote and international facility oversight?

A: 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 Organizational Management Team (OMT).

An AC ODA holder may not perform airmen certification activities outside of the United States with the exception of approved enroute flight checks and 14 CFR Parts 121, 135, and 142 authorized functions at foreign located FAA-approved simulator or training facilities, as applicable.

Reference

FAA Order 8100.15C, Chapter 5., Section 8., Paragraph 5-44 - Limitations

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

1.12

Q: Does the FAA still have roles and responsibilities in selecting ODA UMs?

A: For a period of two years after the initial ODA appointment (except the product related Type Certification (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 for ODA Oversight

1.13

Q: Is there a limit on how many UMs an ODA holder could have?

A: Currently, the policy does not have a limit. 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.

Reference

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

1.14

Q: 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?

A: 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/or 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.

The ODA holder surveillance program has eight system elements. One of the system elements is UMs. 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

1.15

Q: Is an ODA holder required to have an approved Safety Management System (SMS) program?

A: Per FAA Order 8100.15C, Chapter 3., the description of responsibilities for ODA holder management include 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, Section 2, paragraph 3-5.(f)

14 CFR § 5.1, Applicability

1.16

Q: What is the procedure to apply for a deviation of the order if a need exists and a plan for mitigation of some FAA Order 8100.15C requirements is proposed?

A: Deviations. FAA staff and ODA holders are expected to follow the procedures in this order to ensure uniform administration of this directive. To deviate from this material, you must coordinate with, and get approval from, the ODA Office (AVS-60) at 9-AVS-ODA-Office@faa.gov.

Reference

FAA Order 8100.15C, Appendix G, Section 3

1.17

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

A: A deviation from the UM qualifications would be required.

1.18

Q: Is there a process to obtain approval for in-house UM training in lieu of training conducted through Oklahoma City?

A: If an ODA holder wishes to rely on equivalent training in lieu of FAA training, the ODA holder must first discuss its intentions with the OMT. More information can be found in FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-15.a.(2).

1.19

Q: What requirements are there for an ODA holder to remain impartial?

A: An ODA administrator and UMs must possess demonstrated integrity in their experience with the FAA prior to becoming an ODA administrator (see FAA Order 8100.15C, Chapter 3.). 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 FAA Order 8100.15C, Chapter 2.). 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

1.20

Q: How does the ODA holder monitor its system and how does the FAA manage oversight and surveillance of the ODA holder?

A: 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 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

1.21

Q: ODA Administrator qualifications – The Order specifies that the ODA Administrator must be a full-time employee (8100.15C, Ch 3, Sec 1, para 3-3 (a)). Can the ODA Administrator, as a full-time employee, also perform non-ODA work or have other official titles (example - Training Manager or AQP Director)?

A: Yes, the FAA Order 8100.15C does not specify that the ODA administrator is their only position. Any other positions held cannot be a conflict with the ODA administrator responsibilities/functions and the other positions they hold. This needs to be outlined in the ODA holder procedures manual and the organizational chart. Regarding other positions, the ODA holder is responsible to check the requirements for those positions in the regulations, policies, and guidance.

1.22

Q: Can the FAA OMT provide fillable pdf forms to the AC ODA Holder? (FAA forms 8060-4, 8060-5, and 8710-1).

A: The Managing Office can provide downloadable fillable PDF versions of the Airman Certificate and/or Rating Application (FAA Form 8710-1), Temporary Airman Certificate (FAA Form 8060-4) and Notice of Disapproval of Application (FAA Form 8060-5) if IACRA is unavailable and a paper application must be used.

1.23

Q: Auditor Qualifications - Is it required that unit members performing audits (observations) on individual unit members holding a specific authorized function also possess the same authorized function code themselves?

A: Yes, a Unit Member performing the Authorized Function Performance Assessment (AFPA) by evaluating a Unit Member performing an authorized function must hold that authorized function to be qualified as an Auditor.

Reference

FAA Order 8100.15C, Chapter 3, Section 5., Paragraph 3-26. b.(1)(b).

1.24

Q: What happens if an ODA holder has an underperforming UM?

A: In accordance with FAA Order 8100.15C, Chapter 3., Section 2., Paragraph 3-5.j. UM and ODA Administrator Selection and UM Removal. 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.

Also, in accordance with FAA Order 8100.15C, Chapter 4., Section 3., Paragraph 4-20. ODA UM Performance Problems. If the surveillance team identifies performance issues with a specific ODA UM, the OMT must document the deficiency on the ODA Oversight Finding Record and require the ODA holder to take corrective action.

1.25

Q: Is the data that an ODA collects on a UM subject to the Freedom of Information Act (FOIA)? Related question – Are the reports (i.e., work activity and internal audit) that the ODA holder is required to send to the FAA subject to FOIA?

A: Most ODA holder and UM records required by FAA and sent to FAA are subject to FOIA, unless protected by legal exemptions (like privacy or proprietary information). Records not held or controlled by the FAA may not be available via FOIA.

ODA records within FAA possession and under control of the Agency at the time of the FOIA request are subject to release in accordance with FAA Order 1270.1A, *Freedom of Information Act Program (FOIA)*.

References

FAA Order 8100.15C, Chapter 3, Section 2., Paragraph 3-5s., Records.

FAA Order 8100.15C, Chapter 4., Section 2., Paragraph 4-15.a., Records in the DMS.

Section 2. AC ODA Type

2.1

Q: What is AC ODA?

A: ODA is how the FAA grants designee authority to organizations. ODA policy is found in FAA Order 8100.15.

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 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, or 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

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

A: 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

Q: Can existing ODA holders add AC ODA to their ODA?

A: A prospective ODA applicant or ODA holder seeking expansion must discuss with the FAA its desire to obtain an ODA before application. 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 1.9: “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

FAA Order 8100.15C, Chapter 4, Section 1., Paragraph 4-1.b.

2.4

Q: What risks were identified by introducing and implementing the new AC ODA type?

A: AVS-60 and Flight Standards have collaboratively utilized the Aviation Safety (AVS) SMS Safety Risk Management (SRM) process and the AVS-60 Project Risk Process to identify hazards and risks and to determine the appropriate controls and mitigations.

Mitigations include prioritized risk-based implementation strategies, targeted support, outreach, AC ODA resource materials, AC ODA training courses, and updates to existing FAA inspector airmen certification policy and guidance.

2.5

Q: Who makes up the AC ODA Implementation Team?

A: In Spring of 2023 AVS-60 formed an AC ODA Implementation Project Team with sponsors and representatives from AVS-60 and Flight Standards (Office of Air Carrier Safety Assurance (ACSA), Office of General Aviation Safety Assurance (GASA), and Office of Safety Standards (OSS)). The AC ODA Implementation Project Team's mission is to:

- Collaborate across FAA lines of business (AVS and FS) to ensure effective change management-led implementation of AC ODA.
- Communicate regularly with internal and external stakeholders impacted by this non-mandatory change.
- Provide targeted office support during AC ODA application, evaluation, and beyond.

2.6

Q: Why is the FAA implementing this new AC ODA type?

A: 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

Q: Why does AC ODA use the term "airmen"?

A: 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 terms "airmen" (plural) and "airman" (singular) are currently used in regulations to include all aviation functions that require an FAA airman certificate or rating.

2.8

Q: Was AC ODA policy recently developed?

A: AC ODA policy has been in development for almost ten years. When 14 CFR Part 183 Subpart D was implemented in 2006, the rule included the ability to delegate airmen testing to organizations. In 2016, a Flight Standards (FS) workgroup conducted a feasibility study to implement AC ODA for air carriers and training centers and then started developing policy.

The AC ODA implementation team has representatives from AVS-60 and FS, OSS, GASA, ACSA, and Office of Foundational Business (AFB), along with solid support from AVS-60 and FS leadership.

This is a significant change, and the team is developing effective implementation strategies, schedules, and the necessary processes that need to be in place to support this new AC ODA type.

AVS-60 is committed to continually sharing updates as early as possible, so you have the information you need to be ready to support this change if your office receives an AC ODA application. The FAA's public AC ODA webpage and Delegated Organizations Information webpage are being updated continuously with new information. The AC ODA Team can be contacted at: 9-AVS-AC-ODA-Info@faa.gov.

2.9

Q: Are Title 49 U.S.C. § 44709 reexaminations being delegated to appointed AC ODA holders?

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

2.10

Q: Does AC ODA affect the FAA need for pilot qualification and currency of an FAA Aircrew Program Manager (APM) or Training Center Program Manager (TCPM)?

A: For AC ODA applicants with 14 CFR Part 121 and/or 135 certificates there must be an associated ADE program with an approved ADE MOU as defined in FAA Order 8900.1, *Flight Standards Information Management System*, Volume 13.

For AC ODA applicants with a 14 CFR Part 142 certificate there must be an active MOU between the FAA and the certificate holder as defined in FAA Order 8900.1, Volume 3, Chapter 54, or FAA Order 8000.95*, Designee Management Policy*, Volume 7, as appropriate.

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

Q: Does the FAA ODA office oversee the AC ODA holders?

A: No, Flight Standards personnel will be part of an OMT that will evaluate, appoint, and oversee delegated organizations. The ODA office (AVS-60) oversees and ensures consistency of the FAA's oversight program for companies that issue certificates and conduct certain inspections on behalf of the agency. It also establishes standardization and consistency in how the FAA appoints, uses, and oversees ODAs. Additionally, the ODA office brings enterprise focus and support to the FAA's ODA program and drives performance improvements.

In managing an ODA holder, the OMT guides and interacts with the ODA holder to ensure manual procedures are reviewed and approved, appropriate UMs are being proposed and added to the ODA unit, and that ODA programs are being managed effectively. The OMT also monitors incoming work activity reports, internal audit results, and corrective actions as part of their management of these organizations. When performing these tasks, the OMT may identify noncompliances, unsatisfactory performance of authorized functions, or other conditions requiring corrective action. 8100.15C, Chapter 4., Section 2., Organization Management

Reference

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

2.12

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

A: During the FAA development of AC ODA policy there 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.

The AC ODA Implementation Team is closely monitoring feedback for any future updates, revisions, or additions to AC ODA policy and receiving feedback like this is very important. Flight Standards sponsors at ACSA, GASA, and OSS are aware of the other "airmen" types that are currently not included, and they may be included in future revisions after the initial rollout.

2.13

Q: What FAA inspectors would be part of the AC ODA FAA OMT?

A: For AC ODA, FAA Order 8100.15C, paragraph 4-6., Oversight Personnel Roles and Responsibilities, b. OMT. (2) OMT Members. (a) Core OMT Members; FAA Order 8900.1, *Flight Standards Information Management System,* and/or FAA Order 8000.95, *Designee Management Policy*, define specific requirements for FAA managing specialists for equivalent individual designees and the core OMT members will meet the same requirements for qualification as defined in FAA Order 8900.1. For example, it is expected that the Principal Operations Inspector (POI) and APMs and assistants will be the core OMT members for an AC ODA with 14 CFR Part 121 and 135 functions, and TCPMs and assistants, Fleet Training Program Managers (FTPM) and Partial Program Managers (PPM) will be core OMT members for an AC ODA with 14 CFR Part 142 function.

To staff an OMT for an AC ODA, the ODA size, fleet makeup, and authorized functions should mirror personnel requirements for oversight of individual designees accomplishing similar airmen certification tasks. For example, the number of APMs or FTPMs needed for individual designees should equal the numbers of core OMT members. Those individuals who spend the majority of their time working on ODA-related tasks should be identified as core OMT members.

References

FAA Order 8100.15C paragraph 4-6.

FAA Order 8900.1

FAA Order 8000.95

2.14

Q: Do AC ODA UMs need to be current designees?

A: No, UMs are not required to be current designees. Refer to FAA Order 8100.15C, Chapter 3, Section 1, Paragraph 3-3, ODA Staff Qualifications, for UM requirements.

2.15

Q: Our Part 121 APD's are not presently authorized to conduct certification administrative functions. What are the procedures for APD-UMs to be Authorized Function Code 16109 Airman Certification Qualification Review (Administrative)?

A: The UM training on Authorized Function Code 16109 procedures would need to be incorporated in the ODA holder's procedures manual and task training would need to be created and trained in accordance with the ODA procedures manual.

Reference

FAA Order 8100.15C, Chapter 5., Section 8., Paragraph 5-45.

2.16

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

A: 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.

2.17

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

A: 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. OMT Resource Agreements must be created and/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. If the managing offices identify a new lead office, they will need to identify an OMT lead for that delegated organization.

The OMT lead is an administrative role that coordinates the OMT's activity and serves as the focal point for communication with the ODA holder and is responsible for maintaining the required records for the delegation. Some general considerations for this individual should include:

- Prior experience with the ODA holder and/or its programs.
- The capacity to absorb the required workload.
- Experience with organization management or management of programs similar to what is being authorized.

Reference

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

2.18

Q: Are FAA Order 8000.95, *Designee Management Policy,* direct observation requirements the same as FAA Order 8100.15C, *Organization Designation Authorization Procedures* requirements?

A: 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

Q: What guidance must an AC ODA holder follow?

A: In addition to FAA Order 8100.15C, ODA holders must follow **all** applicable regulations, guidance, and policy including portions of FAA Order 8900.1, *Flight Standards Information Management System*; FAA Order 8000.95, *Designee Management Policy*; and the Designee Management System (DMS). AC ODA holders create their procedures manual for their delegation and include references to applicable FAA regulations, policy, and guidance to assure compliance with 14 CFR Part 183.

Reference

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

2.20

Q: Are DPEs and DMEs still going to be needed in addition to AC ODA UMs?

A: The FAA will still have a need for DPEs and DMEs. 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 paragraph 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.

2.21

Q: Can AC ODA UMs conduct tests at different geographic locations like DPEs?

A: The ODA holder may conduct tests as outlined in its FAA-approved ODA Holder Procedures Manual which includes a list of facilities.

2.22

Q: Do checkride fees have to be the same for applicants from the Part 141 school and for Part 61 applicants?

A: The FAA does not regulate fees for practical tests. However, FAA Order 8100.15C, Chapter 3., Section 1., Paragraph 3-2.b. does state, "…the clear expectation that the ODA unit members will conduct authorized functions dispassionately, impartially, and in the interest of aviation safety as opposed to the financial or commercial interest of the ODA holder." Also, FAA Order 8000.95, as revised, Volume 3, Chapter 5.

2.23

Q: Which checkrides can an ODA holder perform after receiving the Letter of Designation?

A: Once appointed, an ODA holder is granted authorized functions and limitations that describe the types of airman testing conducted by the ODA holder. The ODA holder manages its UMs and the Authorized Functions and Limitations for each UM. The ODA holder maintains the UM Listing and provides a UM table to the OMT. The OMT uploads the UM table into DMS to provide UM access to the necessary automation.

References

FAA Order 8100.15C, Chapter 4,, Section 1, Application, Selection, and Appointment

FAA Order 8100.15C, Chapter 4,, Section 2,, Paragraph 4-14., Designee Management System.

Section 3. Application

3.1

Q: How is the FAA "need and ability" determined for an ODA applicant?

A: FAA Order 8100.15C, Chapter 2., Paragraph 2-2: The designee system leverages the FAA's resources by authorizing individuals and organizations to perform functions for the agency. Managing organizations are more efficient for the FAA than managing the activity of many individual designees. An ODA applicant must demonstrate to the OMT the manner in which it will add UMs. It is the responsibility of the ODA holder to select, manage, oversee, train, and record the activities of the UMs.

FAA Order 8100.15C, Chapter 4., Section 4., Paragraph 4-21.(d): The OMT, upon review for ODA renewal, will make a need and ability determination directly related to the number of airmen certification activities. If the OMT decides that the number of activities decreases to a level that produces a burden on the OMT (i.e., fewer certifications than OMT members), the ODA may be terminated or suspended based on projected activities. The FAA and OMT determines need an ability, not just the ODA.

In FAA Order 8100.15C, Chapter 3., Paragraph 3-16.a.(5)(b), "Selection of ODA UMs and ODA Administrators," and as reflected in Figure 3-4.1, "Unit Member (UM) Selection Process," it states the following:

1. *During the initial evaluation of ODA applicants, all proposed ODA UM appointment packages should be reviewed by the OMT prior to appointing the ODA holder.*
2. *For a period of 2 years after the initial ODA appointment, selection decisions for 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.*
3. *After 2 years, 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.*

3.2

Q: What is the scope of the review for UMs? What role does the OMT have to ensure that only qualified applicants are being put forward by the ODA applicant?

A: The OMT's responsibility to review the ODA holder's processes will continue, without expiration, as a regular surveillance activity of the ODA. The ODA holder's procedures manual must clearly identify the manner in which the ODA holders' UMs are selected and managed, and include an initial notification to the OMT identifying the individual so the FAA can conduct prescreening.

References:

FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-16., Selection of ODA UMs and ODA Administrators.

FAA Order 8100.15C, Chapter 4., Section 2, Paragraph 4-10.b,.ODA UM Selection Process.

3.3

Q: We have an existing ODA, how is it determined if we can expand its current ODA or have to apply for a separate ODA?

A: FAA Order 8100.15C, Chapter 4., Section 1., Paragraph 4-1.b. includes language regarding expansion of authority and separate ODAs. When an organization applies for more than one ODA type, or when an existing ODA holder seeks to expand its authorization to include a new ODA type or additional authorized functions under different sections of Title 14 of the Code of Federal Regulations as part of an existing AC ODA, the applicant may submit a proposal to the FAA managing office requesting separate authorizations. The FAA may also elect to establish separate authorizations for each ODA type, combinations of ODA types, or one ODA type specific to certain CFR Parts for a single organization, when determined to be a benefit to the FAA (*e.g.*, the separate authorization provides greater efficiency). If the existing ODA wishes to expand to another type of ODA *(i.e.*, MRA ODA and expand to AC ODA) and multiple FAA managing offices are involved the current OMT and all FAA offices for new application for expansion or separation should coordinate this decision.

3.4

Q: Does a new ODA applicant have to comply with the ethics training requirement in FAA Notice N 8100.20, Organization Designation Authorization (ODA) Holder Ethics Training for Unit Members (UM) and Administrators?

A: Yes, prior to appointment the ethics training requirement must be completed. A new policy memo with the new ODA Applications process for ethics training will be released by AVS-60. Refer to the FAA's Dynamic Regulatory System (DRS) for current ODA-related policy and deviation memos.

3.5

Q: We are a Part 135 Certificate Holder who does not meet the eligibility criteria in FAA Order 8100.15C, Chapter 3, Section 1, Paragraph 3-4.h.(3)(a)2. (There must be an associated Aircrew Designated Examiner (ADE) program with an approved ADE MOU) and we would still like to obtain an ODA designation believing our business model would support the intent behind this directive. Is there any course of action that is possible to further this designation?

A: Regarding ODA applications, the FAA must first determine that there is a demonstrated need for an ODA and that the agency has the resources and ability to effectively oversee and manage that delegation. Delegation is a privilege, not a right, and these considerations are the first step in evaluating any application.

Another requirement is that the applicant holds an active air carrier certificate and meets all eligibility requirements for an ODA. In the case of Part 135 certificate holders, an Aircrew Designated Examiner (ADE) program is required before an ODA application can be considered. Additionally, the FAA must determine that establishing an ODA provides a measurable benefit to the agency, as the FAA retains the responsibility for oversight of all delegated functions.

For Part 135 certificate holders that do not have an ADE program, the need is evaluated based on the volume of certification activities rather than proficiency checks. In many cases, the certification workload is not significant enough to justify the establishment of an ADE program. Without an ADE

program, there is generally insufficient justification for an ODA. ODAs are intended for organizations with higher certification workloads.

A deviation from this requirement is unlikely to be granted if an applicant does not meet these requirements.

References

FAA Order 8100.15C, Chapter 3., Section 1., Paragraph 3-2.b.

FAA Order 8100.15C, Chapter 3., Section 3., Paragraph 3-7.a.

FAA Order 8100.15C, Chapter 4., Section 1., Paragraph 4-1.a.

FAA Order 8100.15C, Chapter 4., Section 1., Paragraphs 4-1.c.(4) and c.(5)

Section 4. AC ODA Support, Resources, and Training

4.1

Q: How does a qualified organization apply for AC ODA?

A: 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. For support, please contact the AC ODA Implementation Team for support via email at 9-AVS-AC-ODA-Info@faa.gov.

The AC ODA Team provides customized, targeted support and guidance during the AC ODA application and beyond (advisory role only) during AC ODA preapplication, formal application, evaluation panel, AC ODA appointment, oversight, and continuing management.

4.2

Q: What training is available to AC ODA holders?

A: A current list of ODA and AC ODA courses can be found on the Information for ODAs webpage.

4.3

Q: Are ODA UMs required to attend DPE training in Oklahoma City? How do UMs register for the Initial Designated Pilot Examiner (IDPE) Part 1 and Part 2 courses?

A: Yes, AC ODA UMs must meet the same eligibility and training requirements as a DPE. The IDPE Part 1 course is online and Part 2 is in person. To submit a request for enrollment in the IDPE Part 1 and Part 2 courses:

- The OMT must email the enrollment request to AFS-850, Delegation Branch.
- Email Destination: designeeseminars@faa.gov
- The request must clearly state that the enrollment is specifically for an ODA UM.

Note: Recurrent training is virtual, follow the on-line registration process.

Reference

FAA Order 8100.15C, Chapter 3.,Section 1., Paragraph 3-3.d.(3)(b)

FAA Order 8000.95, as revised, Volume 3, Chapter 2, Section 6

4.4

Q: Under 14 CFR Parts 121, 135, and Part 142 the FAA managing office provides training to the designees. Once designated as an ODA holder, can the ODA holder provide the equivalent training that the FAA managing office provides now?

A: Yes, FAA Order 8100.15C, Chapter 3, Section 2, Procedures Manual Content, defines training requirements for each ODA UM and administrator, the frequency of the applicable training, and how the training records will be managed.

Under an ODA, the ODA holder can request from the OMT a portion or all of the equivalent training required as long as the OMT agrees and the Procedures Manual provides sufficient detail to the satisfaction and approval of the OMT. The ODA holder may request the ability to provide the otherwise FAA provided equivalent training but ultimately the decision remains with the OMT.

Reference

Refer to 8100.15C, Chapter 3, Section 2, Paragraph 3-5.k.; and Chapter 3, Section 3, Paragraph 3-15.a(2)

Section 5. Expansion of Authority

5.1

Q: In terms of the preapplication process, does "expansion" refer to only ODA type or does expansion also include authorized functions?

A: Expansion can refer to a new ODA type or expansion of authority within an existing ODA type. Refer to FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-23.

5.2

Q: How long does it usually take to hear a response from the appointing office after sending a preapplication for expansion?

A: It depends. Delegation is based on FAA's need for delegation and ability to manage. It takes time for each office to review the organization's proposal. For the new AC ODA type, FAA schedules a briefing. The denial policy is located in FAA Order 8100.15C, Chapter 3., Section 3., Paragraph 3-10.a. A decision to deny the application is expected within 30 days of receipt. However, the Evaluation Panel (EP) can take much longer depending on the complexity of the operation and communication with the OMT. AVS-60 encourages organizations to reach out to their OMT lead or office manager, or principal inspector for updates.

5.3

Q: Should the reference in FAA Order 8100.15C, Table 2-1.4. for the certification of airframe and powerplant mechanic reference Part 65 and not Part 145 (repair station)? Similarly, should the reference for Pilot Certification be Part 61 rather than Part 121?

A: The authorized functions listed in FAA Order 8100.15C, Table 2-1.4., are organized by the 14 CFR Part for the type of certificate holder. The Operating Certificate held by the associated ODA holder makes them qualified to apply for authorized functions. Table 2-1.4. shows columns for authorized functions and by operating part. The airman certificates are still issued under the applicable 14 CFR Part such as Part 65 or Part 61.

5.4

Q: Does an ODA holder have to go through a new approval process for minor expansion requests such as an authorized function?

A: It depends on the complexity of the request. FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-23., describes written policy for expansion of authorities. An ODA holder requesting expansion of a new ODA type must follow the procedure from the Preapplication Phase in Paragraph 3-7. For a new authorized function, the ODA holder must detail the items found in Paragraphs 3-23.b.(1) through (4).

5.5

Q: Would expansion to UM authorized functions in the procedures manual be considered as part of the expansion within authorization described in FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-23.b.?

A: The expansion of authorizations in FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-23.b. applies to the ODA holder and not individual UMs. A request for ODA holder expansion can be described in different categories discussed in Paragraph 3-23.b. New ODA type and new 14 CFR Part authorizations must go through the process in Paragraph 3-7. Other expansions can be routed through the OMT. However, Paragraphs 3-23.b.(1) through (4) describe the required information on the request. The process for individual UM expansion of authority must be described in the procedures manual.

5.6

Q: Does the discussion of ODA expansion apply to all ODA types?

A: Yes. FAA Order 8100.15C, Chapter 3., applies to all eight ODA types.

5.7

Q: In reference to Expansion of Authority/New Products, would the addition of an additional aircraft fleet be considered an expansion?

A: Possibly. It would depend on the details. For example, if the ODA holder is already authorized for B-787 aircraft and is restricted on a particular series, it would be the OMT's responsibility to determine if enough differences exist in the functions being performed. The OMT will help the ODA holder with the determination.

If the request is for a new type of aircraft not previously authorized, then yes, an expansion request is appropriate. The ODA holder would need to send the change to the OMT. The ODA holder must then demonstrate how they have the experience and qualifications. If approved, the authorized function would then be updated with the new limitation.

5.8

Q: Which FAA office(s) makes the decision on AC ODA expansion vs. new ODA for an applicant?

A: Reference FAA Order 8100.15C, Chapter 3., Section 3., Paragraph 3-7.b. The FAA offices that coordinate the decision include the coordinating office, the appointing offices, and any affected offices. The ODA holder will receive a letter that clearly states whether the decision is to move forward as a separate authorization or as an expansion to the current authorization. The FAA appointing office will also be identified in the letter.

5.9

Q: When an organization has two separate ODAs, do they have just one lead administrator, or potentially two lead administrators?

A: Reference FAA Order 8100.15C, Chapter 2., Paragraph 2-3.b.(1). Each ODA must have its own ODA administrator. Because the organization likely shares resources, the ODA administrator of one ODA may still need to coordinate with the ODA administrator of the other ODA. The findings in one ODA holder may be systemic throughout the organization.

5.10

Q: What is the likelihood of getting an expansion within existing ODA type to add a function where the administrator managing the function is across the country from the OMT for the rest of the ODA functions?

A: FAA Order 8100.15C allows for remote locations of ODA functions (reference Chapter 4., Section 1., Paragraph 4-5.). The lead OMT office denotes the office that will provide the OMT lead. The OMT may use remote technology as a tool to conduct surveillance or the OMT may coordinate other managing offices during the designation or reach out for local support.

Section 6. Airman Certification

6.1

Q: Function Code for Airmen Certification (AC) ODA 16107, Advanced Qualification Program (AQP) Initial Qualification Checks, has an asterisk, indicating "These evaluations do not result in the issuance of an airman certificate and are not activity covered by Title 49 U.S.C. [United States Code] § 44702(d)(1)." However, under a current Part 121 AQP, an AQP Evaluator conducts the initial check and then issues the certificate in the Integrated Airman Certification and Rating Application (IACRA) system. Can you clarify why an ODA AQP Initial Check does not result in the issuance of an airmen certificate?

A: If the airmen test results in a FAA certificate (for example, type rating or Airline Transport Pilot (ATP)), and the air carrier has an AQP, the ODA holder would exercise both Function Code 16107 Conduct AQP Initial Qualification Checks and Function Code 16101 Conduct Pilot Airmen Certification Tests. Authorized Function 16107 - Conduct AQP initial qualification checks will be conducted for all qualification evaluations whether or not a certificate is issued.

Section 7. Authorized Functions for Parts 121 and 135

7.1

Q: Once appointed, is an ODA holder with AC functions for Part 121 or 135 required to maintain the ADE MOU?

A: Yes, they must maintain the ADE MOU because they must maintain the qualifications and eligibility criteria to hold their ODA and AC ODA Type.

References

FAA Order 8100.15C, Chapter 3., Section 1., Paragraph 3-4.h.(3)(a)

FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-13.

FAA Order 8100.15C, Chapter 4., Section 4., Paragraph 4-21.a.

FAA Order 8100.15C, Chapter 4., Section 4., Paragraph 4-22.b.(5)

7.2

Q: For Parts 121 and 135 authorized function codes 16106 and 16206 Conduct Air Carrier Check Pilot Evaluation is it observation or evaluation? For Advanced Qualification Program (AQP) the regulation says evaluation but in 8100.15 it uses term observation in other locations?

A: A clarification memo (AVS60-FY26-PM09) was issued regarding the terminology used in authorized function "Conduct Air Carrier Check Pilot Evaluation" (Function Codes 16106 and 16206) to address the distinction between the terms "observation" and "evaluation" as applied to Part 121 and Part 135 certificate holders. The appropriate term, as referenced in FAA Order 8100.15C, Table 2-1.4, Available Airmen Certification Functions per CFR Part, and Table 5-8.1, AC ODA Function, depends on the type of air carrier training program and the applicable regulatory reference. The terminology applicable to each training program is outlined below:

- For Part 121 or Part 135 operators *not* utilizing an AQP, the term "observation" aligns with the regulatory requirements outlined in §§ 135.339 or 121.413, as applicable.
- For Part 121 or Part 135 operators utilizing an AQP, the term "evaluation" is more consistent with the regulatory requirements of § 121.913.
- As outlined in FAA Order 8100.15C, when the term "evaluation" is used in connection with AC ODA Function Codes 16106 or 16206, it may be considered interchangeable with "observation," provided the usage aligns with the governing regulatory reference for the specific air carrier training program.

References

FAA Order 8100.15C, Chapter 5, Section 8., Paragraph 5-43.

Policy Memorandum AVS-60-FY26-PM09, "FAA Order 8100.15C, Organization Designation Authorization Procedures, policy clarification related to the Airmen Certification (AC) ODA type for Title 14 Code of Federal Regulations (CFR) Parts 121, 135, and 142," dated May 8, 2026.

7.3

Q: FAA currently does training of APDs at that carrier. Will the FAA still do that for the ODA and APD UMs or will ODA holders do that? Right now, that's an important part that the FAA provides that training and ensures they have the best information.

A: The ODA holder's procedures manual will define the training required for each ODA UM and administrator, the frequency of the applicable training, and how the training records will be managed. The procedures must also define the action(s) that will be taken if training is not successfully completed within the required timeframe; or, as applicable, failure of a test that is part of the required training, regardless of the due date of that training. The types of training include ODA holder-provided training, FAA seminars, and standardization workshops.

References

FAA Order 8100.15C, Chapter 3., Section 2., Paragraph 3-5.k.

FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-15.c.

FAA Order 8100.15C, Chapter 5., Section 8., Paragraph 5-43.

Policy Memorandum AVS60-FY26-PM09, "FAA Order 8100.15C, Organization Designation Authorization Procedures, policy clarification related to the Airmen Certification (AC) ODA type for Title 14 Code of Federal Regulations (CFR) Parts 121, 135, and 142," dated May 8, 2026.

7.4

Q: If an FAA APM retires and there is a problem replacing that APM, does that jeopardize the ODA holder's AC ODA? What's in FAA Order 8100.15C?

A: If short term no, but it does come down to need and ability to manage. If there isn't a qualified FAA APM for the OMT to do oversight activities, or another inspector that is current and qualified to do surveillance of those authorized functions along with ensuring the ODA is complying with its requirements, then the ODA may have authorizations suspended, the ODA may be suspended, or the ODA could be terminated due to FAA's inability to manage.

In addition, per FAA Order 8100.15C, Chapter 3., Section 1., Paragraph 3-4.h.(3)(a)2., for AC ODA functions under Parts 135 and 121, there also must be an associated Aircrew Designated Examiner (ADE) program with an approved ADE MOU with the ODA to ensure there are adequate FAA inspectors qualified to conduct the surveillance and prevent issues where the FAA is not able to manage the ODA surveillance due to not having a qualified inspector if someone retires. If working to replace the APM there are other resources within the FAA, such as the Flight Standards Inspector Request Program (FSIRP), as needed, until someone can be trained and qualified to fill the FAA APM position, or as required by FAA Order 8900.1, Volume 1, Chapter 3, Section 6.

Reference

FAA Order 8100.15C, Section 4, Paragraph 3-22.a.(4)

7.5

Q: What is the intent of "Authorized function Conduct AQP Initial qualification?" Does this include issuing a type rating?

A: The Authorized Function "Conduct AQP Initial Qualification" does not result in a type rating. This is used to conduct a qualification evaluation (Qual LOE, Upgrade LOE, etc.) in the certificate holder's AQP that does not result in a certificate being issued. This is for pilots who already hold the type rating in the aircraft in which they are training. Common uses will be upgrade, transition back to an aircraft, or if the pilot held the type rating before the training began. The Authorized Function "Conduct Pilot Airmen Certification Tests" does result in a type rating and can be combined with "Conduct AQP Initial Qualification" when applicable.

Section 8. Authorized Functions for Part 141

8.1

Q: How does the Flight school's Part 141 Air Agency Certificate impact the ODA?

A: The Part 141 Air Agency Certificate and ODA are two separate systems and are not connected. The Part 141 Air Agency must maintain an active 14 CFR Part 141 Pilot School Certificate for the AC ODA to exist. A Part 141 school must meet the renewal requirements of § 141.27(a) every 24 months. If the school does not meet these requirements, it will revert to a provisional school. If it is a provisional school, it would be ineligible to maintain or apply for an AC ODA.

Reference

FAA Order 8100.15C, Chapter 3, Section 1., Paragraph 3-4,h., AC ODA

8.2

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

A: AC ODA is non-mandatory and if a Part 141 pilot school already has examining authority and wants to also pursue an application for AC ODA, the two systems would be distinctly separate and not connected. FAA Order 8100.15C, Chapter 3, Section 2., 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**. A Part 141 pilot school may obtain examining authority on a course-by-course basis under Subpart D of Part 141. Under examining authority, a pilot school may administer its tests and recommend for certificates and ratings only those students who complete the school's approved Part 141 training programs. A pilot school must satisfy Subpart D of Part 141 when exercising its examining authority. 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 provision in this Order when exercising its ODA.

8.3

Q: Is there a minimum number of checkrides that must be done outside the ODA holder's main facility?

A: There is no minimum number of checkrides required to be performed outside of the ODA holder's main facility. The FAA Organization Management Team will determine if there is a need for an AC ODA and if having an ODA is a benefit to the FAA. The need, ability, and benefit will be reevaluated at each renewal of the ODA authorization. It is important to note, the ODA holder needs to serve the public and fulfill the FAA's certification needs—not just the needs of the school.

Reference

FAA Order 8100.15C, Chapter 2., Paragraphs 2-1. and 2-2.

8.4

Q: What qualifies as working experience as listed in FAA Order 8100.15C, Section 1., Paragraph 3-3.a.(1)?

A: There are multiple ways an ODA administrator applicant can meet the "5 years of working experience" requirements. Examples are Part 141 Chief Instructor, Part 141 Assistant Chief Instructor, or Designated Pilot Examiner (DPE). It is possible other Part 141 titled positions not recognized by the FAA may also qualify. Some examples of these positions are Director of Training or Training Program Manager.

Keep in mind that the above positions may meet the 5 years of working experience, but applicants must also have experience managing training programs as required by FAA Order 8100.15C, Chapter 3., Section 1., Paragraph 3-3.a.(1)(b).

Some questions, for example, those about experience, will be addressed in the required ODA procedures manual. The procedures manual must be acceptable to the appointing office. The appointing office will review and approve the manual before it is put into use.

8.5

Q: FAA Order 8100.15C, Chapter 3., Section 1., Paragraph 3-2.c. states that an applicant must have experience issuing certification approvals of the same type and complexity as those covered by the requested authorization to be eligible for ODA. What does "same type and complexity" mean?

A: The ODA applicant must meet all the requirements in FAA Order 8100.15C, Chapter 3, Paragraph 3-2 ODA Holder Qualifications. In addition, there is a paragraph specific to AC ODA, FAA Order 8100.15C, Chapter 3, Paragraph 3-2c.(4). Here is an excerpt - "Applicants seeking an AC ODA must have a 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."

- "Performing airmen certification activity" – a part 141 pilot school with examining authority meets this qualification.

- "for managing programs leading to the issuance of airman certificates" – a part 141 school without examining authority but has courses leading to an airman certificate meets this qualification

- The sentence has an "or" so the applicant does not need to meet all the qualifications in the sentence.

- "Authorization" – Reference the "authorized functions" in the table. The ODA applicant needs to be qualified for the authorized function (16301, 16309, 16311) to apply to become an ODA holder. They may meet this by having a pilot training course that leads to the issuance of a pilot certificate.

- The Evaluation Panel/OMT will review the ODA holder Procedures Manual to ensure that the ODA applicant has listed the appropriate limitations for types of airmen certification tests that the ODA applicant intends to conduct and ensure that the proposed unit members meet the qualifications to conduct the airmen certification tests.

- In addition, the Evaluation Panel will thoroughly evaluate the application, the proposed procedures manual, the applicant's qualifications, the proposed ODA administrator's and ODA UMs' qualifications, and the organization's resources and structure. (FAA Order 8100.15C 4-3. Selection Process. d. Evaluation of the Application.

Section 9. Authorized Functions for Part 142

9.1

Q: Will the ODA be required to follow the DMS Order as it pertains to the Training Center submitting a letter for appointment of a TCE UM?

A: No. The applicable and controlling order for ODA delegation is FAA Order 8100.15C, Chapter 3, Section 4., Paragraph 3-16. *Selection of ODA UMs and ODA Administrators*, which details the UM selection process. The procedures for UM selection must be detailed in the ODA holder's procedures manual approved by the OMT. UMs, however, are required to possess the same training and qualifications as current designees for that CFR part and function code.

Reference

FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-16.

9.2

Q: In FAA Order 8100.15C, Chapter 3., Section 1., Paragraph 3-4.(h)(3)(c)(2), it states that there must be an active MOU between the FAA and the Part 142 certificate holder as defined in FAA Order 8900.1, *Flight Standards Information Management System,* Volume 3, Chapter 54, or FAA Order 8000.95, *Designee management Policy*, Volume 7, as appropriate. What is the purpose of this requirement given that the original purpose of the MOU per FAA Order 8000.95 is to establish and maintain TCEs and to provide training for FAA Operations ASIs assigned to provide oversight duties at the training center…functions that would now fall to the ODA holder?

A: The FAA Inspectors (OMT Members) will continue to provide oversight of the ODA holder with a surveillance program. A part of the oversight includes but is not limited to Authorized Function

Performance assessments (FAA Order 8100.15C, Chapter 4, Section 3., Paragraph 4-18.a.(2)) which require the same technical expertise as an FAA Inspector conducting a TCE observation. Also, the OMT members will be surveilling the courseware, course delivery, facilities etc. to ensure the ODA holder system is working properly.

References

FAA Order 8100.15C, Chapter 4., Section 3., Paragraph 4-18

FAA Order 8000.95, as revised, Volume 7, Chapter 3

FAA Order 8000.95, as revised, Volume 7, Chapter 6

FAA Order 8900.1, Volume 1, Chapter 3, Section 6

9.3

Q: Will the ODA holder be granted the authority to fully manage the TCE UMs?

A: The ODA holder will be responsible for the selection, training, managing and records retention of the individual ODA UMs in accordance with the approved procedures manual.

Reference

FAA Order 8100.15C, Chapter 3,, Section 4,, Paragraph 3-16.

9.4

Q: In the ODA Order, it states that TCE UMs must meet the same eligibility requirements and maintain the same training and qualifications as would be required for individual Training Center Evaluators (TCE) to accomplish the same functions. Will the ODA Unit be 100% responsible for TCE UM eligibility including initial and recurring training, standardization meetings, etc?

A: It depends. Training will need to be detailed the procedures manual developed by the ODA holder for training of its UMs and other positions. Reference 8100.15C, Chapter 3, Section 2, Paragraph 3-5 Procedures Manual, k. ODA training.

The training is in two categories, FAA provided training and ODA provided training. FAA provided training done currently for the TCEs will continue to be completed by the OMT unless the ODA holder requests to provide the equivalent training to the TCE UMs approved by the FAA. The ODA would need to coordinate with their OMT and the OMT would determine if the ODA holder is capable of providing that training or what portions of that training if any the ODA holder can provide. Again, after the ODA holder makes the request that decision ultimately lies with the OMT in what training the FAA OMT will retain and what may be authorized for the ODA holder to conduct.

Reference

FAA Order 8100.15C, Chapter 3., Section 4., Paragraph 3-15.

9.5

Q: Will the ODA Unit be required to complete an evaluation panel as stated in the DMS Order? Example, is the Evaluation Panel (EP) required by the ODA Unit Administrator and/or their designated UM as per DMS or ODA policy manual?

A: The ODA holder is responsible for the UM selection and appointment process. In addition, UMs are evaluated through the ODA holder's Internal Audit Program.

References

Order 8100.15C, Chapter 3, Section 2., Paragraph 3-5. j(1)(d).

Order 8100.15C, Chapter 3, Section 4., Paragraph 3-16.a.

Order 8100.15C, Chapter 3, Section 5., Paragraph 3-26.

9.6

Q: Why can't a Training Center Evaluator (TCE) UM receive the authorized function to conduct air carrier check pilot observations that are required under 14 CFR §§ 121.413(a)(2) and 135.339(a)(2)?

A: FAA Order 8000.95, as revised, Volume 7, lists the different types of authorizations available to a TCE. These include certificate level testing and checking authorizations, aircraft category and class authorizations, administrative authorizations, and special authorizations. The special authorizations available to TCEs are those that allow authorized TCE to conduct §142.53 instructor observations and §142.55 proficiency checks. These special authorizations are afforded to TCEs and TCE UMs through FAA Order(s) 8000.95 and 8100.15C, respectfully. It is important to note that both FAA orders clearly state that these observations and proficiency checks are not activity covered by 49 USC §44702. Similarly, a TCE that is only authorized to conduct 61.58 recurrent proficiency checks also falls under this limitation and is not covered by 49 USC §44702. In both cases, a certificate is not issued, therefore, those TCEs are not exercising their authority under 14 CFR Part 183.

Additionally, FAA Order 8000.95,as revised, Volume 6, lists the different types of authorizations available to a TCE. These include certificate level testing and checking authorizations, aircraft category and class authorizations, administrative authorizations, and special authorizations. An APD can only conduct activities for which they are authorized. Therefore, only an APD who has been approved as a Check Pilot Examiner (CPE) by the POI or MS is authorized to conduct initial and/or recurrent 14 CFR part 121, §121.413, or part 135, §135.339 observations. These special authorizations are not available to TCEs. As stated in FAA Order 8000.95, as revised, Volumes 6 and 7, these special authorizations are not activity covered by Title 49 of USC §44702. The FAA merely uses DMS to oversee and manage the performance of these regulatory functions.

9.7

Q: Is it observation or evaluation in FAA Order 8100.15C, Chapter 5, Section 8, Paragraphs 5-43.d.(7) and (8)?

A: For FAA Order 8100.15C, Chapter 5, Section 8, Paragraphs, 5-43.d.(7) and (8) use of the term "evaluation," below, is provided to align with regulatory terminology and to be consistent with the wording in related sections.

Paragraph (7): Conduct Instructor Annual Proficiency Checks (16413). This function authorizes the ODA holder to conduct the evaluation requirement of § 142.53(a)(7).

Paragraph (8): Conduct Evaluator Annual Proficiency Checks (16414). This function authorizes the ODA holder to conduct the evaluation requirement of § 142.55(a)(4).

In addition, AVS-60 issued a policy memorandum that clarifies when to use "observation" and when to use "evaluation". Refer to Policy Memorandum AVS-60-FY26-PM09, *FAA Order 8100.15C, Organization Designation Authorization Procedures, policy clarification related to the Airmen Certification (AC) ODA type for Title 14 Code of Federal Regulations (CFR) Parts 121, 135, and 142,* dated May 8, 2026.

Section 10. Authorized Functions for Part 145

10.1

Q: How does a 14 CFR Part 145 Air Agency meet the Qualifications and Eligibility requirements of FAA Order 8100.15C, Chapter 3?

A: AVS-60 issued Policy Memorandum AVS60-FY26-DM18, *FAA Order 8100.15C, Organization Designation Authorization Procedures, policy deviations related to the Airmen Certification (AC) ODA type for Title 14 Code of Federal Regulations (CFR) Part 145*, dated July 16, 2026.

This memorandum authorizes deviations from certain provisions of FAA Order 8100.15C, to clarify the application of policy for ODA applicants and holders requesting the AC ODA type specific to Authorized Functions available to 14 CFR Part 145 certificate holders.

Section 11. Authorized Functions for Part 147

11.1

Q: Are the function codes for the 14 CFR Part 147 AC ODA applied based on Part 147's AMTS ratings, or are they applied similarly to an Individual Designated Maintenance Examiner (DME)? How do the Authorized Function Codes interface with Mechanic Test Generator (MTG)?

A: Question Clarification: If an AMTS has AMTS ratings for Airframe only, Powerplant only, and/or Airframe and Powerplant single certificate, does the 14 CFR Part 147 AC ODA need all three function codes assigned, Conduct Airmen Certification Tests for Airframe rating (16605), Conduct Airmen Certification Tests for Powerplant rating (16606), and Conduct Airmen Certification Tests for Airframe and Powerplant ratings (16607), or because they have all of the AMTS ratings, can they just have Conduct Airmen Certification Tests for Airframe and Powerplant ratings (16607)?

Background:

FAA Order 8000.95, as revised, Volume 5. DME, DPRE, AND DAR-T Designee Policy, Chapter 1. General Information, Section 2. Designee Roles & Definitions, 1. Definition of Roles in Flight Standards (FS) Maintenance (DME, DPRE, DAR-T), paragraph a. defines the privileges available for a DME. These privileges are Airframe (A), Powerplant (P), and Airframe and Powerplant (A&P). Unlike other individual designees, such as a Designated Airworthiness Representative—Maintenance (DAR-T), no function codes are assigned to these privileges.

The DME Certificate Letter of Authority (CLOA) is generated using the FAA application Designee Management System (DMS). The CLOA identifies the designee type and the specific authorizations (or function codes) and limitations. The DMS automation for a DME only offers options to authorize Airframe and/or Powerplant. There is no option for Airframe and Powerplant (A&P). If a DME has Airframe and Powerplant privileges authorized on their CLOA, it authorizes them to perform Airframe only, Powerplant only, or Airframe and Powerplant combined tests as required based on the mechanic applicant's testing needs.

FAA Order 8100.15C:

Chapter 3. ODA Applicant and ODA Holder Responsibilities, Section 1. Qualifications and Eligibility, 3-2. ODA Holder Qualifications, paragraph c. Experience, sub-paragraph (4) requires AC ODA applicants to either have a recent and successful history of performing airmen certification activity or have responsibility managing programs leading to the issuance of airman certificates of the same type and complexity as those for which the authorization is sought. FAA Order 8100.15C, Chapter 5. ODA Types, Authorized Functions, and Program Requirements, Section 8. Airmen Certification ODA (AC ODA), paragraph 5-43. Functions, sub-paragraph f. 14 CFR Part 147 AC ODA Functions, lists and defines the authorized functions available for a 14 CFR Part 147 AC ODA.

The 14 CFR Part 147 AC ODA Functions are:

- Conduct Airmen Certification Tests for Airframe rating (**16605**). This function allows unit members to accomplish airmen certification activities for an airframe rating per Part 65.
- Conduct Airmen Certification Tests for Powerplant rating (**16606**). This function allows unit members to accomplish airmen certification activities for a powerplant rating per Part 65.
- Conduct Airmen Certification Tests for Airframe and Powerplant ratings (**16607**). This function allows unit members to accomplish airmen certification activities for an airframe and powerplant ratings per Part 65.

Policy Clarification:

FAA Order 8100.15C, Chapter 3, Section 1., Paragraph 3-2.c.(4):

> Applicants seeking an AC ODA must have a 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.

11.2

Q: How does the ODA applicant meet the experience requirement for the same type and complexity?

A: The second part of this experience requirement, “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,” applies to 14 CFR Part 147 AC ODA applicants.

The intent of this experience requirement is for the 14 CFR Part 147 AC ODA applicants' AMTS ratings to align with the 14 CFR Part 147 AC ODA Authorized Functions.

If an applicant for 14 CFR Part 147 AC ODA has AMTS ratings for Airframe only, Powerplant only, and/or Airframe and Powerplant single certificate, the appropriate 14 CFR Part 147 AC ODA Authorized Functions to test for all three AMTS ratings would be:

- Conduct Airmen Certification Tests for Airframe rating (**16605**). This function allows unit members to accomplish airmen certification activities for an airframe rating per Part 65.
- Conduct Airmen Certification Tests for Powerplant rating (**16606**). This function allows unit members to accomplish airmen certification activities for a powerplant rating per Part 65.
- Conduct Airmen Certification Tests for Airframe and Powerplant ratings (**16607**). This function allows unit members to accomplish airmen certification activities for an airframe and powerplant ratings per Part 65.

The 14 CFR Part 145/147 AC ODA Authorized Function codes do not directly interface with the Mechanic Test Generator (MTG). The DMS-to-MTG interface allows a 14 CFR Part 145/147 AC ODA Unit Member to access the MTG, which simply verifies that the Unit Member is on the AC ODA Unit Member Table. The 14 CFR Part 145/147 AC ODA Authorized Function codes authorized for that Unit Member do not impact or limit the Unit Member's access to the MTG.

If a Unit Member for a 14 CFR Part 145/147 AC ODA only had authorized function code 16605 to conduct airmen certification tests for Airframe ratings, the Unit Member would still have MTG access to create airmen certification tests with the powerplant or a combined Airframe and Powerplant knowledge and skills elements.

A 14 CFR Part 145/147 AC ODA will need robust policies and procedures in its Approved Procedures Manual to ensure the Unit Members performing the mechanic certification tests have the appropriate authorized function code and that those procedures adhere to and align with the FAA Order 8900.1, Volume 5 requirements to Administer an Oral and Practical Test for a Mechanic Applicant under Part 65 Subpart D.

Glossary of Acronyms and Abbreviations

ACSA	Air Carrier Safety Assurance
AC ODA	Airmen Certification Organization Designation Authorization
ADE	Aircrew Designated Examiner
AFB	Office of Foundational Business
AIDS	Accident/Incident Data System
AIR	Aircraft Certification
AO ODA	Air Operator
APD UM	Aircrew Program Designee Unit Member
APDs	Aircrew Program Designee
APM	Aircrew Program Manager
AQP	Advanced Qualification Program
ASI	Aviation Safety Inspector
AVS	Aviation Safety
CSOP	Certification Services Oversight Process
DAR-F	Designated Airworthiness Representative for Manufacturing
DAR-T	Designated Airworthiness Representative—Maintenance
DIN	Designee Information System
DME	Designated Mechanic Examiner
DMIR	Designated Manufacturing Inspection Representative
DMS	Designee Management System
DPE	Designated Pilot Examiner
DPRE	Designated Parachute Rigger Examiner
DRS	Dynamic Regulatory System
eCFR	Electronic Code of Federal Regulations
EIS	Enforcement Information System
FAQ	Frequently Asked Question
FS	Flight Standards Service
FSIRP	Flight Standards Inspector Request Program
FTPM	Fleet Training Program Manager
GASA	General Aviation Safety Assurance
MOU	Memorandum of Understanding
MRA	Major Repair, Alteration, and Airworthiness
MTG	Mechanic Test Generator
OMT	Organizational Management Team
OSS	Office of Safety Standards

PC	Production Certification
PIC	Pilot in Command
PMA	Parts Manufacturer Approval
POI	Principal Operations Inspector
PPM	Partial Program Manager
SAS	Safety Assurance System
SMS	Safety Management System
SPAS	Safety Analysis Performance System
SRM	Safety Risk Management
STC	Supplemental Type Certification
TC	Type Certification
TCE	Training Center Evaluator
TCE UM	Training Center Evaluator Unit Member
TCPM	Training Center Program Manager
TSOA	Technical Standard Order Authorization
UM	Unit Member