



Federal Aviation Administration

SUBJ: Questions and Answers (Q&A): FAA Order 8100.15C, *Organization Designation Authorization Procedures* ("Revision C") Changes for Organization Management Teams (OMT) and Organization Designation Authorization (ODA) Holders

Purpose: This Q&A document is designed to support existing OMTs and ODA holders in implementing the new policy in Revision C. This Q&A document serves as a practical resource to address common questions and clarify procedures related to this policy.

The ODA Office (AVS-60) is responsible for maintaining and regularly updating this Q&A document to ensure the information remains current and reflective of any changes in policy or implementation needs. This ensures that OMTs and ODA holders have access to the most up-to-date guidance as they navigate the requirements of Revision C.

Document Revision History

Revision	Description of Change	Effective Date
0	Original	06/30/2025
1	• Update "Rev C" to "Revision C" for consistency across documents (not marked with a change bar) • Expanded Table of Contents (not marked by change bar) • Added question 3.7 and renumbered remaining questions • Added questions 5.5 and 5.6 and renumbered remaining questions • Added question 7.3 and renumbered remaining questions • Added Section 8 • Updated Glossary of Abbreviations and Acronyms	08/14/2025

Contents

Document Revision History	1
Section 1. ODA Program	4
1.1 Where can I find more information about ODA?	4
1.2 Where can I ask for policy support or submit questions?	4
Section 2. General Revision C	4
2.1 Why is FAA Order 8100.15 being revised?	4
2.2 What are the major changes in Revision C?	4
2.3 Where can I find comments on the draft Revision C and the FAA's responses?	4
2.4 Is there one ODA procedures manual for multiple ODA types or can the ODA choose to have different manuals for each ODA type?	4
Section 3. Transition to Revision C	4
3.1 Is there any guidance on how to transition to Revision C?	4
3.2 Will there be OMT training for Revision C changes?	5
3.3 Do OMT members have to be requalified or retrained under Revision C?	5
3.4 Where can I find resources to help with the transition?	5
3.5 What if I submitted an ODA application before Revision C was effective?	5
3.6 What happens if the ODA has not been renewed or is in process?	5
3.7 What happens to already accepted ODA applications that are in-process when the Order becomes effective?	5
3.8 Will an ODA expansion request be affected by the transition to Revision C?	5
3.9 When do ODA holders need to comply with Revision C?	5
3.10 What happens if the ODA holder misses the procedure manual update deadline?	5
3.11 What happens if the OMT is unable to approve the procedures manual within 15 months?	5
3.12 How do OMTs transition from Revision B oversight to Revision C RBDM surveillance?	6
3.13 How does Revision C affect OMT surveillance activities?	6
3.14 Can the procedures manual changes be done via a temporary revision?	6
3.15 Will ODA holders that miss the 12-month submission deadline for revised procedures manuals be automatically suspended?	6
3.16 Are there any tips for revising, reviewing, and approving ODA holder procedures manual revisions?	6
Section 4. Airmen Certification (AC) ODA	6
4.1 Where can I find more information about the new AC ODA type?	6
4.2 Where can I find more information about adding the new AC ODA to existing authorizations? ..	6
Section 5. Revision C Oversight	7
5.1 How is oversight changing in Revision C?	7
5.2 How are the surveillance activities changing from Revision B to Revision C?	7
5.3 What is Risk Based Decision Making (RBDM)?	7
5.4 How is the RBDM Surveillance Window established?	7

5.5	How is the RBDM System Compliance Assessment criteria established?	7
5.6	How is the RBDM Authorized Function and Performance Assessment criteria established?.....	8
5.7	Will there be a tool available for OMTs for the new RBDM process?	8
5.8	Is there a minimum requirement for engineering OMT member on-site surveillance in Revision C?.....	8
5.9	Will there be more surveillance activities under Revision C?	8
Section 6. Revision C Surveillance App (RCSA).....		8
6.1	What is RCSA?	8
6.2	Do I have to use RCSA?.....	9
6.3	Can I have access to RCSA?	9
6.4	What support is available to help me use RCSA?	9
6.5	What data is used for the RCSA?.....	9
6.6	How will the RCSA interface with existing applications like Safety Assurance System (SAS)? Are there duplicate entries?	9
Section 7. OMT Data Portal.....		9
7.1	Who is responsible for entering data into the OMT Data Portal?	9
7.2	How do I enter data into the OMT Data Portal?	9
7.3	What data will OMTs be required to input in the OMT Data Portal?	9
7.4	How often should the data in the OMT Data Portal be updated?	9
7.5	What happens if there is a delay in entering data into the OMT Data Portal?	10
7.6	Can the OMT Data Portal be accessed by ODA holders or the public?.....	10
7.7	Where can I find more detailed instructions on using the OMT Data Portal?.....	10
Section 8. Training		10
8.1	Will there be OMT training on Revision C changes?	10
8.2	Will training on interference be required as part of the OMT Core training requirements?.....	10
Glossary of Abbreviations and Acronyms.....		11

Section 1. ODA Program

1.1 Where can I find more information about ODA?

Visit the Dynamic Regulatory System (DRS) at <https://drs.faa.gov> for official FAA regulatory and guidance material. Additional information is available on the FAA website:

- FAA Only: [ODA Office \(AVS-60\)](#)
- Public: [Delegated Organizations](#)

1.2 Where can I ask for policy support or submit questions?

You can send questions to 9-AVS-ODA-Office@faa.gov.

Section 2. General Revision C

2.1 Why is FAA Order 8100.15 being revised?

The revision incorporates a systems-based approach to oversight and a risk-based decision-making process to enhance FAA ODA surveillance activities. It also incorporates several existing FAA policies and aligns with congressional requirements under the Aircraft Certification, Safety, and Accountability Act of 2020 (ACSAA).

2.2 What are the major changes in Revision C?

Key changes include:

- Strengthen the ODA program per ACSAA requirements, such as prohibiting unit member (UM) interference and enhancing FAA UM approval processes.
- Evolve to a systems-based ongoing surveillance approach, focusing on risk factors rather than calendar-based oversight.
- Expand into a new ODA type for Airmen Certification (AC), enhancing FAA's resource efficiency.

2.3 Where can I find comments on the draft Revision C and the FAA's responses?

Public comments and FAA responses will be available on the [DRS](#) website under Revision C's "Attachments/Public Comments." FAA employees can sign in to view internal comments.

2.4 Is there one ODA procedures manual for multiple ODA types or can the ODA choose to have different manuals for each ODA type?

The lead managing FAA office has the final authority to determine whether the FAA will support the ODA having separate manuals.

Section 3. Transition to Revision C

3.1 Is there any guidance on how to transition to Revision C?

Yes, FAA policy memorandum AVS60-FY25-PM05, *Policy for Organization Management Teams (OMT) on the Transition from FAA Order 8100.15B, Organization Designation Authorization Procedures, to FAA Order 8100.15C*, provides detailed guidance on transitioning from FAA Order 8100.15B ("Revision B"), including how to adapt to the new oversight approach and the Risk Based Decision Making (RBDM) process.

3.2 Will there be OMT training for Revision C changes?

AVS-60 offers outreach sessions for the transition from Revision B to Revision C. Formal FAA training is being updated and will be available soon after the release of Revision C. Training requirements for core OMT members and leads are detailed at:

- Aircraft Certification Service (AIR): [OMT Training Requirements](#)
- Flight Standards Service (FS): [Inspector Training for Designee Oversight](#)

3.3 Do OMT members have to be requalified or retrained under Revision C?

No, current qualifications and training are valid under Revision C. If you're already trained and qualified, you remain so.

3.4 Where can I find resources to help with the transition?

FAA personnel can visit the [ODA Office \(AVS-60\)](#) website for additional resources and support related to the transition. ODA holders should speak with their OMTs and can visit the [FAA's Information for ODAs](#) website for more information.

3.5 What if I submitted an ODA application before Revision C was effective?

If you applied before the effective date, your application will be evaluated on a case-by-case basis. Evaluation panel leads must contact AVS-60 at 9-AVS-ODA-Office@faa.gov for guidance.

3.6 What happens if the ODA has not been renewed or is in process?

The ODA renewal process is not affected by the transition. Follow Revision C policy for any in-process renewals.

3.7 What happens to already accepted ODA applications that are in-process when the Order becomes effective?

For organizations that applied for ODA prior to the effective date of Revision C and wrote their procedures manual to comply with the requirements of Revision B, the FAA will evaluate the timelines for revising procedures manuals in accordance with Revision C on a case-by-case basis.

Timelines for compliance with Revision C requirements will be established between the applicant, evaluation panel, and AVS-60. Evaluation Panel leads should contact AVS-60 at 9-AVS-ODA-Office@faa.gov as soon as practical to establish the required timeline.

3.8 Will an ODA expansion request be affected by the transition to Revision C?

Yes, ODA expansion requests may be in process or submitted after the effective date of Revision C. Regardless of timing, all expansion requests must comply with the policy requirements and schedule outlined in Revision C. In unique situations where meeting these requirements may be challenging, OMTs are advised to coordinate with AVS-60 well in advance to find the best solution.

3.9 When do ODA holders need to comply with Revision C?

ODA holders must submit revised procedures manuals within 12 months of the Order's effective date. OMTs must approve these revisions within 15 months of the Order's effective date.

3.10 What happens if the ODA holder misses the procedures manual update deadline?

An ODA holder's failure to submit its proposed procedures manual updates within 12 months of Revision C's effective date may result in suspension of the ODA holder's authorization.

3.11 What happens if the OMT is unable to approve the procedures manual within 15 months?

If the OMT cannot approve the procedures manual within 15 months of the Order's effective date, the OMT lead will initiate the suspension process. OMTs must also inform AVS-60 by contacting 9-AVS-ODA-Office@faa.gov to discuss the situation and determine the necessary steps.

3.12 How do OMTs transition from Revision B oversight to Revision C RBDM surveillance?

- Review the updated guidelines and processes outlined in Revision C, focusing on the RBDM process described in Quality Procedure Manual (QPM) AVS-060-001-W1, *Risk Based Decision Making Process for Minimum ODA Holder Surveillance Activities Work Instruction* (“QPM AVS-060-001-W1”).
- Use the Revision C Surveillance Application (RCSA) to assist in standardizing policy application, planning, and documenting surveillance activities.
- Develop and approve the initial surveillance plan within 90 days of the Order's effective date.
- Coordinate with AVS-60 for any necessary training or clarification on using the RBDM process and tools.
- Regularly review and adjust surveillance plans as needed, using the RBDM module in the RCSA to guide decision-making based on risk assessments.

3.13 How does Revision C affect OMT surveillance activities?

You'll need to use the RCSA app for planning and documenting surveillance activities and ensure your surveillance plan is approved within 90 days of the Order's effective date.

3.14 Can the procedures manual changes be done via a temporary revision?

Yes, manual revisions and approvals can be handled through existing procedures, including temporary revisions.

3.15 Will ODA holders that miss the 12-month submission deadline for revised procedures manuals be automatically suspended?

Not necessarily. Extensions may be granted for valid reasons, and suspension is at the discretion of the OMT. However, any extension for the ODA holder does not automatically extend the 15-month deadline for the OMT to approve the procedures manual. Requests for extensions must be made by the OMT lead to the Appointing Office Manager, who will then notify the ODA Office.

3.16 Are there any tips for revising, reviewing, and approving ODA holder procedures manual revisions?

One best practice is to communicate early between the OMT and ODA holders, agree on the revision approach, and establish regular check-ins. Consider using a spreadsheet to track comments and ensure the procedures manual aligns with the FAA's review and approval process.

Section 4. Airmen Certification (AC) ODA

4.1 Where can I find more information about the new AC ODA type?

Information on AC ODA is available in Revision C. Specifically, you can refer to:

- Chapter 2: ODA Program Overview
- Chapter 3: ODA Applicant and ODA Holder Responsibilities
- Chapter 5, Section 8: Airmen Certification ODA

Additional resources are available on the [FAA's AC ODA](#) website.

4.2 Where can I find more information about adding the new AC ODA to existing authorizations?

Details on adding the new AC ODA to existing authorizations can be found on the [FAA's AC ODA](#) website.

Section 5. Revision C Oversight

5.1 How is oversight changing in Revision C?

Revision C transitions to a systems-based, ongoing surveillance approach. It eliminates the requirement for a bi-annual Delegation Organization Inspection Program (DOIP) audit and annual supervision records, replacing them with ongoing surveillance activities. These activities will be scheduled throughout the year based on a risk assessment of the ODA holder's system and authorized functions.

5.2 How are the surveillance activities changing from Revision B to Revision C?

The Revision C oversight approach has shifted to a systems-based, risk based decision making process. Surveillance activities are now focused on risk factors, such as areas with open corrective actions or higher risk elements. The ODA holder's system is divided into eight elements: Procedures Manual, Records, Unit Members, Training, Internal Audit Program, Corrective Action, Continuing Requirements, and Authorized Functions.

The types of surveillance activities remain similar to those in Revision B, such as reviews of project data, approvals, records, UM selection, and conformities. However, these activities are now organized into specific system elements and tailored based on the ODA holder's risk profile, which may result in more targeted oversight.

For detailed guidance on implementing the RBDM surveillance process, refer to the FAA's internal document QPM AVS-060-001-W1. Additionally, new forms have been introduced for documenting surveillance activities and findings, with a reduction in finding types from six to three: noncompliance, unsatisfactory performance of an authorized function, and other conditions. Opportunities for Improvement are also introduced, which are recommended changes that don't require corrective action.

5.3 What is Risk Based Decision Making (RBDM)?

RBDM is a framework used by the FAA in three different contexts within the ODA program:

- AIR RBDM Philosophy: Utilized in the FAA's Recognition of Applicant Showings of Compliance (RASC).
- FS's RBDM Tool: Applied when determining make/model authorization or for continued authorization.
- RBDM for ODA Surveillance: Employed to determine the minimum required surveillance activities for overseeing ODA holders (reference QPM AVS-060-001-W1).

5.4 How is the RBDM Surveillance Window established?

The RBDM Surveillance Window is established by assessments of the ODA holder's performance based on key criteria as well as the complexity of their authorization. The surveillance window will be set within a range from one to four years (reference QPM AVS-060-001-W1).

5.5 How is the RBDM System Compliance Assessment criteria established?

The RBDM Surveillance Window considers the Organization Impact Decision (OID) and the Organization Performance Assessment (OPA). The objective of the OID is to assign an appropriate level of impact for each organization, which is established by the number of ODA types the organization is authorized and the complexity of the authorization. The OPA focuses on specific organization performance questions regarding an organization's culture and environment; authorized functions and programs; and their continuous improvement system. The FAA-assigned OPA questions, answers, values, and weights are defined in an internal process document (reference QPM AVS-060-001-W1). The indicators, values, and weights were established based on experience with the ODA Program since its inception.

AVS-60 will monitor the effectiveness of the criteria and output and update the key components of the RBDM for continuous improvement. The RBDM work instruction can be updated without revising the policy, so it can evolve based on feedback and the performance of the RBDM.

5.6 How is the RBDM Authorized Function and Performance Assessment criteria established?

The policy offices assigned an interdisciplinary team to develop the RBDM process. The team took an approach based on a standard risk model (severity x likelihood = risk). The team assigned each authorized function a severity independent of the other authorized functions. Likelihood ("Performance Category") is represented by the number of open, non-implemented corrective actions. A heavier weighting is given to those corrective actions that involve systemic issues. The team then assigned the number of minimum activities associated with the rated risk of the authorized function ("System Impact"). In addition, the team reviewed different ways to account for the complexity and workload of the ODA holder. The team determined a potential direct measure would be the number of UMs performing a specific authorized function. A multiplier (10-40% of UM) was added to account for the complexity and workload of the ODA holder. By doing this, larger ODA holders with more UMs will require more minimum surveillance activities than smaller ODA holders. Likewise, better performing ODA holders (proactive in correcting issues) will have relatively fewer minimum surveillance activities than a poor performing ODA holder (reference QPM AVS-060-001-W1).

AVS-60 will monitor the effectivity of the criteria and output and update the key components of the RBDM for continuous improvement. The RBDM work instruction can be updated without revising the policy, so it can evolve based on the performance of the RBDM.

5.7 Will there be a tool available for OMTs for the new RBDM process?

Yes, the RCSA will be used for planning and tracking surveillance activities, helping standardize policy application, and streamlining processes.

5.8 Is there a minimum requirement for engineering OMT member on-site surveillance in Revision C?

No, Revision C removes the requirement for engineering OMT members to perform on-site surveillance. It is now optional.

5.9 Will there be more surveillance activities under Revision C?

This new approach to surveillance will aid in more appropriate alignment of the quantity of surveillance activities and the performance of the ODA holder in terms of compliance to the requirements and willingness to address deficiencies quickly.

Section 6. Revision C Surveillance Application (RCSA)

6.1 What is RCSA?

The RCSA is an information technology (IT) system used by the FAA OMT to facilitate the Revision C surveillance requirements. It helps:

- Perform the RBDM Quality Management System (QMS) process.
- Conduct risk assessments and plan surveillance requirements.
- Document surveillance activities and results.

The RCSA is composed of four modules:

- RBDM.
- Surveillance Planning.
- Surveillance Activities.
- Surveillance Reports.

6.2 Do I have to use RCSA?

Yes, if you are an OMT lead or core OMT member. The RCSA supports consistent implementation of Revision C surveillance requirements. Other users, like ODA holders, are not required to use it.

6.3 Can I have access to RCSA?

Access is granted only to FAA personnel, including OMT leads, core OMT members, and their management or support personnel. External access, such as for ODA holders or the public, is not allowed.

6.4 What support is available to help me use RCSA?

You can visit the [ODA Office \(AVS-60\)](#) website for more resources, including an RCSA User Manual and workshop presentations. If you have any questions or need additional support, contact the ODA Office at 9-AVS-ODA-Office@faa.gov.

6.5 What data is used for the RCSA?

The RCSA utilizes information from the ODA Static Page in the Designee Management System (DMS) and data collected and maintained by the OMT. This includes ODA types, authorized functions, OMT membership, and ODA holder status.

6.6 How will the RCSA interface with existing applications like Safety Assurance System (SAS)? Are there duplicate entries?

The RCSA will have a background interface with the SAS. SAS will pull RCSA surveillance activity information to the platform. OMT members in FS will not need to duplicate surveillance entries in SAS.

Section 7. OMT Data Portal

7.1 Who is responsible for entering data into the OMT Data Portal?

OMT leads are responsible for ensuring accurate and timely data entry into the OMT Data Portal.

7.2 How do I enter data into the OMT Data Portal?

Access the [AVS-60 OMT Data Portal](#) to enter information into the Revision C Implementation Module.

7.3 What data will OMTs be required to input in the OMT Data Portal?

OMT leads are required to input the following data:

- Date of receipt of the ODA holder's procedures manual revision.
- Date the OMT approved the procedures manual revision.
- Date the managing office approves an OMT extension request and the new expected approval date.
- Date the OMT receives a procedures manual approval extension and the new expected approval date.

Data should be input within 10 business days data submission to OMTs.

See AVS60-FY25-PM05 for additional compliance information.

7.4 How often should the data in the OMT Data Portal be updated?

Data should be updated within 10 business days of:

- Receiving the ODA holder's initial Revision C procedures manual revision.
- Approving the ODA holder's Revision C procedures manual revision.

- Approving an extension request.

7.5 What happens if there is a delay in entering data into the OMT Data Portal?

Delays in data entry can impact compliance and progress timelines. OMT leads should coordinate with their teams to ensure prompt updates and communicate any issues to the managing office if delays occur.

7.6 Can the OMT Data Portal be accessed by ODA holders or the public?

No, the OMT Data Portal is intended for internal use by FAA personnel, including OMT leads and core members.

7.7 Where can I find more detailed instructions on using the OMT Data Portal?

Detailed instructions and guidelines for using the OMT Data Portal can be found in the Policy Memorandum AVS60-FY25-PM05. Additional support may be available through outreach sessions or internal AVS-60 resources.

Section 8. Training

8.1 Will there be OMT training on Revision C changes?

The ODA Office has updated the following formal training course for new OMT members and recurrent training:

- For OMT leads and members, the 2024 – 2025 ODA Seminar (27200184) will no longer be available for registration or completion in electronic Learning Management System (eLMS). In the Fall of 2025, it will be replaced by the 2026 – 2027 ODA Seminar (course number to be determined).
- ODA Oversight: OMT Member (22000087) this course will be cancelled and will no longer be required.
- ODA Oversight: OMT Lead (22000088) will be cancelled and replaced by the new OMT Lead Training (27200078).
- Managing ODAs for AVS Personnel. This instructor led initial training has been updated for Revision C and registrations will be available for FY26 through your service office.
- OMT Lead Training (27200078). This new course replaces the OMT lead course discussed above. It is updated for Revision C and will be available in eLMS in the very near future.
- Orientation to AC ODA (27100380). This new eLMS course is intended for FS personnel that will be assigned to an AC ODA evaluation panel and/or an OMT. This includes Airworthiness (Maintenance/Avionics) and Operations Inspectors.

8.2 Will training on interference be required as part of the OMT Core training requirements?

This is included as part of the Revision C changes to training.

Glossary of Abbreviations and Acronyms

AC	Airmen Certification
ACSAA	Aircraft Certification, Safety, and Accountability Act of 2020
AIR	Aircraft Certification Service
DMS	Designee Management System
DOIP	Delegation Organization Inspection Program
DRS	Dynamic Regulatory System
eLMS	Electronic Learning Management System
FS	Flight Standards Service
IT	information technology
ODA	Organization Designation Authorization Procedures
OID	Organization Impact Decision
OMT	Organization Management Team
OPA	Organization Performance Assessment
Q&A	Questions and Answers
QMS	Quality Management System
QPM	Quality Procedure Manual
RASC	Recognition of Applicant Showings of Compliance
RBDM	Risk Based Decision Making
RCSA	Revision C Surveillance Application
SAS	Safety Assurance System
UM	Unit Member