



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

SUBJ: AVS-60 Organization Designation Authorization (ODA) Office – Nov 2024 Q&As - Part 1

These Frequently Asked Questions (FAQs) are created for FAA personnel. This list will be updated regularly by AVS-60 Webinar Team.

Table of Contents

Topic: DMS/Data Assessment 2

Topic: DOIP 2

Topic: IRT 2

Topic: ODA Scorecard 4

Topic: General Questions 4

Topic: DMS/Data Assessment

1) Do you have any statistics on the safety/effectiveness/efficiency of organization delegation authority (ODA) vs designated engineering representative (DER)?

These metrics have not been developed. AVS-62, is leading the Delegation Strategy Measures and Data Gathering team that is developing metrics for the ODA program. The team's focus is on DPE data gathering and analyzation. Reach out to the team at 9-avs-oda-office@faa.gov for questions on the team schedule, scope, and timeline for this topic.

2) When will Form FAA 8100-9, Statement of Compliance with Airworthiness Standards, be implemented in the Designee Management System (DMS)? What is taking so long?

The context of the participant's question is unclear. The 8100-9 is used by ODAs and is signed by an authorized unit member (UM) for that ODA for approval or to recommend approval. The FAA approved procedures manual will contain the record keeping requirements for this form.

Form FAA 8110-3, Determination of Compliance with Airworthiness Standards, is signed by DER's and are entered in DMS.

Topic: DOIP

3) How much interaction do you have with Delegated Organization Inspection Program (DOIP) reports?

AVS-60 collects and stores the DOIP post inspection reports for reference. Please send DOIP post inspection reports to: 9-avs-oda-office@faa.gov.

FAA Order 8100.15, Organization Designation Authorization Procedures, draft Revision C ("Rev C") does not have this post inspection report requirement. All Risk Based Decision Making (RBDM) surveillance records will be completed and maintained in the Revision C Surveillance Application (RCSA).

4) Will DOIP evaluations continue until draft FAA Order 8100.15C is published, or did those end with fiscal year 2024?

The requirements for the annual Supervision and biannual DOIP audits will end when the ODA holder's surveillance window starts. Supervision and DOIP data produced within 90 days of the initial surveillance window start will be used for the new RBDM process during the assessment at the end of the initial surveillance window. When Rev C publishes, each organization management team (OMT) will have no more than 90 days to develop a RBDM surveillance plan and establish the initial surveillance window.

Topic: IRT

5) Can we get these interference training scenarios?

Yes, AVS-60 intends to send them to the webinar attendees.

6) Could you provide more sample cases in the near future like the ones originally provided?

There are currently 10 interference scenarios. The interference review team (IRT) considers actual interference cases reviewed for developing additional training scenarios to use in future outreach sessions with OMT leads and ODA holders.

7) Does interference apply to recommend approval in Form FAA 8100-9?

Yes, although on a project basis an individual finding of compliance may not be delegated by the FAA, the UM is still performing an authorized function.

8) Does the OMT or IRT ever need to reach out to UMs or others to collect more information not provided by ODA holder as part of their investigation summary?

The IRT solely uses the information provided by the OMT. AVS-60 may seek referenced reports/information from the OMT if not initially provided to the IRT. The OMT may reach out to UMs or witnesses if additional or clarification information is needed.

9) If an ODA Administrator was on that email, would there be an expectation that this would be reported to the FAA? But then determined to not be interference?

Per [FAA Notice 8100.19](#), Updated Policy on Organization Designation Authorization (ODA) Holder Interference with ODA Unit Members (UM) and Communication between UMs and the FAA, ODA holder's procedures manuals must incorporate reporting procedures for UMs and ODA administrators to follow when they have experienced or have perceived any interference.

10) If the Program Manager (PM) insisted that the inspector work through the night to do the authorized function, would that be interference?

The need to work overtime may or may not be interference depending on the circumstances. Not providing adequate time for the UM perform the authorized function is considered interference. However, repeated requests to work overtime to complete authorized functions could potentially be interference. This could be from other duties interfering with the ability to perform the authorized function, or from not providing a sufficient amount of time. (See Interference Scenarios 3 "Adequate Time" and 4 "Adequate Time and Threat").

11) Is more scenario based training like this planned?

Yes. Scenario based training is planned as additional scenarios are developed or if there is a need for refreshers based on outreach sessions with OMT leads and ODA holders.

12) Please comment on performance of duties vs. performing authorized function in making interference determinations.

Per 14 Code of Federal Regulations (CFR) section 183.57 and the definition of interference contained United States Code (U.S.C.) 44742, the prohibition on interference only applies when a UM is performing an authorized function. It does not directly apply to any other duties a UM may perform.

13) What will IRT do with anonymous UM Interference reports?

The IRT does not review anonymous annual solicitation reports (prior to FAA Notice 8100.19, allegations from the annual solicitation that led to an investigation and interference report were provided to the IRT for interference determinations). The anonymous annual solicitation of UMs is part of the ODA holder self-audit with results provided for OMT annual oversight. The ODA holder's annual review and report(s) provided to the OMT are submitted by the OMT to the AVS-60 OMT Data Portal.

The IRT's role is to review completed investigation reports regardless of the method the interference report was made.

14) Will there be consolidated interference guidance published to assist ODAs and OMTs to be consistent in investigations and determinations?

The interference scenarios and factors for evaluating interference have been provided and will be revised based on feedback and review of interference reports by the IRT.

Topic: ODA Scorecard

15) Are we clarifying how to handle projects that span multiple years?

Yes, there is additional instruction in the ODA Scorecard User Guide as well as embedded in the collection tools. If the “Date of final Response” cell in the Participation Tab is in the date range (1/1/2024 to 12/31/2024), the project will be counted for the 2024 Scorecard. This is regardless of when the program notification letter (PNL) was submitted to the OMT. If the project is a no-PNL Project, the “Date of final Response” cell should be the date that the ODA Administrator accepted the Certification Plan.

16) Can ODAs download a copy of their responses in the Survey Monkey survey for recordkeeping?

Yes, Survey Monkey will send an email to the original recipient of the SurveyMonkey link. This e-mail contains a link that will take you to SurveyMonkey to allow download of your responses.

17) Could sample ODA scorecard templates be shared with ODA administrators prior to the scorecard session asked about in the prior question?

Yes, there is a link in the [ODA Scorecard User Guide](#) that provides a downloadable Word document that is an exact replica of the Assessment.

18) How do ODAs see the assessment response that the FAA provided about them and vice versa?

The assessment response is available only *after* all responses have been submitted in SurveyMonkey, they have been rolled up into the individual ODA scorecards, and published to the ODA Scorecard Dashboard (Note: Only individuals who are assigned to an ODA can access that ODA’s information).

19) Will the follow-on session be set up soon? With people needing to use up vacation, it would be nice to have a date soon so we can plan vacation around that if needed.

It has been set for November 26. An email went out on 11/14 and we apologize for the short notice.

20) Will the remaining manual Excel-based portion of the scorecard (participation and compliance) get automated like the assessment section, eventually?

AVS-60 is working with the Continuous Improvement Team (CIT) and AIR on what the future state of the ODA Scorecard looks like.

21) Does SurveyMonkey retain any of the information/data entered for the Scorecard, or is the information only sent through SurveyMonkey directly to the FAA?

The FAA collects the information from Survey Monkey. Survey Monkey temporarily houses the data until the assessment closes on March 1st, then it is permanently deleted from Survey Monkey.

Topic: General Questions

22) Draft 8100.15 Rev C has requirements to submit PNLs and FAA Form 8100-11, Organization Designation Authorization Statement Of Completion, to the OMT Lead. That seems to contradict these slides that would have that data submitted to AIR-700. Are there plans to update Draft 8100.15 Rev C to align with this?

AVS-60 and AIR have been working together to understand the needs of AIR since its organizational refinement. AVS-60 provided a deviation to current policy that will allow AIR to establish the focal role. AVS-60 will continue to work with AIR as they solidify their approach to managing ODAs under the new organizational structure and ensure alignment with future policy.

23) AVS-60, for just ODAs, or ALL Delegates (designated engineering representatives (DER), designated airworthiness representatives (DAR), etc.)?

All AVS delegation. This Webinar is focused on ODA, so you'll hear mostly about that today.

24) Will a transcript be available after the meeting?

AVS-60 will only send out the slides from today's webinar.

25) I have a company that has both Type Certificate (TC) and Supplemental Type Certificate (STC) but last year did not have any STC activity, but I still filled out a scorecard. Will it be the same with this database?

Yes, it will be the same with this database.

26) What about Inspection UMs?

They will transition with all non-engineering designees using that same schedule found on Slide 23 of the [November 2024 ODA Webinar](#).

27) A late question about the Designee Reporting System (DRS) replacement... If someone holds multiple types of authorities (Administrator and Engineering UM, for example), when would they transition to the new system?

For ODA administrator training, you will register in DMS and take the training after June 26, 2025. For the engineering related courses, you will have until the end of 09/30/25 to complete your engineering related courses in DRS.

AVS-60 is keeping DRS open for DERs and engineering UMs due to the yearly maintenance cycle for their technical training. After the 2025 recurrent training is complete, the DERs and engineering UMs will transition to DMS for the 2026 cycle.

28) Draft 8100.15C has requirements to submit PNLs and 8100-11s to the OMT Lead. That seems to contradict these slides that would have that data submitted to AIR-700. Are there plans to update draft 8100.15C to align with this?

AVS-60 and AIR have been working together to understand the needs of AIR since Refinement. AVS-60 has provided a deviation to current policy that will allow them to establish the focal role. AVS-60 will continue to work with AIR as they solidify their approach to managing ODAs under the new organizational structure and ensure alignment with future policy.