



Federal Aviation Administration

SUBJ: Frequently Asked Questions (FAQ): Organization Designation Authorization (ODA) Office (AVS-60) – November 2024 - Part 2

These FAQs are created for ODA program stakeholders that are internal and external to the FAA. The ODA Office Webinar Team will update these FAQs regularly.

Table of Contents

Topic: FAA Order 8100.15, Revision C Related Questions.....	3
1) Has the ODA Office considered extending the implementation period?	3
2) Can ODAs start making changes to the procedures manual (PM) to incorporate Rev C changes?.....	3
3) Can we submit partial Rev C changes or does it have to be all in one revision?.....	3
4) Do we need to follow Rev C once our PM is FAA approved?.....	3
5) Are there more details or guidance on what is changing from Rev B to Rev C?	3
6) How long do ODAs have to update their PM? When do ODAs have to revise PMs to comply with Rev C?	3
7) I am new to ODA administrator training and have recently taken the courses. Will I need to take the most recent courses?	3
8) If course number 20000124 is being revised to Rev C, will it be made available to existing OMT members since we are all new to Rev C requirements?.....	4
9) If any comment requires an update or change to the Order, will it be included in Rev C or rolled into a next revision of the order?.....	4
10) If I have a question on content that is the same between Rev B and Rev C, should I ask the Rev C team or my OMT?	4
11) If we have Delegation Organization Inspection Program (DOIP) audits due in June, should we consider scheduling them?	4
12) Regarding updated ODA applicant training... if a new administrator applicant has already done the training but won't submit until after Rev C will they have to retake the updated training?	4
13) The requirements of Rev B for an ODA's PM remain the same until their updated PM in support of Rev C is approved?	4
14) What would be the timing for implementation - 12 or 15 months?.....	4
15) Where can we find the schedule for outreach opportunities? Is there an additional outreach before release of Rev C?	4
16) Will the ODA Seminar be updated to provide Rev B to Rev C transition? In other words, will it cover everything that has changed?	5
17) With a release planned for the second quarter of fiscal year 2025, does this mean that you anticipate Airmen Certification (AC) ODA approvals in 2025?.....	5
18) Based on comments received to date, what changes do the FAA plan to make from draft Rev C? ...	5
19) Will FAA consider the comments provided on Rev C before implementing?.....	5
20) How are negative public comments being handled regarding AC ODA expansion. Any chance that AC ODA won't be incorporated in the final Order?	5
21) Is there a standard conversion between the new Designee Management System (DMS) designated engineering representative (DER) chart and the legacy chart used for unit members (UM)?.....	5
22) Rev C has requirements to submit program notification letters (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 Rev C to align with this?5

Topic: AVS-60 Policy-Related Inquiries 6

- 23) How will this integrate with pilot schools that have or are requesting self-examining authority?6
- 24) What is the expectation for ODA engineering UM chart of authority format in the future, and why? ..6
- 25) When does the FAA expect to have a cyber delegation defined and available?6
- 26) Why is ODA designee experience not useful for DER experience?.....6
- 27) Will AVS-60 and AIR-700/-800 add sufficient additional resources for oversight and ODA PM updates approvals following Rev C?6

Topic: The ODA Office General Questions 6

- 28) How can the ODA Office be more proactive with ODAs for dealing with emerging technical policy? .6
- 29) Is the long-term goal to drive designees to ODAs?7
- 30) What is the ODA Office doing to train OMT leads so there is consistency across all ODAs?.....7

Topic: FAA Order 8100.15, Revision C Related Questions

1) Has the ODA Office considered extending the implementation period?

There are no plans to extend the implementation period that follows the publication of FAA Order 8100.15, Organization Designation Authorization Procedures, draft Revision C ("Rev C"). The current timeframe provides sufficient time to meet the requirements. Additional guidance will be provided in a transition memo, which will be released concurrently with the release of Rev C.

2) Can ODAs start making changes to the procedures manual (PM) to incorporate Rev C changes?

The ODA Office recommends carefully assessing the specific changes needed in your procedures and processes to align with the requirements in Rev C. However, the ODA Office advises against making any changes, such as revisions to the ODA PM, that would not comply with the current revision FAA Order 8100.15 Revision B, Change 3, ("Rev B") before Rev C is released. The ODA Office continues to conduct outreach in preparation for the Rev C's release and will provide additional guidance and support to facilitate implementation. Making changes prematurely may increase the risk of rework.

3) Can we submit partial Rev C changes or does it have to be all in one revision?

The precise details of how to implement changes to comply with Rev C may be determined by the OMT and ODA. If the OMT and ODA agree to phase-in changes, that approach is acceptable, provided that:

- 1) procedures and processes maintain compliance with the overall ODA Program, and
- 2) do not create gaps in meeting system requirements.

However, there remains an expectation that all required changes will be incorporated into the ODA PM and submitted within 12 months of Rev C's effective date.

4) Do we need to follow Rev C once our PM is FAA approved?

The ODA holder and unit are required to follow their approved ODA PM. Rev C establishes that the Order is effective upon release and requires that revisions to ODA PMs be incorporated and approved no later than 15 months from the effective date. ODA PMs must be adhered to, even if they are revised and approved before the maximum 15-month allowable timeframe.

5) Are there more details or guidance on what is changing from Rev B to Rev C?

The ODA Office will provide internal and external outreach to aid in the implementation of Rev C. Supplementary documents and FAQs will be provided.

6) How long do ODAs have to update their PM? When do ODAs have to revise PMs to comply with Rev C?

Rev C will be effective on the release date of the Order. ODA PMs must be revised to incorporate Rev C provisions within 12 months. Then, FAA approval of the PM must be completed no later than 15 months from Rev C's release date.

7) I am new to ODA administrator training and have recently taken the courses. Will I need to take the most recent courses?

No. Current ODA administrators will not be required to take the initial training again once Rev C is released. However, the ODA seminar, which is required every two years, will be updated with pertinent information on Rev C.

8) If course number 20000124 is being revised to Rev C, will it be made available to existing OMT members since we are all new to Rev C requirements?

At present there is not a requirement for existing OMTs to take the revised 20000124 course.

9) If any comment requires an update or change to the Order, will it be included in Rev C or rolled into a next revision of the order?

A variety of dispositions were used based on the content of the comment. In some cases, the comment resulted in changes to the Rev C text. In other cases, no change was made or the ODA Office noted that the change would be considered as a future potential change. The ODA Office will post all comments and the FAA's disposition of those comments to DRS once Rev C is published.

10) If I have a question on content that is the same between Rev B and Rev C, should I ask the Rev C team or my OMT?

Always start with your OMT first.

11) If we have Delegation Organization Inspection Program (DOIP) audits due in June, should we consider scheduling them?

Yes, OMTs should proceed with scheduling supervision activities and DOIP audits due around the anticipated Rev C release date. The upcoming Rev B to Rev C Transition Policy Memo will provide details on the transition, including guidance for DOIPs and any resulting corrective actions. The ODA Office recommends reviewing the memo once available to ensure alignment with any new policy updates.

12) Regarding updated ODA applicant training... if a new administrator applicant has already done the training but won't submit until after Rev C will they have to retake the updated training?

No. Current ODA administrators will not be required to take the initial training again once Rev C is released. However, the ODA seminar, which is required every two years, will be updated with pertinent information on Rev C.

13) The requirements of Rev B for an ODA's PM remain the same until their updated PM in support of Rev C is approved?

ODA holders are required to follow their approved procedures. Until the PM is revised with changes required by Rev C, the ODA holder must follow its existing PM. However, OMT will be required to follow Rev C upon its effective date. A Transition Policy Memo will supply information to OMTs on making the transition from using Rev B to Rev C.

14) What would be the timing for implementation - 12 or 15 months?

Implementation of the requirements of Rev C timing varies based on the requirements. Rev C will be effective on the release date of the Order. ODA PMs must be revised to incorporate all Rev C provisions within 12 months. Then, the FAA must approve the revised PM no later than 15 months from Order release date. However, some aspects of Rev C are required upon issuance. The ODA Office is preparing a Transition Policy Memo to guide the details of transition from Rev B to Rev C. This memo will be issued at the same time as Rev C to address how PMs are revised and approved. The memo will apply to OMT leads, OMT members, ODA holders, and existing ODA applicants.

15) Where can we find the schedule for outreach opportunities? Is there an additional outreach before release of Rev C?

The ODA Webinar scheduled for June 2025 will have a Rev C status update and have details for ODA outreach sessions for Rev C. If you have any questions regarding Rev C, please email the ODA Office at 9-avs-oda-office@faa.gov.

16) Will the ODA Seminar be updated to provide Rev B to Rev C transition? In other words, will it cover everything that has changed?

The ODA Seminar will be updated with information regarding Rev C.

17) With a release planned for the second quarter of fiscal year 2025, does this mean that you anticipate Airmen Certification (AC) ODA approvals in 2025?

Potentially.

18) Based on comments received to date, what changes do the FAA plan to make from draft Rev C?

Following the FAA disposition of public comments, some changes were made to the Order. No fundamental changes were made, but the final details of the final Order won't be released until issuance.

19) Will FAA consider the comments provided on Rev C before implementing?

Yes.

20) How are negative public comments being handled regarding AC ODA expansion. Any chance that AC ODA won't be incorporated in the final Order?

The FAA plans to continue using delegation, including expanding the ODA program to add AC ODA. As 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. By delegating this work, the FAA can focus on safety critical tasks.

21) Is there a standard conversion between the new Designee Management System (DMS) designated engineering representative (DER) chart and the legacy chart used for unit members (UMs)?

No.

22) Rev C has requirements to submit program notification letters (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 Rev C to align with this?

The ODA Office issued deviation memo [AVS60-FY23-DM02](#) on March 23, 2023, titled: Deviation to FAA Order 8100.15B, Organization Designation Authorization Procedures, Lead Managing Office, and Organization Management Team (OMT) Lead Requirements to Support Aircraft Certification Service (AIR) Organizational Changes. The memo was issued to support AIR and its ongoing reorganization efforts with respect to Rev B. The memo includes the following statement relevant to PNL submittals: "This deviation also supports all remaining ODA holders being managed by the System Oversight Division, AIR-800, to align with new AIR-800 system level oversight responsibilities. It expects that the Compliance and Airworthiness Division, AIR-700, and its associated Certification Branches will continue to manage all TC, STC and PMA certification programs, including the focal role for Program Notification Letter (PNL) submittals. Additionally, AIR-700 will conduct oversight in support of the lead managing office and the OMT lead in AIR-800." The ODA Office anticipates additional language in Rev C to accommodate OMT needs for defining "focal" roles to assist the OMT lead duties.

Topic: AVS-60 Policy-Related Inquiries

23) How will this integrate with pilot schools that have or are requesting self-examining authority?

Holding a 14 CFR Part 141 Pilot School Certificate is one of the experience requirements to apply for AC ODA. AC ODA is a delegation and is separate from Part 141 examining authority. Once appointed, an AC ODA holder is authorized to administer a practical test for its own students in courses for which it does not hold examining authority as well as applicants who have graduated from other Pilot Schools or completed training requirements under Part 61.

24) What is the expectation for ODA engineering UM chart of authority format in the future, and why?

Rev C maintains the use of the DER chart contained in FAA Order 8110.37 for existing ODA holders. There is no expectation for existing ODA holders to make any modifications to currently approved engineering UM charts. For new ODA applicants, they will be required to use the DER charts contained in the DMS. A method to provide the charts to ODA holders and applicants is being developed.

25) When does the FAA expect to have a cyber delegation defined and available?

The FAA does not have a definitive timeline but recognizes cyber security as an area to be investigated for potential delegation.

26) Why is ODA designee experience not useful for DER experience?

Although the duties of a DER and a UM are very similar, they are handled under two different delegation systems. DERs must be able to show they have adequate work as a DER to justify the FAA need and ability to manage to maintain the individual as a designee. An ODA holder, as the FAA designee, has primary responsibility for oversight of the UM. The FAA bases its need and ability to manage on the ODA holder's workload.

27) Will AVS-60 and AIR-700/-800 add sufficient additional resources for oversight and ODA PM updates approvals following Rev C?

AVS-60 and AIR-700/-800 are taking significant steps to enhance oversight resources and support for Rev C. AIR-800 is actively working to hire sufficient OMT lead positions dedicated to ODA oversight, including ODA PM approvals. Additionally, AVS-60 and AIR-700/-800 are focused on building clear processes and driving consistency and standardization in oversight. The implementation of Rev C processes (e.g., risk based decision making (RBDM)) should also help identify where oversight resources are needed most from a risk based perspective, making it easier to justify and allocate resources effectively. This preparation is intended to result in sufficient resource planning.

Topic: The ODA Office General Questions

28) How can the ODA Office be more proactive with ODAs for dealing with emerging technical policy?

Part of the vision for the AVS delegation system, and the ODA Office, is that the ODA Office applies “a robust and forward-looking system that increasingly leverages FAA resources and responds to changes in workload and industry needs...” (FAA Order VS 1100.2, Managing AVS Delegation Programs). The ODA Office is working to establish an ODA program management group that will be responsible for establishing priorities and strategy for ODA program improvements, including emerging technical policy needs. Industry can continue to provide insight and share the areas felt to have the most impact through several channels available including the bi-annual ODA Webinars, ODA Continuous Improvement Team

(CIT), ODA advisory panels, and email to 9-avs-oda-office@faa.gov. All ideas are assessed to determine where FAA resources should focus on changes that make the greatest impact for the delegation system.

29) Is the long-term goal to drive designees to ODAs?

No, the ODA Office's long-term goal is to increase the delegation program's effectiveness and efficiency. Individual and organization designees are both avenues that help accomplish this goal. The ODA Office intends to ensure the FAA can meet resourcing challenges through the proper use of delegation." The FAA's ability to effectively oversee designees and manage the delegation system has resulted in many improvements for both individual and organization's approaches. Based on these changes, however, the ODA Office is seeing a decreasing trend related to individual designee counts.

30) What is the ODA Office doing to train OMT leads so there is consistency across all ODAs?

The ODA Office has developed an updated formal course for OMT leads and is delivering the course to FAA employees regularly, based on outreach needs. In addition to formal training, the ODA Office hosts monthly forums for each ODA type to share upcoming changes and provide time to discuss questions or concerns OMT leads or OMT members may have. A delegation steering group (DSG) and monthly divisional check-ins provide opportunities to receive feedback on consistency and how effectively the field is applying policy. Beyond this, the ODA Office provides policy interpretations, data reports, and other briefings to ensure consistent information is available across all ODAs.