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## Aviation Safety

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### Memorandum

Date: March 24, 2020

To: All Flight Standards Divisions  
All Flight Standards District Offices  
All Flight Standards Certificate Management Offices  
All Flight Standards International Field Offices  
All AFS managed designees

From: Robert Reckert, Manager, Regulatory Support Division, AFS-600

Prepared by: Jay Kitchens, Manager, Delegation Program Branch (AFS-650)

Subject: Flight Standards Designee Oversight and Recurrent Training requirements related to the current Coronavirus (COVID-19) pandemic.

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This memorandum provides guidance on how Flight Standards (FS) personnel can deviate from the provisions contained within FAA Orders 8000.95, 8100.15, 8900.1 and 8900.2. This memorandum also extends the recurrent training due dates for those designees and Flight Standards Organization Designation Authorization (ODA) unit members that are unable to attend in-person recurrent training courses. The deviations addressed by this memorandum are to ensure compliance with U.S. Government and Centers for Disease Control and Prevention (CDC) guidelines taken to limit the spread of Coronavirus (COVID-19).

**Oversight activities not impacted by the CDC COVID-19 guidelines:** FS employees, designees, and ODA holders are reminded that continued oversight, performance evaluations, and renewal activities that can be conducted in accordance with CDC COVID-19 guidelines must continue as required by policy.

**Recurrent training not affected by this deviation:** The following recurrent training is not affected by this deviation because it can be completed on-line:

- ODA administrator and OMT lead recurrent training; including ODA Seminars

- DAR-T and Maintenance ODA unit members for functions other than aircraft certification.
- Designated Parachute Rigger Examiner (DPRE)
- Administrative Designated Pilot Examiner (Admin DPE)
- Sport Pilot Examiner (SPE)

*Note: Additional virtual training options are being developed for certain designee types in order to minimize the impact of canceled in-person training seminars. Once available, designees will be expected to complete their training using the new on-line format. Designees will be notified once these new training options are available for registration through the Designee Registration System (DRS).*

**Oversight activities that are impacted by the CDC COVID-19 guidelines:** FAA personnel and their managers must exercise Risk Based Decision Making (RBDM) and critical thinking when deciding to implement the provisions of this deviation.

For all designee types each Flight Standards office should assess the risk of any overdue oversight activities for their assigned designees. If an activity cannot be completed before the due date, the designee should not be automatically prevented from performing additional delegated activities. All factors must be considered and the risk managed appropriately. For individual designees, using the criteria listed below (technical, procedural, and professional), FS personnel must assess the designee's overall performance. FS personnel must determine if pending or overdue activities present a level of unacceptable risk.

#### Technical

- The designee demonstrates sufficient knowledge, skill, and ability to conduct authorized tasks within established guidance and standards. The designee possesses an expert level of knowledge and skill, understands and uses appropriate terminology, uses the correct equipment, applies appropriate standards, and accurately interprets results.

#### Ratings

1. Significant issues noted throughout the performance period and/or were safety related.
2. Some significant issues were noted and/or were safety related.
3. Some issues noted, but were corrected and/or were of minimal impact to safety.
4. Few or minor performance-related issues noted throughout the period.
5. No performance-related issues noted throughout the period.

## Procedural

- The designee demonstrates the ability to complete administrative functions correctly. The designee accurately completes and issues appropriate documentation, submits required data, follows established procedures, and complies with all regulations, orders, and directives.

## Ratings

1. Significant issues noted throughout the performance period and/or were safety related.
2. Some significant issues were noted and/or were safety related.
3. Some issues noted, but were corrected and/or were of minimal impact to safety.
4. Few or minor performance-related issues noted throughout the period.
5. No performance-related issues noted throughout the period.

## Professional

- The designee conducts activities in an ethical, courteous and conscientious manner reflecting highly on the Administrator. The designee presents a cooperative attitude, and demonstrates integrity, tact, and diplomacy when dealing with industry and the FAA. The designee communicates effectively in a manner that reflects positively on the FAA, both orally and written.

## Ratings

1. Significant issues noted throughout the performance period and/or were safety related.
2. Some significant issues were noted and/or were safety related.
3. Some issues noted, but were corrected and/or were of minimal impact to safety.
4. Few or minor performance-related issues noted throughout the period.
5. No performance-related issues noted throughout the period.

For ODA's the Organization Management Team (OMT) Lead should assess the risk to include all factors and data contained in previous supervised visit records, corrective actions, and the last inspection program results. The OMT Lead should evaluate all parts of the system and as many of the criteria as possible from previous supervision and inspection records. The OMT Lead must assess the ODA's overall performance and determine if pending or overdue oversight activities present an unacceptable risk.

If the individual designee or ODA's overall performance is satisfactory, the Flight Standards office may allow the designee to continue performing delegated activities through December 31, 2020 with no interruption.

**Recurrent training affected by this deviation:** FAA personnel and their managers must exercise Risk Based Decision Making (RBDM) and critical thinking when deciding to implement the provisions of this deviation. Additional policy deviations and guidance unique to specific individual designee types and ODA holders may be necessary in some cases and will be issued separately. In accordance with this memorandum, FAA personnel may extend the due dates for required training to December 31, 2020.

**Individual Designee Types in Designee Management System (DMS):** The risk assessment and outcome discussed within the memorandum must be documented in DMS using a Special Emphasis Item task under the Oversight Activities tab. When recording the results, “COVID” must be entered in the “National Use Field” for tracking purposes.

If the designee’s overall performance is not satisfactory, the Flight Standards office may temporarily suspend the designee in DMS until the oversight activity is completed. Alternatively, the Flight Standards office may place the designee on “manual pre-approval” and assess each activity as pre-approval requests are submitted.

**Individual Designees Types NOT in the Designee Management System (DMS) and ODAs:** The Flight Standards office will document the risk analysis allowing a designee to perform delegated activities beyond an oversight activity due date by completing Program Tracking and Reporting Subsystem (PTRS) code 1947/3947/5947, entering “COVID” in the National Use Field, and using the following Comment Codes:

- Primary Area: A, E, or J, as appropriate
- Keyword: 783
- Opinion Code: I
- Comment Box: For ODAs enter ODA name and ODA number

If the designee’s overall performance is not satisfactory, the Flight Standards office will notify the designee in writing to cease delegated activities until the oversight activity is completed.

A copy of this deviation will be posted in the Flight Standards Information Management System (FSIMS).

If offices have questions regarding FS designees, please contact Jay Kitchens, Manager, Delegation Program Branch, at (580) 434-6480 or at [jay.kitchens@faa.gov](mailto:jay.kitchens@faa.gov).