

ODA Procedures Manual Review Considerations

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This guide is a living document and will be updated with additional information as needed

Introduction

The first thing to know about ODA procedures manuals is that they are called procedures manuals because they are supposed to have PROCEDURES. The term "Procedures" implies that the manual will not only define "what" the organization does, but how, when, and by whom. It is not called an ODA requirements/policy statement manual for a reason. Policy statements are nice, but there are a bunch of FAA documents that already provide those. Merely restating those in a manual doesn't provide the PROCEDURES. In addition, the procedures defined in the manual need to be understandable to the extent that the FAA can perform oversight of the organization's compliance. If something is not clear, it's left up to the FAA's interpretation, so it is everyone's benefit, especially the organization's, for the manual to be concise and understandable. This guide is meant to address the items typically found and commented on by AIR-140. We'll now step through the different parts of the manual following the sample manual in Order 8100.15. Let's begin.

A Note about References

There seems to be a lot of confusion about using references to other FAA documents. There are many times when references to other documents are appropriate, other times they aren't. Remember that FAA documents, at least most orders, are written with the idea that the FAA would do the work, not a delegated organization. For instructions on how to fill out a form, references are fine--how to fill out a form applies to whoever fills it out. Things like "Type Certification", require a little more detail than "we perform type certification IAW Order 8110.4." Unless the ODA holder is arranged with directorates, ACOs, MIDOs, project managers, etc., such a reference doesn't make a whole lot of sense. A good rule of thumb is that if the content from the reference documents could be cut and pasted into the procedures manual and make sense, it can be referenced. If the reference document doesn't make sense in the context of the company's organization or processes, a reference-only is not appropriate.

References also need to be direct and specific. General references like "We certify IAW 8110.4" don't really give any value. The idea is that the organization certifies by following the procedures in its manual. If it needs to refer to 8110.4 as part of the procedure, it should do so specifically--"The TIR part II will contain the information required by Order 8110.4C, paragraph 2-7b(3)."

The manual can also reference other internal company manuals, but there should be some limits to what is referenced in a separate company manual. If the company is a repair station, and already has processes under their 145 to determine whether a change is major or minor, it would be appropriate to refer to that document. However, the company should not be creating new manuals to reference to from the ODA manual. For example, the company should not create a new, separate, manual for "Selection of ODA Unit Members", since that is unique to the ODA and wouldn't be contained in any other company manuals.

Use of the Term "ODA Unit Members"

One issue that's caused much heartache within industry is the term "ODA unit member" to refer to the staff members within the ODA unit. Everyone seems to prefer the term used under the previous programs--"authorized representative." That's not a real great term under ODA because it could be misconstrued that these individuals are "representatives of the administrator", when in fact, the organization is the representative. Can the manual use a different term than "unit member"? Yes, but it needs to clearly define how it refers to the ODA unit members. This should be done in Section 4, which addresses ODA unit responsibilities. Also, keep in mind that the ODA rule and order use unit members, and any correspondence, etc.(including PNLs) with the FAA needs to use the term unit member.

Cover Page

One thing to remember about the cover page is that it has to be signed by the ODA administrator, and the managers of all of the FAA managing offices. So depending on the functions the ODA is authorized, it could include the ACO, MIDO, FSDO, and AEG managers. Don't forget that the managers of the AEGs for each product involved needs to sign. That means if someone gets the authority to issue STCs on any type of product (hopefully they won't), then all of the AEG managers need to sign. There could be a lot of signatures on the cover page.....

A Note about Format

The FAA wants manuals to follow the format of the sample manual in the order. To what extent? you ask. Well at least to the extent that the content of the manual is arranged and identified in the general sequence shown in the sample manual. So Section 1 of all manuals should be "Preface and Introduction" and Section 9 is "Self Audit Responsibilities" and Section 15 is "Procedures", etc. What about all of the silly header information? Does every page have to have a date and company approval block? These are good questions, and I think everyone would agree that these things might be critical to aviation safety. However, I would hope that everyone could focus on what's really important.

Be careful when trying to address the "Procedures" section requirements. A manual should define the "Procedures" section in chronological format as much as possible. For example, don't make the first section "Submittal of the PNL." First address how the information in the PNL is developed and coordinated among the ODA unit.

A Note about "Boilerplate" Language

The sample manual in the order is chock full of boilerplate language. Some of it is OK, and some is pretty poor. Does it have to be in the manual?--No. But the manual should at least cover everything the boilerplate language attempts to address. It seems like many applicants copy all of boilerplate language pretty efficiently. Everyone is pretty good about getting the company name in where it says "INSERT COMPANY NAME HERE", many are not so good about providing something where it says "INSERT COMPANY PROCEDURES HERE." A good practice is to avoid passive voice--although this document is probably chock full of it. Instead of saying "Project management will be accomplished by"" say "The ODA administrator will....." Many manuals make statements such as "The TIR will be completed in accordance with...." This doesn't specify "who" is completing the TIR, which is an important piece of information.

Manual Development Tips for the Applicant

Outline Your Process. Rather than trying to write a manual that meets the requirements of the Order, try to describe your process. Put it in chronological order as much as possible. Fill in the gaps with the who/how/documentation information, then review against the order's requirements and make sure you have all of the requirements satisfied. It should be very easy to take a well written procedure and develop a briefing on the subject.

Get Rid of the Fluff.

Don't use a lot of general, non-meaningful statements, even if it might be in the sample manual or the order. For example, Section 7 of the sample manual has the following boilerplate language.--

". (INSERT COMPANY NAME) will determine that proposed ODA unit members are qualified to perform the authorized functions as described in paragraph 5. (INSERT COMPANY NAME) must evaluate the proposed ODA unit members using a process similar to that prescribed in Order 8100.8."

That language is OK, but it doesn't really say anything useful. The processes that follow are meant to ensure qualified unit members are selected, and the FAA is concurring that the process is similar to 8100.8's when we approve the manual. Better language would be:

(INSERT COMPANY NAME) will use the following process to select ODA unit members.

Or, it could just be left out, and the procedures stated.

Don't junk up the manual with unnecessary language. Rather than:

"In order to ensure compliance with the requirements of the 14 CFR and document that all of the substantiation data is complete and accurate, the ODA lead administrator will execute a Statement of Completion in accordance with Order 8100.15 that indicates all aspects of the program have been completed and properly accomplished."

Try:

The ODA administrator will sign the Statement of Completion.

Do Use Concise Statements

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Table of Contents

Hey this is one area where one could probably just cut and paste from the sample manual and get away with it. It would probably be OK. However, some might put a little more thought in it and add page numbers--that would be smart. Even break up into subsections if needed. An STC ODA manual could identify subsections within the "procedures" section, like "STC Procedures" and "Airworthiness Certification Procedures."

I. Log of Revisions

Another section that's easy. Note that FAA approval of manual revisions is indicated on the Log of revision pages.

II. List of Effective Pages

Some people don't like a LEP, they'd rather make changes by a revision to the entire documents, not just change pages. That's OK, I suppose. Just remember that the purpose of the Revisions log and LEP is to be able to track the status and content of the manual at any point in time. So through the revisions log and LEP we can determine what the manual said in 1989 (assuming it was in effect at that time). Notice how this page says to keep a file of superseded and deleted pages? That's how we would do this. If the manual is completely revised from rev A. to rev B, the ODA holder needs to retain a copy of all previous revisions. If the company does the "complete revision" thing, they might decide they don't want the LEP, or they could go ahead and keep it and just put "All" under the page numbers for a revision. If the manual doesn't utilize change pages and you'd rather not have an LEP, that's OK but you're going to have to figure out how to renumber these sections.....

III. Manual Control

The big thing about this section is that it defines what can be incorporated into the manual without FAA approval. Think about what this should contain. In addition to the typos, etc. sorts of things, you might consider FAA forms as something that could be updated by the ODA holder.

1. Preface and Introduction

This section is easy. The hard thing here is to define how the organization will communicate with the OMT. Most organizations will say something like by phone, email, letter and so forth.

2. Authorized Functions and Limitations

Sample manual shows how to do this section pretty well. Use a table to identify the authority for each type of ODA including the functions, and associated limitations for each function.

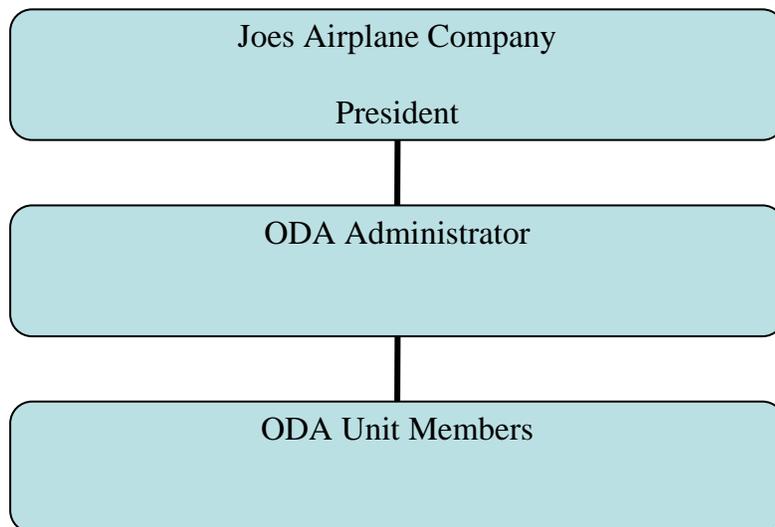
In addition to the limitations by function, this section should also list the general types of limitations for each ODA type. Be specific in the types of products/articles for which the authority applies. Include the limitations that apply to each type of ODA IAW 8100.15.

Even though it's not included in the sample manual, include a limitation on noise/emissions (Parts 34 and 36) since these things are not currently delegated under ODA.

3. Organizational Structure and Responsibilities

This sections is where things start getting difficult--there's no BPL (that's boiler plate language) to copy here, only a description of the requirements. Many clever applicants have turned these requirements around and made them part of their manual. The biggest problem with this section

is in the description of the organizational structure. Between this section and Appendix B, there should be a good definition of the ODA unit and ODA holder. Many organizations provide an organizational chart in appendix B like:



I appreciate that this is a very complex organizational diagram, but more details are needed. There needs to be --between the description here and the charts in the appendix--a description of the ODA holder's corporate hierarchy/structure, and a description of how/where the ODA unit is located within that organization. This portion needs to depict or describe the reporting paths up through management for an UM's ODA duties, as well as those reporting paths up through management for any other duties he might have. For a large or complex organization, several organizational charts might be required to adequately define its corporate structure.

4. ODA Administrator and ODA Unit Duties and Responsibilities

This should be an easy section to complete, another one that can be pretty much copied from the sample manual. The language is pretty poor, however. It would be fine for someone to re-word and improve.

5. Required Capabilities and ODA Unit Positions

The sample manual pretty much addresses this section. This section needs to identify the qualification requirements for all of the ODA unit positions, and appendix D identifies, the number of ODA unit positions and their authority should be defined. If the OMT defines any special qualification requirements for ODA unit members that are not addressed in 8100.8, they must be provided here. In addition, the special qualification requirements of 8100.15 Para 3-5c must be referenced for those conformity functions.

This section should explain that ODA unit members do not need direct FAA experience. In lieu of FAA experience, a unit member may have experience within the ODA holder's organization or as a staff member at another delegated organization. As such, the manual should **not** define "candidate" or "trainee" types of programs for their personnel to gain experience. They can incorporate those types of programs, but don't need to address within their manual.

6. ODA Unit Listing

This section must describe how the ODA listing will be updated and maintained. What is the format for the listing? Is it a word document, or an electronic file on a shared drive? Who has control and how are revisions tracked? It must include the description for coordinating changes to the listing with the OMT. For the first two years, most ODAs will have to coordinate with the FAA before any changes are made to the listing. This could involve a review of the ODA unit member's qualifications and proposed functions. This section should define the information that the organization will provide to the OMT while appointment decisions are under review by the FAA. Also describe in this section where/how the listing is maintained and controlled. The ODA unit listing should include the location of the unit members.

While additions to the listing may be made only with FAA concurrence, the ODA holder may remove personnel from the listing without first notifying the OMT. The updated listing still needs to be provided to the FAA, and the FAA should be notified if the removal was based on ODA-related performance.

7. ODA Unit Selection Procedures

This area typically requires some effort on the part of the applicant to document appropriately. Cutting/pasting and stating that "We will select staff members using a process similar to Order 8100.8" isn't nearly enough.

Things to consider include:

-The selection process must include coordination with the OMT regarding each prospective staff member. This may be done before the ODA holder evaluates the individual, as the OMT does not need to know the proposed authority of the individual. If the individual is known to be unacceptable based on previous FAA experience, the OMT will notify the organization.

-The process must be similar to the FAA's process described in Order 8100.8. Looking at 8100.8 we see the basic process as follows:

- **Initial administrative processing of application.** This ensures the application is complete before forwarding the application to the advisor. An organization's corresponding step would be to make sure that the information required to be documented for the proposed staff member is completed. In this part of the process, the organization must notify the OMT of the proposed staff member. The procedures manual also needs to define exactly what information is documented, how coordination with the OMT will occur, the expected timeframe for FAA response, etc.. Be specific. If a form is used describe it and provide a copy in the appendices.
- **Evaluation by Focal Point (Advisor).** The advisor conducts a preliminary review of the application for general qualifications. The advisor is responsible to determine the appropriate authority and limitations, and may interview the applicant, check references, etc. -- An organizations process needs to identify who does this, and when/how they will determine that interviews, etc. need to occur.

- **Evaluation Panel Review.** Consisting of at least two people, the evaluation panel may include the advisor. The people selected must be technical experts--engineering, flight test, or inspection, and should be familiar with the selection and appointment process. The evaluation panel can confirm the advisor's recommendation, reduce their authority, or deny the application. -- An organization's manual needs to identify the people --not necessarily by name, but by position, etc. who might serve on the EP. Also need to specify any documentation used as part of the EP process. The FAA's tracking form could be modified to use in the organization's process.
- **Administrative Requirements.** The organization needs to retain completed records, etc. to document the appointment of staff members.

The manual should address how the organization performs all of these steps.

An organization might have different processes if the proposed unit member is already a designee or staff member at another delegated organization. If so, they can skip the evaluation part of the selection process--assuming the unit member will be performing the same functions already authorized. It still must be considered whether the individual has the right kind of experience and knowledge for a particular type of product or article. Also, the initial notification to the OMT regarding a proposed staff member still needs to be done, even for existing designees.

After determining the authority and limitations for the staff member, the organization would follow the process defined in section 6 to update the staff listing. This will probably require FAA concurrence for at least the first two years.

Does an organization have to have an "appeal panel" for rejected ODA unit members?--No.

8. Training.

This section needs to define the training required for the ODA administrator and other unit members. It should address both in-house and FAA seminars. Define the training required for each ODA unit member depending on the functions they perform and how often it is required.

Outline the content of the in-house training, including a description of the format of the training, and the people responsible for developing and presenting the training (if in classroom format).

The organization might want to incorporate limited or lesser training for staff members performing temporary or limited functions. The training section needs to define the training each of these types of staff members will receive, depending on the functions performed. Such limited training should be agreed to by the OMT before put into practice.

9. Self Audit Responsibilities

Keep in mind that the self-audit is not just a self-audit of/by the ODA unit. It is an ODA holder audit of all of their ODA responsibilities.

This section should address who is responsible for conducting the self-audit and any documentation/reporting requirements used within the self audit program. This would include sample forms (in the appendix) for self auditing purposes. If specific people are not identified, the qualifications for people conducting the audit should be provided. Audit of unit member's performance will require people with technical expertise in the ODA unit member's discipline. It might be acceptable for the FAA to audit technical performance of a unit member if the organization does not have another resource, but this should not be the norm.

Although the evaluation criteria in appendix 5 of the order are a good starting point for the self-audit, there are other aspects of the organization's performance that should be addressed, such as evaluation of the ODA unit members.

That portion of the self audit that reviews the ODA staff must follow the general guidelines and documentation prescribed for FAA designee oversight. This means that the organization should document and evaluate the performance of their staff members using similar forms and criteria that we use to evaluate designees. The unit members don't need to be "renewed", but the organization does need to perform the same type of assessment that the FAA does to renew a designee.

10. Guidance Material This should be easy. Describe how the organization will stay apprised of changes to FAA policies and regulations and how changes will be communicated to the ODA unit members.

11-13 Duration/Maintenance of Eligibility/Inspection

Feel free to copy and paste from the sample manual.

14. Service Difficulties.

This section needs more detail than provided in the sample manual. Especially to describe how the company monitors service problems. The sample manual describes requirements in this section, that are OK to parrot--The ODA holder will, will, will. Make sure you describe the who, and the how. How do you define the "service problems" that you monitor? How do you monitor? How often? Who within the ODA holder's organization does this?

Note that the requirements of this section apply to the ODA holder, not specifically to the ODA unit. Depending on the organizational structure, it may be appropriate for the ODA unit to perform these functions, in other organizations; it may be personnel outside the ODA unit. In either case, the ODA unit would certainly need to review/agree to proposed corrective action for aspects of compliance.

This is a good section to ignore the sample manual language and focus on requirements. There are 3 general areas to address in this section:

- Service Problem Monitoring/Identification of Potentially Unsafe or Non-Compliant Conditions
- FAA Notification of Conditions (183.63)
- Investigation and Submittal of Corrective Action.

15. Procedures

Refer to each appropriate chapter of the order for the detailed requirements for this section. A good procedures section will walk through the certification process to the extent that people unfamiliar with FAA processes could understand it.

16. Records

Again, be sure to incorporate all of the requirements that apply to your organization, both from chapter 3 and chapters 8-13. You'll want to specifically define the types of records for each ODA type, or function.

17. Corrective Action

Another section that is typically copied from the sample manual, but needs a little more thought. You need to at least incorporate or address the requirements from paragraph 5-6 of the order. Also address who in the organization will be involved in the development and internal review of proposed corrective actions.

18. Manufacturing Activity Reporting

No, this section does not report on the manufacturing of parts. It reports on the airworthiness/manufacturing activity that your ODA unit members perform. This includes conformity inspections, airworthiness approvals, and certificates. Although the order refers you to 8100.8, the specific format of the report needs to be coordinated with your managing MIDO to include the appropriate codes/information applicable to your organization.

Appendix A--Memorandum of Understanding. Put a copy of the MOU here. Include in the MOU a statement that the ODA holder understands that the ODA appointment is a privilege granted at the discretion of the FAA, and may be terminated for any reason.

Appendix B--ODA Holder and Unit Organizational Chart. See Section 3. This will probably require more than one chart. One specific to the ODA unit, and one or more for the ODA holder.

Appendix C--ODA Facilities. This section would describe the location/facilities where ODA unit members are located, including suppliers. If the ODA unit member is a consultant that works primarily from their home or separate office, it does not need to be listed, but any facility where a group of ODA unit members are located should be described.

Appendix D--Required ODA Unit Capabilities and Positions. Between this and section 5, the manual should define the minimum required ODA staff, the qualifications for the ODA staff, and the functions (IAW 8100.15 function codes and the charts from 8110.37) those personnel will perform. For example, for an STC ODA, appendix D might specify:

(Include copies of the "DER" charts)

2 ODA unit positions for Structural Engineers with authority for Chart A, Areas a1, b1, a2, etc. etc. authorized to sign FAA Form 8100.9

1 ODA unit position for Systems and Equipment Engineer with authority for Chart C1, Areas A1, B1, C1, etc. authorized to sign FAA Form 8100.9

1 ODA unit position for Airworthiness Inspector with Authority for Function Code 11061 (Issue Standard Airworthiness),

And so on and so on.

Appendix E--Forms. See sample manual. Include a sample of all forms.

Appendix F--Certification Plans. See Sample Manual