



# Federal Aviation Administration

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## Memorandum

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Subject: Policy clarification to Order 8100.15, Organization Designation Authorization, Chapter 3, paragraph 3-10.c. allowing ODA developed equivalent training for *FAA Conformity Determination and Airworthiness Approval Tag courses.*

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Order 8100.15, Organization Designation Authorization (ODA), Chapter 3, paragraph 3-10.c, allows an ODA holder the ability to seek Organization Management Team (OMT) concurrence to conduct initial and/or recurrent training for Unit Members (UMs) equivalent to FAA required training.

### Background

The FAA created this guidance for ODA holders who desire to provide equivalent FAA training to their manufacturing ODA UMs with concurrence from their OMT. This memorandum authorizes manufacturing OMTs to determine the capability of an ODA holder to conduct equivalent training without the need to coordinate with AIR-160 or AFS-640. ODA holders taking advantage of this option are responsible for evaluating their training programs to ensure that the programs meet the expectations of this memorandum and specific course materials meet the required training standards associated with each course. Courses may be added in the future. The FAA has identified the following two course standards:

1. FAA Conformity Determination; and
2. Airworthiness Approval Tag.

### Training Program Expectations

ODA holders desiring to provide FAA equivalency training to their manufacturing unit members must establish a training program meeting certain expectations. These expectations serve as the foundation upon which training curricula should be developed, resourced, implemented, maintained, and evaluated. They detail FAA authorization requirements for any ODA holder to provide UMs training considered equivalent to FAA training for the above referenced manufacturing training courses. These expectations are listed below.

1. ODA holders must clearly address the expectations in their Procedures Manual.
2. Training must occur in supervised training environments and meet FAA provided training standards for each course.
3. ODA holders may be provided access to electronic FAA instructional materials to use in their training program. To obtain and use FAA training materials:
  - a. The manufacturing OMT member must submit an email request to AIR-160, who will then provide the electronic instructional training materials directly to the ODA Holder;
  - b. The materials must be modified appropriately to remove all FAA branding; and
  - c. The content must be modified as necessary to remove any content not specifically applicable to the ODA processes and to add content consistent with the ODA delegated functions and procedures as applicable to the product/article authorized.
4. Communicate the learning goals and objectives defined in each course standard:
  - a. Learning goals must include performance expectations and specific criteria related to delegated functions unit members are authorized to perform; and
  - b. Learning objectives must be based on the required skills, knowledge, and delegated functions exercised by manufacturing ODA UMs.
5. Follow the required delivery format for each course standard, so that:
  - a. Each training standard identifies the delivery format requirements for each course;
  - b. All training materials are formatted on company letterhead consisting of a name, address, company logo, or corporate design; and
  - c. Courses can contain distance learning components, such as instructional videos, interactive videoconferencing, webcasts, etc., only if not restricted by the course standard.
6. The ODA must develop a process for selecting qualified trainers including:
  - a. An established curriculum to train the trainers, with a review of lesson plans, materials, and the trainers' roles and responsibilities;
  - b. Trainers/instructors that are subject matter experts, defined as a person of authority who possesses a high level of expertise, knowledge, and skill on the topic being taught and holds the minimum industry experience identified in each standard; and
  - c. Trainers/instructor(s) possessing effective communication skills and the ability to plan, organize, lead, and supervise a classroom as demonstrated through effective lesson planning and time management.
7. Learning materials, such as training hand-outs, student guides, etc., are accessible to UMs during and after the course by handout and/or electronic means.
8. Follow final course evaluation standards, which must:
  - a. Use periodic knowledge assessments, as dictated by each course standard;
  - b. Have a post-course examination;
  - c. Possess a method to notify the ODA administrator of each UM training failure; and
  - d. Possess a method to document successful training completion for each UM.

9. The ODA holder is to create and make available an annual training delivery schedule, including dates and locations for their UMs.
10. Conduct configuration management of each individual course, with post-delivery follow-up and methods for the revision of training materials as a result of:
  - a. A revision to the specific training standard;
  - b. A trainee feedback mechanism that includes how follow-up will be made when necessary or requested by a student;
  - c. Revision or change to FAA regulation or policy; and
  - d. Technology driven changes.
11. Training record management is maintained for the duration of the ODA program.
12. Create a defined procedure to ensure the security of learning materials and electronic data, including training and testing materials.

The guidance contained in this memorandum will be included in the next change or revision to Order 8100.15. If you have any questions please contact AIR-100 at (202) 267-4964.

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