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## Aviation Safety

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### Memorandum

Date: March 31, 2020

To: All Aircraft Certification Offices  
All Manufacturing Inspection Offices  
All Manufacturing Inspection District Offices  
Boeing Aviation Safety Oversight Office  
All DAR-F/DMIR Designees and AIR Managed ODA Holders

From: Scott Geddie, Manager, Delegation and Organizational Procedures Branch,  
AIR-6F0

Subject: Deviation to FAA Order 8000.95, *Designee Management Policy* and FAA Order 8100.15, *Organization Designation Authorization Procedures*, in Response to the COVID-19 Pandemic

Memo No.: AIR600-20-6F0-DM135

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This memorandum authorizes a deviation to individual and organizational designee oversight and training requirements that cannot be met due to widespread federal, state, and local government and Centers for Disease Control and Prevention (CDC) precautions taken to limit the spread of COVID-19.

This memorandum deviates from FAA Orders 8000.95 and 8100.15 for Aircraft Certification Service (AIR) personnel responsible for the oversight of individual designees and AIR managed organization designation authorization (ODA) holders. It also provides deviations for ODA holders responsible for the oversight and training of unit members (UM). The memo extends the recurrent training due dates for those designees and ODA UMs that are unable to attend in-person recurrent training courses.

The specific deviations are as follows:

1. **Recurrent training for DAR-Fs/DMIRs and inspection ODA unit members with Aircraft Certification functions.** FAA Orders 8000.95 and 8100.15 require authorized designees and unit members to successfully complete recurrent aircraft certification training every 36 months. This training is delivered in an in-person format. For individual

designees and inspection ODA unit members with training due after March 1, 2020, this deviation extends the due date to complete the required recurrent aircraft certification training course to no later than December 31, 2020. Since ODA holders likely have their inspection unit member training due date requirements defined in their FAA approved procedures manual, not meeting those dates will constitute a regulatory non-compliance. However, FAA Organization Management Teams (OMTs) will not take enforcement action against ODA holders that voluntarily disclose non-compliances related to this specific inspection unit member recurrent training requirement. OMTs should work with ODA holders to complete the required training by the new due date once additional offerings are scheduled.

Recurrent training NOT part of this deviation: The recurrent training deviation due date extension in this memorandum is to accommodate government and CDC guidelines to limit the spread of COVID-19. The following recurrent training is not affected because it can be completed on-line:

- ODA administrator and OMT lead recurrent training; including ODA seminars
- DAR-F/DMIR and manufacturing ODA unit members for functions other than aircraft certification.
- Designated Engineering Representatives (DERs) and engineering ODA unit members.

*Note: DERs and engineering ODA unit members must complete their required training for this year by September 30, 2020, as currently required by policy memo AIR600-19-6F0-PM01. Scheduling of optional DER Supplemental Training Seminars in a face-to-face format have been deferred until further notice.*

*Note: Additional virtual aircraft certification training options will be developed for DAR-F/DMIRs and ODA inspection unit members 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).*

2. **Delegated Organization Inspection Program (DOIP) and supervision visits.** – FAA Order 8100.15, paragraph, 6-3(a) requires DOIP audits every two years. All DOIP audits due in 2020, are now due by December 31, 2020. Supervision visits to an ODA holder's facility by personnel on the organization management team (OMT) are required at least once a year (reference paragraph 5-4(e)). All supervision visits due in 2020, are now due by December 31, 2020.

*Note: OMTs should consider whether it is feasible to perform all or portions of the DOIP or supervision visits remotely, using remote video technology. Best practice considerations for utilizing remote technologies can be obtained by consulting an FAA policy statement issued on a similar topic (Use of Remote Technology During the Performance of Inspections and Tests, PS-AIR-21-1901, issued March 31, 2020). The*

*ability to use remote video technologies will be incorporated in the next revision to Order 8100.15.*

3. **Direct observation oversight of individual DAR-F/DMIR designees.** In accordance with FAA Order 8000.95, Volume 8, Chapter 6, Oversight and Management of a Designee, a “direct observation” (DO) oversight activity must be performed on the type of certification activity with the highest risk associated with the activity, by the managing specialist in accordance with the due dates established in the Designee Management System (DMS). All direct observations due in 2020, are now due by December 31, 2020.

As a means to complete a DO by December 31, 2020, the following approaches to accomplishing this required oversight are authorized by this deviation:

- **Simulated Aircraft Certification DO Event.** This option allows a managing specialist to perform a DO of a designee with aircraft certification functions. Simulation may occur when a designee does not have a request to perform a Standard or Special airworthiness certification, but has access to an aircraft and can simulate the inspection techniques used during an actual aircraft certification event. To begin, the managing specialist will direct the designee to submit a preapproval for the requested simulation in DMS. The managing specialist completes the DO by observing the designee demonstrating proficiency through a simulation and documents the outcome in DMS.
- **Desktop Aircraft Certification Review with Designee Phone Interview.** In circumstances when there is a lack of aircraft certification activity available to the authorized designee, the office manager, on a case-by-case basis, may allow the managing specialist to conduct a paperwork review and an interview with the designee who previously issued the Standard or Special airworthiness certificate. To begin, the managing specialist will locate the post activity (aircraft certification) report in the designee record, schedule a phone call with the designee and request the designee provide copies of the most recent completed certification package. The interview shall encompass a thorough review of the completed certification package, with the designee describing how the examination was conducted, and highlight any specific technical aspects of the inspection. Upon completion of the interview, the managing specialist must document the outcome in DMS, including a reference to the manager’s approval under the “procedural” comment section.
- **Simulated DO for FAA Form 8130-3 and Conformity Inspections.** This option deviates from current policy in Order 8000.95 by allowing simulations on a consecutive basis. A DO of a designee with authorization to perform conformity inspections and/or issuance of FAA Form 8130-3 tags may demonstrate inspection techniques and knowledge of the pertinent guidance material by simulating this requirement. To begin, the managing specialist will direct the designee to submit a preapproval for the requested simulation in DMS. Upon completion of the DO, the managing specialist will document the outcome in DMS.

*Note: When deemed appropriate, managing specialists may also utilize remote video technology in conducting a DO in a “live” but remote environment. It may also be used to conduct a simulated event as discussed above. Best practice considerations for utilizing remote technologies can be obtained by consulting an FAA policy statement issued on a similar topic (Use of Remote Technology During the Performance of Inspections and Tests, PS-AIR-21-1901, issued March 31, 2020). The ability to use remote video technologies will be incorporated in the next revision to Order 8000.95.*

4. **ODA Holder On-Site Visits for Inspection Unit Members (UMs).** FAA Order 8100.15, paragraph 3-14(a) requires an ODA holder to make at least one on-site visit every 18 months to manage ODA inspection unit member activity including unit members located at suppliers or at other locations. On-site visits due after March 1, 2020 are now due by December 31, 2020. UMs with performance issues are excluded from this deviation, and must be suspended by the ODA holder until the required evaluation can be conducted.

Since ODA holders likely have their on-site visit due date requirements incorporated in their FAA approved procedures manual, not meeting those dates will constitute a regulatory non-compliance. FAA organization management teams will not take enforcement action against ODA holders that voluntarily disclose a non-compliance related to on-site visits.

*Note: When deemed appropriate by the individual tasked with performing the function, ODA holders may allow the use of remote video technology for conducting on-site visits of inspection unit members. ODA holders should ensure that their procedures manual allows for the use of remote video technology and that the acceptability of using this approach resides entirely with the individual tasked with conducting the oversight. Best practice considerations for utilizing remote technologies can be obtained by consulting an FAA policy statement issued on a similar topic (Use of Remote Technology During the Performance of Inspections and Tests, PS-AIR-21-1901, issued March 31, 2020). The ability to use remote video technologies will be incorporated in the next revision to Order 8100.15.*

A copy of this deviation will be posted in the Regulatory and Guidance Library.

If offices have questions, please contact Scott Geddie, Manager, Delegation and Organizational Procedures Branch, at (405) 954-6897 or at [scott.geddie@faa.gov](mailto:scott.geddie@faa.gov).