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**To:** [Paul Rinaldi](#)  
**Cc:** [Kendal Manson](#); [Nicole Vitale](#); [Dean Iacopelli](#); [McDowell, James \(FAA\)](#); [Jones, Karen E \(FAA\)](#); ["AHR-LERF-MGR; "AHR-LERFMT](#)  
**Subject:** NOTICE: AVS Organization Designation Authorization (ODA) Office ODA Survey  
**Date:** Wednesday, March 17, 2021 2:45:20 PM

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Dear Mr. Rinaldi:

Please see the AVS Organization Designation Authorization (ODA) Office ODA survey questions below that is being implemented by AIR-634, the Office of Inspector General (OIG), and Kevin Dickert (AVS Special Committee Response Program Manager). The survey is intended for all Organization Management Team (OMT) Leads pertaining to the Designee Information Network (DIN) and ODA Unit Members acting as both company engineers and compliance finders. The purpose of the survey is to seek information from the OMT Leads of ODAs about DIN user access and usage. We are concerned that ODA information is not being updated in DIN or anywhere else. FAA Order 8100.15B reflects using DIN to record ODA actions and keeping DIN up-to-date. The consequences if the information were not being updated would be the cascading effect of inaccurate or outdated data. One example: The publicly available ODA directory is published based on data contained in DIN. That directory was used to send an ODA improvement survey to all ODA administrators, as mandated by Congress in Section 213 of the FAA Reauthorization Act of 2018. Inaccurate ODA administrator information resulted in multiple attempts to validate contact information for the survey. The AVS ODA Office, acting on a recommendation by the DOT OIG, is also seeking to conduct an assessment to determine how frequently unit members serve as both the company engineer involved in a design as the applicant and also find compliance on FAA's behalf on that same design. This inquiry is related to one of the areas of focus recommended by the DOT OIG for mitigating weaknesses in the FAA's certification and delegation processes hindered its oversight of the 737 MAX 8 program (Ref.: FAA OIG Report No. AV2021020, dated 2/23/2021). Based on the results of this assessment, AIR will revise ODA guidance to strengthen controls in this area. The AVS ODA Office would like to implement this survey by March 31, 2021.

The survey will be completed during employee's duty hours and will be voluntary and anonymous in nature. In coordination in AIR-330, the data will be collected using Survey Monkey. The survey results will be forwarded to the union upon completion.

**ODA Survey Questions:**

1. Do you have access to DIN? Yes or No
  - a. If yes, do you populate ODA information in DIN? Yes or No
    - i. If no, why not?
    - ii. If no, how many people in your office would need access to DIN?
2. Do you capture the information anywhere else? Yes or No
  - a. If yes, where do you capture the information?

Second, the AOO has been tasked by Kevin Dickert (AVS Special Committee Response Program Manager) to conduct an assessment to determine how frequently unit members serve as both the company engineer involved in a design as the applicant and also find compliance on FAA's behalf on that same design. This inquiry is related to one of the areas of focus recommended by the FAA Office of Inspector General (OIG) for mitigating weaknesses in the FAA's certification and delegation processes hindered its oversight of the 737 MAX 8 program (Ref.: FAA OIG Report No. AV2021020, dated 2/23/2021). Based on the results of this assessment, AIR will revise ODA guidance to strengthen controls in this area.

Below are the questions we have for the OMT leads (associated with TC and/or STC ODA's) on this topic:

1. What type of ODA (e.g., TC, STC) do you manage?
2. What type of engineering work the ODA performs?
3. What's the size of the ODA's engineering staff? How many Engineering-Unit Members (E-UMs) are there for each technical discipline?
4. Is it common for company engineers of your ODA to act in the capacity of an E-UM?
5. If yes on Item #4 above, do you have any concerns with company engineers involved in a design as the applicant and also find compliance on FAA's behalf on that same design (e.g., conflict of interest, undue pressure, insufficient checks and balances, etc)?
6. Does the ODA have any safeguards in place to mitigate the concerns (if any) raised in Item #5 above? If not, please feel free to provide your recommendations.

If you have any additional concerns, please feel free to contact me.

Thank you,

***Deborah K Jackson***

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