



# Federal Aviation Administration

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## Memorandum

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Subject: Guidance on Actions to Take in Response to Organization Designation  
Authorization (ODA) Self-Audits

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Order 8100.15B, Organization Designation Authorization Procedures, paragraph 3-14 outlines the requirements for ODA self-audits. These audits include an assessment by the ODA holder of each ODA unit member's performance, an assessment of whether the ODA procedures satisfy FAA regulatory and policy requirements, and an assessment of compliance with ODA procedures. Paragraph 5-3c(2) provides guidance on the review and actions required in response to self-audits. This memorandum supplements the supervision guidance for Organization Management Team (OMT) members in Order 8100.15B. OMT leads and OMT members shall comply with this guidance during their supervision activities of ODA holders. An effective self-audit system with effective corrective action processes serves as the basis for self-correcting ODA holder improvement. ODA holders with effective self-audit and corrective action processes require less FAA supervision, and the self-audit results should be considered when planning and conducting supervision.

Upon receipt of an ODA self-audit report or other self-audit information, the OMT lead must share it with all OMT members and request review by at least one OMT member in each of the different technical disciplines represented on the OMT and those responsible for the self-audit program. If multiple OMT members are responsible for assessment of like functions performed at different locations, for example, geographic manufacturing or flight standards inspectors responsible for supervision at different facilities, then each of those OMT members must review the self-audit report and provide input back to the OMT lead.

Upon the OMT lead's request for review of the self-audit report, each responsible OMT member will review the self-audit report focusing on the identification of trends in their technical area

and procedural compliance in their area of responsibility and provide the OMT lead with a written response addressing the following considerations:

1. Procedural Effectiveness. Indicate whether the self-audit findings and observations regarding procedural requirements and compliance are consistent with those normally encountered during your interactions/assessments of the ODA holder.

2. ODA Unit Performance. Indicate whether the self-audit findings and observations are consistent with those normally encountered during your interactions/assessments of the ODA unit members.

3. Corrective Action Performance. Indicate whether the ODA holder has incorporated effective corrective actions related to your technical area as required in previous agreed-to corrective action plans. If the self-audit report contains details of corrective actions taken in response to self-audit findings or observations, review them for appropriateness and indicate whether those corrective actions require further FAA action. Corrective actions are processed in accordance with Order 8100.15B paragraph 5-6. Identify any new corrective actions that you determine are necessary based on your review of the self-audit report.

4. Supervision Planning. Indicate specific supervision activities, if any, that should be conducted based on your review of the self-audit report. Focusing on high risk areas, this could be any activity, including validation of performance in a technical area, supervision at a particular location, or validation of specific corrective actions that were implemented by the ODA holder.

During their review of the self-audit report, the OMT members should consider results from previous years for the identification of trends that require corrective action. While seemingly inconsequential findings or observations might not warrant FAA action individually, the FAA expects ODA holders to self-correct such discrepancies.

The OMT lead and those OMT members responsible for oversight of the self-audit system must confirm that the self-audit system is functioning appropriately. If the ODA self-audit report is not detailed sufficiently to allow an OMT member to assess any of the 4 areas above, the OMT member's written response to the OMT lead should state "unable to evaluate." The OMT lead should then evaluate the self-audit report format and address any shortcomings that need to be addressed with the ODA holder in future self-audit reports.

The OMT must also consider the information provided from the self-audit review when planning supervision and when discrepancies or regulatory violations have occurred. During supervision, the OMT should compare its observations of individual unit member performance with those documented in the self-audit. When discrepancies, violations, or differences in the performance assessment of unit members are identified the OMT should question why the self-audit program did not provide for discovery of the condition and ensure improvements are incorporated into the self-audit and corrective action programs when needed.

This guidance will be incorporated into a future revision of Order 8100.15. For more information, contact Ralph Meyer at (202) 267-1575 or Michael Hendricks at (817) 741-6812.

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