



# FAA Aviation Safety

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## Memorandum

Date:

To: All Flight Standards Divisions  
All Flight Standards District Offices  
All Flight Standards Certificate Management Offices  
All Flight Standards International Field Offices  
All AFS Managed Designees

From: Karen Lucke, Acting Division Manager, Regulatory Support Division, AFS-600

Prepared by: Christopher Specht, Delegation Program Branch, AFS-650

Subject: Flight Standards Designee Oversight related to the current Coronavirus (COVID-19) pandemic. (REVISED)

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This memorandum provides guidance on how Flight Standards (FS) personnel may deviate from the provisions contained within FAA Orders 8000.95, 8100.15, and 8900.1. The deviations addressed in this memorandum are to ensure compliance with U.S. Government and Centers for Disease Control and Prevention (CDC) guidelines taken to limit the spread of Coronavirus (COVID-19).

**Oversight activities not impacted by the CDC COVID-19 guidelines:** FS employees, designees, and ODA holders are reminded that continued oversight, performance evaluations, and renewal activities that can be conducted in accordance with CDC COVID-19 guidelines must continue as required by policy.

**Oversight activities that are impacted by the CDC COVID-19 guidelines:** FAA personnel and their managers must exercise risk-based decision-making (RBDM) and critical thinking when deciding to implement the provisions of this deviation. For all actions impacted by the COVID-19 guidelines the managing office should start to implement alternate methods to accomplish these task upon expiration of this relief.

For all designee types, each Flight Standards office should assess the risk of any overdue oversight activities for their assigned designees. If an activity cannot be completed before the due date, the designee should not be automatically prevented from performing additional delegated activities. All factors must be considered and the risks managed appropriately. For individual designees, using the criteria listed below (technical, procedural, and professional), FS personnel must assess the designee's overall performance. FS personnel must determine if pending or overdue activities present a level of unacceptable risk.

## Technical

The designee demonstrates sufficient knowledge, skill, and ability to conduct authorized tasks within established guidance and standards. The designee possesses an expert level of knowledge and skill, understands and uses appropriate terminology, uses the correct equipment, applies appropriate standards, and accurately interprets results.

### Ratings:

1. Significant issues noted throughout the performance period and/or were safety related.
2. Some significant issues were noted and/or were safety related.
3. Some issues noted, but were corrected and/or were of minimal impact to safety.
4. Few or minor performance-related issues noted throughout the period.
5. No performance-related issues noted throughout the period.

## Procedural

The designee demonstrates the ability to complete administrative functions correctly. The designee accurately completes and issues appropriate documentation, submits required data, follows established procedures, and complies with all regulations, orders, and directives.

### Ratings:

1. Significant issues noted throughout the performance period and/or were safety related.
2. Some significant issues were noted and/or were safety related.
3. Some issues noted, but were corrected and/or were of minimal impact to safety.
4. Few or minor performance-related issues noted throughout the period.
5. No performance-related issues noted throughout the period.

## Professional

The designee conducts activities in an ethical, courteous, and conscientious manner reflecting highly on the Administrator. The designee presents a cooperative attitude and demonstrates integrity, tact, and diplomacy when dealing with industry and the FAA. The designee communicates effectively in a manner that reflects positively on the FAA, both orally and written.

### Ratings:

1. Significant issues noted throughout the performance period and/or were related to safety.
2. Some significant issues were noted and/or were safety related.
3. Some issues noted, but were corrected and/or were of minimal impact to safety.
4. Few or minor performance-related issues noted throughout the period.
5. No performance-related issues noted throughout the period.

For ODAs, the Organization Management Team (OMT) Lead should assess the risk to include all factors and data contained in previous supervised visit records, corrective actions, and the last inspection program results. The OMT Lead should evaluate all parts of the system and as many of the criteria as possible from previous supervision and inspection records. The OMT Lead must assess the ODA's overall performance and determine if pending or overdue oversight activities present an unacceptable risk.

If the individual designee or ODA's overall performance is satisfactory, the Flight Standards office may allow the designee to continue performing delegated activities through March 31, 2021, with no interruption.

**Individual Designee Types in Designee Management System (DMS):** The risk assessment and outcome discussed within the memorandum must be documented in DMS using a "Special Emphasis Item" task on the "Oversight Activities" tab. When recording the results, "COVID" must be entered in the "National Use Field" for tracking purposes. For APDs, TCEs, and DADEs, use the "Record Feedback" link on the "Management and Information Links" tab. Under "Reason for Input," use "compliments, critiques, and suggestions" from the drop-down box as well as "positive" input. In the "Feedback Description" section, select "Procedural" and enter "COVID" in the comments box. A risk assessment must be recorded prior to December 31, 2020, if extending beyond December 31, 2020, thru March 31, 2021.

If the designee's overall performance is not satisfactory, the Flight Standards office may temporarily suspend the designee in DMS until the oversight activity is completed. Alternatively, the Flight Standards office may place the designee on "manual pre-approval" and assess each activity as pre-approval requests are submitted.

**Individual Designees Types not in the Designee Management System (DMS) and ODAs:**

The Flight Standards office will document the risk analysis allowing a designee to perform delegated activities beyond an oversight activity due date by updating existing Program Tracking and Reporting Subsystem (PTRS) code 1947/3947/5947, entering "COVID" in the "National Use" field, and using the following comment codes:

- Primary Area: A, E, or J, as appropriate
- Keyword: 783
- Opinion Code: I
- Comment Box: For ODAs enter ODA name and ODA number

For new entries, complete a SAS activity (1947/3947/5947, entering "COVID" in the "National Use" field) if extending beyond December 31, 2020, thru March 31, 2021.

If the designee's overall performance is not satisfactory, the Flight Standards office will notify the designee in writing to cease delegated activities until the oversight activity is completed.

A copy of this deviation will be posted in the Flight Standards Information Management System (FSIMS).

If offices have questions regarding FS designees, please contact Jay Kitchens, Manager, Delegation Program Branch, at (580) 434-6480 or jay.kitchens@faa.gov.