

Supporting Statement for Paperwork
Reduction Action Submission
Medical Standards and Certification Application
OMB No. 2120-0034

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate collection.

The Secretary of Transportation collects this information under the authority of 49 U.S.C. 40113; 44701; 44510; 44702; 44703; 44709; 45303; and 80111. Airman medical certification program is implemented by Title 14 Code of Federal Regulations (CFR) parts 61 and 67 (14 CFR parts 61 and 67). Using four forms to collect information, the Federal Aviation Administration (FAA) determines if applicants are medically qualified to perform the duties associated with the class of airman medical certificate sought. This collection of information supports the DOT Strategic Goal on safety.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

FAA Form 8500-7; Report of Eye Evaluation:

Applicants who do not meet the distant visual acuity standards and who desire an Authorization for Special Issuance of a Medical Certificate (Authorization) must submit FAA Form 8500-7 for evaluation and determination by FAA.

FAA Form 8500-8; Application for Airman Medical Certificate or Airman Medical and Student Pilot Certificate:

Agency physicians and designated Aviation Medical Examiners (AMEs) review the information submitted on this for and perform a medical examination to assess an applicant's medical fitness. As of January 1, 1999, the FAA issued medical certificates to 606,307 airmen whose medical fitness was evaluated and found to have met the established medical standards.

FAA Form 8500-14; Ophthalmological Evaluation for Glaucoma:

Applicants with glaucoma must submit FAA Form 8500-14 so that FAA medical personnel can evaluate and determine the permissible operational flight activities of applicants that are commensurate with their medical condition and public safety.

FAA Form 8500-20; Medical Exemption Petition (Operational Questionnaire):

Applicants who do not meet the medical standards prescribed by part 67 but who desire to perform aviation activities must submit FAA Form 8500-20 as part of their special issuance request. This information facilitates a fair and equitable ruling that may permit applicants to perform operational flight activities that are commensurate with their medical condition and public safety.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In accordance with the Government Paperwork Elimination Act (GPEA), AMEs are required to electronically transmit FAA Form 8500-8 to the FAA Civil Aerospace Institute for processing via the Aeromedical Certification Subsystem (AMCS). This system improves the process by reducing paperwork, eliminates errors of omission on the application, enables transmission 24 hours a day, and allows the FAA to review applications shortly after transmission. This also allows the AME to access stored medical data and reduce data entry on subsequent visits by the airman.

AMEs are also required to transmit electrocardiograms (ECGs) via digital electronic transfer. A fully digital system is faster, more accurate and more cost effective than the old analog system.

The use of the AMCS has decreased application processing time and provides a more timely service to the airman. It has reduced the significant backlog of applications caused by AME and/or applicant errors or omissions on the application.

There are no current plans to automate FAA Forms 8500-7, -14, and -20.

4. *Describe efforts to identify duplication.*

Forms 8500-7, -8, -14, and -20 were designed exclusively to evaluate and/or aid in the evaluation of the medical fitness of pilot applicants. This is personal medical information and not available elsewhere. Other information collection methods were screened and we are not aware of any duplication of effort.

5. *If the collection of information impacts small businesses or another small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize this burden.*

This information is collected solely from individuals; small businesses are not involved.

6. *Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

FAA Form 8500-8 information is only collected when an individual applies for an airman medical certificate. FAA regulations require that an applicant for a pilot license meet prescribed flight requirements and be medically qualified for the type of pilot certificate sought. The frequency of medical examinations is a function of the class of medical certificate. FAA regulations specify a duration for medical certificates of 6 months for first-class; 12 months for second-class; and 24 or 36 months for third-class medical certificates, dependent on age.

7. *Explain any special circumstances that require the collection to be conducted in a manner inconsistent with guidelines in 5 CFR 1320.5(d)(2).*

This information collection is consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. *Describe efforts to consult with persons outside the agency to obtain their views.*

A notice for comment was published in the Federal Register, October 29, 2007, vol. 72, no. 208, p. 61198-61199. No comments were received. A copy is attached.

This is a request for OMB approval of the burden associated with four FAA Forms 8500-7, -8, -14, and -20 that are based on 14 CFR parts 61 and 67. Form 8500-7, -14, and -20 were last revised in 1997, and Form 8500-8 was revised in 1999. The Revision of Airman Medical Standards and Certification Procedures and Duration of Medical Certificates (14 CFR parts 61 and 67) took effect on September 16, 1996. Revisions made to parts 61 and 67 in this final rule necessitated changes to FAA Form 8500-8 to reflect the current medical requirements. These changes to Form 8500-8 were made in 1999.

9. *Explain any decision to provide payment or gift to respondents, other than remuneration of contractors or grantees.*

No payment or gifts to respondents will be made.

10. *Describe any assurance of confidentiality provided to respondents.*

The information collected on these forms becomes part of the Privacy Act System of Records DOT/FAA 847, "General Air Transportation Records on Individuals," and is provided the protection outlined in the description of the system as published in the Federal Register.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes and religious beliefs.

The medical questions of a sensitive nature are asked only to determine if the applicant is medically fit to perform the duties associated with aviation.

12. Provide estimates of the hour burden of the collection of information.

FAA Form 8500-7; Report of Eye Evaluation; FAA Form 8500-14, Ophthalmologic Evaluation for Glaucoma:

Applicants not meeting distant visual acuity standards or those who have glaucoma must submit this form for evaluation and ruling. We estimate an average of 15 minutes per respondent to complete the form. We estimate 12,232 respondents per year.

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| Estimated Annual Submissions of Form 8500-7 & 8500-14 | 12,232 |
| Estimated Average Completion Time Per Form | .25 hours |
| Estimated Annual Reporting Burden | 3,058 hours |

The respondent's cost per hour is estimated at \$23.00.

0.25 hours x \$23.00/hour x 12,232 forms = \$70,334

FAA Form 8500-8; Application for Airman Medical Certificate or Airman Medical and Student Pilot Certificate

The FAA had 380,000 applicants apply for certification using Form 8500-8 in CY 2006. We estimate an average time burden of 1 hour and 30 minutes per applicant. This is broken down into 30 minutes to complete the medical history on the form and 1 hour for all aspects of the physical exam.

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| Number of Submissions Received in CY 2006 | 380,000 |
| Estimated Average Completion Time Per Form | 1.5 hours |
| Annual Hour Burden to Applicants | 570,000 hours |

The applicant's cost per hour is estimated at \$23.00

570,000 hours x \$23.00/hour = \$13,110,000

FAA Form 8500-20; Medical Exemption Petition (Operational Questionnaire)

Applicants who do not meet physical standards prescribed under Part 67 and who desire to perform aviation activities must submit this form. This form supports the waiver process outlined in Part 67. We estimate an average of 135 applicants that take an average of 8 minutes to complete the form.

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| Estimated Annual Submissions of Form 8500-20 | 135 |
| Estimated Average Completion Time Per Form | .13 hours |
| Estimated Annual Reporting Burden | 18 hours |
| The applicants cost per hour is estimated at \$23.00 | |
| 18 hours x \$23.00 = | \$414 |

Total annual hours burden to applicants for all forms
3,058 + 570,000 + 18 = 573,076 hours

Total annual costs to applicants for all forms
\$70,334 + \$13,110,000 + \$414 = \$13,180,748

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the costs not already included in Items 12 and 14.)

The average medical examination fee is estimated at \$88.00
\$88.00 x 380,000 = \$33,440,000

14. Provide estimates of annualized costs to the Federal government.

Printing costs have been decreased by 10%; fillable form now available on FAA website.

FAA Forms 8500-7 & 8500-14

We estimate that it costs \$3.43 per form to process with 12,232 applicants per year.

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| Estimated Annual Submissions per year | 12,323 |
| Estimated Annual Cost to Process \$3.43 x 12,232 | \$41,956 |
| Estimated Annual Printing & Mailing Costs | <u>\$ 4,500</u> |
| Estimated Annualized Cost to government | \$46,456 |

Form 8500-8

We estimate that it cost \$23.01 per form to process with 380,000 applicants per year.

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| Estimated Annual Submissions per year | 380,000 |
| Estimated Annual Cost to Process \$23.01 x 380,000 | \$8,743,800 |
| Estimated Annual Printing & Mailing Costs | \$63,687 |
| Estimated Annual Cost to the government | \$8,807,487 |

Form 8500-20

We estimate it cost \$2.29 per form to process the application with 135 applicants per year.

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| Estimated Annual Submissions per year | 135 |
| Estimated Annual Cost to Process \$2.29 x 135 | \$309 |
| Estimated Annual Printing & Mailing Costs | \$23 |
| Estimated Annual Cost to the government | \$332 |

Total annualized costs to Federal government for all forms

\$46,456 + \$8,807,487 + \$332 = \$8,854,275

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13.

The burden hours for Forms 8500-7, -14, -8, and -20 decreased for this submission because fewer pilots applied for medical certification during this reporting period; based on those figures, we adjusted our estimate. Also, we have moved the cost to the respondents represented by the medical physical examination fee from Item 12 to Item 13. There have been no program changes.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulations, statistical analysis, and publication.

Not applicable.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We seek approval to not display the expiration date. The subject FAA forms are recurring forms that are printed and stocked for continuous use. When the supply gets low, the forms are automatically reprinted and stocked so that there will be no interruption in service. It would not be cost effective to destroy unused, dated stock.

Although the FAA has three of the four forms online in a PDF fillable format, both the printed and web versions need to be the same. Therefore, the FAA requests an exemption from placing the expiration date on the forms.

18. Explain each exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions, of OMB Form 83-I.

There are no exceptions to the certification statement.