

JUSTIFICATION FOR OMB APPROVAL OF AVIATION MEDICAL EXAMINER
DESIGNATION APPLICATION

OMB #2120-0604

1. Explain the circumstances that make the collection of information necessary.

Title 49, U.S.C., Section 44702 states that the Secretary of Transportation may, subject to such regulations as he/she may prescribe, delegate to any properly qualified private person, the examination and testing necessary for issuance of certificates.

Part 183 of the Federal Aviation Regulations (14 CFR 183), Representatives of the Administrator, implements the provisions of Title 49 U.S.C., section 44702. FAR Part 183 describes the requirements for delegating to private physicians the authority to conduct physical examinations on persons wishing to apply for their airmen medical certificate.

In addition to the regulatory basis, the purpose of this information collection is to make a list of designated Aviation Medical Examiners (AME) readily available to the public.

This information collection supports the Department of Transportation's strategic goal on safety that promotes public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage.

2. Indicate how, by whom, and for what purpose the agency has used the information.

The collection of information is for the purpose of obtaining essential information concerning the applicants' professional and personal qualifications. The FAA uses the information to screen and select the designees who serve as aviation medical examiners.

The collection of information is currently accomplished by use of FAA Form 8520-2, Aviation Medical Examiner Designation Application. The information is necessary to determine the qualifications of those physicians applying to become aviation medical examiners. The information is also used to develop the AME directories used by approximately 620,000 airmen who must undergo periodic examinations by AMEs in order to obtain medical certificates.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection or other forms of information technology.

At the present time, the only method available to evaluate an applicant's qualifications is review of the form completed and signed by the applicant. Once the form has been reviewed and the applicant approved for designation, required information is entered into the computerized Aviation Medical Examiner Information System (AMEIS). This form

is available online in PDF format, as of now 0% can be submitted electronically. This will be accomplished in the most cost beneficial manner consistent with the annual usage of approximately 450 forms per year. There are currently two separate actions taking place to upgrade the hardcopy FAA Form 8520-2 into an electronic version. First, the Associate Administrator for Safety, AVS-1, directed the formation of an AVS-wide Designee Steering Group (DSG). The DSG has developed a totally paperless Designee Management System for all designee groups within AVS, including AMEs. The projected date for implementation is September 2012. A separate action is currently taking place within the Civil Aerospace Medical Institute to develop an electronic FAA Form 8520-2 in the interim. Based on funding and other available resources, an implementation date has not been determined.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

We have reviewed the other FAA public use reports and find no duplication, and we know of no other agency collecting this information. The information collected is only available from the applicants applying to become AMEs. It is not available in any other form or from any other source.

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

The collection of information involves individuals only.

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.

If the collection is not conducted, it will not be possible to determine the qualifications of a physician applying to become an AME. The information is collected only when the applicant wishes to apply to become an aviation medical examiner.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR Part 1320.5(d) (2) (I) – (viii).

This information collection is conducted in a manner consistent with the guidelines in 5 CFR, Part 1320.5 (d) (I) – (viii).

8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosures, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A notice for public comment was published in the Federal Register on October 28, 2010, vol. 75, #208, page 66422. No comments were received.

We meet with AME's on a regular basis, which allows the AMEs an opportunity to express their views and opinions. Also, the application offers directions on how the AME may comment on the accuracy of estimate of burden or make suggestions.

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

No payments, gifts or remuneration of any kind are provided to respondents for completing, or providing information, on FAA Form 8520-2.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.

The information collected on this form becomes part of the Privacy Act system of records DOT/FAA 822, Aviation Medical Examiner System. The Privacy Act and the routine uses of that system dictate the disclosure procedures of the information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no sensitive questions on FAA Form 8520-2.

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

FAA Form 8520-2, Aviation Medical Examiner Designation Application must be filled out by AME applicants in order to be designated as an aviation medical examiner. We estimate that there will be approximately 400 new applications and approximately 50 reinstated applications completed per year at .5 hours per application to equal 225 hours annually. FAA Form 8520-2 is used by the Federal Air Surgeon for the initial selection and designation of aviation medical examiners. AMEs are redesignated through a process of issuing a new identification card. There is no burden on an AME for renewal of designation. However, when a reinstatement is requested by an AME, most regions require the AME to submit an updated application, especially if a long time has elapsed since the AME was terminated.

The cost to respondents to prepare this form is estimated to be \$13,500. (450 new and reinstated applications at .5 hours times \$60 per hour equals \$13,500).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There is no set up or maintenance cost associated with collection over and above the hourly cost associated with filling out the form.

14. Provide estimates of annualized cost to the Federal Government.

The estimated cost of this collection of information to the Federal Government is \$66,325. This is based on the FAA reviewing 450 applications at 1 hour each, times \$26 an hour for a total of \$11,700. Also approximately 8,000 letters and identification cards mailed each year at .5 hours times \$19 an hour equals \$54,625.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83 I.

No changes or adjustments were made.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

A Directory of Aviation Medical Examiners is published annually and is also available through the internet.

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.

FAA Form 8520-2 is seldom revised and is printed and stocked for continuous use. When the supply gets low, the form is automatically reprinted and stocked so there will be no interruption in service. It would not be cost beneficial to have to throw away unused, dated stock.

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

There are no exceptions to the certification statement.