

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; 44702; 44703; and 44709. Title 14 of the Code of Federal Regulations (CFR), parts 61 and 67, set forth specific operational and medical requirements for pilot certification. The Federal Aviation Administration (FAA) uses three forms to collect specific medical certification information to determine whether 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, how frequently, and for what purpose the information is to be used.*

**FAA Form 8500-7; Report of Eye Evaluation:** Applicants who do not meet distant visual acuity standards and who desire an Authorization for Special Issuance of a Medical Certificate must submit FAA Form 8500-7 for evaluation and determination by FAA physicians.

**FAA Form 8500-8; Application for Airman Medical Certificate or Airman Medical and Student Pilot Certificate:** Applicants complete this form to make application for an FAA medical certificate. Designated Aviation Medical Examiners (AMEs) perform a medical examination and, based on the applicants' input, work with Agency physicians to assess an applicant's medical fitness.

**FAA Form 8500-14; Ophthalmological Evaluation for Glaucoma:** Applicants with glaucoma must submit FAA Form 8500-14 so that FAA physicians can make determinations regarding permissible operational flight activities 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 2007, the FAA launched the FAA MedXPress system allowing anyone requiring a FAA Medical Certificate or Student Pilot Medical Certificate to electronically complete FAA Form 8500-8 online and transmit it to an Aviation Medical Examiner (AME).

Information entered into MedXpress is transmitted to the FAA and is available for the AME to review at the time of the applicant's medical examination. The FAA has fully implemented Med Xpress and no longer prints the forms.

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, eliminating errors of omission on the application, enabling transmission 24-hours-a-day, and allowing 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 MedXpress and 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.

FAA Forms 8500-7 and -14 are also available online in .pdf fillable format.

*4. Describe efforts to identify duplication.*

Forms 8500-7, -8, and -14 were designed exclusively to assist the FAA in evaluating the medical fitness of applicants for FAA medical certification. These forms are used to collect an applicant's personal medical information and are not available elsewhere. The FAA is not aware of any duplication.

*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 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.*

The FAA collects medical information only when an individual applies for an FAA medical certificate. The collection of an applicant's medical information complies with pertinent operational provisions of Part 61 of Title 14 of the Code of Federal Regulations (14 CFR) and medical provisions of 14 CFR Part 67. Section 61.3(c) sets forth requirements for FAA certificates, including medical certificates, and 61.23(d) sets forth the duration of the three classes of FAA medical certificates. Part 67 Subpart A sets forth specific application standards for medical certificate applicants. Applicants not meeting these standards would be in violation of the regulations. Reducing the burden, or conducting the collection less frequently, would require regulatory amendment of these

existing minimum standards. The FAA would have no safety basis for reducing a long-standing level of safety for medical certificate applicants.

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 on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.*

A public notice was placed in the Federal Register to receive comments on this collection, titled "Agency Information Collection Activities: Requests for Comments; Clearance of Renewed Approval of Information Collection: Medical Standards and Certification," 79 FR 8233 (Feb. 11, 2014). This comment period ended April 14, 2014. We received one comment from the Equal Employment Opportunity Commission regarding Form 8500-14. They noted that when used in the employment context, line 5 of the form, which asks whether the applicant has a family history of glaucoma, poses a conflict with the requirements of Title II of the Genetic Information Nondiscrimination Act of 2008.

We do not concur with this statement. It is the duty of Aerospace Medicine to certify pilots and air traffic controllers medically. As the EEOC noted in their comment, this Form is not generally used in the employment context. In the limited circumstance that it is used for hiring purposes, our request for family history of glaucoma is not hiring criteria. It is requested in order to create follow-up requirements for the medical certificate or medical clearance that best support our statutory responsibility to promote safe flight of civil aircraft in air commerce. It is never used to qualify or disqualify an applicant. The request for family history of glaucoma is made for the benefit of public health and the improvement of aviation safety for the travelling public.

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 and the basis for the assurance in statute, regulation, or agency policy.*

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, religious beliefs, and other matters that are commonly considered private.**

No information regarding sexual behavior or religious belief is collected. Applicants must respond to medical questions on these FAA Forms only so the FAA can make informed medical determinations.

- 12. Provide estimates of the hour burden of the collection of information. The statements should: Indicate the number of respondents, frequency of response, annual hour burden and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

[Note: The decrease in number of respondents to Forms 8500-7 and 8500-14 is attributed to fully automating the application process and changes in certification policy for some vision issues. These factors have reduced the need for applicants to complete these additional forms.]

Form #	# of Apps	Hrs/App	Total Hrs	Cost/Hr	Total Cost
8500-7 and -14	18,000	.25	4,500	\$35.56	\$160,020
8500-8	396,300 (CY12)	1.5	594,450	\$35.56	\$21,138,642
Totals	414,300		598,950		\$21,298,662

- 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.)**

Once the information on FAA Form 8500-8 is collected, respondents must receive a medical examination in order to be certificated to exercise pilot privileges. The average cost of a basic medical examination is estimated at \$117.00.

$$\$117.00 \times 396,300 \text{ submissions of 8500-8 in CY 2012} = \mathbf{\$46,367,100}$$

- 14. Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses and any other expense that would not have been incurred without this collection of information.**

Estimated annual cost to the Federal Government is **\$2,926,014**.

This cost is determined by estimating the time required for FAA personnel to review and process FAA Forms 8500-7, -8, and -14. We estimate that 75% of applications are electronically reviewed. The remaining 25% will go to an FAA Legal Instruments Examiner (LIE). We estimate that 103,575 Forms are submitted for these medical

certificates at an average file processing time by an LIE of 15 minutes (0.25) each at an average wage of \$31 per hour.

$$\begin{aligned} 25\% \text{ of } 414,300 \text{ total submissions} &= 103,575 \\ 103,575 \times 0.25 \text{ hours} \times \$31 \text{ per hour} &= \$802,706 \end{aligned}$$

After review by an LIE, approximately 50% will need review by a physician. We estimate that 51,788 of these Forms are submitted to a physician at an average file processing time of 30 minutes (0.5) each at an average wage of \$82 per hour.

$$\begin{aligned} 50\% \text{ of } 103,575 \text{ submissions reviewed by an LIE} &= 51,788 \\ 51,788 \times 0.5 \text{ hours} \times \$82 &= \$2,123,308 \end{aligned}$$

$$\$802,706 + \$2,123,308 = \mathbf{\$2,926,014}$$

**15.** *Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.*

- The number of applicants and the applicants cost per hour has increased since the last submission
- The average cost of a basic medical examination has been adjusted for inflation (from \$88.00 to \$117.00)
- With full automation, the forms are no longer printed and mailed
- A fourth form, previously reported, FAA Form-8500-20 is no longer used and has been cancelled.

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

There are no plans to publish this information for statistical or other purposes.

**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 continue to seek approval to not display the expiration date on FAA Forms 8500-7, -8, and -14. Displaying the expiration date has caused confusion for respondents, for our nearly 3500 FAA AME designees, and for FAA IT program personnel who ultimately must ensure that the date is kept current. None of these entities fully understand the tenets of the Paperwork Reduction Act and the need to display the date. As such, the expiration date has caused confusion regarding the currency of the medical information on the forms, particularly when an applicant renews an existing medical certificate.

**18.** *Explain each exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions, of OMB Form 83-1.*

There are no exceptions to the certification statement.