

Supporting Statement

OMB 2120-0009

Pilot Schools - FAR Part 141

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

This paperwork burden directly supports the Department of Transportation Strategic Goal on Safety. Specifically, the goal is to promote the public health and safety by working toward the elimination of transportation related deaths, injuries, and property damage.

49 USC Section 44707 empowers the Administrator of the Federal Aviation Administration (FAA) to provide for the examination and rating of civilian schools giving instruction in flying. This CFR prescribes the requirements for issuing pilot school certificates, provisional pilot school certificates and associated ratings to qualified applicants. In addition to the statutory and regulatory basis, the collection of this information is necessary for:

- a. Collection and public dissemination of alphabetical listing of schools via the FAA public web site: http://www.faa.gov/training_testing/schools/;
- b. Issuance, renewal, or amendment of applicants' pilot school certificates; and
- c. It is necessary to certify pilot schools to insure that minimum acceptable training standards are met.

2. Indicate how, by whom, and for what purpose the information is to be used.

The information on FAA Form 8420-8, Application for Pilot School Certificates, is required from applicants who wish to be issued pilot school certificates and associated ratings. Pilot schools train private, commercial, flight instructor, and airline transport pilots, along with training for associated ratings in various types of aircraft. The form is also necessary to assure continuing compliance with Part 141, renewal of certificates every 24 months, and for any amendments to pilot school certificates, FAA approval of pilot school certificate amendments enables schools to provide new training courses not previously approved.

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.

Currently, pilot school statistical information is collected and entered into the Flight Standards National Vital Information System (Air Agency-Part 141). This information does not include any statistical information regarding the many non-FAA certificated flight schools operated in accordance with the regulations of Part 61. Part 141 permits trainees to meet the flight experience requirements of Part 61 with less flight time. At the present time, the best method available to evaluate an applicant's eligibility for initial issuance or renewal of a Part 141 school certificate is the review of the applicant's FAA Form 8420-8. The Form is generally not sent to the FAA without a cover letter with attachments which contains information such as recency of experience and examining

experience that the applicant desires the FAA District Office to know and cannot be indicated on the Form.

Upon receipt of the applicant's Form 8420-8, FAA inspectors physically verify such things as:

- a. The Facilities and Training Aids,
- b. The existence of a principal business office for school files and records,
- c. The Primary category aircraft,
- d. The existence of the continuous pilot briefing areas at each airport where flights originate,
- e. Show that it has the continuous use of each airport where training flights originate,
- f. Inspection of the aircraft used and maintained by the school,
- g. Credentials of the Chief Flight Instructor, and
- h. Review and approval of the Training course outline(s).

In summation, the FAA Form 8420-8 is used as the base document to initiate and/or confirm the status of the schools eligibility to hold an FAA Form 8000-4, Air Agency Certificate. Form 8420-8 in itself is not the only document that an applicant sends to the FSDO and for that reason it is extremely difficult for it to be received electronically. As noted above, during the certification process, our inspectors are required to go to the applicant's location to perform their inspection. Part of that inspection is the completion of the inspector's sections of the form. At this time the infrastructure is not in place to electronically complete the forms at all flight school locations. We are currently updating our Web Based Operations Safety System (WebOPSS) to approve 141.57 pilot schools electronically. A future addition will enable a school to make application through WebOPSS thus eliminating the current form.

4. Describe efforts to identify duplication.

We have reviewed the other FAA public use reports and find no duplication. Also, we know of no other agency collecting information on pilot school applicants for the purpose of certifying these applicants.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Completion of the required items is of minimal burden to the respondent due to the simplistic format of the document. Many local offices further reduce this burden by preparing the application for the respondent's signature.

6. Describe the consequence 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.

Frequency of collection is determined by the applicant requesting certification benefit. A decrease of initial applicants is governed by the applicant, not the FAA. While no technical or legal obstacles are anticipated, we do not presently foresee any public burden reduction. The consequence to FAA's program activities if the collection of information was not conducted would be the inability to determine whether or not an applicant met the criteria for a pilot school certificate.

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

This collection of information is conducted in a manner consistent with 5 CFR 1320.5(d)(2).

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB.

A notice for comment was published in the *Federal Register* on April 3, 2012, vol. 77, no. 64, page 20093. No comments were received.

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

There is no payment involved in this collection.

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

No assurance of confidentiality is promised.

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 questions of a sensitive nature.

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

Estimated annualized costs to respondents is **\$30,006** and the estimated burden hours are **29,770**.

This cost is determined by estimating the applicant's time required to complete and submit new applications, as well as apply for renewal or amendment to existing certificates. The estimate also includes the average time required to prepare a training course outline.

581 Form 8420.8 at .5 hours each x \$28 per hour	= \$ 8,134
6 training course outlines at 200 hours each x \$25 per hour	= <u>\$30,000</u>
Total	\$38,134

The specific reporting and recordkeeping requirements of Part 141 are prescribed by the following sections:

Section 141.13, Application - requires an applicant to submit FAA Form 8420.8, Application for Pilot School Certificate, for an original certificate, amendment, or renewal. Unless sooner surrendered, suspended, or revoked, a pilot's school certificate is effective for 24 months.

We estimate 31 new applications for original certification annually from applicants never before issued a pilot school certificate. We estimate 291 applications for renewal annually. This figure represents half of the current 581 certificated pilot schools, since they all must apply for renewal every 24 months.

31 new applications at .5 hours each	= 15.5 hours.
291 applications for renewal at .5 hours each	= 145.5 hours
20 applications for amendment at .5 hours each	= <u>10.0 hours</u>

171.0 hours

We estimate that of the 31 new applications for pilot school certificates, 25% will have special curricula courses that will need to be accounted for in the passage rate required for issuance of a certificate in § 141.5(d). Of the 291 applications for renewal of pilot school certificates, approximately 25% would include special curricula courses that must now be accounted for in the passage rate for renewal of a certificate under § 141.5(d). We estimate that it would take .1 hours to add this special curricula course information to both initial and renewal applications.

8 new applications at .1 hours each	= .8 hours
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73 applications at .1 hours each (adding special curr.) = 7.3 hours

171.0 hours + 7.6 hours = 181.6 total burden hours

Section 141.53, Training Course Outline - requires an applicant for initial or amended pilot school certificate to submit an initial or amended training course outline (TCO) along with FAA Form 8420-8 for approval, indicating how the pilot school intends to train the students.

We estimate 35 new applicants annually for approval of training course outlines on a one-time basis from applicants never before issued a pilot school certificate. We estimate that 200 hours are required to prepare an acceptable TCO. However, acceptable outlines are easily obtained commercially. Therefore, most applicants spend relatively little time in preparation of training course outlines. We estimate then that only 5 new applicants will devise their own TCO's.

5 new applicants at 200 hours each = 1,000 hours per year

Section 141.57, Special Curricula - an applicant for a pilot school certificate can apply for approval to conduct a special pilot training course by submitting FAA Form 8420-8. We estimate 55 applicants per year at 20 hours each.

55 applicants at 20 hours each = 1,100 hours per year

Section 141.63, Application for Examining Authority - is made by the holder of a pilot certificate on FAA Form 8420-8. We estimate 15 new applicants for examining authority at 20 hours each.

15 new applicants at 20 hours each = 300 hours per year

Section 141.87, Change of Chief Instructor - holders of a pilot school certificate must notify the FAA of changes in chief instructor designations. We estimate 80 annual reports at 0.1 hours each.

80 annual reports at 0.1 hours = 8 hours

Section 141.101, Training Records - each holder of a pilot school certificate shall establish and maintain current and accurate records for each student. We estimate that the total annual recordkeeping amounts total 26,200 hours, based on an average of 50 hours per year for each of the 581 certificated pilot schools.

581 schools x 50 hrs = 29,050 hours

SUMMARY OF BURDENS

Reporting Burden

Section 141.13, Application

181.6 hrs

Section 141.53, Training Course Outline	1,000 hrs
Section 141.57, Special Curricula	1,100 hrs
Section 141.63, Application for Examining Authority	300 hrs
Section 141.87, Change of Chief Instructor	<u>8 hrs</u>
Total	2,589.6 hrs

Recordkeeping Burden

Section 141.101, Training Records	<u>29,050 hrs</u>
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TOTAL BURDEN	31,639.6 hrs
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13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There is no additional cost not already included in question #12.

14. Provide estimates of annualized cost to the Federal government. Also provide a description of the method used to estimate cost, which include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimated annualized cost to the Federal Government is **\$14,958**. This cost is based on FAA inspectors' time to review and process new applications, renewals, and amendments to existing certificates. It also includes time spent reviewing and approving training course outlines.

a.	546 Form 8420-8 at .5 hours each x \$54 per hour	= \$14,742
b.	5 training course outlines at an average of 24 hours each x \$25 per hour	= <u>\$ 3,000</u>
	Total cost	\$17,742

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

Part 141.5(d) allows pilot schools that hold training course approvals for special curricula courses to renew their certificates based on their students' successful completion of an end-of-course test for these FAA approved courses. There are currently hundreds of FAA approved special curricula courses in use by active pilot schools. It is likely that with this new allowance, some schools will request new special curricula course approvals. The FAA estimates that of the 581 active 141 pilot schools approximately 25% (145) have FAA approved special curricula courses. The FAA anticipates:

- (1) a new time burden for the increase in requests for approval of special curricula courses, and
 - (2) a new time burden of including the pass rate of students completing these courses.
- These burdens are reflected under 141.57, Special Curricula and Section 141.13, Application.

The allowance under §141.5(d) to accept student completions of a special curricula course for pilot school renewal will likely generate some new requests for special curricula approvals from existing pilot schools. We estimate a 10% increase in applicant requests per year.

As part of its review of this information collection, the FAA has made a burden adjustment to reflect an increased population for the current number of pilot schools. The population has increased from 546 to 581, creating a burden adjustment of +35 pilot schools. The FAA has made adjustments throughout this supporting statement to reflect the 581 pilot schools.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of this collection of information, completion of report, publication dates, and other actions.

No publication is planned for this information.

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

FAA is not seeking such approval.

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.