

Supporting Statement

Advanced Qualification Program (AQP)
Subpart Y to 14 CFR 121
2120-0701

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating and authorizing the collection of information.

In October 1990, the FAA published Special Federal Aviation Regulation (SFAR) No. 58, Advanced Qualification Program (AQP). The SFAR addressed recommendations from a Joint Government-Industry Task Force on flight crew performance. The SFAR also addressed a National Transportation Safety Board (NTSB) Safety Recommendation (A-88-71) on the subject of Crew Resource Management. The FAA extended the SFAR several times since 1990 and also determined that the SFAR requirements should be codified into a permanent regulation.

Under SFAR No. 58, the FAA provides certificated air carriers, as well as training centers they employ, with a regulatory alternative for training, checking, qualifying, and certifying crewmembers subject to the requirements of 14 CFR parts 121 and 135. Air carriers can choose to use a traditional training program or to participate in AQP. AQP offers several long-range advantages to participation such as the flexibility to tailor training and certification activities to a carrier's particular needs and operational circumstances subject to data collection procedures that enable the FAA to determine whether the training and evaluations are working to accomplish the overall objectives of the curriculum. AQP encourages innovation in developing training strategies, but employs data collection and analysis to validate the effectiveness of such innovations.

The main goal of the AQP is to improve crewmember performance by providing alternative means of complying with certain rules that may inhibit innovative use of modern technology for crewmember training. The SFAR has been successful in encouraging carriers to become innovative in their approach to training, and in making use of data collection and analysis to validate such innovations. From an FAA perspective, the overriding advantage of AQP is the improved quality of training and its data driven validation. AQP provides a systematic basis for matching technology to training requirements and for approving training program content based on relevance to operational performance. AQP also incorporates data driven quality control processes for validating and maintaining the effectiveness of curriculum content. Data collection and analysis is a fundamental part of AQP. AQP efficacy is continuously validated through the collection and analysis of trainee performance. Data collection and analysis

processes ensure that the certificate holder provides performance information on its crewmembers, flight instructors, and evaluators that will enable the certificate holder and the FAA to determine whether the form and content of training and evaluation activities are satisfactorily accomplishing the overall objectives of the curriculum.

This rule supports the Department of Transportation strategic goal of Safety. It has contributed to the reduction of commercial aviation fatal accidents to 0.01 per 100 thousand departures; and to the reduction of general aviation fatal accidents.

The pertinent section of the regulation concerning information collection is as follows:

§ 121.917 (c) Data collection and analysis processes acceptable to the FAA that will ensure that the certificate holder provides performance information on its crewmembers, flight instructors, and evaluators that will enable the certificate holder and the FAA to determine whether the form and content of training and evaluation activities are satisfactorily accomplishing the overall objectives of the curriculum.

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.

Certificated air carriers, as well as training centers they employ may voluntarily respond to this collection in order obtain the benefit of a regulatory alternative for training, checking, qualifying, and certifying crewmembers subject to the requirements of 14 CFR parts 121 and 135. Air carriers can choose to use a traditional training program or to participate in AQP. FS-200, Air Transportation Division, Branch AFS-280, receives the AQP data monthly in order to monitor program compliance, effectiveness, and efficiency. AFS-280 processes the information for errors and omissions then analyzes the data. The FAA principal operations inspector (POI) responsible for oversight of the certificate holder reviews the analyzed data. The POI and his or her staff make use of this information to monitor training trends, to identify areas in need of corrective action, to plan targeted surveillance of curricula, and to verify that corrective action is effective. In general, the information is used to provide an improved basis for curriculum approval and monitoring, as well as agency decisions concerning air carrier training regulation and policy.

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.

In compliance with the Government Paperwork Elimination Act (GPEA), collection of this information is available 100% electronically. Air carriers routinely make use of state-of-the art electronic collection and data transmission techniques as the primary means of compliance with the reporting requirements of the rule. Air carriers use electronic information management technology for archiving, maintaining, and reporting data associated with the requirements of the rule.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can be used for the purpose described in Item 2 above.

Similar information is not available from any other source. The rule does not entail any duplication of information reporting requirements.

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

The information requested is limited to the minimum necessary to fulfill the requirements. The amount of data required to be submitted is proportional to the size of the operation.

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.

The monthly collection and review of data is required to identify positive and negative trends regarding training efficacy in a timely manner. If the requested data were not collected, the FAA would not have a data driven basis for identifying pilot, dispatcher, and flight attendant AQP curriculum deficiencies, nor be able to employ such data to ascertain that actions taken to correct such deficiencies have been effective. Similarly, the FAA would not be able to benefit from the use of AQP information for agency decision-making purposes concerning air carrier training and evaluation policies. **The required electronic monthly performance data collection serves as a diagnostic tool used by the FAA in determining whether the form and content of training and evaluation activities are satisfactorily accomplishing the overall objectives of the curriculum.** The information collection frequencies required by this rule are the minimum amount necessary and appropriate for these purposes.

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

The information collection is consistent with the requirements of 5 CFR 1320.5(d) (2) (i) - (viii) with the exception that the information collection is to be provided at least monthly to the FAA in order to handle safety concerns in a timely manner.

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, disclosure, or reporting format (if any) and on data elements to be recorded, disclosed, or reported.

The FAA has participated in periodic industry forums during which many airlines provide input to the FAA regarding AQP and associated data collection/reporting issues. The Air Transport

Association sponsored an AQP Data Management Focus Group that helped the FAA to develop an AQP Data Management Guide (initial release May 29, 1996). The guide provides data management direction by discussing general data considerations and specific data collection, entry, reporting, and analysis requirements. It also provides an expansion of the information provided in the AQP Advisory Circular 120-54A and incorporates data submission guidance. The guide also includes findings from research conducted by academia and selected AQP-participating airlines.

Additionally, the FAA issued a notice in the Federal Register on February 6, 2018 (83 FR 5292) to allow for public comments regarding the renewal of this information collection. 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 or gift to respondents.

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

Section 121.905, Confidential Commercial Information, specifies the procedure for a certificate holder to make a claim that AQP information or data submitted to the FAA is entitled to confidential treatment under 5 U.S.C 552 (b)(4). The certificate holder must clearly identify its claim of confidentiality on each submission and must justify that claim. The FAA office of primary responsibility for the AQP will evaluate a submitter's claim for confidential treatment of information or data. The FAA office of primary responsibility for the AQP will make the determination whether the information submitted is entitled to protection under 5 U.S.C 552(b) (4), within a reasonable time, with review by the Office of the Chief Counsel.

In addition, applicants may be provided confidentiality under the provision of the Privacy Act and the Privacy system of records DOT/FAA 847, General Air Transportation Records on Individuals.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of hour burden of the collection information. This information should: Provide number of respondents, frequency of response, annual burden, and an explanation of how the burden was estimated.

The estimated burden is the time required to transform the data already produced monthly by the certificate holder as part of an approved AQP into the appropriate form for use by the FAA.

- (1) Number of respondents with approved Advanced Qualification Programs: 25
- (2) Frequency of response per respondent: Monthly
- (3) Estimated number of hours per respondent to prepare information to be submitted to the FAA: 2.0
- (4) Estimated annual hour burden per respondent: 24
- (5) Total estimated hours of industry burden: 600

Based on a cost benefit study from certificate holders with existing AQP programs, the average cost of an AQP analyst is \$60 per hour. Therefore, the maximum cost of this burden is:

- All respondents per annum (600 hours) \$36,000
- Each respondent per annum (24 hours) \$1440

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information.

No other costs except those indicated in question 12.

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

The FAA has established an infrastructure suitable for the acquisition, monitoring, and use of AQP information.

Annualized personnel:

- GS-11 (or contract equivalent) average hourly wage is \$28.83 per hour
 - o Data review and analysis ~ 30 hours per week (\$865)
 - \$44,980 per year

Annualized maintenance: Component maintenance costs ~ \$2,500.00 per year

Annualized new components: New components ~ \$1,957 per year

$\$44,980 + \$2,500.00 + \$1,957 = \$49,437$ per year.

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

There are no burden changes being reported from the previous submission, with the exception of updated information regarding number of respondents, wages and component costs.

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.

The information to be collected will not be published, and is releasable to the public only under special circumstances as may be required under 5 U.S.C 552 (b)(4). The FAA office of primary responsibility for the AQP will make the determination whether the information submitted is entitled to protection under 5 U.S.C 552(b)(4), within a reasonable time, and with review by the Office of the Chief Counsel. There are no complex analytical techniques that will be used.

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 is not seeking approval to not display the expiration date of OMB's approval of this collection of information.

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 identified in Item 19, OBM Form 83-1.