

SUPPORTING STATEMENT

OMB 2120-0600

Training and Qualification Requirements for Check Airmen and Flight Instructors

Justification

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

Federal Aviation Regulations (FAR) Parts 121.411(d), 121.412(d), 135.337(d), and 135.338(d) require the collection of this data. This collection is necessary to insure that instructors and check airmen have completed necessary training and checking required to perform instructor and check airmen functions.

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.

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

Experienced pilots who would otherwise qualify as flight instructors or check airmen, but who may not medically eligible to hold the requisite medical certificate are mandated to keep records that may be inspected by the FAA to certify eligibility to perform flight instructor or check airmen functions. This information is inspected on occasion and will be used by the FAA to determine and to assure that check airmen and instructors maintain the high qualification standards (training and experience) required to perform their safety functions.

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.

This is a recordkeeping burden only. Written or electronic methods may be used. Any form of information technology may be used.

In response to the Government Paperwork Elimination Act (GPEA), we do not dictate the method of recording keeping. The check airmen and instructors may keep their records in whatever filing order is necessary to perform their safety functions, and we allow for 100% electronic records.

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

There is no duplication of this information. Since recordkeeping requirements are only maintained in accordance with FAR's, no other Federal agency requires that these records be maintained.

5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (item 5 of OMB Form 83-I), describe the methods used to minimize burden.

This regulation will have no impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If the data is not maintained FAA surveillance and compliance programs, including aviation safety, will be compromised. This information will be used by the FAA to determine and to assure that check airmen and instructors maintain the high qualification standards required to perform their safety functions. If this information is not maintained, the FAA cannot insure that check airman and instructors are adequately trained.

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

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(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, disclosure, or reporting format (if any) and on the data elements to be recorded, disclosed, or reported.

A notice for comment was published in the *Federal Register* September 19, 2018 (83FR 47398). 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.

Respondents have been given no assurance of confidentiality.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

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

The estimated hour and cost burdens are **12.5 hours** and **\$576.25**. We estimate that there are approximately **3,100 respondents**, the average burden hour is **15 seconds** per respondent, and the average industry cost is **\$46.10 per hour** (fully loaded wages including fringe and overhead).ⁱ Respondants would be entering a date into their recordkeeping system of dates of training for the instructor/check airman.

Recordkeeping:

3,100 respondents
x .004165 hrs (15 seconds*)

12.5 hours
x \$46.10 (per hour)

\$576.25

[*.25 (15 sec.) x .01666 (1 min.) = .004165 hours]

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

There are no additional costs not already included in #12.

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

There is no cost to the Federal Government, this is a recordkeeping only program.

ⁱ Bureau of Labor Statistics, Employer Costs for Employee Compensation - September 2018, USDL-18-1941, Released December 14, 2018

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

There are no program changes from the previous submission. The number of respondents increased from 3000 to 3100.

16. For collections of information whose results are planned to 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 the collection of information, completion of report, publication dates, and other actions.

There is no publication planned for this information.

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.

There are no forms required for use by the airline industry.

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.