

Supporting Statement A

Survey of Airmen Satisfaction with Aerospace Medical Certification Services

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

The Federal Aviation Administration (FAA), through the Office of Aerospace Medicine (OAM), is responsible for the medical certification of pilots and certain other personnel under 14 CFR 67 to ensure they are medically qualified to operate aircraft and perform their duties safely. In the accomplishment of this responsibility, OAM provides a number of services to pilots, and has established goals for the performance of those services. This is a biennial survey designed to meet the requirement to survey stakeholder satisfaction under Executive Order No. 12862, "Setting Customer Service Standards," and the Government Performance and Results Act of 1993 (GPRA).

The survey of airman satisfaction with Aeromedical Certification Services assesses airman opinion of key dimensions of service quality. These dimensions, identified by the OMB Statistical Policy Office in the 1993 "Resource Manual for Customer Surveys," are courtesy, competence, reliability, and communication. The survey also provides airmen with the opportunity to provide feedback on the services and a medical certificate application tool they use. This information is used to inform improvements in Aeromedical Certification Services. The survey was initially deployed in 2004, and deployed again in 2006, 2008, 2012, 2014, and 2016 (OMB Control No. 2120-0707). Across collections, minor revisions have been made to the survey items and response options to reflect changes in operational services and survey technology. In the current collection, format changes have been made to accommodate multiple administration modes (i.e., paper, desktop computer, and mobile device), reduce the burden on the individual respondent, and potentially improve the response rate.

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.

- The survey will be available for completion either electronically or hard copy
- The collection is reported by survey and is voluntary
- Airmen who have sought a medical certification within two years of the survey administration will be invited to participate in the survey
- The survey will take place approximately every two years
- The survey will be administered by the Human Factors Research Lab of the Civil Aerospace Medical Institute with the support of Cherokee CRC, LLC.
- Demographic information will be collected from respondents, but any information disseminated to the public will be presented in aggregate form
- The information obtained from the survey will be used to brief the Federal Air Surgeon, the Regional Flight Surgeons, and the Director of the Civil Aerospace Medical Institute following the survey closing
- Data will be used by the senior managers of OAM to:

- o Evaluate stakeholder satisfaction with aeromedical certification services provided by or on behalf of the FAA
- o Identify areas in which improvements in service delivery can be made
- o Assess changes in stakeholder satisfaction as a result of those improvements
- All publications of data would be provided in a technical report or journal article
- The information from the survey will also be briefed in the Federal Air Surgeon's Medical Bulletin
- It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. The Office of Aerospace Medicine will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with OAM standards for privacy of information. See response to Question 10 of this Supporting Statement for more information on the OAM guarantee of privacy. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

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.

- Invitation to participate in survey delivered by U.S. mail
 - o 100% of pilots invited to participate in the survey will be asked to complete the survey online
 - o Information on how to complete the survey online
 - Internet address
 - Unique ID and password for each pilot
 - Responses are anonymous and no personally identifying information will be collected
 - o Pilots can request to complete a paper survey if they cannot or do not want to complete the survey online
 - o If requested, a paper survey will be mailed to the pilot
- For online surveys
 - o Incomplete surveys are saved and can be modified by the pilot
 - o Once submitted, pilot no longer has access to the survey
- Online surveys can be completed 24/7 for 90 days from when the invitation was mailed
- Reminders to complete survey will be sent to all participants via U.S. mail
- The results of the survey will be used to improve FAA services. Results will be disseminated through several publication channels
 - o The OAM technical report series
 - o Federal Air Surgeon's Bulletin
 - o Aviation trade press, including Airline Pilot and the AOPA magazine
 - o Presentations at scientific meetings and publication in scientific journals

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.

- This is the only data collection effort to solicit feedback regarding pilot medical certification exams at the FAA
- The Office of Aerospace Medicine is the only known party who would request this data, and OAM representatives are involved in survey development, are briefed on the findings, and are delivered the final reports.
- No other information sources have been identified which would provide the required information
- Airmen are the sole source of information for their satisfaction and feedback regarding aeromedical certification services provided by or on behalf of the FAA.

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

- Collection of information does not involve small businesses

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.

- Failure to collect the stakeholder satisfaction data from airmen will seriously jeopardize Office of Aerospace Medicine efforts to improve its customer service
- Failure to collect the information will result in the Office of Aerospace Medicine being in non-compliance with the Executive Order 12862 and GPRA.
- The survey is administered approximately every two years to continually assess service quality, as the services are continually being updated based on need. These administrations are needed to ensure quality of services in a timely manner.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- No special circumstances exist

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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 Federal Register Notice published on February 1, 2019 (84 FR 1265) solicited public comment. No comments were received

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

- No payments or gifts will be provided to respondents

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

All data provided will be kept private to the extent possible by law. To preclude the identification of individual responses, all identifying information will be removed from the survey data prior to use by the FAA. Only analyses and reports of aggregate data will be produced and released. The opinion data will be collected, analyzed, and reported in accordance with guidelines from the Office of the Secretary of Transportation on Customer Service Standards.

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 questions of a sensitive nature relating to sexual behavior, religious attitudes, or other matters commonly considered private, will be asked.

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

- Previous administrations suggest 10-15 minutes to complete either version of the survey
- The 2016 survey administration yielded a 55% response rate, however this was unusually high compared to past administrations. Therefore, based on previous administrations of the survey (e.g., 2014), it is anticipated that 35% of the surveys will be returned, resulting in approximately 2,323 usable surveys from the estimated 2016 sample of 6,637.

Annual hour burden: It is estimated that, on average, respondents will require about 10-15 minutes to complete either the printed or online versions of the survey. The estimated hour burden for each data collection cycle would be 581 hours under the most likely response rate of 35% (6,637 x 35% response rate / .25 hours or 15 minutes = 581 burden hours). The base wage for pilots per Bureau of Labor Statistics Data is \$115,670¹. The fully burdened annual

¹Source: Bureau of Labor Statistics. "Occupational Outlook Handbook". May, 2018. Airline and Commercial Pilots. <https://www.bls.gov/ooh/transportation-and-material-moving/airline-and-commercial-pilots.htm#tab-1>

²Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

salary including fringe benefits and overhead according to the Department of Health and Human Services is a factor of 2 of the base wage, coming to \$231,340². The hourly wage at the fully burdened rate is \$111.22 ($\$231,340/52 \text{ weeks}/40 \text{ hours} = \111.22). The estimated cost per data collection cycle, at a cost of approximately \$27.80 per respondent ($\$111.22 * 0.25 = \27.80), would be approximately \$64,579.40 ($2,323 * \$27.80 = \$64,579.40$).

¹ Source: Bureau of Labor Statistics. "Occupational Outlook Handbook". May, 2018. Airline and Commercial Pilots. <https://www.bls.gov/ooh/transportation-and-material-moving/airline-and-commercial-pilots.htm#tab-1>

² Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

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|--------------------------------------|--------------------|----------------------|
| Summary (Annual numbers) | Reporting | Recordkeeping |
| IC 1 | | |
| # of Respondents | 2323 | 0 |
| # of Responses per respondent | 1 | 0 |
| Time per Response | 15 Min (.25 Hr) | 0 |

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

- None

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 (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Cost to Federal Government for each year the survey is administered.

The estimated biennial cost to the Federal government for collecting airman satisfaction data is about \$33,000, based on a return rate of 35%.

Research assistants, technicians, and data entry clerks from Cherokee CRC, LLC will assist in this project. The tasks they will perform with fully burdened cost estimates as follows:

| Product/Delivery | Projected |
|--|---------------------|
| Background and content development | \$ |
| Online and paper survey development | \$ 7,000.00 |
| Database build and analyses | \$ 4,500.00 |
| Online and paper survey distribution, reminders, technical | \$ 6,000.00 |
| Item Report development, presentations | \$ 6,000.00 |
| Process and hand enter paper surveys and comments | \$ 5,000.00 |
| *TOTAL | \$ 33,000.00 |

*FAA Researcher time: The mission of the Flight Deck Human Factors Research Division employees at CAMI is to support FAA research projects which originate from requests made by various offices within the agency. The proposed questionnaire is such a project. No new employees will be hired to conduct this project. PC & B expenses will be incurred for current employees whether or not this project is undertaken. Thus, it is not necessary to include the cost of FAA employee time.

15. Explain the reasons for any program changes or adjustments.

- The reason for administering the survey is to capture trend data and use feedback to improve organizational operations.
- The population of interest has been updated since the last administration and is reflected in the burden estimate and number of respondents.

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 the collection of information, completion of report, publication dates, and other actions.

- Survey results will be made available approximately 12 months after data collection completion.
- Results will be disseminated through several publication channels
 - o The OAM technical report series
 - o Federal Air Surgeon's Bulletin
 - o Aviation trade press, including Airline Pilot and the AOPA magazine
 - o Presentations at scientific meetings and publication in scientific journals
- Data will be presented at the aggregate level

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

- Not applicable

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

- No exceptions