

SUPPORTING STATEMENT

OMB No. 2120-0570

Part 142, Certificated Training Centers

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

This report and the resulting paperwork burden directly support 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.

Chapter 447 of Title 49, United States Code, states that, applications for certificates under this title shall be in such form, contain such information, and be filed and served in such manner as the Administrator may prescribe.

14 CFR Part 142 is one of several Federal Regulation parts that implement the Public Law. Section 142.11 provides that application for a training center certificate and training specifications shall be made in a form and manner prescribed by the Administrator, shall provide specific information about each management, instructor position, and evaluator position, and contain certain other administrative information.

Section 142.37 provides that application for approval of training programs must be in a form and manner acceptable to the Administrator, and must provide specific information about curriculum and courses of the training program.

Chapter 447, Section 44701 of Title 49, United States Code, provides, in pertinent part, that the Administrator may find, after investigation, that a person found to possess proper qualifications for a position as an airman may be issued such certificate. That certificate shall contain such terms, conditions, and limitations as to duration thereof, as well as periodic or special examinations, and other matters as the Administrator may determine to be necessary to assure safety in air commerce.

Section 142.73 requires that training centers maintain records for a period of one year to show trainee qualifications for training, testing, or checking, training attempts, training checking, and testing results, and for one year following termination of employment the qualification of instructors and evaluators providing those services.

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

This information collection involves both reporting and recordkeeping by Part 142 training centers in order to issue pilot certificates. Some of the information collected in

this collection is recordkeeping by Part 142 training centers for information that they collect to be able to issue pilot certificates. Applicants for Part 142 Training Center are required to report the information when submitting an application to the FAA. Existing Part 142 Training Centers are required to maintain records of the information in order to issue pilot certificates. Both the application process and the recordkeeping process for training that has occurred is accounted for in this collection. The training center is required by regulation to collect information and keep records to show trainees are qualified for training, testing, or checking. The information contained in this collection is mandatory as required by the regulations mentioned in number 1 of this collection. The entities who must respond are Part 142 Training Centers. The requirements of this collection are recordkeeping and reporting requirements. The collection frequency is as required and may differ per regulatory requirement. For example, training records of trainee must be kept each time they engage in training. The information would be retained by the certificate holder for inspection by FAA personnel or in the case of certification requests, be presented to the FAA.

The information is maintained by the certificate holder and subject to review by aviation safety inspectors (operations), designated to provide surveillance to training centers to ensure compliance with airman training, testing, and certification requirements specified in other parts of the 14 CFR. Information may be reviewed on a periodic basis, and at times of special events such as accidents, requests for certificate or course amendments, and the like. If the information were not collected, inspectors would not be able to determine if airmen who are clients are being trained, checked, or tested to meet the safety standards established in other parts of 14 CFR. To date, FAA inspectors have used the information collected to determine and assess regulatory compliance during routine program surveillance.

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.

In compliance with the Government Paperwork Elimination Act (GPEA), the information collected for this activity can be submitted/maintained 100% electronically, and training centers and certificate holder clients will be permitted and encouraged to use modern information technology for collection, storage, retrieval, and reporting. If, as expected, they are to be required to participate in an automated record-keeping system (FAA Operations Specifications) for certain elements of information, they are being provided with access to the system. There is no form involved. The results of the information collection are not available to the public. There is no intent to make this information available to the public as often includes Personally Identifiable Information that is subject to the privacy act.

4. Describe efforts to identify duplication.

Section 142.73(e) provides that trainee clients of training centers may obtain all records that pertain to them, and thereby potentially avoid making individual logbook record entries substantiating the training, checking, and testing involved.

We have determined that no other agency collects this information. Information required for the initial certificate is new, and neither this agency nor any other has requested it yet.

The items of information involved would be the initial exposure for many of the trainees, to show compliance with initial training and certification requirements required by 14 CFR in the interest of aviation safety. For other students, each event requiring a record is to show compliance with recency of experience requirements and recurring training required by 14 CFR in the interest of aviation safety. Training centers may also provide approved training not required by 14 CFR pursuant to section 142.81. Section 142.73 also requires training center maintenance of applicable trainee records subsequent to the provision of such training, testing and/or checking.

No similar information concerning student records is available from any other source. Little information required for future certificate applications exists, and the FAA would use that information that is available in lieu of requiring the information again.

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

Since the requirement is to allow continuing FAA oversight of aviation safety, it is the same whether accomplished individually, from a small entity, or organization other than a small entity. There are no methods proposed to reduce the burden 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, as well as any technical or legal obstacles to reducing burden.

As discussed in item no. 5, the items of information are required only one time in the event of each initial qualification, or to maintain, and show compliance with, recency of experience requirements and other reoccurring pilot training requirements. For recency of experience requirements and reoccurring pilot training requirements, the interval of experience events would have to be increased to decrease the frequency of collection. Previous research has shown that the recency of experience requirements of 14 CFR is the minimum levels that can ensure safety.

If records of qualification are not maintained in the specified timeframe then crewmembers would have no records to show that they are qualified. Without appropriate records, they could be removed from flying status until they show proof of compliance with the Code of Federal Regulations regarding training.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 1320.5 (d)(2)(I0 – (viii).**

There are no special circumstances.

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 on the data elements to be recorded, disclosed, or reported.**

A Federal Register Notice published on April 18, 2019 (84 FR 16316), solicited public comment. No comments were received.

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

No payments or gifts are provided to respondents.

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

There is no assurance of confidentiality provided to respondents.

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 annualized cost to respondents for the hour burdens for collections of information.**

Recordkeeping

FAA records currently indicate that there are 142 training centers, (40 training centers and 102 associated satellite facilities)¹, and the estimated number of students is 71,994. The estimated hourly rate for the respondents is approximately \$18.25 per hour, based on

¹ https://www.faa.gov/pilots/training/part_142/media/Active_FAA-142_Training_Centers.pdf

a typist (clerical) earning FG-5, Step 5 (Kansas City Locality Pay).² Kansas City locality pay was utilized as it is a mid point, cost wise, for locality pay. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$23.98 per hour.³ To account for overhead, a multiplier of 17 percent was applied.⁴ The total salary with fringe and overhead is \$27.08. During each year of operation under a Part 142 certificate, each training center would:

- a. Maintain a record for each student and provide that record once to each student. Record must be recorded each time a student completes training. This is an estimate of students per year.

71,994 students, 1 hour per record estimated = 71,994 hours.

71,994 hours x \$27.08 per hour = \$1,949,597

- b. Maintain a record for each instructor and evaluator and provide that record once per instructor or evaluator, excluding the initial certificate application. These records must be updated yearly to reflect recurrent training/checking.
 - 1. 142 training centers
 - 2. 67 instructors/evaluators each (estimated average) 1 hour each record = 67 hours x 142 = 9,514 hours
 - 3. 9,514 hours x \$27.08 = \$257,639
- c. Provide a record to each Principal Operations Inspector (POI) of Part 121 and 135 certificate holders provided training in a Part 142 training center to include each course being instructed and the instructor's name.
 - 1. 22 (Part 121) operators + 702 (Part 135) operators = 724 operators⁵
 - 2. 724 operators x 3 reports each (estimate 3 training courses) = 2,172 reports x 0.25 hours = 543 hours x \$27.08 = \$14,704

Hours/Cost

71,994	\$1,949,597
9,514	\$257,639
543	\$14,704
TOTALS:	\$2,221,940

² <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>

³ <https://www.bls.gov/news.release/ecec.nr0.htm>

⁴ Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

⁵ Data obtained from Ops Spec A031

Summary (Annual numbers)	Reporting	Recordkeeping
a		
# of Respondents		142
# of Responses per respondent		507
Time per Response		1 hour
b		
# of Respondents		142
# of Responses per respondent		67
Time per Response		1 hour
c		
# of Respondents		142
# of Responses per respondent		15.3
Time per Response		.25 hours

Certification

Applicants that are not already a part 121 or 135 certificate holder:

The costs incurred in applying for a Part 142 certificate would include the administrative cost of application. This cost would include the development of the training specifications and the composition of the actual application.

The FAA estimates that the paperwork burden involved in the process to become a new part 142 certificate holder and developing the necessary documents would require 100 hours each from two flight employees and one clerical support employee. The FAA estimates there will be not more than 5 such applicants during any future year.

100 hours x 3 employees = 300 hours

300 hours x 5 applicants = 1,500 hours

Applicants that are already a Part 121 or Part 135 certificate holder:

These operators are already required to establish and maintain an approved training program for crewmembers, check airmen, instructors, and other operations personnel employees. The current regulations permit these operators to use flight simulators and flight training devices for training. Testing, and checking, and many of the requirements in part 142 are parallel to concurrent requirements of Parts 121 or 135. A Part 121 or Part 135 certificate holder would be required to obtain a Part 142 certificate to implement and maintain a training program for persons who are not crewmembers for that air carrier under the same 14 CFR part as the carrier providing the training.

The FAA estimates that the paperwork burden involved in the process to become a new part 142 certificate holder and developing the necessary documents would require 36 hours each from two flight employees and one clerical support employee. The FAA estimates there will be not more than 2 such applicants during any future year.

36 hours x 3 employees = 108 hours

108 hours x 2 applicants = 216

a. New Part 142 certificate applications:

The paperwork burden incurred in applying for a Part 142 certificate would include the administrative cost of application. The paperwork burden would also include the development of the training specifications and the composition of the actual application. Applicants in this category would be required to develop at least one training program. Estimates to develop a training course vary from \$770 to \$7700. Actual certificate application might cost \$1540 to \$2310. The FAA estimates that the total one-time paperwork burden cost to apply for a Part 142 certificate would be approximately \$11,390. The costs associated with this section are no material costs. They are the costs associated with labor to complete the application and required documents for the application. The FAA estimates there will be not more than 5 such applicants during any future year.

5 applicants x 300 hours = 1500 hours

5 applicants x \$11,390 = \$56,950

b. New Part 142 certificate applicant that is a Part 121 or Part 135 certificate holder.

These part 121 or part 135 certificate holders should require only about one third of the costs to establish a training program under part 142, as a new part 142 certificate holder or 108 hours of time. These part 121 and part 135 certificate holders can basically duplicate their existing approved training programs, as well as leverage existing processes and procedures in their training and recordkeeping programs when going through the certification process to provide training under part 142.

These part 121 or part 135 certificate holders should require only about 36% of the paperwork burden (as a new part 142 certificate holder) to establish a training program under part 142. The FAA estimates that the total one-time paperwork burden cost to apply for a Part 142 certificate for these operators would be approximately \$4,180. The FAA estimates there will be not more than 2 such applicants during any future year.

2 applicants x 108 hours = 216 hours

2 applicants x \$4,180 = \$8,360

Hours/Cost

	1,500		\$56,950
	216		\$8,360
TOTALS:	1,716		\$65,310

Summary (Annual numbers)	Reporting	Recordkeeping
Applicants that are not 121/135 Cert Holder		
# of Respondents	5	
# of Responses per respondent	1	
Time per Response	300 Hours	
Applicants that are 121/135 Cert Holder		
# of Respondents	2	
# of Responses per respondent	1	
Time per Response	108 Hours	

Summary of Hours/Cost

Recordkeeping	82,051	Recordkeeping	\$2,221,940
Certification/Reporting	1,716	Certification	\$65,310
TOTALS:	83,767		\$2,287,250

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

There are no additional costs that have not already been included in item 12. There are no material costs.

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

The estimated annual cost for the government is \$1,112,714. This figure is the estimated cost for the government to approve training centers, certificate applicants, and approve training specification and training programs. Typically inspectors at the GS-13 level would inspect and approve these programs. Generally, these inspectors are GS-13 (General GS-13, Step 5 hourly wage, Kansas City Locality Pay) for an average wage of \$47.66 per hour⁶ with 31.4%⁷ fringe benefits cost for a total of **\$62.76 per hour. Kansas City was used as the locality pay as it is the mid point in terms of cost for locality pay. With overhead added, the total salary is 70.86 per hour. The sources for these rates are the same as in question 12.**

Any costs for FAA publications and advisory material would be considered part of the FAA's periodic update of the regulations.

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

The number of training centers has decreased from the last submission. Current data also indicates a necessary revision to the number of 121 and 135 certificate holders provided training in a Part 142 training center. The collection has been edited to reflect this change.

The agency has separated collection activity into appropriate information collections, there has not been additional forms or applications added. Some of this collection was updated to be reporting instead of recordkeeping as reporting more accurately represents the collection. There has been no change to the collection requirements. It is simply a reclassification for accuracy.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

The collected information will not be published, as the collection is for one-time determination of compliance with proposed certification requirements, and one-time, on demand determination of compliance with individual training requirements.

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.

Not applicable.

⁶ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf

⁷ Bureau of Labor Statistics, Employer Costs for Employee Compensation – September 2018, USDL-18-1941, Released December 14, 2018

18. Explain each exception to the certification statement identified in Item 19, OMB Form 83-1.

There are no exceptions.