Supporting Statement A Airman Knowledge Test Registration

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

The collection involves information required for registration of an Airman Knowledge Test in the ATLAS Aviation test delivery system as part of the FAA Airman Certification Process.

The information collected is necessary to know who is taking a FAA knowledge test and to ensure compliance and proper registration of an individual for the necessary knowledge test for the certification or rating pursued by the individual. U.S. Code § 44703. Airman certificates states the Administrator of the Federal Aviation Administration shall issue an airman certificate to an individual when the Administrator finds, after investigation, that the individual is qualified for, and physically able to perform the duties related to, the position to be authorized by the certificate.

FAA regulations in part 61, 65, and 107 require an individual to pass an Airman Knowledge Test as part of the individual's certification requirements. Individuals must be properly identified prior to taking an Airman Knowledge Test at an approved FAA Knowledge Testing Center.

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.

Individuals pursuing an FAA certificate or rating to operate in the National Airspace System (NAS) must meet the standards established in the FAA regulations specific to the certificate sought by the individual. FAA certification requires that an individual must successfully pass an Airman Knowledge Test as part of the requirements to obtain an FAA certificate or rating. The FAA develops and administers 90 different knowledge tests in many different areas that are required as part of the overall airman certification process.

Airman Knowledge Tests are administered at approved Knowledge Testing Centers by an approved test proctor who is required to administer the appropriate Airman Knowledge Test to the individual pursuing FAA certification through the ATLAS test delivery software. It is voluntary for individuals taking an FAA Airman Knowledge Test to report the following information on occasion in order to complete the registration process before the administration of the Airman Knowledge Test: Name, username, password, FAA Tracking Number (FTN), physical address, Date of Birth, email address, phone number, country, citizenship, branch of service, previous number of test attempts, flight school or field experience, graduation date, authorization category, accommodation selections, scheduled exam date, photo identification, and test authorization (credentials of the individual such as an instructor endorsement).

The information below is collected by the approved knowledge test delivery vender in electronic format for the purposes stated below:

- Name: First, Middle, Last, Suffix
- Username
- Password
- FAA Tracking Number (FTN) provided to identify individual's name as established by individual in IACRA.
- Email Address
- Date of Birth: Airman Knowledge Tests have minimum age requirements in order to take specific test based on minimum age for FAA certification
- Phone number
- City
- State
- Postal Code
- Country
- Citizenship
- Branch of Service Designation
- Number of Attempts: Number of attempts to be in compliance with regulations that mandate how long an individual must wait to take the test again after failure.
- Flight School or Field Experience (when applicable)
- Graduation Date (when applicable)
- Authorization Category
- Accommodation Selections (when applicable)
- Scheduled exam date
- Photo identification that contains the individuals photograph, address, signature, and DOB for compliance with U.S. Code § 44703, part 61 and part 107.
- Test authorization indicating individual is qualified for the specific knowledge test (instructor endorsement, graduation certificate, etc) according to the specific regulation of the certificate being pursued by the airman.

It is anticipated that the information collected will not be disseminated to the public or used to support publicly disseminated information. FAA (ATLAS Aviation) will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information. The information collection is designed to yield data that meet all applicable information quality guidelines.

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.

The information is collected electronically through a system called ATLAS Aviation. ATLAS Aviation is the system used for test registration and delivery for all Airman Knowledge Tests. This collection is available to be submitted 100% electronically. There is no form involved and the results of this collection will not be made available to the public, as this information is not for public use.

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.

The specific information collected is not already available after evaluating the current similar collections used by the FAA IACRA system which are certification specific and do not cover the information required for knowledge test registration.

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

This collection will not involve small business or 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.

The FAA will be unable to certificate any airman to operate in the National Airspace System (NAS) if collection is not conducted. Airman must be identified, vetted, and investigated in order to operate in the NAS for each type of certificate pursued by the airman which all starts with registering and taking a FAA Airman Knowledge Test. There are no obstacles if collection is conducted less frequently.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

- requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances.

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 October 22, 2019 (84 FR 56520) solicited public comment for 60 days. One comment was received and found to be inapplicable to the solicitation.

Analysis of the burden, frequency of collection, disclosure, format, data elements, clarity of instructions, and recording keeping was conducted in collaboration with the FAA's testing vendor who owns and operates the testing application. The historical data publicly available provided the annual frequency of the burden to the public.

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

There are no payments or gifts provided to respondents.

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

Airman providing information for this collection are protected under the Privacy Act. A privacy act statement is provided to the airman prior to submission of information. No additional assurances of confidentiality are provided.

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. The statement should:

6,963 hours annually

208,904 respondents x 2 minutes each = 417,808 minutes

417,808 minutes / 60 minutes in an hour = 6,963 hours annually

Estimated exam volume is based on 2019 airman knowledge test statistics. <u>2019 Airman Knowledge Test</u>

<u>Statistics</u>. The average burden time is 2 minutes per response based on observing time responses during

development of the application.

• Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

• Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.

Although this submission may be a revision to an approved collection, and thus describes only the new or changed requirements in Question 2, this answer should state the total new burden hours and how much this figure is increased/decreased from the previous burden (if any) for the requirement. **NOTE: You are NOT required to stick to the estimated numbers in the Federal Register Notice for this collection.**

- a. The statement must provide the number of respondents expected annually, the frequency of their responses, the total number of responses expected, the average response time per respondent, and the total annual response time (in hours) for the collection. Response time includes not only the time necessary to complete the form or answer the questions, but also the time needed to gather the information (unless it was already being gathered for other purposes), to have it reviewed by lawyers or accountants, etc. Explain how you arrived at these estimates.
- b. Remember that figures should be annualized. For example, if a permit will be valid for three years, and you expect 300 respondents the first year and none the second and third years, use the average of 100 respondents. If the burden per response is expected to vary widely, show the expected range of responses and explain the variance.
- c. If the collection will involve more than one form or other means of information collection, provide burden estimates for each form.
- d. Provide estimates of annualized labor cost to respondents for the hour burden for the collection, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for the collecting the information should not be included here (see Item 14 below).
 - Annualized labor cost to respondents should be sourced and cited

- Annualized labor cost to respondents should include base wage, fringe, and overhead (each sourced/cited)
- Calculations should be shown

*Please complete the burden table below for each IC, and a total burden summary table If you have multiple ICs, copy/paste and complete the table for each

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	208,904		
# of Responses			
per respondent	1		
Time per			
Response	2 minutes		
Total # of			
responses	208,904		
Total burden			
(hours)	6,963		

The total annual cost burden to respondents is estimated to be \$339,845. See table below.

Respondents were categorized into certification categories that more accurately capture the appropriate wage rate based on U.S. Bureau of Labor Statistics. Wage rate per hour was calculated into per minute based on 2 minute average response time.

Annual burden was calculated as (average response time x wage per minute x number of responses) = Burden per minute.

(Burden per minute x Fringe multiplier 31.7%) + Burden per minute = Annual Burden

Certifcation Categories	Annual Burden	Avg. Response Time (Mins)	per			Number of Responses	Tests Included	Notes	Reference
Aircraft Dispatch	\$1,174	2	\$ 19.32	\$ 0.32	31.70%	1,384	ADX		https://www.bls.gov/ooh/about/data-for-occupations-ne
Airline Transport Pilot/Flight Engineer/Navigator	\$19,670	2	\$ 58.38	\$ 0.97	31.70%		ATM,ATS,ACM,ASC, ATH,ARH,ACH,FNX,F ER,REN,FEX,FEP,FET	:	https://www.bls.gov/ooh/transportation-and-material-m
Aviation Mechanic/Inspection Authorization	\$47,077	2	\$ 30.92	\$ 0.52	31.70%	34,682	AMA,AMG,AMP,IAR	2	https://www.bls.gov/ooh/installation-maintenance-and-r
Commercial Pilot/Instrument/Flight & Ground Instructor/Rigger	\$125,079	2	\$ 41.38	\$ 0.69	31.70%		CAX, CCP, CBH, CGX, C RG, CRH, CCH, FIX, AF A, FIG, AFG, FRG, GFA, FRH, HFA, FII, AIF, FIH, HIF, SIA, SIY, SIP, SIW, FOI, AGI, BG, I, GI, IRA, ICP, IFP, IRH, ICH, MC N, MCI, RIG, RMC		https://www.bls.gov/ooh/transportation-and-material- moving/airline-and-commercial-pilots.htm#tab-5
Unmanned Aircraft (Photography)	\$8,986	2	\$ 17.44	\$ 0.29	31.70%		UAG,UGR	(45892+12790)/5 = 11736	https://www.bls.gov/ooh/media-and-communication/ph
Unmanned Aircraft (Real Estate)	\$12,566	2	\$ 24.39	\$ 0.41	31.70%		UAG,UGR	(45892+12790)/5 = 11736	https://www.bls.gov/ooh/sales/real-estate-brokers-and-s
Unmanned Aircraft (Law Enforcement)	\$16,142	2	\$ 31.33	\$ 0.52	31.70%		UAG,UGR	(45892+12790)/5 = 11736	https://www.bls.gov/ooh/protective-service/police-and-c
Unmanned Aircraft (Insurance Claims,Adjusters, Appraisers, Examiners)	\$16,482	2	\$ 31.99	\$ 0.53	31.70%		UAG,UGR	(45892+12790)/5 = 11736	https://www.bls.gov/ooh/business-and-financial/claims-a
Unmanned Aircraft (Construction Managers/Other)	\$23,597	2	\$ 45.80	\$ 0.76	31.70%		UAG,UGR	(45892+12790)/5 = 11736	https://www.bls.gov/ooh/management/construction-ma
Private Pilot/Recreational Pilot/Sport Pilot	\$69,072	2	41.38	\$ 0.69	31.70%		PAR,PCP,PAT,PLA,P BH,PGL,PRG,PRH,PC H,PHT,PPP,PWS,RP A,RPG,SPA,SPY,SPB, SPP,SPW		https://www.bls.gov/ooh/transportation-and-material- moving/airline-and-commercial-pilots.htm#tab-5

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

No additional cost.

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.

No annualized costs to the Federal Government. The contract to which this information collection operates is a zero-dollar services contract.

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

The Airman Knowledge Testing Program has historically operated as an Organization Designation Authorization (ODA) in accordance with 14 CFR part 183. However, the program is now operated through a vendor services contract by the FAA's office of acquisitions.

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.

The information to be collected will not be published, and is not releasable.

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.

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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.