

SUPPORTING STATEMENT
Pilot Professional Development, OMB 2120-XXXX

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year approval clearance for the information collection entitled, Pilot Professional Development, (OMB Control No. 2120-XXXX).

Part A. Justification

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

This project directly supports the FAA's strategic goal to provide the next level of safety. By achieving the lowest possible accident rate and always improving safety, all users of our aviation system can arrive safely at their destinations.

This rulemaking is promulgated under the authority described in 49 U.S.C. 106(f), which vests final authority in the Administrator for carrying out all functions, powers, and duties of the administration relating to the promulgation of regulations and rules, and 44701(a)(5), which requires the Administrator to promulgate regulations and minimum standards for other practices, methods, and procedures necessary for safety in air commerce and national security. This rulemaking is also promulgated under the specific authority found in the Airline Safety and Federal Aviation Administration Extension Act of 2010 (Public Law 111-216) which directed the FAA to convene an aviation rulemaking committee (ARC) and conduct rulemaking based on the ARC recommendations regarding mentoring, professional development and leadership and command training for pilots serving in part 121 operations and to include in leadership and command training, instruction on compliance with flightcrew member duties under 14 CFR 121.542.

The information collection is required for the full implementation of the regulations promulgated under this authority. As further described in response to question 12 herein, the FAA expects respondents to modify training programs and training courseware to comply with the final rule requirements.

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.

This request for clearance reflects requirements necessary under 14 CFR part 121 to ensure safety-of-flight by making certain that adequate training is obtained and maintained by those who operate under this part of the regulation. The FAA reviews the respondents' training programs and training courseware through routine certification, inspection and surveillance of certificate holders using part 121 pilot training and qualification programs to ensure compliance and adherence to regulations and, where necessary, to take enforcement action.

This collection is mandatory for all certificate holders using part 121 pilot training and qualification programs to ensure compliance and adherence to the regulations. This collection contains both reporting and recordkeeping requirements. The frequency of the information collection is dependent on the type of collection. Most collections are one time occurrences. The information that would be collected relates to new and revised curriculums for training, including new hire and upgrade training. The information would be received by the Federal Aviation Administration. The information is collected to ensure compliance with the regulations. The FAA will review and approve the revised training curricula and ensure that air carriers are maintaining currency on these requirements.

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 accordance with the Government Paperwork Elimination Act (GPEA), the FAA encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this final rule with the provision that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and approval/acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA.

The amendments to part 121 in this final rule do not affect the current methods of reporting, gathering, storing, presenting, reviewing, and transmitting all requests, records, reports, tests, or statements required by part 121. This recordkeeping includes different types of media such as electronic and paper records (e.g., courseware, training records, and manuals).

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.

We have reviewed other FAA public-use reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is particular to the training and qualification requirements for certificate holders who conduct pilot training and qualification in accordance with the provisions of 14 CFR part 121. The information necessary is available from that certificate holder only, and is not available from any other source.

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

The FAA believes that the collection of information associated with this final rule does not have a significant impact on small businesses or other small entities. The material published in conjunction with this final rule is informative and explanatory with regards to the revised training requirements. Further, an existing certificate holder or an applicant for a certificate can be guided through the administrative requirements by the local FAA principal operations inspector assigned to that air carrier and, if necessary, by representatives of the Safety Standards

staff.

As stated in the Regulatory Flexibility Act analysis published with the final rule, the FAA expects only minimal new training documentation, reporting, and record-keeping compliance requirements. These burdens affect all certificate holders and are not unique to 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 above, the FAA reviews the respondents' training programs and training courseware through routine certification, inspection and surveillance of certificate holders using part 121 pilot training and qualification programs to ensure compliance and adherence to regulations. If a new applicant seeking to use a part 121 pilot training and qualification program is not able to produce the documents for approval to show compliance with the requirements of the final rule, the FAA would not be able to issue the applicant an air carrier certificate. Similarly, if existing certificate holders do not continue to provide this information for review and make it available for inspection upon request of the FAA, the FAA would not be able to determine if the certificate holder continues to administer the program according to the approval.

Current regulations already provide that the information required by this final rule be maintained in training programs and manuals. These current regulations are:

- § 121.135 Manual contents
- § 121.403 Training Program Curriculum
- § 121.405 Training Program and Revision: Initial and Final Approval

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

There are no special circumstances associated with this collection. The information collection requirements related to the final rule provisions, including those responsive to the mandate in § 206 of Public Law 111-216, are consistent with 5 CFR 1320.5(d)(2)(i)-(viii).

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 requesting public comments on our intent to collect this information was published on October 7, 2016 (81FR69908). There were no comments. Due to the length in time of processing this rule, we filed a second 60 day FRN on September 29, 2020 (85FR 61083). We received one comment which did not relate to the collection. It was of a political nature.

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

There are no monetary considerations for this collection of information.

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

The 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.

There are no questions of a sensitive nature.

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

These amendments to part 121 set out prerequisites and levy requirements that must be met by certificate holders using part 121 pilot training and qualification programs and by those individuals who serve in given capacities for those certificate holders. The estimates for hours and costs are broken down by development and approval of new and revised training curriculums followed by pilot training recordkeeping and reflect the numbers provided in the PRA section of the final rule. The numbers cover the 10 year analysis period in the final regulatory evaluation.

The FAA anticipates that certificate holders will incur costs for the following groups of provisions:

- Operations familiarization for new-hire pilots (§ 121.435);
- Leadership and command and mentoring ground training for pilots currently serving as pilot in command (PIC) (§ 121.429) and recurrent PIC leadership and command and mentoring ground training (§§ 121.409(b) and 121.427);
- Leadership and command training and recurrent leadership and command training for pilots serving as second in command (SIC) in operations that require three or more pilots (§ 121.432(a))
- Upgrade training curriculum requirements (§§ 121.420 and 121.426);
- Part 121, Appendix H requirements; and
- Approval of Qualification Standards Document for certificate holders using an Advanced Qualification Program (AQP) (§ 121.909).

The development and approval of new and revised curriculums will be a one-time occurrence for each certificate holder. The documentation regarding training in leadership and command and mentoring for current PICs will be a one-time occurrence. Similarly, the documentation regarding training in leadership and command for current SICs serving in operations that require three or more pilots will be a one-time occurrence. The documentation of operations

familiarization for new-hire pilots will occur once for each new-hire pilot. The documentation of recurrent PIC leadership and command and mentoring training will occur every three years for each PIC. The documentation of recurrent leadership and command training for SICs serving in operations that require three or more pilots will occur every three years for each such SIC.

Development and approval of new and revised training curriculums

For the development and approval of new and revised training curriculums, the FAA estimated the paperwork costs for these provisions by multiplying the hourly rate of the person responsible by the number of estimated hours to develop and submit the new or revised training curriculum. (In all cases, we assume that a ground instructor would develop and submit the new or revised training curriculum and that the ground instructor fully burdened wage is \$53 per hour.¹) We then multiplied these costs by the number of certificate holders affected by the provision.

Leadership and command and mentoring ground training for pilots currently serving as PIC (§ 121.429) and recurrent PIC leadership and command and mentoring training (§§ 121.409(b) and 121.427)

Section 121.429 requires one time development of a training course for leadership and command and mentoring for current PICs. This course must be submitted to the FAA for approval.

Revisions to §§ 121.409(b) and 121.427 require one time revision to the certificate holder’s approved recurrent PIC training curriculum. This revised curriculum must be submitted to the FAA for approval.

The FAA estimates a total of 40 hours of ground instructor time for development and submission of both the curriculum for current PICs and the revision to the recurrent PIC training curriculum.

Assuming 79 affected certificate holders, the FAA estimates that these provisions result in a one-time total cost of \$167,480 for all affected certificate holders.

Summary (Annual numbers)	Reporting	Recordkeeping	Third-party Disclosure
# of Respondents	79		
# of Responses per respondent	1		
Time per Response	40 hours		
Total # of responses	79		
Total burden (hours)	3,160		

Leadership and Command Training and Recurrent Leadership and Command Training for Pilots Serving as SIC in Operations that Require Three or More Pilots (§ 121.432(a))

¹ Training instructor hourly wage rate of \$36.60 multiplied by 1.435 to account for costs of employer provided benefits. Wage based on 2016 Bureau of Labor Statistics (BLS) Occupational Employment Statistics for Air Transportation Industry. (http://www.bls.gov/oes/current/naics4_481100.htm): Training and Development Specialists (13-1151). Wage multiplier from BLS, Employer costs for Employee compensation – December 2016, Table 5, Private Industry. (https://www.bls.gov/news.release/archives/ecec_03172017.pdf)

SICs serving in operations that require three or more pilots complete the same one-time training and recurrent training in leadership and command as PICs. Therefore, no additional revisions are necessary to the training curriculums. The FAA expects that the program updates to reflect this change are minimal and are subsumed in the paperwork costs for the collective amendments made to the training provisions in this final rule.

The FAA estimates there are no costs for this provision.

Upgrade training curriculum requirements (§§ 121.420 and 121.426)

Sections 121.420 and 121.426 require one-time revision to the certificate holder’s approved SIC to PIC upgrade training curriculum. This revised curriculum must be submitted to the FAA for approval.

The FAA estimates a total of 80 hours of ground instructor time for development and submission of the revised SIC to PIC upgrade training curriculum.

Assuming 79 affected certificate holders, the FAA estimates that these provisions result in a one-time cost of \$334,960 for all affected certificate holders.

Summary (Annual numbers)	Reporti ng	Recordkeepi ng	Third-party Disclosure
# of Respondents	79		
# of Responses per respondent	1		
Time per Response	80 hours		
Total # of responses	79		
Total burden (hours)	6,320		

Part 121 Appendix H requirements

The revision to part 121 appendix H requires one-time revision to the certificate holder’s approved training program to remove the pilot experience prerequisites for using a level C full flight simulator during training and checking. This revised training program must be submitted to the FAA for approval. The FAA expects that the program updates to reflect this change are minimal and are subsumed in the paperwork costs for the collective amendments made to the training provisions in this final rule.

The FAA estimates there are no costs for this provision.

Approval of Qualification Standards Document for certificate holders using an AQP (§ 121.909)

Although the final rule does not make any changes to § 121.909, when the new subparts N and O training requirements become effective, certificate holders that use AQP must review their training programs to make sure they address the new subparts N and O requirements. It is possible that certificate holders may make a one-time revision to their Qualifications Standards Document required by § 121.909 during this process to address the revised subparts N and O

requirements.

This is a cost that only applies to certificate holders that use AQP for pilot training because only those certificate holders must meet the § 121.909 requirements. Therefore, this provision does not apply to certificate holders who only train their pilots under a training program in accordance with subparts N and O of part 121.

For each of the 25 certificate holders with an approved AQP, the FAA estimates 3 hours of ground instructor time for development and submission of the revised Qualification Standards Document.

The FAA estimates that this provision results in one-time costs of \$3,975 across all certificate holders who train their pilots under AQP.

Summary (Annual numbers)	Reporti ng	Recordkeepi ng	Third-party Disclosure
# of Respondents	25		
# of Responses per respondent	1		
Time per Response	3 hours		
Total # of responses	25		
Total burden (hours)	75		

Recordkeeping

For the pilot training recordkeeping, the FAA estimated the paperwork costs for these provisions by first multiplying the number of required entries by the estimated number of pilots affected. Second, we multiplied the total number of entries by .001 hours (the time required to make each entry). Lastly, we multiplied the total time to make all entries by the hourly rate of the person responsible for making the entries. In all cases, the FAA assumes that the person making the entries is a clerical employee with an estimated fully burdened wage of \$29 per hour.²

Leadership and command and mentoring ground training for pilots currently serving as PIC (§ 121.429)

A record showing compliance with this requirement for current PICs must be retained in accordance with § 121.683(a)(1). This is a one-time burden.

The FAA assumes that this cost is incurred in 2019, the year prior to the compliance date of the final rule and estimates that during that year 39,515 pilots are affected and require one record. The FAA estimates 40 hours of clerical time for entry of these records.

The FAA estimates that this provision adds a one-time cost of \$1,160 for all affected certificate holders.

²The clerk hourly wage rate of \$20.29 multiplied by 1.435 to account for costs of employer provided benefits. Wage based on 2016 BLS Occupational Employment Statistics for Air Transportation Industry. (http://www.bls.gov/oes/current/naics4_481100.htm): Information and Record Clerks (43-4000). Wage multiplier from BLS, Employer costs for Employee compensation – December 2016, Table 5, Private Industry. (https://www.bls.gov/news.release/archives/ecec_03172017.pdf)

Summary (Annual numbers)	Reporting	Recordkeeping	Third-Party Disclosure
# of Respondents		39,515	
# of Responses per respondent		1	
Time per Response		.001 hours	
Total # of responses		39,515	
Total burden (hours)		40	

Leadership and Command for SICs Serving in Operations that Require Three or More Pilots (§ 121.432(a))

A record showing compliance with this requirement for SICs currently serving in operations that require three or more pilots must be retained in accordance with § 121.683(a)(1). This is a one-time burden.

The FAA assumes that the majority of this cost is incurred in the year prior to the compliance date of the final rule, however new SIC pilots serving in operations that require three or more pilots will also receive this initial training. The FAA estimated that 5,498 pilots are affected and require one record during a 10 year period beginning in year two. The FAA estimates 5 hours of clerical time for entry of these records.

The FAA estimates that this provision adds a one-time cost of \$145 for all affected certificate holders.

Summary (Annual numbers)	Reporting	Recordkeeping	Third-party Disclosure
# of Respondents³		611	
# of Responses per respondent		1	
Time per Response		.001 hours	
Total # of responses		611	
Total burden (hours)		1	

Recurrent PIC leadership and command and mentoring ground training (§121.427)

A record showing compliance with this requirement for current PICs must be retained in accordance with § 121.683(a)(1), in addition to the current recordkeeping burden approved under OMB Control Number 2120-0008.

PICs are required to complete the recurrent training every 3 years. Over the 10-year analysis period, the FAA estimates that there are 109,874 instances of PICs undergoing recurrent training involving leadership and command and mentoring. Each instance requires one record. The FAA estimates 110 hours of clerical time for entry of these records.

The FAA estimates that this provision results in costs of \$3,190 over the analysis period for all affected certificate holders.

³ The number of respondents is the average number of SIC pilots affected per year. The training starts in year 2 of the final rule.

Summary (Annual numbers)	Reporti ng	Recordkeepi ng	Third-party Disclosure
# of Respondents⁴		13,734	
# of Responses per respondent		1	
Time per Response		.001 hours	
Total # of responses		13,734	
Total burden (hours)		14	

Recurrent Leadership and Command Ground Training for SICs Serving in Operations that Require Three or More Pilots (§§ 121.427 and 121.432(a))

A record showing compliance with this requirement for SICs serving in operations that require three or more pilots must be retained in accordance with § 121.683(a)(1), in addition to the current recordkeeping burden approved under OMB Control Number 2120-0008.

These SICs are required to complete the recurrent training every 3 years. Over a 10 year analysis period, the FAA estimates that there are 8,267 instances of SICs undergoing recurrent training involving leadership and command. Each instance requires one record. The FAA estimates 8 hours of clerical time for entry of these records.

The FAA estimates that this provision results in costs of \$232 over the analysis period for all affected certificate holders.

Summary (Annual numbers)	Reporti ng	Recordkeepi ng	Third-party Disclosure
# of Respondents⁵		1,033	
# of Responses per respondent		1	
Time per Response		.001 hours	
Total # of responses		1,033	
Total burden (hours)		1	

Operations familiarization for new-hire pilots (§ 121.435)

Section 121.435 implements a new qualification requirement for new-hire pilots to complete operations familiarization consisting of 2 operating cycles. A record showing compliance with this requirement for each new-hire pilot must be retained in accordance with § 121.683(a)(1), in addition to the current recordkeeping burden approved under OMB Control Number 2120-0008.

The FAA estimates that all affected certificate holders have a total of 23,517 new-hire pilots over the analysis period. Each of the estimated 23,517 pilots affected requires one record. The FAA estimates 24 hours of clerical time for entry of these records.

⁴ This number of respondents is the average number of PIC pilots affected per year. The training starts in year 3 of the final rule.

⁵ This number of respondents is the average number of SIC pilots affected per year. The training starts in year 3 of the final rule.

The FAA estimates that this provision results in costs of \$696 across the analysis period for all affected certificate holders.

Summary (Annual numbers)	Reporting	Recordkeeping	Third-party Disclosure
# of Respondents⁶		2,940	
# of Responses per respondent		1	
Time per Response		.001 hours	
Total # of responses		2,940	
Total burden (hours)		3	

Summary of Estimated Paperwork Costs (10 year analysis period)

	Number of Records	Number of Hours	Wage	Number of Certificate Holders	Total Cost	7 Percent Present Value
Final Rule Requirement						
Development and Approval of new and revised training curriculums						
Leadership and command and mentoring ground training for pilots currently serving as PIC (§ 121.429) and recurrent PIC leadership and command and mentoring training (§§ 121.409(b) and 121.427)	N/A	40	\$53*	79	\$167,480	\$146,284
Upgrade training curriculum (§§ 121.420 and 121.426)	N/A	80	\$53*	79	\$334,960	\$292,567
Approval of Qualification Standards Document (§ 121.909)	N/A	3	\$53*	25	\$3,975	\$3,472
Recordkeeping						
Leadership and command and mentoring ground training for pilots currently serving as PIC (§ 121.429)	39,515	40	\$29**	N/A	\$1,160	\$947
Leadership and Command for SICs Serving in Operations that Require Three or More Pilots (§ 121.432(a))	5,498	5	\$29**	N/A	\$145	\$112
Recurrent PIC leadership and command and mentoring ground training (§121.427)	109,874	110	\$29**	N/A	\$3,190	\$1,936
Recurrent Leadership and Command Ground Training for SICs Serving in Operations that Require Three or More Pilots (§§ 121.427 and 121.432(a))	8,267	8	\$29**	N/A	\$232	\$141
Operations familiarization for new-hire pilots (§ 121.435)	23,517	24	\$29**	N/A	\$696	\$424
Total		310			\$511,838	\$445,883
Annualized						\$108,747

* Fully burdened hourly wage for ground instructor.

** Fully burdened hourly wage for clerical employee.

⁶ The number of respondents is the average number of new-hire pilots affected per year. The training starts in year 3 of the rule.

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

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

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.

The recordkeeping requirements for the public respondents imposed by this final rule do not add costs to the Federal Government. The final rule reporting requirements do not require the Federal Government to:

- Create any special data entry or information collection systems,
- Update any current data entry or information collection systems, or
- Hire additional staff to review or inspect the additional paperwork the final rule adds.

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

This is a new collection therefore, it is a program change.

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.

There is no plan for tabulation or publication.

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.

No such approval is being sought. This information collection does not involve the use of a standard form to submit information to the FAA. This information collection requires certificate holders to update training programs and courseware. Certificate holders are required to maintain these documents for display and inspection upon request of the FAA.

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

The FAA certifies compliance with all provisions of the Paperwork Reduction Act. There are no exceptions.