

Supporting Statement A

FAA Organization Designation Authorization (ODA) Survey

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

We are requesting Office of Management and Budget (OMB) approval for a new information collection, a survey of Organization Designation Authorization (ODA) Holders and ODA Program Applicants to document and assess FAA certification and oversight activities.

What are ODA Holders?

Under Title 49 of the United States Code (49 USC) 44702(d), the FAA may delegate to a qualified private person a matter related to issuing certificates, or related to the examination, testing, and inspection necessary to issue a certificate on behalf of the FAA Administrator. The Organization Designation Authorization (ODA) program is the means by which the FAA grants designee authority to organizations or companies. The regulations addressing the ODA program are found in Title 14 of the Code of Federal Regulations (14 CFR) part 183, subpart D, sections 183.41 through 813.67.

FAA typically authorizes ODA holders to conduct certain FAA functions that the holders would seek from the FAA without such designation. For example, aircraft manufacturers who hold ODA may approve design changes in their products and repair stations may be authorized to approve repair and alteration data. FAA engineers and inspectors then oversee the ODA to ensure they are meeting FAA safety standards.

Why must we survey ODAs? Section 213 of Public Law 115-254 FAA Reauthorization Act of 2018 requires that the FAA establish an expert panel that "... shall conduct a survey of ODA Holders and ODA Program Applicants to document and assess FAA certification and oversight activities, including use of the ODA program and the timeliness and efficiency of the certification process." To our knowledge, such a requirement that surveys *all* ODA Holders and applicants is a first of its kind; and we therefore we not able to consolidate these requirements with other current, or past, surveys as they do not exist.

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.

Section 213 of Public Law 115-254 FAA Reauthorization Act of 2018 establishes an Expert Review Panel representing ODA Holders, aviation manufacturers, safety experts, and FAA labor organizations, including FAA aviation safety inspectors and aviation safety engineers. The law tasks the panel with designing, conducting, and analyzing results of the requested survey to, "submit to the [FAA] Administrator, the [Safety and Oversight] Advisory Committee [defined in Section 202 of the Reauthorization Act], and the appropriate committees of Congress a report on the findings and recommendations of the Panel." The report provided to Congress will be

practically utilized as it will undoubtedly inform future ODA policy, and influence how ODA oversight is administered by the FAA.

The survey collection will be voluntary, advertised to the entire ODA Holder and applicant community (ODA being defined in section 44736 of title 49, United States Code), and will not require records to be retained by ODA entities. The collection is anticipated to be a one-time collection.

The survey results will be summarized in a report to the Advisory Committee providing recommendations regarding FAA ODA certification and oversight activities, including use of the ODA program and timeliness and efficiency of the certification process. The report will be submitted as an Advisory Committee record and retained as a permanent record available to the public. Raw survey data will not be disseminated to the public, but will be retained along with historical records of the Expert Panel. Since the ODA entities represent organizations, and not individuals, we will not be asking questions about race or ethnicity.

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.

We will solicit requests for electronic submission of the survey answers from ODA Holders using electronic means and enable responses to be provided electronically over a web-enabled survey.

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.

Due to the specific tasking to conduct a new survey in the Reauthorization Act, we have not located prior collections that could be relevant. Prior survey results would be neither sufficient, nor current enough, to respond to the tasking of the Expert Panel.

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

ODA companies include large and small entities. One way we are reducing impact to smaller entities is we are limiting responses to one focal point per ODA to limit the burden. Investment in time completing this survey will provide additional benefit to smaller entities in that an anonymous response from a smaller entity will have equal influence to the single anonymous response of a larger entity.

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 consequence of not conducting the survey would be loss of input from ODA Holders required under the FAA's Reauthorization Act; further, we would miss out on the opportunity to make policy improvements by getting direct feedback from the stakeholders most effected by ODA policy. We plan to reduce burden by only requiring a single survey collection advertised to all ODA Holders. Additional surveying would only be requested by ODA Holder Expert Panel members or the Advisory Committee.

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;**
We don't plan to require reporting at all. It will be voluntary and planned for a one-time response.
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
We're planning at least 30 days to respond.
- **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;**
Responses will be electronic with no need to retain responses.
- **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;**
All results will be generalized to represent the ODA Holder community in entirety.
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
We will not be using classification outside of approved OMB classifications.
- **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**
The limited purpose of this collection is to share ODA Holder perspectives to improve certification and oversight activities in partnership with the FAA. We will make an effort to de-identify individual responses. No requests for identifying information will be requested in the survey. ..
- **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.**
The survey will be voluntary, and sharing of trade secrets or proprietary

information will not be required.

Explain the need for any inconsistencies in your collection.

No inconsistencies in the collection are required.

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 4, 2020 (Federal Register / Vol. 85, No. 23, FR Doc. 2020–02026) solicited public comment. No comments were received.

The survey design comes from the industry expert panel representing all ODA Holders. A survey development expert team has worked closely with the expert panel to generate meaningful and neutral questions. The availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure, and reporting formats will all be vetted by the expert panel and deemed to be reasonable and necessary. The final survey, and associated documents and decisions, will be approved by the expert panel prior to releasing it to survey participants.

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

We will not be providing payments or gifts to survey respondents.

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

We will not be providing any assurance of confidentiality 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.

No questions of a sensitive nature are part of this survey.

**12. Provide estimates of the hour burden of the collection of information.
The statement should:**

Respondents should, in their ODA lead administrator roles in their companies, be able to respond to the survey using knowledge on-hand or gained through direct experience, with very limited need to research or coordinate answers. This will simplify the number of steps necessary to develop answers to each survey question by requiring only the direct knowledge of the respondent.

We arrived at the estimates in the table below by conducting limited testing among the expert panel of industry and FAA participants (kept to less than 10 industry panelists). The survey tool provides time spent completing the survey, which of 14 respondents averaged 51 minutes for the approximately 60 questions with 40 potential follow-up questions for a potential total of up to 100 questions, depending on the type of response to follow-up questions. We would anticipate at least a tripling of time spent in actual ODA representational survey completion (150 min, or 2.5 hours), and added 7.5 hours of minimal coordination for each company to allow for whatever minor compilation time may be necessary for lead administrators to represent within-ODA diversity of opinion for the single respondent-per-ODA. The total of an average 10 hours (600 minutes) for the 100 question survey produced our 6 minute per question estimate.

| Summary (Annual numbers) | Reporting | Recordkeeping | Disclosure |
|--------------------------------------|---|---------------|------------|
| # of Respondents | 66 (expected of 82) | N/A | N/A |
| # of Responses per respondent | 1 | N/A | N/A |
| Time per Response | 600 min | N/A | N/A |
| Total # of responses | 66 | N/A | N/A |
| Total burden (hours) | 66 responses x 600m = 39,600m/60 min per hr = 660 hrs | N/A | N/A |
| Annualized labor cost | \$81.04 per hour x 660 hours = \$53,486 | N/A | N/A |

*Annualized labor cost to respondents includes base wage, fringe, and overhead based on tables for highest compensation of 90th percentile hourly wage for Aerospace Engineers (172011), Aerospace Product and Parts Manufacturing (336400) obtained using the Bureau of Labor Statistics occupational employment statistics query system at: <https://data.bls.gov/oes/#/home>.

We identified the annualized labor cost by filtering on the following categories: Manufacturing sectors' Aerospace Product and Parts Manufacturing industry labor costs.

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

Since this will be a simple electronic survey with no requirement for retention of records, we do not expect any additional cost burden to respondents or record keepers other than time spent completing the survey.

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.

For method to estimate cost, we tallied the number of sessions the FAA survey expert dedicated with the Expert Panel during development, piloting, and draft revisions, and added administrative costs of the specialist assisting with PRA expenses, and estimated approximately 450 hours dedicated to the final draft survey. To check our assumptions, we divided the estimate by the total number of questions, and judged our development time of 4.5 hours per question to be appropriate. For salary information we referenced the OPM site mentioned below the table, and to include benefits we referenced OMB memo M-08-13.

No additional equipment, overhead, printing, or support staff were required for government expenditures associated with this collection. The following table breaks down the survey costs.

| Total Survey Questions | Dev/processing time per Q | Time unit | Federal Time burden | Labor cost per hour | Labor cost | Benefits ¹ | Labor cost with benefits | Where labor cost came from |
|------------------------|---------------------------|-----------|---------------------|---------------------|-------------|-----------------------|--------------------------|----------------------------|
| 100 | 4.5 | hour | 450 | \$71.37 | \$32,116.50 | 36.25% | \$43,758.73 | See ¹ below |

¹Hourly Rate is based on average GS14 90th percentile plus locality hourly rate: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2019/general-schedule-gs-salary-calculator/>

Benefits calculated per OMB Memorandum M-08-13 available at: <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

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

This is a new collection.

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.

We hope to release the survey in the Fall of 2020 and plan to keep the survey open for a minimum of 30 days. Results of the survey will be publicized in the form of summary assessment and recommendations included in the Expert Panel report to Congress, the Safety Oversight and Certification Advisory Committee (*SOCAC), other appropriate Committees, and appropriate FAA leaders.

*Results of the survey will be summarized in a Panel report to the SOCAC and available on their website at:

https://www.faa.gov/regulations_policies/rulemaking/committees/documents/index.cfm/committee/browse/committeeID/717

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.

We will display the OMB expiration date.

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

This collection adheres to all statements on the 83-I form’s certification (Q 19 compliance with 5 CFR 1320.9).