

## **Supporting Statement A**

### Safety Awareness, Feedback, and Evaluation (SAFE) Program

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

Executive Order 12862 Setting Customer Service Standards signed September 11, 1993 and most recently updated in Executive Order 13571 requires the Federal Government to provide the “highest quality service possible to the American people.” Under the order, the “standard of quality for services provided to the public shall be: Customer service equal to the best in business.” The Executive Order defines customers as “individual or entity directly served by a department or agency” and “best in business” as defined by “the highest quality of service delivered to customers by private organizations providing comparable or analogous service.” We in the Federal Aviation Administration (FAA) Flight Standards Service refer to our customers as “stakeholders,” as it more accurately represents the unique relationship that we have with our aviation partners.

The FAA Flight Standards Service designed the SAFE Program to continuously promote and improve overall aviation safety. The program goals are accomplished by periodically surveying stakeholder groups to measure the effectiveness of FAA regulatory processes and products and collect feedback on the quality of provided services. The survey outcomes form the basis of program improvements to ensure stakeholders are effectively served. The outcomes and planned improvements are shared with stakeholder groups.

#### **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 Safety Awareness, Feedback, and Evaluation (SAFE) survey program is a voluntary collection with five distinct external, aviation community stakeholder groups. The stakeholder groups include general aviation pilots, aviation maintenance technicians, commercial and airline transport pilot (ATP) rated pilots, repair station managers, and air carrier management.

The FAA currently conducts two different surveys per year which would indicate each stakeholder group will be surveyed in a rotational basis once in every two and a half years. The type of reply is that each stakeholder group is reporting to the FAA. No Personally Identifiable Information (PII) is collected in the survey process. In fact, respondents are specifically asked not to include any PII as part of the survey instructions.

The information collected will be used by FAA Flight Standards Service to improve the quality and delivery of the services and products provided to their stakeholders. Specifically, the Flight Standards Service will use the information collected for the following purposes:

- Promote and monitor continuous program improvement to maintain the safest aviation system in the world;
- Identify service areas that are not up to standard based on our stakeholders' experiences and determine what improvements are needed to effectively serve our aviation partners;
- Produce responsive action plans that address effectiveness of the SAFE program by sustaining aspects of the program found to be effective and, where needed, introducing improvement strategies; and
- Implement and evaluate action plans within the Flight Standards Service and with stakeholders to ensure safety improvements occur at the point of need.

**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.**

To the maximum extent possible, the collection effort will rely on electronic submission and communication methods. Beyond reducing costs, the use of electronic collection methods is expected to reduce the burden on the respondents and improve return rates. The postal mail will be required for initial contact and follow-on reminders because "postal address" is the only contact information available in the official FAA databases.

Announcement of the upcoming surveys will be posted on FAA and trade websites frequented by stakeholders. Each randomly selected stakeholder will receive a mailed letter inviting them to participate in the survey. The invitation will include details on how to access the online survey either via a computer or mobile device, or how to request a paper version of the survey through email, telephone, or postal mail. Reminders to participate in the survey will be sent only to those who have not responded via postal mail. The multi-mode approach supports generational differences in preferred methods of communicating and takes into account lack of computer access and experience.

**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.**

Stakeholders are the sole source of the information to be collected. It does not exist elsewhere in a comparable format, nor is it (or something similar) collected from other FAA or government agencies.

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

There is no anticipated burden to 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.**

Within the current program, we expect to survey each stakeholder group approximately once every four years. By collecting information on a less frequent basis, the FAA Flight Standards Service risks providing sub-par services and products to stakeholders and potentially fails to perform to posted standards.

**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.*

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 60-day notice for public comments was published in the Federal Register on 14 July 2020 with citation: 85 FR 42482. 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 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 respondents, unique identifiers will be assigned and they will be instructed not to provide any identifying information; however, prior to use by the FAA, the contractor will review all text entries and "sanitize" them by replacing identifying information with generic terms as placeholders. Only analyses and reports of aggregate data will be produced and released. The 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 sensitive information will be collected.

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

- **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.**

The estimates in the below table are based on:

- **2018** population data from **FAA Airman Statistics**;
- 95% confidence level and 3% margin of error in computing sample size of required returns for each stakeholder group,
- 20 minutes, on average, to complete the survey in any of the response modes,
- income data from the **Bureau of Labor Statistics (BLS)**, and
- a 3-year approval period for annualized hour burden and cost of collection.

*Annual hour burden:* The total average annual burden for the 3-year approval period is **629** hours per year. A mixed mode survey approach is being used in an effort to offset the individual burden by providing a means of requesting a print version and the convenience of on-demand electronic versions. This allows the respondent to choose how and when to complete the survey.

## Cost Estimates Table

Stakeholder Group	Population Size (2018 data)	Estimated Sample Size (95% confidence level, 3% margin of error)	Estimated Hour Burden (20 minutes per respondent)	Estimated Cost to Respondent (based on median hourly rate from BLS)	Estimated Cost of Data Collection
Commercial and Airline Transport Pilots	262,025	1,063	354	\$18.53	\$6,565.80
General Aviation (top row) and Sport Pilots (bottom row)	224,404	1,063	354	\$8.33	\$5,497.80
	6,513	918	306	\$8.33	
Repair Station Operators	4,801	873	291	\$9.59	\$2,790.69
Aviation Maintenance Technicians and Repairers	327,384	1064	354	\$10.10	\$3,575.40
Air Carrier Operations Management	1,895	683	228	\$19.78	\$4,509.84
<b>Total</b>			<b>1,887</b>		<b>\$22,939.53</b>
<b>Annualized</b>			<b>629</b>		<b>\$7,646.15</b>

## Burden Tables

### Commercial and Airline Transport Pilots

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	1,063	0	0
<b># of Responses per respondent</b>	1	0	0
<b>Time per Response</b>	20 minutes (.30 hr)	0	0
<b>Total # of responses</b>	1,063	0	0

<b>Total burden (hours)</b>	354	0	0
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#### General Aviation and Sport Pilots

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	1,981	0	0
<b># of Responses per respondent</b>	1	0	0
<b>Time per Response</b>	20 minutes (.30 hr)	0	0
<b>Total # of responses</b>	1,981	0	0
<b>Total burden (hours)</b>	660	0	0

#### Repair Station Operators

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	873	0	0
<b># of Responses per respondent</b>	1	0	0
<b>Time per Response</b>	20 minutes (.30 hr)	0	0
<b>Total # of responses</b>	873	0	0
<b>Total burden (hours)</b>	291	0	0

#### Aviation Maintenance Technicians and Repairers

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	1064	0	0
<b># of Responses per respondent</b>	1	0	0
<b>Time per Response</b>	20 minutes (.30 hr)	0	0

<b>Total # of responses</b>	1064	0	0
<b>Total burden (hours)</b>	354	0	0

#### Air Carrier Operations Management

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	683	0	0
<b># of Responses per respondent</b>	1	0	0
<b>Time per Response</b>	20 minutes (.30 hr)	0	0
<b>Total # of responses</b>	683	0	0
<b>Total burden (hours)</b>	228	0	0

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

There are no material nor any other costs to the respondents to participate in the SAFE program. The surveys are conducted via electronic means, website delivered. Respondents may select a paper copy of the survey which is sent with a return addressed, stamped envelope to return the completed survey to the FAA. Respondents who do not reply electronically are also sent a paper copy of the survey with the same return addressed, stamped envelope to return the completed survey to the FAA.

This bears repeating - do NOT include the labor cost (wage equivalent) of the burden hours described in Question 12 (above).

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (a) to achieve regulatory compliance with requirements not associated with the information collection, (b) for reasons other than to provide information or keep records for the government, or (c) as part of customary and usual business of private practices.

Operations and maintenance costs include the costs of mailing, faxing or calling in information, making paper copies, notary costs, and electronic transmission from vessel



monitoring systems. Paint and brushes for vessel and gear marking would also fall under this category. Regular maintenance of any equipment whose initial costs fall under “capital and start-up” would also belong here.

**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 FAA plans to leverage existing customer satisfaction formats (survey files, database structures, programming code, and reports) used in the past to minimize total costs. Additionally, every effort will be made to reuse products created in the conduct of the first stakeholder group data collection for subsequent data collections. Research assistants, technicians, and data entry clerks from Cherokee Nation 3-S will assist in this effort. The projected costs of the tasks the contractor will perform are in the following table.

<b>Support Activity/Product/Deliverable</b>	<b>Projected Cost (\$)</b>
Build and manage database	25,150
Create distribution list and manage returns	28,230
Develop surveys across modes (computer, mobile, paper)	48,000
Gather existing file formats and create stakeholder templates	1,939
Generate and run statistical code	29,340
Generate item results	30,000
Manage survey submissions	10,500
Print and mail (invitations, reminders, requests for paper survey)	75,000
Process and scan	12,200
Provide tech support for online access	9,000
Transcribe and sanitize free text entries	30,635
<b>*TOTAL (contractor costs)</b>	<b>299,994</b>

\*FAA employees' 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. Similarly, the FAA Headquarters responsible office, Flight Standards Service, has the mission, with others, to determine the

effectiveness of various programs and policy with external stakeholder groups. The Safety Awareness, Feedback, and evaluation program is such a program. 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 the FAA employees' time.

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

This is not a new collection; no program changes. Numbers in ROCIS reflect a more accurate annual representation of survey responses and differ slightly from supporting statement due to rounding.

**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.**

A single stakeholder survey will generally occur within a 15-18 month window with each stakeholder group being surveyed only once within the approval period. The following table shows the schedule for the entire project.

	Year 1			Year 2		Year 3	
Group 1	Prepare survey	admin & analyze	report				
Group 2		prepare survey	admin & analyze	report			
Group 3			prepare survey	admin & analyze	report		
Group 4				prepare survey	admin & analyze	report	
Group 5					prepare survey	admin & analyze	report

**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.