Supporting Statement A
Runway to Recovery Recommendations to Help Airports and Airlines Mitigate the Risks of COVID-19 Transmission

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

The Federal Aviation Administration (FAA) will use this collection to gather information on the implementation of measures by United States airports and airlines to mitigate COVID-19-related risks and to restore aviation, in accordance with recommendations in the joint Federal agency guidance *Runway to Recovery: The United States Framework for Airlines and Airports to Mitigate the Public Health Risks of Coronavirus.*[1] The FAA will share the collected information with the Federal agencies that issued *Runway to Recovery* (Departments of Transportation (DOT), Homeland Security (DHS), and Health and Human Services (HHS)). As described in *Runway to Recovery,* the adoption of the mitigation measures by airports and airlines is vital to reducing the spread of the virus in the air transportation system and restoring the confidence of passengers and the aviation workforce in air travel, both of which are critical to the recovery of the aviation industry. The collected information will help to identify the specific mitigation measures used by airports and airlines to stop the spread of COVID-19 and to assess the impact these measures are having on aviation safety and operations, reduction of public health risk, and security and resiliency of the air transport system.

Authority

The FAA is collecting this information on behalf of multiple Federal agencies including DOT, HHS, and DHS. DOT's authority to collect this information is derived generally from 49 U.S.C. § 106(f), which establishes the FAA Administrator's responsibilities with respect to aviation safety. DHS's authority to collect this information is derived generally from 49 U.S.C. § 114, which establishes the Transportation Security Administration Administrator's responsibilities with respect to aviation security, and 6 U.S.C. § 211, which establishes the CBP Commissioner's responsibilities with respect to admission of persons into the United States and border control. HHS's authority to collect this information is derived generally from 42 U.S.C. § 241, which establishes the HHS Secretary's responsibilities with respect to control and prevention of physical diseases.

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.

[1] U.S. DOT, HHS, DHS, *Runway to Recovery: The United States Framework for Airlines and Airports to Mitigate the Public Health Risks of Coronavirus* (July 2020), available at https://www.transportation.gov/briefing-room/runway-recovery.

This collection is in response to the ongoing COVID-19 public health emergency. Because of the nature of the current crisis, evolving knowledge about the virus, and emerging technologies and practices for mitigating the transmission risks, the FAA is seeking an emergency approval to ensure this collection can be implemented quickly. The FAA is conducting this information collection on behalf of the agencies that issued *Runway to Recovery*, which includes DOT, DHS, and HHS.

The collection will be voluntary and includes reporting of primarily quantitative data. The FAA plans to request responses from airports certificated under Title 14 Code of Federal Regulations (CFR) part 139[2] and air carriers certificated under 14 CFR part 119 conducting operations under part 121[3] that offer passenger service. The FAA plans to request responses every 2 months for a 6-month period for a total of three survey instances.

The FAA will use this information to update the International Civil Aviation Organization (ICAO) on the progress of U.S. airports and airlines implementing safety, security, and public health measures to mitigate risks associated with COVID-19.[4] The FAA will share the collected information with the Federal agencies that issued *Runway to Recovery*. The FAA will also share the collected information with airports and airlines.

The collected data will be used to:

- Assess the extent to which airports and airlines have implemented the recommended mitigation practices in the *Runway to Recovery* document;
- Help identify the impact of these practices on aviation safety and operations, reduction of public health risk, and the security and resiliency of the air transportation system;
- Better understand potential barriers airports and airlines are facing when they implement these recommendations; and
- Identify success stories and additional practices that airports and airlines are using to help prevent the spread of the virus, inspire confidence among the traveling public, and further ensure the safety of passengers and the aviation workforce.

Based on collected data, DOT, DHS, or HHS may recommend changes and/or additions to the mitigation measures identified in the *Runway to Recovery* document.

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[2] 14 CFR part 139 establishes certification requirements for airports serving scheduled air carrier aircraft configured with more than 9 seats and serving unscheduled air carrier operations in aircraft designed for more than 30 passenger seats. Currently, this includes 520 airports.

[3] 14 CFR part 121 establishes certification requirements for regularly scheduled air carriers, including large air carriers, regional air carriers, and cargo carriers. As the *Runway to Recovery* strategies focus on passengers, this collection applies only to the approximately 50 part 121 air carriers that provide passenger service.

[4] The United States is a member of ICAO. Given the global scope of COVID-19 public health emergency and its impact on aviation worldwide, ICAO published global guidance and asked member States to report on the actions they are taking to mitigate the spread of the virus during air travel. The *Runway to Recovery* is the U.S. response to this call. *See* https://www.icao.int/covid/cart/Pages/CART-Report---Executive-Summary.aspx.

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 FAA will collect this information via an online survey tool.

Once the data is aggregated, the FAA anticipates publishing the results on FAA's public website (www.faa.gov) or on a DOT website.

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.

This is a new collection related to the ongoing COVID-19 public health emergency. The mitigation measures that serve as the basis of this collection are unique to this situation and to the aviation industry. The FAA is coordinating with the other agencies and departments that issued *Runway to Recovery* (DHS, including the Transportation Security Administration and U.S. Customs and Border Protection; HHS, including the Centers for Disease Control) to ensure there is no duplication of effort.

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

This information collection has been designed to minimize the burden on all respondents. Reporting is voluntary, and the use of an online reporting tool will allow airports and airlines to submit their responses whenever and wherever it is most convenient for them to do so.

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 ongoing COVID-19 public emergency is unique. Without this information, the *Runway to Recovery* agencies will be unable to assess the extent to which airports and airlines are implementing the recommended mitigation practices, identify their impact on operations, understand potential barriers to implementation, or identify additional practices that might be needed to prevent the spread of the virus and further ensure the safety of passengers and the aviation workforce.

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 19, 2020) (85 FR 66403) solicits public comment by November 18, 2020. The FAA is seeking emergency approval due to the COVID-19 public health emergency and is submitting this supporting statement while the comment period is still open.

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

The FAA will not provide gifts or remuneration.

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

The FAA offers no assurance of confidentiality. However, responses will be summarized. Further, the FAA will sanitize any responses to open-ended questions that might identify respondents before the data is shared with other agencies or published. On the survey, respondents are informed data will be summarized and are reminded to leave identifying information out of open-ended responses.

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.

The FAA will not ask questions of a sensitive nature.

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

The FAA anticipates the total annualized burden to airports and airlines, assuming the survey is run three times, to be 1,233 hours, and the total annualized cost to both airports and airlines to be $129,492.[5]

Part 139 Airports

The FAA intends to request responses from approximately 520 U.S. airports certificated under 14 CFR part 139 (IC 1). Because reporting is voluntary, there is no requirement for the airport representative completing the questionnaire to provide all of the information requested. Response times will likely vary depending on the size of the airport. At larger airports where responsibility for the health-related mitigations addressed by this survey have been delegated, responses may require coordination and thus take longer. At smaller airports, where the airport director may be directly involved in the implementation of mitigations, response times may be significantly lower.

[5] As this is a new collection, the FAA has based its initial calculations on full participation by the survey populations. When this collection is renewed under the normal approval process, the FAA will base these calculations on the number of actual respondents.

On average, we expect each airport to spend approximately 45 minutes responding to the collection.

520 x 45 minutes = 23,400 minutes = 390 hours

As we plan to run the survey three times (every 2 months for 6 months), the total burden will be as follows:

be as follows:

390 hours x 3 = 1170 hours

The FAA estimates the total annualized cost to airports if we run three surveys to be $121,680.

This estimate is based on the mean hourly wage of the Airport Director. The mean hourly pay for an Airport Director[6] is $52 (rounded), multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[7] for a fully-loaded hourly wage of $104.

3($104 x 390 hours) = $121,680

Part 121 Air Carriers that Provide Passenger Service

The FAA intends to request responses from approximately 50 Part 121 air carriers that provide passenger service (IC 2). Because reporting is voluntary, there is no requirement for the airline representative completing the questionnaire to provide all of the information requested. We expect each airline to spend on average approximately 25 minutes responding to the collection.

50 x 25 minutes = 1250 minutes = 21 hours (rounded)

If we run the survey three times (every 2 months for 6 months), the total burden will be as follows:

21 hours x 3 = 63 hours

This estimate is based on the mean hourly wage of the Vice President for Safety. The average hourly pay for a Vice President for Safety[8] is $62 (rounded), multiplied by 2 to

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[6] Based on Occupation 53-2000, BLS Occupational Employment Statistics for Transportation, 2019. See https://www.bls.gov/oes/current/oes_nat.htm#53-0000. BLS does not provide a mean hourly wage for this occupation. Wage provided above was calculated by dividing the mean annual wage by 2000 hours (50 weeks at 40 hours per week).

[7] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

account for benefits plus other overhead costs such as rent, utilities, and office equipment,[9] for a fully-loaded hourly wage of $124.

The FAA estimates the total annualized cost to airlines if we run three surveys to be $7,812.

3($124 x 21) = $7,812

Summary (Annual numbers)	Reporting	Recordkeeping
IC 1		
# of Respondents	520	—
# of Responses per respondent	3	
Time per Response	45 min.	
Total # of responses	1560	
Total burden (hours)	1170	
IC 2		
# of Respondents	50	—
# of Responses per respondent	3	
Time per Response	25 min.	
Total # of responses	150	
Total burden (hours)	63	

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

As this collection will be fully online, there is no additional cost burden to respondents.

[8] Based on Occupation 11-1021, BLS Occupational Employment Statistics for Transportation, 2019. NAICS 481000 - Air Transportation. See https://www.bls.gov/oes/2019/may/naics3_481000.htm.

[9] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

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 total estimated annualized cost to the Federal Government is $75,480. This is based on administering the surveys at least three times (once every 2 months) over a 6-month period.

$14,760 + $14,760 + $45,960 = $75,480

Part 139 Airport Survey Data Analysis

The total cost of this analysis if we run the Part 139 airport survey three times is $13,248 + $1512 = $14,760.

Two (2) Management and Program Analyst, 343 series, will analyze and process the data received from Part 139 airports. We expect they will each spend 24 hours per collection.

The average hourly pay for management and program analysts is $46 (rounded),[10] multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[11] for a fully-loaded hourly wage of $92.

Based on the average fully loaded hourly wage of $92 and an average processing time of 24 hours per collection, the FAA estimates the total annualized cost to the government of this task if we run three surveys to be $13,248.

3[(2 x $92)24] = $13,248

Two (2) Supervisory Aviation Technical System Specialists, 2186 series, will review the results of this analysis. We expect each supervisor will spend 2 hours per collection.

The average hourly pay for supervisory aviation technical system specialists is $63 (rounded),[12] multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[13] for a fully-loaded hourly wage of $126.

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[10] Occupation 13-1111, BLS Occupational Employment Statistics, Federal Executive Branch, 2019. See https://www.bls.gov/oes/current/oes131111.htm

[11] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

[12] Occupation 11-1021, BLS Occupational Employment Statistics, Federal Executive Branch, 2019. As the FAA position of Supervisory Aviation Technical Systems Specialist is not listed, we have used the General and Operations Manager occupation. See https://www.bls.gov/oes/current/oes111021.htm.

Based on the average fully loaded hourly wage of $126 and an average review time of 2 hours per collection, the FAA estimates the total annualized cost to the government of this task if we run three surveys to be $1512.

3[(2 x $126)2] = $1512

Part 121 Air Carriers Survey Data Analysis

The total cost of this analysis if we run the Part 121 air carriers survey three times is $13,248 + $1512 = $14,760.

Two (2) Management and Program Analyst, 343 series, will analyze and process the data received from Part 121air carriers. We expect they will each spend 24 hours per collection.

The average hourly pay for management and program analysts is $46 (rounded),[14] multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[15] for a fully-loaded hourly wage of $92.

Based on the average fully loaded hourly wage of $92 and an average processing time of 24 hours per collection, the FAA estimates the total annualized cost to the government of this task if we run three surveys to be $13,248.

3[(2 x $92)24] = $13,248

Two (2) Supervisory Aviation Technical System Specialists, 2186 series, will review the results of this analysis. We expect each supervisor will spend 2 hours per collection.

The average hourly pay for supervisory aviation technical system specialists is $63 (rounded),[16] multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[17] for a fully-loaded hourly wage of $126.

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[13] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

[14] Occupation 13-1111, BLS Occupational Employment Statistics, Federal Executive Branch, 2019. See https://www.bls.gov/oes/current/oes131111.htm

[15] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

[16] Occupation 11-1021, BLS Occupational Employment Statistics, Federal Executive Branch, 2019. As the FAA position of Supervisory Aviation Technical Systems Specialist is not listed, we have used the General and Operations Manager occupation. See https://www.bls.gov/oes/current/oes111021.htm.

[17] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

Based on the average fully loaded hourly wage of $126 and an average review time of 2 hours per collection, the FAA estimates the total annualized cost to the government of this task if we run three surveys to be $1512.

3[(2 x $126)2] = $1512

FAA Review and Publication of Collected Data

The total cost of these tasks is $3360 + $42,600 = $45,960.

Approximately seven (7) FAA Senior Executives will review the consolidated data from both the airport and airline surveys to determine if the FAA will recommend any changes to the mitigation measures in the Runway to Recovery document. The FAA anticipates the seven (7) individuals will spend a total of one hour each on this task.

The average hourly pay for Federal Senior Executives is $80,[18] multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[19] for a fully-loaded hourly wage of $160.

Based on the average fully loaded hourly wage of $160 and an average time expenditure of 1 hour per executive, the FAA estimates the total annualized cost to the government of this task if we run three surveys to be $3360.

3[(7 X $160)1] = $3360

In addition, two public relations specialists and one web manager within the FAA Office of Communications will publish the results of each survey online. The FAA expects they will each spend approximately 50 hours planning and executing this task for each survey run.

The average hourly pay for public relations specialists is $46 (rounded),[20] multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[21] for a fully-loaded hourly wage of $92.

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[18] Occupation 11-1011, BLS Occupational Employment Statistics, Federal Executive Branch, 2019. See https://www.bls.gov/oes/current/oes111011.htm

[19] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

[20] Occupation 27-3031, BLS Occupational Employment Statistics, Federal Executive Branch, 2019. See https://www.bls.gov/oes/current/oes273031.htm

[21] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

The average hourly pay for a web manager is $50 (rounded),[22] multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment,[23] for a fully-loaded hourly wage of $100.

Based on the average fully loaded hourly wage of $92 and $100 respectively and an average time expenditure of 50 hours each, the FAA estimates the total annualized cost to the government of this task if we run three surveys to be $42,600.

$$3[(2 \times \$92)50 + (\$100 \times 50)] = \$42,600$$

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.

Once summarized, the results of this information collection may be published on the FAA website (www.faa.gov) or a Department of Transportation website.

The FAA will collect this information for the 6 months during which the emergency approval is valid. As the COVID-19 public health emergency is ongoing, FAA will pursue a normal approval to continue collection of this data.

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.

The FAA is not seeking such approval.

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

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[22] Based on Occupation 15-1250, Software and Web Developers, Programmers, and Testers, BLS Occupational Employment Statistics, Federal Executive Branch, 2019. https://www.bls.gov/oes/current/naics4_999100.htm#15-0000

[23] U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

There are no exceptions.