



# Federal Aviation Administration

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## Memorandum

Date: November 2, 2020

To: Kyle Gardiner, Policy Analyst, Office of Information and Regulatory Affairs,  
Office of Management and Budget, Executive Office of the President

From: John R. Dermody, Director, Office of Airport Safety and Standards

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Subject: OMB Emergency Clearance for New Information Collection Request (ICR):  
Runway to Recovery Recommendations to Help Airports and Airlines Mitigate  
the Risks of COVID-19 Transmission

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This is a request for an emergency clearance for a new information collection, titled “Runway to Recovery Recommendations to Help Airports and Airlines Mitigate the Risks of COVID-19 Transmission.” This collection is necessary to determine the extent U.S. certificated air carriers and airports have implemented practices recommended to reduce and mitigate the risks of COVID-19 transmission during air travel. If the FAA does not receive emergency approval, the economic recovery of the nation’s air transport system may be delayed and public health may be endangered because of the inability to gauge rapidly changing conditions in virus spread and containment among the nation’s airports and airlines.

Pursuant to 5 CFR § 1320.13, emergency processing is appropriate where (1) the collection of information is needed prior to the expiration of time periods established under the Paperwork Reduction Act and that collection is essential to the mission of the Agency; and (2) the Agency cannot reasonably comply with the normal clearance procedures because public harm is likely to result if normal clearance procedures are followed.

### **This Information Collection is Necessary and Essential to the Missions of the Agencies**

FAA is collecting this information on behalf of itself and all partner agencies that issued the *Runway to Recovery* guidance document, which includes the Departments of Transportation, Homeland Security,<sup>1</sup> and Health and Human Services.<sup>2</sup> *Runway to Recovery* recommends a

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<sup>1</sup> Including the Transportation Security Administration and Customs and Border Protection.

<sup>2</sup> Including the Centers for Disease Control and Prevention.

number of practices that U.S. airports and airlines can use to reduce disruptions to air travel while maintaining essential health and security measures, all of which are critical to the recovery of the aviation industry. This collection is necessary for the *Runway to Recovery* agencies to gauge shifting implementations of recommended practices, identify the changing impacts on the operations of airports and airlines, understand potential barriers to implementation, and identify additional mitigation practices.

The collection of this information is essential to the missions of the FAA and partner *Runway to Recovery* agencies to maintain the most efficient aerospace system in the world, enhance the health and well-being of all Americans, and ensure the safety and security of the Homeland. Use of the normal clearance process would prevent the agencies from attaining a timely and meaningful assessment of mitigation measures in use by airports and airlines, which is urgently needed to prevent harm to the public's collective health and economic well-being. This information collection is consistent with the *Runway to Recovery* guidance document and will support the agencies' assigned functions of maintaining an efficient aviation system, preventing disease, and ensuring security.

### **Public Harm is Likely to Result if Emergency Processing is Not Granted**

Public harm will likely result if the FAA and partner *Runway to Recovery* agencies are prevented from immediately collecting this necessary and essential information. The *Runway to Recovery* agencies are contending with rapidly changing conditions on an ad hoc basis due to phased re-openings in states and regions, fluctuations in COVID-19 spread, and ongoing international travel negotiations with foreign governments. These circumstances complicate the agencies' ability to fulfill their missions.

An emergency clearance allows for a more accurate evaluation of mitigation measures currently deployed at airports and airlines, thus enabling the agencies to update their responses. Gathering this information rapidly is critical to fulfilling our obligations to the American people, who will benefit from this collection. Conversely, delay in obtaining and evaluating this information may hinder economic recovery and endanger public health.

### **The FAA's Role**

To avoid unnecessary burdens on the public, the FAA has taken the role of lead agency for this collection and has coordinated with its partner agencies and departments that issued *Runway to Recovery* to ensure there is no duplication of effort. Accordingly, the FAA will share the collected information with its partner agencies and departments. In addition to the emergency clearance, the FAA will also complete the normal OMB review process and post the 60-Day and 30-Day Federal Register Notices following the Emergency Federal Register Notice.

Due to the *Runway to Recovery* agencies' urgent need for this information collection, the FAA respectfully requests approval by November 13, 2020.