

**Supporting Statement A**  
**Inspection Authorization Refresher Course Acceptance Form**  
**OMB 2120-XXXX**

**Summary:** Approval of a new information collection, including use of a new FAA Form, is being requested.

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

The collection of information described in this IC is necessary to allow the FAA Administrator to determine if a refresher course used for mechanic certificate inspection authorization (IA) renewal, under 65.93(a)(4) is acceptable.

- Title 49, United States Code, Sections **44702** and **44703**, empower the Administrator of the Federal Aviation Administration to issue airman certification and to specify the terms, conditions, and limitations, and to authorize the regulations that prescribe the reporting requirement discussed in this supporting statement.
- Title 14, Code of Federal Regulations, **part 65** (14 CFR part 65) prescribes, among other things, rules governing the issuance of certificates and associated rating for mechanics, and issuance and renewal of mechanic certificate IAs.
- **Section 65.93** prescribes several methods by which a mechanic with an IA can comply with the biennial renewal requirement.
  - o Section 65.93(a)(4) specifies that, mechanics with an IA can complete a refresher course(s), *acceptable to the Administrator*, of not less than 8 hours of instruction for each year of the two-year renewal requirement.

**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 collection is required to obtain or retain a benefit (i.e., the ability to provide creditable IA refresher training for IA renewals). Respondents are persons or entities desiring to provide IA refresher courses that are creditable for IA renewal.

The collection requires reporting to obtain the initial course acceptance and includes the disclosure of the course provider's contact information, course outline, length, type of delivery, and description of the course provider's record keeping. The information collection also requires that the course provider maintain records of recipients of the IA renewal course training for 3 years.

Once a refresher course is accepted it must be renewed every four years, unless significant changes are made to the course. If significant changes are made to the course, the respondent must re-submit the course for acceptance. the FAA's Inspection Authorization Refresher Course Coordinator (IA RCC) for the Flight Standards Aircraft Maintenance Division would receive the reporting information collected. The FAA could

request to inspect the training records of the course provider to verify the training of IA applicants using the training course to meet the renewal requirements.

The IC requires the use of the collection instrument FAA Form 8610-6, IA Refresher Course Acceptance Request, from persons or entities interested in offering IA refresher courses to meet the requirements of § 65.93(a)(4). Respondents would submit the requested information by email regarding their administrative processes and course content to the FAA. The purpose of the IC is to ensure that IA mechanics receive refresher training appropriate to their job responsibilities, e.g., maintenance training topics, human factors training or FAA regulations and policy that directly relates to the maintenance, inspection, repair, or alteration of aircraft products, systems, components, or accessories, thus qualifying those IA mechanics for renewal under § 65.93(a)(4).

**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 response to the Government Paperwork Elimination Act (GPEA), FAA Form 8610-6 is available in electronic format and can be downloaded from <http://www.faa.gov/forms>. The form is electronically fillable, signable, and fileable. The form and substantiating documents, as well as course acceptance notifications, are done via email. Only the courses found acceptable will be listed on the Master IA Refresher Course Database (Refer to question 16 for link to this list).

**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 FAA public use reports and find no duplication. We know of no other agency collecting information about IA mechanic refresher courses. The circumstances of providing IA refresher course training is specific to § 65.93(a)(4) which is under the purview of the FAA. The information 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 IC burden is a function of the number of refresher training courses that a course provider wants to offer. Small businesses or individuals compete in this field but typically offer a limited number of courses tailored to a specific region or type of course content and consequently have fewer submissions.

**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.**

If the applicants do not submit the information requested by FAA Form 8610-6, the FAA would have no basis to determine if the courses offered by said applicants are acceptable to meet the renewal requirements of § 65.93(a)(4). The FAA estimates that approximately 74 percent of IA renewals are done using the refresher course method,

therefore failure to provide the requested information would have a decidedly negative effect on the IA Mechanic 2-year renewal process. The desired outcome of the IC is to ensure that IA mechanics are properly trained and current in their job knowledge to work in the aviation transportation industry.

If the information collection was conducted less frequently the FAA would not be able to ensure that renewal courses continue to be acceptable to ensure IA mechanics are properly trained and current with today's technology to exercise the additional privileges afforded to a mechanic holding an IA.

**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.*

Respondents need only submit their courses for acceptance at initial submittal, and thereafter renew them every four years. Additional submissions to the FAA would only be required if the course provider elected to significantly revise a previously accepted course.

There are no special circumstances for this IC, it is conducted in a manner consistent with the guidelines in 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 60-day Federal Register Notice was published on April 29, 2021, (86 FR 22758). No comments were received.

The FAA reached out to eight current course providers requesting burden and costs info related to refresher course acceptance. Their responses were used to develop the question #12 Reporting Burden.

On September 28, 2021 FAA Flight Standards notified, via email, all current course providers that the draft Advisory Circular, Inspection Authorization Refresher Course Training Acceptance in Accordance with 14 CFR § 65.93(a)(4) could be found at the [https://www.faa.gov/aircraft/draft\\_docs/afs\\_ac/](https://www.faa.gov/aircraft/draft_docs/afs_ac/) website for a 30-day public comment period. Several public comments were received and prompted some changes to the AC and the information to be collected.

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

No gifts or payments were provided to respondents.

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

Respondents were 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.**

This IC does not collect information of a sensitive nature.

**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.

**Burden Summary**

The total annual burden of this IC is approximately **6,860 hours** (280 submission hours + 6,580 recordkeeping hours).

The total annual cost burden of this IC is approximately **\$740,880** (\$30,240 course submission costs + \$710,640 course recordkeeping costs).

The data in the table below reflects annual estimates of submittal (reporting) and recordkeeping burden, based on a four-year course acceptability expiration.

IA Refresher Course Provider Burden			
<b>§65.93(a)(4) burden</b>	<b>Course Acceptance Submittals</b>	<b>Course Record Keeping</b>	<b>Totals</b>
# of Respondents Annually	35	100	135
# Responses per Respondent Annually	8	658	666
Time per Response (hour)	1	0.1	--
Total # of Responses Annually	280	65,800	66,080
<b>Annual Burden (hours)</b>	280	6,580	<b>6,860</b>
Cost/Hour (\$)	\$108	\$108	\$108
<b>Annual Cost Burden (\$)</b>	\$30,240	\$710,640	<b>\$740,880</b>

### Reporting Burden

The annual number of respondents to this collection is approximately 35, consisting of course providers and course provider applicants. The total estimated annual submission burden under part 65.93(a)(4) as described in this IC includes 35 respondents, submitting 280 responses averaging 1 hour per response @ \$108/hr. for a burden of 280 hours, with an estimated cost of \$30,240.

To estimate time spent responding to this IC, the FAA requested refresher course submission burden from eight current course providers. Five of these entities responded with time estimates and four with cost figures; they included one small (6 accepted courses), two medium (15 & 24 courses) and two large (51 & 60 courses) course providers. Their time and cost burdens were summed, averaged, and used in the burden estimates that follow.

There are three occasions that require course providers to make course acceptance submissions: the initial course acceptance, a change to course acceptance, and course renewal acceptances. Based on responses from the survey, the average time burden in each instance is as follows:

- initial course acceptance - 2.6 hrs.,
- prepare a change to course acceptance - 1.1 hrs.
- prepare a course renewal acceptance - .7 hrs.

These figures were summed and averaged to .85 hrs. per response. The FAA rounded this up to 1 hour per response for the purpose of burden determination. Based on a four-year renewal cycle, the FAA would receive approximately 250 renewal acceptances, 10 change acceptances, and 20 initial acceptances annually.

### Recordkeeping Burden

The total estimated annual recordkeeping burden as described in this IC includes 100 respondents, recording 65,800 training events averaging .1 hour per entry @ \$108/hr. for 6,580 hours, with an estimated cost of \$710,640.

The FAA National Vital Information System (NVIS) database contained 22,230 mechanics with an active Inspection Authorization as of April 5, 2021. A survey of six Flight Standards offices determined that approximately 74 percent of IA renewals use the refresher course method. The FAA estimates that the average IA has taken four courses to meet the eight-hour annual training requirement. Seventy-four percent of 22,230 yields 16,450 IA's taking refresher courses multiplied by four, equals an estimated 65,800 training events to record per year.

### Course Provider Labor Cost Analysis

The labor cost estimates used the course providers offered wage rates for their refresher course submissions. The average wage was determined to be \$54/ hour. The FAA multiplied the hourly wage by 2 to account for a fringe benefit rate of 30 percent<sup>1</sup> and an overhead rate of 69 percent<sup>2</sup>.

Course Provider Wages			
Hourly wage	30% Fringe Benefit	69% Overhead	Total
\$54	\$16	\$38	\$108

### **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 covered in question 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.**

Costs to the Federal government are incurred by reviewing the emailed form submissions from course providers and course provider applicants. The contents of the form and the accompanying training course outline are reviewed by Aviation Safety Inspectors and average 1 hour per submission. The annual time burden of review is **280 hours** multiplied by the \$91/hr. salary for a total agency annual cost of **\$25,480**.

<sup>1</sup> An employee fringe benefit of 30 percent is added (for benefits such as health benefits, vacation, sick time, etc.), based on the private industry wages, as reported in BLS release, Employer Costs for Employee Compensation-March 18, 2021.

Source: U.S. DOL/BLS: <https://www.bls.gov/news.release/ecec.nr0.htm>

<sup>2</sup> Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf). On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

IA Refresher Course Agency Burden	
IA Refresher Course Acceptance	IA Renewal § 65.93(a)(4)
# of Respondents Annually	35
Responses per respondent	8
Total # of Responses	280
Time per Response	1 hr.
Total Hour Burden	280
Fully Burdened Cost/Hour (\$)	\$91
Total Annual Cost Burden (\$)	\$25,480

### Agency Labor Cost Analysis

The FAA estimates the fully burdened hourly rate of an FAA aviation safety inspector (ASI) rate at \$90.96, rounded to \$91. The salary base rate for this position is from the 2021 General Schedule for a midpoint GS-14<sup>3</sup>, effective January 3, 2021. For this position, the Washington, D.C. locality pay of 30.48 percent<sup>4</sup> was applied and a benefit overhead of 36.25 percent<sup>5</sup> added.

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

This is a new IC, though it is not a request to collect new information. Similar information has been requested of course providers using a submittal form that is embedded in FAA Order 8900.1 Volume 3, Chapter 56, Section 1.

The new submittal form is a standalone form that solicits less documentation than its predecessor and is the basis of this IC. The new form does not require information regarding the course instructor, copy of test given, or samples of attendance or training completion forms. Additionally, increasing the course acceptance renewal from 2 to 4 years is a notable reduction of burden to the course providers. However, the FAA has determined that the average of one hour for the three occasions (initial, change, & renewal) that necessitate form submission is still an accurate number to use. The function of the new FAA Form 8610-6 remains the same, to substantiate that a course provider's content and administrative procedures are acceptable to the Administrator as required by 14 CFR § 65.93(a)(4).

### **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**

<sup>3</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS.pdf>

<sup>4</sup> <https://www.federalpay.org/gs/locality/washington-dc>

<sup>5</sup> <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

**and ending dates of the collection of information, completion of report, publication dates, and other actions.**

IA refresher courses that have been found acceptable to the FAA will be listed on the Master IA Refresher Course Database List at:  
<https://faasafety.gov/WINGS/pub/IATrainingProviders/IaUnderMaint.aspx> website under the maintenance tab for a period of four years, plus an additional two years if expired.

**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 are not seeking approval to not display the expiration date.

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

There are no exceptions.