

Supporting Statement A
Aviation Maintenance Technician Schools
OMB 2120-0040

The major changes to this collection are as follows:

- The individual collections in this ICR were re-named and consolidated to be presented as a burden area (with multiple regulatory references) rather than presenting each regulation as a separate instrument.
- Estimates for recordkeeping burden were re-evaluated and changed to show estimates on a per AMTS basis, instead of a per student basis as done in the last approval. This resulted in a significant hour reduction related to recordkeeping, and is more accurate than the previously approved estimates.
- Two new collection instruments were added. These areas of burden were unintentionally omitted from the previous approval:
 - o The § 147.31(e) requirement for certificate holders/applicants to submit procedures for determining final course grades and for recording student attendance to the FAA for review and approval, and to resubmit for approval when those procedures are revised by the AMTS.
 - o The § 147.35 requirement for AMTS to produce transcripts and graduation and/or completion documents.

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

49 U.S.C. 44701, *General requirements*, provides the general authority of the Administrator to prescribe regulations and minimum standards in the interest of safety for inspecting, servicing, and overhauling aircraft, engines, propellers, and appliances, including for other practices, methods, and procedures necessary for safety in air commerce.

49 U.S.C. 44702, *Issuance of certificates*, provides the authority of the Administrator to issue air agency certificates.

49 U.S.C. 44707, *Examining and rating air agencies*, empowers the Administrator of the Federal Aviation Administration (FAA) to examine and rate air agencies.

14 CFR part 147, *Aviation Maintenance Technician Schools*, prescribes the requirements for issuing aviation maintenance technician school (AMTS) certificates and associated ratings and the general operating rules for the holders of those certificates and ratings. Specifically, part 147 imposes information collection burden on the public related to the following:

Application (reporting burden)

- Section 147.5. Applicants for a part 147 FAA Air Agency certificate must make application on **FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application**. The form requires applicants to describe their operations and curriculum, and to include a statement of the maximum number of students it expects to teach at any one time (made on the FAA Form 8310-6). Certificated AMTS may request an amendment to their certificate for the purpose of adding or removing ratings, name changes, or location changes.
- Section 147.31(d). A school may not have more students enrolled than the number stated in its application for a certificate, unless it amends its application and has it approved.
- Section 147.41. AMTS must have changes to the schools location approved in advance. The Air Agency certificate contains the AMTS address, therefore changes to location would require amendment of the Air Agency certificate.

Curriculum (Reporting burden)

- Section 147.21. Each AMTS must develop a curriculum and submit the curriculum for FAA review and approval.
- Section 147.38. AMTS must maintain their curriculum. As a result, whenever the curriculum is revised, it must be submitted for FAA review and approval.

Facilities, Equipment, and Materials (Reporting Burden)

- Section 147.5. Applicants for certification must provide a list of the facilities and materials to be used.
- Section 147.37. If the certificated AMTS makes substantial changes to facilities or equipment, it must submit those changes for FAA approval.

Instructors (Reporting and Recordkeeping Burden)

- Section 147.5. Applicants for certification must provide a list of instructors, including the kind of certificate and ratings held and the certificate numbers. (Reporting burden)
- Section 147.23. AMTS must maintain a list of the names and qualifications of specialized instructors, and upon request, provide a copy of the list to the FAA. (Recordkeeping burden)

Procedures (Reporting Burden)

- Section 147.31(e). The school must submit its procedures for determining final course grades and for recording student attendance to the FAA for approval. Additionally, if these procedures are revised, the AMTS must submit the revised procedures to the FAA for approval.

Records (Recordkeeping Burden)

- Section 147.33. AMTS must keep a current record of each student enrolled, showing attendance, and any instruction credited to the student based on prior training. The AMTS must retain the record for at least 2 years after the end of the student's enrollment. Additionally, the AMTS must keep a progress chart for each student showing the practical projects or laboratory work completed by the student in each subject of the school's curriculum.

Graduation/Completion Documentation

- Section 147.35. AMTS must provide a transcript to student's upon request. AMTS must provide a graduation certificate or certificate of completion to each student it graduates.

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 respondents to this collection are AMTSs who are issued an FAA air agency certificate under 14 CFR part 147, and AMTS applicants for a part 147 air agency certificate. Responding to the collection is required to obtain and/or retain a benefit.

The collection includes both reporting and recordkeeping requirements.

- Certain part 147 requirements involve reporting to the FAA at the time of application for an FAA air agency certificate.
- Other reporting requirements occur occasionally after certification, when the certificate holder's operations change.
- Schools must issue graduation and/or completion certificate based on the graduation or curriculum completion schedule of the school.

- Schools must keep specified records on each student, for at least 2 years after the end of the student's enrollment.

The information collected is provided to the certificate holder/applicant's responsible FAA Flight Standards office in order to allow the FAA to determine compliance with the part 147 requirements for obtaining and/or retaining an FAA air agency certificate.

- For part 147 applicants, when all CFR part 147 requirements have been met, an FAA air agency certificate, with the appropriate ratings, is issued.
- For certificated part 147 certificate holders, the FAA uses the information collected to (1) verify that an AMTS operates in accordance with their certificate and operations specifications, as required by § 147.3, (2) determine if the AMTS provides appropriate training as required by part 147, and (3) ensure that AMTS graduates receive appropriate documentation showing the graduate is eligible to take the FAA tests required to obtain a mechanic certificate.

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.

AMTS certificate holders and/or applicants may submit the information described in this collection, including FAA Form 8310-6, *Aviation Maintenance Technician School Certificate and Ratings Application*, either electronically via email, or through a paper submission. Required application attachments may also be submitted electronically, or using paper submissions, depending on the applicant's capabilities. A certificated AMTS typically uses paper and/or electronic submissions at their discretion.

FAA Form 8310-6 is available in electronic format from www.faa.gov/forms, and may be filled and signed electronically, as well as downloaded and printed.

Other reporting and recordkeeping aspects of this collection may be done using various forms of information technology, at the discretion of the AMTS, for example:

- Records - AMTS typically use a combination of paper and electronic records.
- Curriculum – Most AMTS maintain an electronic format of their FAA approved curriculum.
- Instructors – Most AMTS report instructor lists and maintain other instructor information electronically.
- Facilities, Equipment, and Materials – Most AMTS provide information related to facilities, equipment, and materials in electronic format.
- Procedures – Most AMTS create and maintain required procedures in electronic format.
- Graduation/Completion Documentation – Most AMTS provide graduation/completion documentation to students in paper format.

The results of the information collection will not be made available to the public over the Internet.

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 the other FAA public use reports and find no duplication. We know of no other agency collecting information about part 147 or AMTS.

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

The reporting and recordkeeping requirements described in this collection are the minimum necessary to ensure effective compliance with 14 CFR part 147. Most AMTS would be considered a small business/entity and most reporting requirements would not vary based on a schools size. Burden could vary in the following areas related to a schools size:

- Section 147.35. The AMTS must issue a graduation or completion certificate that shows when a student graduated from the part 147. Schools with less graduates would have a proportionally smaller reporting requirement than schools with more graduates.
- Section 147.33. An AMTS, regardless of its size, must have FAA approved procedures for determining final course grades and recording student attendance. Schools with larger student populations may spend more time tracking student grades and attendance.

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 information described in this collection is not collected, the FAA would not be able to ensure that applicants or certificate holders meet the requirements of 14 CFR part 147 to issue an FAA certificate, and to verify continued compliance with part 147 after certificate issuance.

Part 147 recordkeeping requirements provide documented evidence that graduates from part 147 certificated AMTS have the requisite knowledge and skills necessary to be prepared to test for a mechanic certificate under part 65. If certificate holders did not meet part 147 requirements, then mechanic applicants may be testing for a mechanic certificate when they do not have the appropriate knowledge and skills. Additionally, if the certificate holder did not provide the documented evidence of a graduates completion of the part 147 curriculum, the FAA could not verify the applicants eligibility to test for a mechanic certificate.

If this information were collected less frequently, the FAA would not be able to ensure that applicants or certificate holders meet the requirements of 14 CFR part 147 initially, or when the schools has changed certain aspects of its operations.

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 related to this information collection.

The information collection is conducted in a manner consistent with the guidelines in Title 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.

The Federal Register notice process was used to solicit comments from stakeholders formally. However, FAA Flight Standards routinely receives comments and concerns from the AMTS community via email and letters from individual AMTS, and from the Aviation Technical Education Council (ATEC), an industry representative of AMTS. The FAA has not received any comments related to the information collection under part 147.

A Federal Register Notice published on November 22, 2021 (86 FR 66615) solicited public comment. No comments were received.

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

No gifts or payments are provided to respondents.

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

Respondents are not given an 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 information collection 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.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The estimated paperwork burden for respondents to this collection is **64,025 hours and \$2,532,123.**

Respondent Burden Summary	Application	Curriculum	Instructors	Facilities	Procedures	Records	Graduation	Totals
# of Respondents	15	24	100	15	15	182	222	573
# of Responses per respondent	1	1	1	1	1	1	1	1
Total number of responses	15	24	100	15	15	182	222	573
Time per response (average)	50	139	2	4	24	300	21	112
Total Burden (Hours)	750	3,324	165	63	355	54,600	4,768	64,025
Total Cost (\$)	57,533	203,855	10,224	5,025	24,079	1,946,657	285,123	\$2,532,123

Application (reporting burden)

The FAA estimates that each year, 15 respondents to this collection have annual reporting burden relating to initial and amended part 147 applications totaling **750 hours and \$57,159.**

- Applicants for a part 147 FAA Air Agency certificate must make application on FAA Form 8310-6, *Aviation Maintenance Technician School Certificate and Ratings Application*. The FAA estimates that time to fill out the application takes approximately 1 hour. Additionally, the FAA estimates that the time to gather and/or develop the application attachments will take each applicant between 40 and 80 hours, depending on the purpose of the application.
- Applicants describe their operations, curriculum, and maximum number of students on the form by completing the form fields. When a certificated AMTS requests an amendment to their certificate for the purpose of adding or removing ratings, name changes, or location changes, a new FAA form 8310-6 must be submitted to the FAA. Additionally, changes to the maximum number of students requires an amended application to be submitted.
 - o Section 147.5. New part 147 applicants must make application for a certificate and rating, or for an additional rating, on a form and in a manner prescribed by the FAA Administrator.
 - o Section 147.31(d). A school may not have more students enrolled than the number stated in its application for a certificate, unless it amends its application and has it approved.
 - o Section 147.41. AMTS must have changes to the schools location approved in advance. The Air Agency certificate contains the AMTS address, therefore changes to location would require amendment of the Air Agency certificate.

Application	Initial Application		Amended Application		Total
	Director	Admin	Director	Admin	
# of Respondents (annually)	10		5		15
Responses per respondent (annually)	1	1	1	1	1
Total # of Responses (Annually)	10		5		15
Time per Response (hours)	60	4	20	2	50
Hour Burden (hours)	600	40	100	10	750
Cost/Hour	\$80.40	\$25.10	\$80.40	\$25.10	--
Cost Burden (\$)	48,238	630	8,040	251	\$57,159

Curriculum (reporting burden)

The FAA estimates that 24 respondents to this collection have annual reporting burden relating to initial curriculum development and curriculum revision totaling **3,324** hours and **\$203,855**.

- AMTS must use a curriculum that is approved by the FAA. When changes are made to the curriculum, the revised curriculum must again be approved by the FAA.
 - o Section 147.21. Each AMTS must develop a curriculum and submit the curriculum for FAA review and approval.
 - o Section 147.38. AMTS must maintain their curriculum. As a result, whenever the curriculum is revised, it must be submitted for FAA review and approval.

Curriculum	Initial Curriculum			Curriculum Revision			Total
	Director	Instructor	Admin	Director	Instructor	Admin	
# of Respondents (annually)	10			14			24
Responses per respondent (annually)	1			1			--
Total # of Responses (annually)	10			14			24
Time per Response (hours)	120	90	30	48	12	6	138.5
Hour Burden (hours)	1200	900	300	672	168	84	3,324
Cost/Hour	\$80.40	\$40.93	\$25.10	\$80.40	\$40.93	\$25.10	--
Cost Burden (\$)	96,477	36,837	7,530	54,027	6,876	2,108	\$203,855

Instructors (reporting and recordkeeping burden)

The FAA estimates that 100 respondents to this collection have annual reporting burden relating to instructor requirements in part 147, totaling **165** hours and **\$10,224**.

- Prior to certification, AMTS applicants must provide a list of instructors that will be used by the school. Following certification, AMTS must maintain a list of specialized instructors and provide a copy of the list to the FAA upon request.
 - o Section 147.5(a)(3). Applicants for certification must provide a list of instructors, including the kind of certificate and ratings held and the certificate numbers.
 - o Section 147.23. AMTS must maintain a list of the names and qualifications of specialized instructors, and upon request, provide a copy of the list to the FAA.

Instructors	Instructor List (Reporting)		Maintain Instructor List (Recordkeeping)		Total
	Director	Admin	Director	Admin	
# of Respondents (annually)	10		90		100
Responses per respondent (annually)	1		1		--
Total # of Responses (Annually)	10		90		100
Time per Response (hours)	2	1	1	0.5	--
Hour Burden (hours)	20	10	90	45	165
Cost/Hour	\$80.40	\$25.10	\$80.40	\$25.10	--
Cost Burden (\$)	1,608	251	7,236	1,129	\$10,224

Facilities, Equipment, and Materials (reporting burden)

The FAA estimates that 15 respondents to this collection have annual reporting burden relating to facilities, equipment, and materials totaling **63** hours and **\$5,025**.

- Prior to certification, AMTS applicants must provide a list of facilities and material that will be used by the school. Following certification, AMTS must submit substantial changes to AMTS facilities or equipment to the FAA for approval.
 - o Section 147.5(a)(2). Applicants for certification must provide a list of the facilities and materials to be used.
 - o Section 147.37. If the AMTS makes substantial changes to facilities or equipment, they must submit those changes for FAA approval.

Facilities, Equipment, Materials	Develop Equipment List		Maintain Equipment List		Total
	Director		Director		
# of Respondents (annually)	10		5		15
Responses per respondent (annually)	1		1		1
Total # of Responses (Annually)	10		5		15
Time per Response (hours)	6		0.5		4
Hour Burden (hours)	60		2.5		63
Cost/Hour	\$80.40		\$80.40		
Cost Burden (\$)	4,824		201		\$5,025

Procedures (reporting burden)

The FAA estimates that 15 respondents to this collection have annual reporting burden relating to procedure approval, totaling **355** hours and **\$24,079**.

- Section 147.31(e). The school must submit its procedures for determining final course grades and for recording student attendance for FAA approval. Additionally, if these procedures are revised, the AMTS must submit the revised procedures for FAA approval.

Procedures	Initial Approval			Revision Approval			Total
	Director	Instructor	Admin	Director	Instructor	Admin	
# of Respondents (annually)	10			5			15
Responses per respondent (annually)	1			1			--
Total # of Responses (Annually)	10			5			15
Time per Response (hours)	24	4	4	4	2	1	--
Hour Burden (hours)	240	40	40	20	10	5	355
Cost/Hour	\$80.40	\$40.93	\$25.10	\$80.40	\$40.93	\$25.10	--
Cost Burden (\$)	19,295	1,637	1,004	1,608	409	125	\$24,079

Records (recordkeeping burden)

The FAA estimates that 182 respondents to this collection have annual recordkeeping burden relating to student record requirements, totaling **54,600** hours and **\$1,946,657**.

- Section 147.33. AMTS must keep a current record of each student enrolled, showing attendance, and any instruction credited to the student based on prior training. The AMTS must retain the record for at least 2 years after the end of the student's enrollment. Additionally, the AMTS must keep a progress chart for each student showing the practical projects or laboratory work completed by the student in each subject.

Recordkeeping	147.33 Records		Total
	Instructor	Admin	
# of Respondents (annually)	182		182
Responses per respondent (annually)	1		1
Total # of Responses (Annually)	182		182
Time per Response (hours)	200	100	300
Hour Burden (hours)	36,400	182,200	54,600
Cost/Hour	\$40.93	\$25.10	
Cost Burden (\$)	\$1,489,856	\$456,792	\$1,946,657

Graduation/Completion Documentation (reporting burden)

The FAA estimates that respondents to this collection have annual recordkeeping burden relating to part 147 curriculum graduation/completion documentation, totaling **4,768** hours and **\$285,123**.

- Section 147.35. AMTS must provide a transcript to student's upon request. AMTS must provide a graduation certificate or certificate of completion to each student it graduates.

Graduation	Transcripts		Graduation Certs		Total
	Director	Admin	Director	Admin	
# of Respondents (annually)	40		182		222
Responses per respondent (annually)	1		1		--
Total # of Responses (annually)	40		182		222
Time per Response (hours)	2	8	16	8	--
Hour Burden (hours)	80	320	2912	1456	4,768
Cost/Hour	\$80.40	\$25.10	\$80.40	\$25.10	--
Cost Burden (\$)	\$6,432	\$8,032	\$234,117	\$36,543	\$285,123

AMTS Labor Cost Estimates

Businesses affected by this rule would be classified using the 2020 North American Industry Classification System under NAICS code¹ 611500 “Technical and Trade Schools”.² This U.S. industry comprises establishments primarily engaged in offering job or career vocational or technical courses. The major occupation codes for AMTS directors, instructors, and administrative assistant under the 611500 NAICS code are 11-1000, 25-1194, and 43-6014, respectively. The FAA believes that these occupation codes are the appropriate codes to estimate the salaries of AMTS employees. The BLS survey lists an annual mean wage for each of these occupation codes.

AMTS Base Salaries		
Job Category	Occupation Code	Annual Mean Wage
Director	11-1000	\$117,560
Instructor	25-1194	\$59,850
Administrative Assistant	43-6014	\$36,700
Source: May 2020 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 611500 - Technical and Trade Schools. https://www.bls.gov/oes/current/naics4_611500.htm		

The FAA starts with the base salaries for the director, instructor, and administrative assistant. The FAA then applies the appropriate multipliers for overhead (this includes health benefits, vacation, sick time, etc.). For private positions, we add a benefit overhead of 42.25%, which is based on the percent of total compensation for transportation employees.³

AMTS Salaries including Overhead			
Job Category	Director	Instructor	Administrative Assistant
Annual Base salary	\$117,560	\$59,850	\$36,700
Overhead benefit multiplier	1.4225	1.4225	1.4225
Salary including overhead	\$167,226	\$85,135	\$52,205
Hourly Wage	\$80.40	\$40.93	\$25.10

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 startup 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.

The estimated annual paperwork burden for the FAA is **2,018** hours and **\$172,325**. Each area of FAA burden is discussed in detail below the summary table.

¹ The NAICS code is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy.

² U.S. Bureau of Labor Statistics, NAICS 611500 - Technical and Trade Schools
https://www.bls.gov/oes/current/naics4_611500.htm.

³ Percent of total compensation = 29.7%. Source: <https://www.bls.gov/news.release/pdf/ecec.pdf>.

FAA Burden Summary	Application	Curriculum	Procedures	Quality of Instruction	Total
# of Respondents (annually)	15	24	15	1	55
Responses per respondent (annually)	1	1	1	4	--
Total # of Responses (annually)	15	24	15	4	58
Time per Response (hours)	34	42	12	80	35
Hour Burden (hours)	510	1008	180	320	2,018
Cost/Hour (\$)	90.06	90.06	90.06	60.64	--
Cost Burden (\$)	45,930	90,779	16,210	19,406	172,325

The FAA has paperwork burden as a result of part 147, in the following areas:

Application

The FAA must review original and amended applications submitted by applicants and certificated AMTS:

- Section 147.5. Applicants for a part 147 FAA Air Agency certificate must make application on FAA Form 8310-6, *Aviation Maintenance Technician School Certificate and Ratings Application*. The form requires applicants to describe their operations, curriculum, and to include a statement of the maximum number of students it expects to teach at any one time (made on the FAA Form 8310-6). Certificated AMTS may request an amendment to their certificate for the purpose of adding or removing ratings, name changes, or location changes.
- Section 147.31(d). A school may not have more students enrolled than the number stated in its application for a certificate, unless it amends its application and has it approved.
- Section 147.41. AMTS must have changes to the schools location approved in advance. The Air Agency certificate contains the AMTS address, therefore changes to location would require amendment of the Air Agency certificate.

Curriculum

The FAA must review and approve an AMTS initial curriculum and any revisions to the curriculum:

- Section 147.21. Each AMTS must develop a curriculum and submit the curriculum for FAA review and approval.
- Section 147.38. AMTS must maintain their curriculum. As a result, whenever the curriculum is revised, it must be submitted for FAA review and approval.

Procedures

The FAA must review and approve the procedures for determining final course grades and for recording student attendance, and review and approve revisions to those procedures.

- Section 147.31(e). The school must submit its procedures for determining final course grades and for recording student attendance for FAA approval. Additionally, if these procedures are revised, the AMTS must submit the revised procedures for FAA approval.

Quality of Instruction Reporting

The FAA must determine and review each schools quality of instruction statistics in accordance with the parameter outlined in § 147.38a. Four times per year the FAA produces a quality of instruction report (aka, NORMS report) on the quality of instruction for each school. The FAA

must collect test results from the FAA mechanic written test, and then produce a report on those test results. The FAA must review each schools quality of instruction statistics indicated on the report to ensure each schools compliance with § 147.38a. The collection and reporting are conducted by an FAA statistician.

- Section 147.38a. AMTS must provide instruction of such a quality that, of its graduates of a curriculum for each rating who apply for a mechanic certificate or additional rating within 60 days after they are graduated, the percentage of those passing the applicable FAA written tests on their first attempt during any period of 24 calendar months is at least the percentages listed in §147.38a.

FAA Labor Cost Estimates

The FAA obtained the salary rates for FAA employees from the 2020 Core Compensation Plan Pay Bands (Excluding Locality Pay), effective January 5, 2020. The pay bands for principal inspectors and statisticians are shown in the table below. The FAA uses the mid-range salary for each of these positions.

FAA Base Salaries		
Job Category	Pay Band	Annual Mean Wage
Principal inspector	J	\$105,368
Statistician	H	\$70,954
Source: Core Compensation Plan Pay Bands, effective January 5, 2020. https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/hr_policies/hrpm/comp/comp_ref/2020payadjustment/		

The FAA starts with the base salaries for FAA principal inspectors and statisticians. Next, the FAA multiplies the base salaries by a locality multiplier. For instance, for the principal inspector and the statistician, the FAA assumes the affected position is in Washington, D.C. Therefore, the FAA uses the multiplier of 1.3048.⁴ The FAA then applies the appropriate multipliers for overhead (this includes health benefits, vacation, sick time, etc.). For federal positions, the standard is 36.25%.⁵

FAA Salaries including Overhead		
Job Category	Principal Inspector	Statistician
Pay band	J	H
Annual Base salary	\$105,368	\$70,954
Locality pay multiplier	1.3048	1.3048
Salary adjusted by locality pay	\$137,484	\$92,581
Overhead benefit multiplier	1.3625	1.3625
Salary including overhead	\$187,321	\$126,141
Hourly wage rate	\$90.06	\$60.64

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

⁴https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/hr_policies/hrpm/comp/comp_ref/media/locality_pay_percentages.pdf

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

There are no program changes. However, the following burden was unintentionally omitted from the previous approval:

- The § 147.31(e) requirement for applicants and AMTS to submit procedures for determining final course grades and for recording student attendance to the FAA for review and approval, and to resubmit for approval when those procedures are revised by the AMTS.
- The section 147.35 requirement for AMTS to produce transcripts and graduation and/or completion documents.

The following adjustments were made to this IC:

- The assumption for total number of AMTS has increase from the last approval, from 177 to 182.
- Time for populating AMTS operations specifications is FAA burden, not AMTS burden as shown in the previous IC approval. Under this IC, this time is included in the FAA burden estimates and not otherwise specifically identified.
- Estimates for recordkeeping burden were re-evaluated and changed to show estimates on a per AMTS basis, instead of per student basis as done in the last approval. This resulted in a large reduction of hours and cost related to recordkeeping and is more accurate than the previous estimates.
- AMTS and FAA wage rates are updated to reflect current wage estimates.
- FAA burden estimates unintentionally omitted the burden related to Quality of Instruction reporting under 147.38a. This information is added to the FAA costs in this summary.
- The individual collections within this ICR were re-named and presented as a burden area (with multiple regulatory references), rather than presenting each regulation as a separate instrument.

Respondent Burden Changes

Respondent Burden Change Summary	Current IC Totals	2018 Totals	Change
Total # of Responses	573	319	254
Total Burden (Hours)	64,025	93,612	-29,588
Total Cost (\$)	2,532,123	3,181,779	-649,656

- Total # of responses is increased, primarily due to increasing the number of AMTS respondents, and addition of the responses for graduation/completion documentation.
- The reduction in hour estimates for recordkeeping burden are the primary reason for the reduction in hour burden, compared to the previous approval.

FAA Burden Changes

FAA Burden Change Summary	Current IC Totals	2018 Totals	Change
Total Burden (Hours)	2,018	1,690	328
Total Cost (\$)	172,325	\$105,560	66,734

- The increase in FAA hour estimates is primarily due to the addition of the time spend creating and reviewing the Quality of Instruction report that is needed to determine if AMTS meeting the quality of instruction requirements of 147.38a.

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.

No information collected from respondents is published.

The FAA collection of quality instruction data is published quarterly on www.faa.gov, here: https://www.faa.gov/data_research/aviation_data_statistics/test_statistics/

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 approval to not display the date of expiration of this information collection.

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

There are no exceptions to the certification statement for this information collection.