

## Supporting Statement

### Flight Instructor Enhanced Qualification Training Program (FIEQTP): Preparation and Approval

RIN: 2120-AL25

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year approval clearance for the information collection entitled “Flight Instructor Enhanced Qualification Training Program: Preparation and Approval.”

#### **Justification:**

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

Title 14 of the Code of Federal Regulations (14 CFR) part 61, Certification: Pilots, Flight Instructors, and Ground Instructors, prescribes minimum standards requirements and procedures for the issuance of airman certificates. Currently, pursuant to § 61.195(h), to train initial flight instructor applicants, a flight instructor must meet certain eligibility requirements, have held the appropriate flight instructor certificate for at least 24 calendar months, and have given a certain number of hours of flight training as a flight instructor (200 hours of training in the case of an airplane, rotorcraft, or powered-lift rating, and 80 hours of training in the case of a glider rating).

The Federal Aviation Administration (FAA) is publishing a Notice of Proposed Rulemaking (NPRM) to amend part 61 by proposing two new qualification options for flight instructors to train initial flight instructor applicants, in addition to retaining the original qualification parameters as an option. Flight instructors seeking to instruct initial flight instructor applicants must satisfy one option to meet qualification requirements and, therefore, may choose between the three. One proposed option is successful completion of an FAA-approved flight instructor enhanced qualification training program (FIEQTP), which may be offered by a part 141 pilot school or part 142 training center under the respective part. In order for training providers to offer an FIEQTP, they must submit specific course information to the FAA for approval. Additionally, the proposed rule requires part 141 pilot schools and part 142 training centers that offer an FIEQTP to provide certain documentation to its graduates.

**2. Indicate how, by whom, how frequently, and for what purpose the information is to be used.**

To approve the FIEQTP, the FAA must evaluate the course curriculum that will be offered by the training provider. For FIEQTPs offered under part 141, the training provider must submit the curriculum and training course outline in accordance with part 141. For FIEQTPs offered under part 142, the training provider must submit the

curriculum and syllabus in accordance with part 142. After initial FAA-approval, only amendments or revisions to the FIEQTP need be submitted, in accordance with the part under which the training provider operates, respectively.

The FIEQTP curriculums may be submitted in electronic or paper form to the FAA Flight Standards District Offices (FSDO), Certificate Management Office, as appropriate. After the first submission to the appropriate FAA office, pilot schools and training centers would make additional submissions as needed for updates or corrections. While the FAA continues to accept paper forms where the training provider elects to do so, the FAA urges its field offices to encourage electronic submission in-lieu of paper form and has added such language to its FAA Order 8900.1. Specifically, submission options are provided in FAA Order 8900.1, Volume 3, Chapter 53, Section 2, Paragraph 3-4314. Electronic submissions can be submitted through the Safety Assurance System (SAS). Additionally, electronic versions of a training program submission may be in Microsoft Word or Adobe PDF format and sent via email provided it is done in accordance with the appropriate FSIMS guidance.

As further described in Question 12, the FAA estimates that 25 percent of currently existing part 141 and part 142 schools will seek approval of an FIEQTP. Additionally, the FAA estimates that each year at least 50 percent of those part 141 pilot schools and part 142 training centers that provide the FIEQTP would require at least one revision to address amendments to applicable federal regulations, changes to airman training and testing standards, or any deficiencies identified by the FAA, pilot school, or training center. Those revisions may also be submitted electronically or in paper form, as previously discussed.

Finally, the proposed regulations would require each part 141 pilot school and part 142 training center to provide a graduation certificate to each enrollee who successfully completes the FIEQTP.

**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 or information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.**

The FAA urges its field offices to generally encourage electronic submissions in place of paper form. However, the FAA continues to accept paper submissions where the training provider elects to do so. The FIEQTP curriculums may be submitted through the SAS or via email to the appropriate FAA office (i.e., FSDO, CMO). Certificated part 141 pilot schools and part 142 training centers will have already obtained access to SAS as part of their certification and ongoing regulatory requirements and will be familiar with the platform. Paper forms may be submitted via U.S. Mail or hand-delivery to prevent undue delay in the review of a training curriculum by the FAA.

**4. Describe efforts to identify duplication.**

We have reviewed other FAA public-use reports, information collections, and forms, and find no duplication. Additionally, this proposed rulemaking and resulting information collection is strictly within the purview of the FAA to regulate airmen and air agencies. Therefore, no other agency is collecting information from part 141 pilot schools and 142 training centers pertaining to the FIEQTP curriculums.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

The information described in this collection would be the minimum necessary to ensure compliance with the regulatory requirements proposed § 61.195(h)(3). In order to minimize the burden, the training provider need only submit all information during the initial submission process. After the FIEQTP is approved, there is no course approval expiration or requirement to resubmit materials after a certain amount of time, provided there is no material change to the course. The training provider must only submit additional information if there is a revision in the FIEQTP as approved. The FIEQTP will be continuously evaluated in accordance with the part under which the training provider operates. Further, the FAA notes that this is an optional course that part 141 or part 142, intended to be relieving to air agencies and flight instructors, therefore, operators voluntarily elect to offer such course.

**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 this information were not collected, the FAA would be unable to ensure compliance with the proposed regulatory requirements for the FIEQTP. This includes verifying the minimum amount of curriculum hours are delivered by the FIEQTP (i.e., 10 flight training hours and 25 ground training hours), appropriate end-of-course written tests are given, and training in flight simulation training devices and advanced aviation training devices do not exceed the proposed regulatory maximums.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with guidelines.**

This information collection would be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii). There are no special circumstances related to this information collection.

**8. Describe 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 record keeping, disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.**

The FAA is publishing an NPRM, which seeks public comments on this proposed collection. The public is free to comment on any aspect of the proposed information collection.

**9. Describe any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift is provided in connection with this information collection.

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

There is no confidentiality requested or provided for the information collected in association with the FIEQTP curriculum.

**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.**

There are no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statements should: Indicate the number of respondents, frequency of response, annual hour burden and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

**Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

At the time of writing, FAA records show 546 active part 141 pilot schools and 50 active part 142 training centers.<sup>1</sup> The FAA estimates that 25 percent of these pilot schools and training centers would take advantage of the provision in this proposed rule, resulting in an estimated 149 responses to this new information collection for § 61.195(h)(3). Therefore, in the first year, the FAA estimates that about 136.50 pilot schools and 12.50

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<sup>1</sup> The FAA obtained a list of active part 141 pilot schools and a list of active part 142 training centers from the FAA WebOPSS system on March 9, 2022.

training centers would submit a training program for approval for a total of about 149 respondents in the first year. Further, the FAA estimates that the development of each FIEQTP would take approximately 80 hours and that the task would be performed by the pilot schools' or training centers' chief flight instructor. The Bureau of Labor Statistics estimates that the mean base annual salary for a chief flight instructor is \$92,040, from which the FAA estimates an average wage of \$44.25 per hour.<sup>2</sup> This wage was obtained using the North American Industry Classification System (NAICS) industry code 53-2010 designated for aircraft pilots and flight engineers. This wage estimate was derived by dividing \$92,040 by 2,080 hours (assuming a 40-hour work week for 52 weeks), which is \$44.25 per hour. Next, a fringe benefit multiplier of 1.42 was included to the base salary.<sup>3</sup> This results in an annual salary of \$130,553 and hourly wage of \$62.77.<sup>4</sup> This would result in a first-year burden of about 11,920 hours and about \$748,218 ((136.50 pilot schools +12.50 training centers) x 80 hours x \$62.77) for affected pilot schools and training centers to prepare and submit new training programs.

**Table 1. Industry Salary Including Overhead**

Job Category	Annual Wage	Multiplier	Total	Hourly Wage
Chief Flight Instructor	\$92,040 <sup>(1)</sup>	1.42 <sup>(2)</sup>	\$130,553	\$62.77 <sup>(3)</sup>

Sources:  
(1) NAICS Code (53-2010). <https://www.bls.gov/oes/current/oes131151.htm>.  
(2) Overhead benefit percent of total compensation = 29.5%. <https://www.bls.gov/bls/news-release/ecec.htm>.  
(3) Using 2,080 working hours in one year.

For subsequent years, the FAA assumes a growth rate of one percent for both pilot schools and training centers. The FAA estimates that 25 percent of those institutions would submit FIEQTP curriculum to the FAA for approval, resulting in approximately 1.49 new respondents and an additional burden of about 119 hours and \$7,482 in subsequent years. The FAA also estimates that each year at least 50 percent of the pilot schools and training centers that provide the FIEQTP curriculum would require at least one revision to address any updates or deficiencies identified by the FAA, pilot school, or training center. As a result, the FAA estimates the total annual burden to pilot schools and training centers of submissions, including growth and revisions, at 4,806 hours and \$301,652.

<sup>2</sup> The code was determined to be the appropriate code as the NAICS code for training and development specialists states “flight instructors are included with “Aircraft Pilots and Flight Engineers” (53-2010)”. Source: <https://www.bls.gov/oes/current/oes131151.htm>.

<sup>3</sup> The BLS estimates that 29.50 percent of total compensation consists of overhead benefits. The chief flight instructor wage obtained from the BLS does not include the overhead benefits so the FAA calculates it. If the base salary obtained from the BLS is \$92,040 then that implies that the base salary is 70.50 percent of total compensation. The remaining 29.50 percent is the overhead benefits, which equate to \$38,513. Thus, total compensation is \$130,553 or \$62.77 per hour. This then results in a multiplier of 1.42 of the base salary (((\$130,553 - \$92,040)/ \$92,040 = 0.42).

<sup>4</sup> Percent of total compensation = 29.5%. Source: Bureau of Labor Statistics News Release. Employer Costs for Employee Compensation – March 2022. [Employer Costs for Employee Compensation Archived News Releases: U.S. Bureau of Labor Statistics \(bls.gov\)](https://www.bls.gov/news.release/empcosts.archived.htm).

The FAA reviewed the number of initial flight instructors certificated in the previous three years, which was reported as: 2021 (6,199), 2020 (6,237), and 2019 (5,945) equaling a total of 18,381 newly certificated flight instructors. Using the most recent year of these newly certificated flight instructors, the FAA estimates 6,199<sup>5</sup> student records would be generated in the first year. The FAA further assumes that 25 percent of the students would enroll in a FIEQTP regardless of other alternatives. The FAA, therefore, estimates that 1,550 students<sup>6</sup> would enroll in a FIEQTP in the first year. The FAA further estimates that the student-population growth rate would be 0.6 percent.<sup>7</sup> In addition, the FAA estimates each record would require five minutes of processing time and that recordkeeping functions would be the responsibility of the chief flight instructor. This would result in an annual recordkeeping burden of 43 hours and \$2,724.

The annual industry burden and cost of this information requirement for plan submission and revision and student recordkeeping is about 4,849 hours and \$304,376.

**Table 2. Industry FIEQTP Development and Revision Burden and Costs  
(Information used for Estimates)**

<b>Category</b>	<b>Element</b>	<b>Estimate</b>
Pilot Schools	Number of pilot schools	546
	Portion of pilot schools affected	25%
	Number of pilot schools affected	(546 x 0.25 =) 136.50
	Growth rate of pilot schools	1%
Training Centers	Number of training centers	50
	Portion of training centers affected	25%
	Number of training centers affected	(50 x 0.25 =) 12.50
	Growth rate of training centers	1%
FIEQTP	Time needed to develop and submit original	80 hours

<sup>5</sup>

<sup>6</sup> 6,199 x 25% = 1,550 students.

<sup>7</sup> Source: FAA Airman Certification Branch.

Category	Element	Estimate
	Time for revisions	10 hours
	Percent revisions per year	50% <sup>8</sup>
Wage Rate	Chief flight instructor	\$62.77 <sup>9</sup>

**Table 3. Total Industry Burdens**

Category	Total Responses	Hours per response	Burden Hours				Costs
			Reporting	Recordkeeping	Disclosure	Total	
Industry:							
61.195(h)(3)							
Development Cost - Pilot Schools	46.41*	80	3,713			3,713	\$233,075
Development Cost - Training Centers	4.25	80	340			340	\$21,344
Cost - Revisions	75.25	10	752			752	\$47,233
Industry Recordkeeping Costs	522.80	0.083		43		43	\$2,724
Total Industry Costs for 61.195(h)(3)			<b>4,806</b>	<b>43</b>	<b>0</b>	<b>4,849</b>	<b>\$304,376</b>

**\*Total burden hours differ slightly from those in ROCIS due to rounding.**

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

There are no additional costs associated with this information collection because, should a training provider choose to offer an FIEQTP, the curriculum would be generated regardless of the required submission to the FAA (i.e., the training provider is submitting content to the FAA that the training provider would have to develop in order to offer the course).

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses and any other expense that would not have been incurred without this collection of information.**

<sup>8</sup> Estimated as 50% of the total affected pilot schools and training centers per year adjusted for growth.

<sup>9</sup> Data obtained from NAICS code 53-2010 from BLS data website: [https://www.bls.gov/oes/current/naics4\\_611500.htm#25-0000](https://www.bls.gov/oes/current/naics4_611500.htm#25-0000). Accessed April 4, 2022. Hourly wage calculated by dividing the annual mean wage of \$92,040 by 2,080 hours.

The FAA estimates the annual burden and cost to the Federal Government for the review and authorization of the FIEQTP would be 2,842 hours and **\$231,861**. This burden and cost was determined by estimating the time required for FAA personnel to review FIEQTP curriculums and authorize an applicant’s program through the issuance of an approval letter. The FAA estimates FAA ASIs would spend 40 hours on each review and 10 hours on each revision. Additionally, FAA clerks would spend 30 minutes on issuance of an approval letter. The FAA estimates the salaries for the ASIs and clerks based on the 2022 General Schedule Locality Pay Tables using the Rest of the United States locality pay multiplier. The FAA uses 36.25 percent to calculate the overhead benefits multiplier. The total salary, including overhead, is \$172,206 (\$82.51 per hour) for ASIs and \$84,508 (\$40.49 per hour) for clerks. The analysis uses the same number of responses estimated for industry FIEQTP submission and revision to estimate the burden and cost to the FAA of reviews and approvals.

**Table 4. FAA Salaries Including Overhead**

Job Category	Aviation Safety Inspector	Clerk
Grade and Step	GS-14 Step 5	GS-9 Step 5
Annual Base Salary	\$108,769 <sup>1</sup>	\$53,377 <sup>1</sup>
Locality Multiplier	1.162 <sup>2</sup>	1.162 <sup>2</sup>
Salary Adjusted by Locality Pay	\$126,390	\$62,024
Overhead Benefit Multiplier	1.3625 <sup>3</sup>	1.3625 <sup>3</sup>
Salary including Overhead	\$172,206	\$84,508
Hourly Wage	\$82.51 <sup>4</sup>	\$40.49 <sup>4</sup>
Sources: (1) 2022 General Schedule Pay. <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2022/general-schedule/">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2022/general-schedule/</a> (2) FAA locality rate for the Rest of the United States. (3) <a href="https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf">https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf</a> (4) Using 2,087 working hours in one year.		

The combined (industry + FAA) annual burden and cost is 7,691 hours and \$536,236. The following provides additional detail of response, burden, and cost estimates to industry and the FAA (some estimates may not exactly total due to rounding).

**Table 5. Total Industry and FAA Record Keeping Costs**

Category	Total Responses	Hours per response	Burden Hours				Costs
			Reporting	Recordkeeping	Disclosure	Total	
FAA:							
61.195(h)(3)							
Review cost of FIEQTP curriculums	50.66	40	2,027			2,027	\$167,222
Revision cost of FIEQTP curriculums	75.25	10	752			752	\$62,089



Cost of issuing approval letter	125.91	0.5	63			63	\$2,549
Total FAA Costs for 61.195(h)(3)			2,842	0	0	2,842	\$231,861
<b>Total Industry and FAA Costs for 61.195(h)(3)</b>			<b>7,648</b>	<b>43</b>	<b>0</b>	<b>7,691</b>	<b>\$536,236</b>
Details may not add to row or column totals due to rounding.							

Finally, the proposed regulations would require part 141 pilot school and part 142 training centers to issue a graduation certificate to each flight instructor who successfully completes the FIEQTP. While part 141 already requires pilot schools to issue a graduation certificate to each student who completes an approved course of training,<sup>10</sup> this will be a new requirement for part 142 training centers, and only required for training centers in the context of FIEQTPs. The FAA does not know how many part 141 pilot schools and part 142 training centers, respectively, will choose to provide the FIEQTP course. Therefore, the FAA is unable to quantify the costs to provide a graduation certificate. In the NPRM, the FAA is requesting comments regarding how many part 141 pilot schools and part 142 training centers would provide an FIEQTP. The FAA may quantify these costs in the final rule.

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.**

This is a new information collection as prescribed by the proposed rulemaking, Removal of Expiration Date on a Flight Instructor Certificate.

**16. For collections of information whose results will be published, outline plans for tabulation, and publication.**

There are no plans to publish this information.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

No such approval is being sought.

**18. Explain each exception to the certification statement identified in item “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.**

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<sup>10</sup> See § 141.95.

There are no exceptions to the certification statement.