

Supporting Statement A

OMB 2120-0600

Training and Qualification Requirements for Check Airmen and Flight Instructors

Summary of Changes:

- In the notice of proposed rulemaking *Integration of Powered-Lift: Pilot Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes* (RIN 2120-AL72), the FAA proposes a Special Federal Aviation Regulation for alternate eligibility requirements to safely certificate initial groups of powered-lift pilots. Currently, there is not an established path for the initial group of civilian powered-lift pilots to obtain the required experience to obtain a pilot certificate. Sixty-six (66) check airmen and flight instructors are estimated to be added with the incorporation of powered-lift in the three years of this information collection.
- The number of current check airman and flight instructors was updated with data obtained from the National Vital Information System (NVIS) and with expected incorporation of check airmen and flight instructors in powered-lift. (Question 12)

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

Federal Aviation Regulations (FAR) Parts 121.411(d), 121.412(d), 135.337(d), and 135.338(d) require the collection of this data. This collection is necessary to insure that instructors and check airmen have completed necessary training and checking required to perform instructor and check airmen functions.

This paperwork burden directly supports the Department of Transportation Strategic Goal on Safety. Specifically, the goal is to promote the public health and safety by working toward the elimination of transportation related deaths, injuries, and property damage.

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 reporting requirements are to ensure the check pilots and instructors are adequately trained and checked/evaluated to ensure they are capable and competent to

perform the duties and responsibilities required by the air carrier to meet the regulations. Experienced pilots who would otherwise qualify as flight instructors or check airmen, but who may not be medically eligible to hold the requisite medical certificate are mandated to keep records that may be inspected by the FAA to certify eligibility to perform flight instructor or check airmen functions. The information reported is information related to ground and flight training records including dates that the airman completed oral and flight checks. This information is inspected on occasion and will be used by the FAA to determine and to assure that check airmen and instructors maintain the high qualification standards (training and experience) required to perform their safety functions.

This information will not be disseminated to the public. Responding to this collection is mandatory as required by the CFR. This collection includes recordkeeping requirements. These records are collected as needed. Each carrier has a FAA approved training curriculum that has different requirements in terms of timelines to complete training. The information reported would be in accordance with each airline's approved training program. This is a required collection.

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.

This is a recordkeeping burden only. Written or electronic methods may be used. Any form of information technology may be used. The air carrier will determine whether they comply via written or electronic means. This collection does not have a form associated with it.

In response to the Government Paperwork Elimination Act (GPEA), we do not dictate the method of recording keeping. The check airmen and instructors may keep their records in whatever filing order is necessary to perform their safety functions, and we allow for 100% electronic records. The results are not 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.

There is no duplication of this information. Since recordkeeping requirements are only maintained in accordance with FAR's, no other Federal agency requires that these records be maintained.

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

This regulation will have no impact on small businesses or other small entities.

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 data is not maintained FAA surveillance and compliance programs, including aviation safety, will be compromised. This information will be used by the FAA to determine and to assure that check airmen and instructors maintain the high qualification standards required to perform their safety functions. If this information is not maintained, the FAA cannot insure that check airman and instructors are adequately trained. Collecting this information less frequently would have the same impact to safety as not collecting it at all. If the information were not collected in accordance with the requirements of each carrier's FAA approved training program then the airman would not be allowed to conduct training or checking activities.

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.*

This collection of information 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.

The revision of this information collection supports the notice of proposed rulemaking, Integration of Powered-Lift: Pilot Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes (RIN 2120-AL72) published on June 14, 2023; 88 FR 38946. That rule sought public comment on the revisions to this information collection associated with that rule. The information collection was submitted to the Office of Management and Budget for review upon publication of the notice of proposed rulemaking.

The FAA Aircrew Program Manager attends Check Airmen meetings where the carrier and individual check airmen/instructors have the opportunity to offer stakeholder feedback. Continual conversations between the Air Carrier and the CMO/CMU happen throughout the year. Pilot training records for instructors and check airmen is an industry norm. If the records aren't available then then crewmember is unable to prove the training occurred. Without these training records there is no definite method to ensure training occurred which would risk the safety of the National Airspace System.

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

There is no payment involved in this collection.

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

Respondents have been 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.

There are no questions 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.**

The estimated hour and cost burdens are **66 hours** and **\$5784**. We estimate that there are approximately **15,925 respondents (check airmen and instructors) with 66 expected additional check airmen and instructors for powered-lift**, the average burden hour is **15 seconds** per respondent. Respondents would be entering a date into their recordkeeping system of dates of training for the instructor/check airman.

The following costs are based on the paper work burden being done by a Check Airmen/Flight Instructor earning approximately \$57.00 per hour.¹ A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$74.90.² To account for overhead, a multiplier of 17 percent was applied.³ Therefore, the estimated hourly salary for a Check Airman/Flight Instructor is \$87.63.

Recordkeeping:

15,991 respondents

x .004165 hrs (15 seconds*)

¹<https://www.comparably.com/salaries/salaries-for-check-airman>

² <https://www.bls.gov/news.release/ecec.nr0.htm>

³ Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

66.6 hours

x \$87.63 (per hour)

\$5,836

[*.25 (15 sec.) x .01666 (1 min.) = .004165 hours]

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		15,991	
# of Responses per respondent		1	
Time per Response		.004165 Hours	
Total # of responses		15,991	
Total burden (hours)		67 Hours	

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 included in #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.

An FAA aviation safety inspector, GS-13, step 5, "rest of U.S." locality, will likely spend approximately 3 hours per fleet type per year inspecting records at each carrier. There are approximately 70 part 121 carriers, with approximately 3 fleet types per carrier. 70 carriers * 3 fleet types * 3 hours = 630 hours per year.

As noted, for Aviation Safety Inspectors, the FAA assumes a mid-grade GS-13 salary, Rest of USA locality. Annual salary is \$111,628,⁴ divided by 2,080 hours for an hourly rate of \$53.67. The FAA uses a fringe benefits and overhead cost, for FAA employees, of 100%.⁵ This results in a fully loaded wage of \$107.34 per hour. 630 hours*107.34 = \$67,624.

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

In the notice of proposed rulemaking, Integration of Powered-Lift: Pilot Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes (RIN 2120-AL72), The FAA proposes a Special Federal Aviation Regulation for alternate eligibility requirements to safely certificate initial groups of powered-lift pilots. Currently, there is not an established path for the initial group of civilian powered-lift pilots to obtain the required experience to obtain a pilot certificate. Sixty-six (66) check airmen and flight instructors are estimated to be added with the incorporation of powered-lift in the three years of this information 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.

There is no publication planned for this information.

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.

There are no forms required for use by the airline industry.

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

There are no exceptions.

⁴ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/RUS.aspx>

⁵ 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. 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...."

