SUPPORTING STATEMENT
Application for Pilot School Certification.
OMB 2120-0009

CHANGES IN THIS SUBMISSION:
In the final rule, Integration of Powered-Lift: Pilot Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes (RIN 2120-AL72), the FAA establishes a Special Federal Aviation Regulation to apply certain operating rules to powered-lift aircraft on a temporary basis to enable the FAA to gather additional information and determine the most appropriate permanent rulemaking path for these aircraft. The FAA estimates that this regulatory change will result in one additional pilot school application, one additional renewal application, and one additional training course outline per year.

A. JUSTIFICATION:

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The paperwork burden associated with the collection of information for the certification of a pilot school directly supports the Department of Transportation Strategic Goal on Safety. Specifically, the goal is to promote public safety by working towards the reduction of transportation related fatalities, injuries, and property damage across the transportation system.

The Federal Aviation Administration (FAA) is an operating mode of the United States (U.S.) Department of Transportation (DOT). One of the FAA's many responsibilities includes regulating certificated pilot schools in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part 141. FAA Form 8420-8, *Application for Pilot School Certification*, is necessary for the FAA to collect information for the certification of pilot schools, ensuring these schools meet the minimum acceptable training standards as prescribed by part 141. Section 141.13, *Application for issuance, amendment, or renewal,* requires persons seeking certification for a part 141 provisional pilot school, pilot school, and those schools seeking to renew their certificates to make an application on a form and in a manner prescribed by the FAA Administrator.

On previous renewals, the title of this information collection was "Pilot Schools –FAR 141". The name of this information collection is revised as the term "FAR" stands for Federal Acquisition Regulation, and is outdated terminology that referred to the Federal Aviation Regulations. FAR is no longer used to reference aviation regulations. Because of this change, and to add clarity, we are using the name of the FAA form 8420-8, *Application for Pilot School Certification* for this collection renewal**.**

The FAA approves course curricula, training facilities, the chief instructor and any assistant chief instructors, if applicable, for each course, and ensures oversight of flight instructors that provide training under part 141. FAA Form 8420-8 provides the means to comply with § 141.13. Submission of this form, either electronically or by duplicate paper to the FAA, and the FAA's receipt of the applicant's completed application, begins the formal application phase for the certification of a part 141 pilot school. The following link provides access to the part 141 regulations: https://www.ecfr.gov/current/title-14/chapter-I/subchapter-H/part-141?toc=1

The renewal of a part 141 pilot school is initiated with FAA Form 8420-8. Section 141.27 allows pilot schools holding training course approvals for all courses to renew their Air Agency Certificate based on their students' successful completion of an end-of-course tests, knowledge tests leading to a certificate or rating, and practical tests leading to a certificate or rating. Part 141 pilot schools are required by § 141.83 to maintain the quality of training in order to renew their pilot school certificate every 24 calendar months. Additionally, the

FAA approval of pilot school certificate amendments enables schools to provide new training courses not previously approved. Amendments to existing part 141 pilot school certificates are accomplished with FAA Form 8420-8. The form can be accessed at http://www.faa.gov/training_testing/schools/.

The information on FAA Form 8420-8 is made available to the public, in particular to those persons who are seeking pilot training, so they are able to find information on flight schools and the courses they offer. This information is provided to the public free of any costs and may be accessed through the internet. The information collected from Form 8420-8 is also disseminated to the public to support publicly disseminated information.

Title 49 United States Codes (U.S.C.) Section 44707 empowers the Administrator of the FAA to provide for the examination and rating of civilian schools giving instruction in flying. Additionally, 14 CFR part 141 prescribes the requirements for issuing pilot school certificates, provisional pilot school certificates and associated ratings to qualified applicants. In addition to the statutory and regulatory basis, the collection of this information is necessary for:

a. Collection and public dissemination of alphabetical listing of schools via the FAA public web site: http://www.faa.gov/training_testing/schools/ ;
b. Issuance, renewal, or amendment of applicants' pilot school certificates; and
c. To certify pilot schools ensuring that minimum acceptable training standards are met.

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 information is reported and recorded by 14 CFR part 141 certificated pilot schools seeking to maintain their Air Agency Certification. Uncertificated pilot schools seeking certification as a part 141 pilot school are also required by part 141 to report information to the FAA and keep specific records. Part 141 pilot schools train private, commercial, flight instructor, and airline transport pilots, along with training for associated ratings in various types of aircraft. FAA Form 8420-8 is necessary to ensure continuing compliance with part 141, renewal of pilot school certificates every 24 calendar months, and for any amendments to pilot school certificates. The information collected becomes a part of the FAA's official records and is only used by the FAA for certification, compliance, enforcement, and when accidents, incidents, reports of noncompliance, safety programs, or other circumstances requiring reference to records. The requirements of part 141 include reporting and recordkeeping.

Section 141.13, Application for issuance, amendment, or renewal. This section requires an application for an original part 141 certificate to be made on a form and manner prescribed by the FAA Administrator. Furthermore, the applicant is also required to submit copies of the proposed training course curriculum for which approval is sought. FAA Form 8420-8 contains key element fields, which the pilot school populates when the school applies for examining authority under part 141, subpart D. The holder of a part 141 pilot school certificate who has the privilege of examining authority may recommend a person who graduated from their course for the appropriate pilot, flight instructor, or ground instructor certificate or rating without taking the FAA practical test.

Section 141.87, change of chief instructor. This section describes actions a part 141 pilot school or provisional pilot school must make whenever there is a change in the designation of the school's chief

instructor. The section provides for a period not to exceed 60 days, to have the stage check and end of course tests administered by the course's assistant chief instructor or a check instructor, or by an FAA inspector, or by a designated pilot examiner. After 60 days without a chief instructor, the pilot school or provisional pilot school must cease operations and surrender it certificate to the Administrator. The pilot school or provisional pilot school may have its certificate reinstated upon designating and approving another chief instructor.

Section 141.101, Training records. Section 141.101 requires the holder of a pilot school or provisional pilot school to establish and maintain a current and accurate record of the participation of each student in an approved course of training conducted by the school. Each school must retain each student record for at least one year. The school must also make a copy of the student's training record upon request by the student.

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, e.g. permitting electronic submission of responses and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The information is collected without the use of paper (i.e., by email) to the greatest extent possible. Currently, pilot school statistical information is collected and entered into the Flight Standards Safety Assurance System (SAS) Vitals for part 141 Air Agency Certificate holders, at https://sas.faa.gov/sas.external.portal/ext/accounts.

Section 141.53, Approval procedures for a training course. The applicant must receive the FAA's approval for each initial or amended training course outline and syllabus for which certification is sought. The FAA field offices are being encouraged to accept electronic submissions instead of paper submissions which is reflected in FAA Order 8900.1, Volume 2, Chapter 9, Section 1, paragraph 2-1071 which states "TCOs must be submitted in duplicate. However, submission of TCOs and syllabi may be done electronically through the SAS system, with one electronic submission equal to two paper copies".

Section 141.57, Special curricula. An applicant for a pilot school certificate or provisional pilot school certificate may apply for approval to conduct a special course of airmen training for which a curriculum is not prescribed in the appendixes of part 141. Under this section, a pilot school or provisional pilot school may receive approval for a training course that contains features that could achieve a level of pilot proficiency equivalent to that achieved by a training course prescribed in the appendixes found in part 141 or the requirements of part 61. Submissions for the TCOs and syllabi may be done electronically through the SAS system.

Section 141.63, Examining authority qualifications requirements. A pilot school (not a provisional pilot school) may receive approval for examining authority that allows the school to recommend a person who graduated from its course for the appropriate pilot, flight instructor, or ground instructor certificate or rating without taking the FAA practical test. Section 141.63 prescribes the requirements to receive examining authority. The training course for which examining authority is requested may not be a course that is approved without meeting the minimum ground and flight time requirements of part 141. After meeting the requirement of § 141.63, a part 141 pilot school submits the required application electronically through the SAS system.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can used for the purpose described in Item 2 above.

We have reviewed other FAA public use reports and find no duplication. Furthermore, we know of no other agency collecting information on pilot school applicants for the purpose of certifying these applicants. All records and information gathered are compiled for a specific reason, from a specific source. The information collected only relates to a unique and specific requirement and situation. Our other public information collection methods do not contain the required information.

The requirements of Title 49 U.S.C., and the correspondent Title 141 CFR, part 141 mandate the collection of certain information which is available only from within the aviation community. These records and other information cannot be obtained from any other source.

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

The collection of information is obtained only when necessary to fulfill the requirements of Title 14 CFR part 141. Completion of the required items is of minimal burden to the respondent due to the simplistic format of the document. Many local FAA offices further reduce this burden by assisting the applicant with FAA Form 8420-8. This assistance can greatly reduce the amount of time needed for regulated entities to study and understand their information requirements.

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.

Frequency of collection is determined by the applicant requesting certification benefit. While no technical or legal obstacles are anticipated, we do not presently foresee any public burden reduction. The consequence to FAA's program activities if the collection of information was not conducted would be the inability to determine whether or not an applicant met the criteria for a part 141 pilot school certificate.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d (2).

There are no special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB.

On June 14, 2023, the FAA published the notice of proposed rulemaking (NPRM), Integration of Powered-Lift: Airman Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes (88 FR 38946) (RIN 2120-AL72). The FAA discussed the proposed revision of this information collection in that NPRM. The FAA solicited public comments as part of the rulemaking.

The FAA did not receive any comments in response to the proposed revision of this information collection.

Further, the FAA submitted this information collection to the Office of Management and Budget for its review during the NPRM comment period. OMB did not provide any comments in its notice of action for this information collection.

9. Explain any decision to provide any payment or gift 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 the assurance in statute, regulation, or agency policy.

No assurance of confidentiality is promised.

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.

Currently, there are 527 certificated part 141 pilot schools. We estimate 32 new applications annually for an original certification annually from applicants for a pilot school certificate. We estimate 264 applications for renewal annually. This figure represents approximately half of the current 527 certificated pilot schools. Every 24 months certificated pilot schools must renew their pilot school certification. Estimated Average Burden per response: We anticipate 32 new applications at a rate of 0.5 hours for a pilot school seeking original pilot school certification for a total of 16 hours. We also anticipate 264 applications for renewals at a rate of 0.5 hours for a total of 132 hours. Additionally, we estimate 20 applications for an amendment to their pilot school certificate at a rate of 0.5 hours for a total burden of 10.0 hours.

Estimated Total annual Burden: The cumulative total burden is estimated to be 158 hours per year.

The FAA believes that the responses to this information collection will be performed by flight instructors and similar personnel at certificated pilot schools. The median hourly wage for these occupations is $27.38.[1] The FAA multiplied this base hourly rate by 1.309, representing a load factor of 30.9%, and a fully loaded wage of **$35.84.** [2]

The specific reporting and recordkeeping requirements of Part 141 are prescribed by the following sections:

Section 141.13, Application. This section requires an applicant to submit FAA Form 8420.8, Application for Pilot School Certificate, for an original certificate, amendment, or renewal. Unless sooner surrendered, suspended, or revoked, a pilot's school certificate is effective for 24 months.

We estimate 32 new applications for original certification annually from applicants that have never been issued a pilot school certificate. We estimate 264 applications for renewal annually. This figure represents half of the current 527 certificated pilot schools, since they all must apply for renewal every 24 months.

[1] This information is derived from the Bureau of Labor Statistics, Education, Training, and Library Occupations (code 25-0000) in the Nonscheduled Air Transportation Industry (NAICS 481200), and is assumed to be representative of flight instructor and representative occupations. http://www.bls.gov/oes/current/naics4_481200.htm

[2] Employer Costs for Employee Compensation Summary - 2021 Q03 Results (bls.gov)

32 new applications at .5 hours each = 16 hours.
264 applications for renewal at .5 hours each = 132 hours
20 applications for amendment at .5 hours each = 10 hours

Number of Responses: 316
Total hourly burden: 158 hours per year
Cost ($35.84*158): $5,663

Section 141.53, Training Course Outline. This section requires an applicant for an initial or amended pilot school certificate to submit a training course outline (TCO) for each course a with FAA Form 8420-8 for approval, indicating how the pilot school intends to train the students.

We estimate 32 new applicants annually for approval of training course outlines on a one-time basis from applicants never before issued a pilot school certificate. We estimate that 200 hours are required to prepare an acceptable TCO. However, acceptable outlines are easily obtained commercially. Therefore, most applicants spend relatively little time in preparation of training course outlines. We estimate then that only 5 new applicants will devise their own TCOs.

Number of responses: 32
Total hourly burden: 32 new TCOs at 25 hours each = **800 hours per year**
Cost ($35.84*800): $28,672

Section 141.57, Special Curricula. An applicant for a pilot school certificate or provisional pilot school certificate may apply for approval to conduct a special course of airmen training for which a curriculum is not prescribed in the appendixes of part 141. We estimate ten applications under this section,

Number of responses: 10
Total hourly burden: 10 new applications at 15 hours each = **150 hours per year**
Cost ($35.84*150): $5,376

Section 141.63, Application for Examining Authority. The holder of a pilot certificate may apply for examining authority on FAA Form 8420-8. We estimate 15 new applicants for examining authority at 20 hours each.

Number of responses: 15
Total hourly burden: 15 new applicants at 20 hours each = **300 hours per year**
Cost ($35.84*300): $10,752

Section 141.87, Change of Chief Instructor. The holders of a pilot school certificate must notify the FAA of changes in chief instructor designations. We estimate 80 annual reports at 0.1 hours each.

Number of responses: 80
Total hourly burden: 80 annual reports at 0.1 hours = **8 hours**
Cost ($35.84*8): $287

Section 141.101, Training Records. Each holder of a pilot school certificate shall establish and maintain current and accurate records for each student. We estimate that the total annual recordkeeping amounts total 26,350 hours, based on an average of 50 hours per year for each of the 527 certificated pilot schools.

Number of responses: 527
Total hourly burden: 527 schools x 50 hrs = **26,350 hours**
Cost ($35.84*26,350): $944,384

SUMMARY OF BURDENS

Reporting Burden

Section		Hours	Responses	Cost (labor)
Section 141.13, Application		158	316	$5,663
Section 141.53, Training Course Outline		800	32	$28,672
Section 141.57, Special Curricula		150	10	$5,376
Section 141.63, Application for Examining Authority		300	15	$10,752
Section 141.87, Change of Chief Instructor		8	80	$287

Recordkeeping Burden

Section 141.101, Training Records		26,350	527	$944,384
TOTAL BURDEN		**27,766**	**980**	**$995,134**

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

There is no additional cost not already included in question #12.

14. Provide estimates of annualized cost to the Federal government. Also provide a description of the method used to estimate cost, which 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimated annualized cost to the Federal Government is **$95,230.** This cost is based on FAA inspectors' time to review and process new applications, renewals, and amendments to existing certificates. It also includes time spent reviewing and approving training course outlines. The wage rate for FAA inspectors is based on the

2022 General Schedule, for a GS-13, Step 5, Rest of U.S. Locality. That salary, $106,955, divided by 2,080, results in an hourly wage of $51.42. The fully loaded wage rate is **$102.84.**[3]

a. 316 Form 8420-8 at .5 hours each x $102.84 per hour = $16,249
b. 32 training course outlines at an average of 24 hours each x $102.84 per hour = $78,981

Total cost **$95,230**

15. Explain the reasons for any program changes or adjustments

In the final rule, Integration of Powered-Lift: Pilot Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes (RIN 2120-AL72), the FAA establishes a Special Federal Aviation Regulation to apply certain operating rules to powered-lift aircraft on a temporary basis to enable the FAA to gather additional information and determine the most appropriate permanent rulemaking path for these aircraft. The FAA estimates that this regulatory change will result in one additional pilot school application, one additional renewal application, and one additional training course outline per year. The FAA did not receive any comments to the proposed revisions to this information collection. The FAA is revising this information collection as proposed.

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 this collection of information, completion of report, publication dates, and other actions.

No publication is planned for this information.

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

FAA is not seeking such approval.

18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

There are no exceptions.

[3] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/RUS.pdf