

**Supporting Statement A
Federal Aviation Administration**

**Drug and Alcohol Testing Program for Personnel Engaged in Specified Aviation
Activities
OMB Control 2120-0535**

**Drug and Alcohol Testing of Certificated Repair Station Employees Located
Outside of the United States
Final rule
RIN 2120-AK09**

Program Changes and Adjustments

- The Drug Abatement Division continues to require all domestic aviation employers, contractors, and certificated foreign repair stations that must comply with the Federal Aviation Administration's (FAA's) final rule, Drug and Alcohol Testing of Certificated Repair Station Employees Located Outside of the United States, to complete and submit a Management Information System (MIS) report to the FAA, which allows the agency to base estimations on actual data provided by the industry.
- To renew the information collection, as required every three years, updates were made under items 12, 13, and 14 to include more recent wage data and to update each ICR with the most recently available data. Significant changes to this information are explained in number 15 of this Supporting Statement.
- The Drug Abatement Division made a significant change to the Foreign Repair Station information collection by adding the ability for foreign repair stations to combine their testing programs under a single registration in some cases. The purpose of the registration is to provide an individual or corporation that owns and operates multiple foreign repair station certificates in one country (or different countries without the need for a waiver or exemption) and who would like to fully implement [14 CFR part 120](#) and [49 CFR part 40](#) in each location, the option to request a single drug and alcohol testing program to cover all certificates by obtaining a foreign repair station registration from the FAA's Drug Abatement Division that covers all their certificates and safety-sensitive employees. The Drug Abatement Division requires the submission of additional information in order to process registration requests, which we account for in this renewal. More information is explained in number 15 of this Supporting Statement.
- The total number of foreign repair stations were adjusted from 977 to 1,045 based on current data on certificated part 145 repair stations located outside the territory of the United States.

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

The FAA mandates specified aviation entities¹ to conduct drug and alcohol testing under its Drug and Alcohol Testing Program regulations (14 CFR Part 120), 49 USC 31306 (Alcohol and controlled substances testing), the Omnibus Transportation Employee Testing Act of 1991, and the FAA Modernization and Reform Act of 2012 (49 U.S.C. 44733(d)(2)).

The FAA Extension, Safety, and Security Act of 2016 (2016 Act) and the FAA Reauthorization Act of 2024 (2024 Act) both reemphasized Congress's prioritization of drug and alcohol programs for foreign repair station employees who perform maintenance on part 121 air carrier aircraft. Specifically, section 302(b) of the 2024 Act directed the FAA to issue a final rule within 18 months of the date of the enactment of the 2024 Act that carries out the requirements of the 2016 Act. This final rule necessitates an update to this collection to account for these foreign repair stations.

This collection of information supports the Department of Transportation (DOT) and FAA strategic goals for safety.

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 drug and alcohol testing regulation requires part 119 certificate holders with the authority to operate under parts 121 and 135, air tour operators as defined in 14 CFR § 91.147, non-FAA or Military Air Traffic Control Facilities, and contractors or domestic part 145 repair stations that elect to implement a drug and alcohol testing program to report information to this collection. The final rule extends this requirement to part 145 certificate holders located outside the territory of the United States who perform safety-sensitive maintenance functions on part 121 air carrier aircraft, and who obtain and implement a drug and alcohol testing program in accordance with 14 CFR part 120 and 49 CFR part 40. The FAA uses this information for determining program compliance or non-compliance by regulated aviation entities, oversight planning, determining who must provide mandatory annual MIS testing information, and communicating with entities subject to the program regulations. In addition, the information is used to ensure that appropriate action is taken regarding flight crewmembers and other safety-sensitive employees who have tested positive for drugs, engaged in prohibited alcohol related-conduct, or refused to submit to testing. The collection includes reporting, recordkeeping, and disclosure information. Using the information reported on the annual

¹ The regulations are applicable to entities listed under 14 CFR 120.1, which include part 121 or 135 air operators, air tour operators as defined in 14 CFR 91.147, non-FAA or Military Air Traffic Control Facilities, contractors or part 145 certificate holders located in the territory of the United States that elect to implement their own testing. The final rule adds all part 145 certificate holders outside the territory of the United States who perform safety-sensitive maintenance functions on part 121 air carrier aircraft as an entity subject to the regulations listed under 14 CFR 120.1. However, as discussed herein, the final rule extends an alternative option to part 145 certificate holders outside the territory of the United States who perform safety-sensitive maintenance functions on part 121 air carrier aircraft that have obtained recognition of a country's or foreign repair station's existing requirements or testing program(s) promulgated under the laws of the country as a compatible alternative to establishing a drug and alcohol testing program.

MIS allows the FAA Administrator to determine the random testing rates for the following year, which are published in the Federal Register.

In addition, foreign governments, on behalf of certificated repair stations within their territories, and individual foreign repair stations subject to the requirements of 14 CFR part 120 may submit information to this collection to seek the FAA Administrator's recognition of a country's or foreign repair station's existing requirements or testing program(s) promulgated under the laws of the country as a compatible alternative to establishing a drug and alcohol testing program. Such recognition is predicated on the establishment by the foreign government or repair station that its program contains minimum elements of 14 CFR part 120, which requires certain information be provided to the FAA so the FAA may determine the existing requirements or testing program(s) meet the regulatory elements. Affected foreign repair stations that receive a recognition by the Administrator will be relieved from comprehensive compliance with subparts E and F of 14 CFR part 120 (in turn, providing relief from 49 CFR part 40) and will not need to seek further waivers or exemptions from 14 CFR part 120 or 49 CFR part 40. All other foreign repair stations subject to the rule will be required to meet 14 CFR part 120 and 49 CFR part 40, subject to any waivers or exemptions that a repair station may obtain. Foreign repair stations subject to the rule must comply not later than three years after the date of publication in the Federal Register.

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.

The Drug Abatement Division requires part 119 certificate holders with the authority to operate under parts 121 and 135, and domestic part 145 repair stations that elect to implement their own drug and alcohol testing programs, to certify their compliance by obtaining a drug and alcohol testing program paragraph (A449) in FAA's Operations Specifications System (OPSS). The Drug Abatement Division also requires all air tour operators as defined in [14 CFR § 91.147](#) to certify their compliance by obtaining a Letter of Authorization (A049) in FAA's OPSS. Further, the Drug Abatement Division requires all non-FAA or Military Air Traffic Control Facilities, and contractors who elect to implement their own drug and alcohol testing programs, to certify their compliance by obtaining a drug and alcohol testing program registration from the FAA's Drug Abatement Division. Because of the Act, which implemented 49 U.S.C. 44733, the FAA issued a final rule, Drug and Alcohol Testing of Certificated Repair Station Employees Located Outside of the United States, which requires part 145 certificated repair stations located outside the territory of the United States who perform maintenance functions on part 121 air carrier aircraft and aircraft parts, and who obtain and implement a drug and alcohol testing program in accordance with 14 CFR part 120 and 49 CFR part 40, to obtain an A449 paragraph as part of their FAA's Operations Specifications. Aviation entities that possess the capability of transmitting information securely can make and amend these entries electronically. Others may mail, email or fax the information to be input by the FAA. In 2004, the DOT and FAA allowed electronic reporting of annual MIS

data using the Drug and Alcohol Management Information System (DAMIS). Therefore, in reference to the Government Paperwork Reduction Act requirements, and as explained in the following paragraph, all respondents have the option to submit electronically, and most respondents choose to submit electronically.

Foreign governments or individual foreign repair stations that seek to obtain the Administrator's recognition of a country or foreign repair station's existing requirements or testing program(s) can make these requests electronically by email or may use mail or fax. All respondents have the option to submit electronically, and the FAA expects most respondents will choose to submit electronically.

Line 13.b.1. of the Paperwork Reduction Act Submission form, i.e., "Percentage of these responses collected electronically" refers to responses required in the form of reports to the FAA. Of the responses to items 2, 10, 11, 12 and 13 on the attached table, 80% are submitted to the FAA electronically. The remaining Paperwork Burden responses consist of recordkeeping and may be accomplished in any form (electronic or otherwise) that the respondents choose. The FAA estimates that a similar percentage of these responses (i.e., 80%) are maintained electronically as well.

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.

No similar information exists.

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

Starting in 2004, the Drug Abatement Division reduced the paperwork burden on small businesses by simplifying the data requirements for certifying compliance by allowing electronic submission of their certification for compliance in OPSS and MIS reporting in DAMIS.

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.

The data required for domestic program registration is provided upon startup by each regulated contractor (and after three years if seeking renewal) and then amended only when significant program changes occur. The data required for program certification (e.g., A449 and A049) is provided upon startup by each regulated aviation entity and then amended only when significant program changes occur. The data required to combine multiple foreign repair stations under a single drug and alcohol testing program (foreign repair station registration) is provided upon initiation by an individual or

corporation (and after three years if seeking renewal) and then amended only when significant program changes occur. If the FAA were unable to update aviation entities information, it would not be possible to stay current with the status of regulated aviation entities. Furthermore, if the FAA did not receive reports of positive drug or alcohol tests or refusals by airmen, the agency would not be able to take enforcement action regarding the qualification to hold the certificates, which would result in a serious detriment to public safety.

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

There are no special circumstances and the information required is not in conflict with these guidelines.

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 FAA published a 60-day Federal Register Notice on April 24, 2026 (91FR22215), requesting public comments about our intention to seek Office of Management and Budget (OMB) approval of our current information collection. No comments were received.

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

No payments or gifts are provided to respondents.

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

The drug and alcohol testing programs are replete with confidentiality protections for safety-sensitive workers who are tested, at every stage of testing, from random selection for testing through collection and processing of urine specimens or breath samples, to handling, communication, and storage of the results. These protections are specified throughout the pertinent testing regulations, which are 49 CFR part 40 and 14 CFR part 120. Enforcement of these protections is a major responsibility of the FAA Drug Abatement Division and the DOT's Office of Drug and Alcohol Policy and Compliance.

As explained above, the statutory authority for these assurances of confidentiality is contained in the FAA's authority to issue rules regarding aviation safety (Title 49 USC). Subtitle VII, Section 106 describes the authority of the FAA Administrator. Subtitle VII, Section 45102, charges the FAA with prescribing regulations to establish programs for drug and alcohol testing of employees performing safety-sensitive functions for air carriers.

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.

Total Burden:

IC	Total Hours	Hours per Response	Responses per Year	\$ Yearly Burden
Currently Domestic Regulated Aviation Entities				
Promulgate Policy	4,576	16	286	\$158,787
Registration (new, amended, or renewed)	512	1	512	\$17,766
Supervisory Drug and Alcohol Training Documentation	1,529	.25	6,114	\$53,039
Employee Training Documentation	28,307	.25	113,226	\$982,253
Reasonable Cause/Suspicion Documentation for Drugs and Alcohol	850	2	425	\$29,495
Post-Accident Determination Documentation	1,378	2	689	\$47,817
Voluntary Disclosures	6,520	40	163	\$226,244
Emergency Maintenance Reports	30	1.25	24	\$1,041
Scientifically Valid Random Testing Process	24,456	1	24,456	\$848,623
Medical Review Officer (MRO) Contract Record Keeping Provision	71.5	.25	286	\$2,481
Refusal to Take Drug Test Report to FAA	41.25	.25	165	\$1,431
Positive Drug Test Report to FAA	63.25	.25	253	\$2,195
Refusal to Take Alcohol Test Report to FAA	3.25	.25	13	\$113
Positive Alcohol Test Report to FAA	15.75	.25	63	\$547
Substance Abuse Professional (SAP) Return to Duty Letter for Part 67 Medical Certificate Holders	31	.25	124	\$1,076
Currently Domestic Regulated Aviation Entities Total:	68,384		146,799	\$2,372,907
Foreign Repair Stations				
Foreign Repair Station Antidrug and Alcohol Misuse Prevention Program Operations Specification	348	0.33	1,045	\$12,076

Foreign Repair Station Parent Company Information Collection	23	0.33	69	\$798
Foreign Repair Station Drug and Alcohol Testing Program Development and Program Maintenance	14,672	16	917	\$669,483
Foreign Repair Station Education and Training Records	37,533	0.25	150,132	\$1,302,395
Foreign Repair Station records related to the alcohol and drug collection process, test results, refusal to test, employee dispute records, SAP reports, follow-up tests	204,221	5.00	40,844	\$7,086,469
Foreign Repair Stations Total:	256,797		193,007	\$9,071,221
Total:	325,181		339,598	\$11,444,128

Note: These numbers are subject to rounding error.

Note: For all line items, except the development and program maintenance, the FAA is using a wage rate of \$34.70 per hour for Designated Employer Representatives. Information and Records Clerks (SOC 43-4000) NAICS 481000 – Air Transportation, May 2024; Mean Hourly wage. (<https://www.bls.gov/oes/2024/may/oesrci.htm#48-49>). The base wage rate is \$24.46 and the wage rate used includes fringe benefits at a rate of 42 percent.

Note: For the development and program maintenance the FAA is using a wage rate of \$45.63 per hour. Office and Administrative Support Workers (SOC 43-9199) NAICS 481000 – Air Transportation, May 2024; Mean Hourly wage. (<https://www.bls.gov/oes/2024/may/oesrci.htm#48-49>). The base wage rate is \$32.17 and the wage rate used includes fringe benefits at a rate of 42 percent.

Note: The annual number of responses and annual time burden listed in this supporting statement differ from the entries in ROCIS. This discrepancy is due to a simplified summation of the reporting, recordkeeping, and disclosure requirements across several line items. While certain sections aggregate the hours per response or the number of annual responses, the overall total annual time burden remains unchanged.

Total Burden: Waiver Based on FAA Recognition (Low-Cost Case)

IC	Total Hours	Hours per Response	Responses per Year	\$ Yearly Burden
Submission of Request	660	20	33	\$49,850

Note: These numbers are subject to rounding error.

Note: The FAA is using two wage rates as the submission will require two employees to complete the submission.

Note: The FAA is using a wage rate of \$67.87 per hour for the government program analyst that will be doing 15 hours of the 20 hours of work. FAA Technical Pay Band, I Band with Washington D.C. locality; effective Jan. 2026, minimum salary \$103,604.

The total loaded salary of \$141,160 is divided by 2,080 hours to get the hourly wage.

(https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026).

Note: The FAA is using a wage rate of \$98.51 per hour for the government manager that will be doing 5 hours of the 20 hours of work. FAA Technical Pay Band, K Band with Washington D.C. locality; effective Jan. 2026, minimum salary \$150,392. The total loaded salary of \$204,909 is divided by 2,080 hours to get the hourly wage.

(https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026).

Note: The calculation of the yearly burden is as follows: $((15 * 67.87) + (5 * 98.51)) * 33 = \$49,850$.

Domestic Regulated Aviation Entities

Promulgate Policy

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		286	

# of Responses per respondent		1	
Time per Response		16.0 hours	
Total # of responses		286	
Total burden (hours)		4,576	

Explanation: Each respondent must promulgate a policy on the misuse of alcohol and drug use in the workplace. The policy must include the elements identified under 14 CFR §§ 120.115(a)(2) and 120.223(a). The Designated Employer Representative (DER) must develop the policy during the start of operations and provide written notice to each safety-sensitive employee. To calculate the number of respondents that were required to promulgate a new policy, the Drug Abatement Division compared the 2023 MIS reporting with the 2024 MIS reporting to find the number of new operators. Based on the time it takes the DER for each respondent to develop a policy, the Drug Abatement Division determined it would take the DER 16.0 hours.

Registration (new, amended, or renewed)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	512		
# of Responses per respondent	1		
Time per Response	1.00 hour		
Total # of responses	512		
Total burden (hours)	512		

Explanation: Each respondent that conducts testing must register the Drug and Alcohol Testing Program and update the information as changes occur. The Drug Abatement Division also asks that registrations are renewed on a three-year timeline. To calculate the number of respondents, the Drug Abatement Division used the number of new, amended, and renewed registrations processed during the period of January 1, 2024, through December 31, 2024. Based on the time it takes a DER for each respondent to prepare the information and notify the Drug Abatement Division, it was estimated it would take the DER 1.0 hour.

Supervisory Drug and Alcohol Training Documentation

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		6,114	
# of Responses per respondent		1	
Time per Response		0.25 hours	
Total # of responses		6,114	
Total burden (hours)		1,529	

Explanation: Each respondent must conduct initial supervisory training for drug and alcohol, and recurrent supervisory training for drug testing. The respondent must document training provided to supervisors and maintain the information for a period of 2 years. To calculate the number of respondents, the Drug Abatement Division used the number of active programs between January 1, 2024, and December 31, 2024. Based on the time it takes the DER for each respondent to collect the information and maintain it, the Drug Abatement Division determined it would take the DER 0.25 hours of time.

Employee Training Documentation

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		113,226	
# of Responses per respondent		1	
Time per Response		0.25 hours	
Total # of responses		113,226	
Total burden (hours)		28,307	

Explanation: Each respondent must conduct initial drug and alcohol training for each new safety-sensitive employee. Documentation of the alcohol misuse training must be maintained by the DER for a period of 2 years. To calculate the number of respondents, the Drug Abatement Division used the number of negative pre-employment drug tests reported in the 2024 MIS reporting data to determine that each respondent that was hired for or transferred into a safety-sensitive position and provided initial training from January 1, 2024, and December 31, 2024. Based on the time it takes the DER to document the initial training and maintain the records for each new hire, the Drug Abatement Division determined it would take the DER 0.25 hours.

Reasonable Cause/Suspicion Documentation for Drugs and Alcohol

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		425	
# of Responses per respondent		1	
Time per Response		2.00 hours	
Total # of responses		425	
Total burden (hours)		850	

Explanation: Each respondent must ensure that the trained supervisor that determines reasonable cause/suspicion testing documents the observations and determination. The DER must maintain the documentation for a period of 2 years. To calculate the number of respondents, the Drug Abatement Division used the number of reasonable cause/suspicion tests reported in the 2024 MIS reporting data to determine how many times a DER obtained the information from a supervisor and maintained it from January 1, 2024, through December 31, 2024. Based on the time it takes the DER to obtain the documentation from the supervisor and maintain the records, the Drug Abatement Division determined it would take the DER 2.0 hours of time.

Post-Accident Determination Documentation

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		689	
# of Responses per respondent		1	
Time per Response		2.00 hours	
Total # of responses		689	
Total burden (hours)		1,378	

Explanation: Each respondent must document decisions on post-accident testing and maintain them for 2 years. To calculate the number of respondents, the Drug Abatement Division used the number of post-accident tests reported in the 2024 MIS reporting data to determine how many times a DER collected and maintained documentation between January 1, 2024, and December 31, 2024. Based on the time it takes the DER to obtain

the documentation and maintain the records, the Drug Abatement Division determined it would take the DER 2.0 hours.

Voluntary Disclosures

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents			163
# of Responses per respondent			1
Time per Response			40.0 hours
Total # of responses			163
Total burden (hours)			6,520

Explanation: Any respondent may submit a voluntary disclosure (in accordance with Advisory Circular 120-117) to report any noncompliance issue it discovers. To calculate the number of respondents, the Drug Abatement Division used the number of disclosures reported during the period January 1, 2024, to December 31, 2024. Based on the time it takes the DER to identify the noncompliance, investigate the matter and collect the supporting evidence, establish and document the comprehensive fix, notify the Drug Abatement Division and provide any follow-up information, the Drug Abatement Division determined it would take the DER up to 40.0 hours.

Emergency Maintenance Reports

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	24	24	
# of Responses per respondent	1	1	
Time per Response	1.00 hour	0.25 hours	
Total # of responses	24	24	
Total burden (hours)	24	6	

Explanation: Each respondent that conducts on-demand operations and requires emergency maintenance must provide written notification to the Drug Abatement Division and retain copies for 2 years. To calculate the number of respondents, the Drug Abatement Division used the number of emergency maintenance reports submitted during the period of January 1, 2024, through December 31, 2024. Based on the time it

takes an employer to collect and report the emergency maintenance information, the Drug Abatement Division estimated it would take the DER 1.0 hour. To maintain the record, the Drug Abatement Division estimated it would take the DER 0.25 hours. The 24 total respondents are reporting (1 hour) and recordkeeping (0.25 hours), for a total of 1.25 hours per response.

Scientifically Valid Random Testing Process

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		6,114	
# of Responses per respondent		4	
Time per Response		1.00 hour	
Total # of responses		24,456	
Total burden (hours)		24,456	

Explanation: Each respondent must conduct a random selection using a scientifically valid process throughout the calendar year and maintain each selection list for 2 years. It is common for a respondent to conduct quarterly random selections. To calculate the number of respondents, the Drug Abatement Division used the total number of active programs for January 1, 2024, through December 31, 2024. Based on the time it takes to conduct the random selection and maintain the selection list, the Drug Abatement Division estimated it would take the DER 1.0 hour for each selection.

Medical Review Officer (MRO) Contract Record Keeping Provision

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		286	
# of Responses per respondent		1	
Time per Response		0.25 hours	
Total # of responses		286	
Total burden (hours)		71.5	

Explanation: Each respondent must document a written contract with the Medical Review Officer (MRO), directly or through a consortium/third party administrator, that ensures the MRO understands his or her responsibilities for recordkeeping under 14

CFR part 120 and 49 CFR part 40. To calculate the number of respondents, the Drug Abatement Division used the number of new operators by comparing the 2023 MIS reporting with the 2024 MIS reporting. Based on the time it takes the DER to document a contract with the MRO, the Drug Abatement Division estimated a burden of 0.25 hours per contract.

Refusal to Take Drug Test Report to FAA

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	65	65	35
# of Responses per respondent	1	1	1
Time per Response	0.25 hours	0.25 hours	0.25 hours
Total # of responses	65	65	35
Total burden (hours)	16.25	16.25	8.75

Explanation: The DER must report any individual that holds a part 61, 63, or 65 FAA certificate and refused to submit to drug testing and maintain the record for 5 years. To calculate the number of respondents, the Drug Abatement Division used the number of reports of part 61, 63, and 65 airman that refused to submit to drug testing during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours. To maintain the record, the Drug Abatement Division estimated it would take the DER 0.25 hours. The 65 respondents reporting and recordkeeping are the same.

FAA guidance indicates that some DERs may voluntarily report non-certificated refusal cases to the Drug Abatement Division. To calculate the number of respondents under this type of disclosure, the Drug Abatement Division used the number of voluntary reports of a refusal to submit to drug testing during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and voluntarily submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours.

The number of respondents in the total burden table for this category is 100, which combines the 65 respondents required to report a refusal to take a drug test and the 35 who may disclose the information voluntarily. The 65 respondents are reporting (0.25 hours) and recordkeeping (0.25 hours), for a total of 0.5 hours per response. The 35 additional respondents are voluntarily disclosing refusals to submit drug testing to the FAA (0.25 hours), but the recordkeeping requirements do not apply to them under the rule.

Positive Drug Test Report to FAA

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	58	58	137
# of Responses per respondent	1	1	1
Time per Response	0.25 hours	0.25 hours	0.25 hours
Total # of responses	58	58	137
Total burden (hours)	14.5	14.5	34.25

Explanation: The DER must report any individual that holds a part 67 medical certificate and tests positive on a drug test and maintain the record for 5 years. To calculate the number of respondents, the Drug Abatement Division used the number of positive drug test results for a part 67 that were reported to the Drug Abatement Division during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours. To maintain the record, the Drug Abatement Division estimated it would take the DER 0.25 hours. The 58 respondents reporting and recordkeeping are the same.

FAA guidance indicates that some DERs may voluntarily report non-part 67 medically certificated drug test positive reports to the Drug Abatement Division. To calculate the number of respondents under this type of disclosure, the Drug Abatement Division used the number of voluntary reports of a positive test for all non-part 67 medically certificated employees during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and voluntarily submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours.

The number of respondents in the total burden table for this category is 195, which combines the 58 respondents required to report a refusal to take a drug test and the 137 who may disclose the information voluntarily. The 58 respondents are reporting (0.25 hours) and recordkeeping (0.25 hours), for a total of 0.5 hours per response. The 137 additional respondents are disclosing to the FAA voluntarily (0.25 hours), but the recordkeeping requirements do not apply to them under the rule.

Refusal to Take Alcohol Test Report to FAA

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	3	3	7
# of Responses per respondent	1	1	1
Time per Response	0.25 hours	0.25 hours	0.25 hours
Total # of responses	3	3	7
Total burden (hours)	.75	.75	1.75

Explanation: Each respondent must report any individual that holds a part 61, 63, or 65 FAA certificate and refused to submit to alcohol testing and maintain the record for 5 years. To calculate the number of respondents, the Drug Abatement Division used the number of reports of a refusal to submit to alcohol testing during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours. To maintain the record, the Drug Abatement Division estimated it would take the DER 0.25 hours. The 3 respondents reporting (0.25 hours) and recordkeeping (0.25 hours) are the same, for a total of 0.5 hours per response.

FAA guidance indicates that some DERs may voluntarily report non-certificated refusal cases to the Drug Abatement Division. To calculate the number of respondents under this type of disclosure, the Drug Abatement Division used the number of voluntary reports of a refusal to submit to alcohol testing during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and voluntarily submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours.

The number of respondents in the total burden table for this category is 10, which combines the 3 respondents required to report a refusal to take an alcohol test and the 7 who may disclose the information voluntarily. The 3 respondents are reporting (0.25 hours) and recordkeeping (0.25 hours), for a total of 0.5 hours per response. The 7 additional respondents are voluntarily disclosing refusals to submit to alcohol testing to the FAA (0.25 hours), but the recordkeeping requirements do not apply to them under the rule.

Positive Alcohol Test Report to FAA

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	20	20	23
# of Responses per	1	1	1

respondent			
Time per Response	0.25 hours	0.25 hours	0.25 hours
Total # of responses	20	20	23
Total burden (hours)	5	5	5.75

Explanation: Each respondent must report any individual that holds a part 67 medical certificate and engaged in alcohol use that violated the alcohol misuse prohibitions listed in 14 CFR §§ 120.19 and 120.37 and maintain the record for 5 years. To calculate the number of respondents, the Drug Abatement Division used the number of alcohol violations for a part 67 certificate holder that were reported to the Drug Abatement Division during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours. To maintain the record, the Drug Abatement Division estimated it would take the DER 0.25 hours. The 20 respondents reporting and recordkeeping are the same.

FAA guidance indicates that some DERs may voluntarily report non-part 67 medically certificated alcohol violator reports to the Drug Abatement Division. To calculate the number of respondents under this type of disclosure, the Drug Abatement Division used the number of voluntary reports of an alcohol violation for all non-part 67 medically certificated employees during the period of January 1, 2024, and December 31, 2024. Based on the time it takes a DER to prepare a report and voluntarily submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours.

The number of respondents in the total burden table for this category is 43, which combines the 20 respondents required to report a refusal to take a drug test and the 23 who may disclose the information voluntarily. The 20 respondents are reporting (0.25 hours) and recordkeeping (0.25 hours), for a total of 0.5 hours per response. The 23 additional respondents are disclosing to the FAA voluntarily (0.25 hours), but the recordkeeping requirements do not apply to them under the rule.

Substance Abuse Professional (SAP) Return-to-Duty Letter for Part 67 Medical Certificate Holders

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	62	62	
# of Responses per respondent	1	1	
Time per Response	0.25 hours	0.25 hours	

Total # of responses	62	62	
Total burden (hours)	16	16	

Explanation: Each respondent must send the SAP reports to the Drug Abatement Division for any individual originally reported for a positive drug test result, refusal to submit to testing, or alcohol violation and successfully completed the education and/or treatment. The SAP cannot recommend return-to-duty without obtaining a new certificate dated after the violation that was reported. The aviation entity must maintain the records sent to the FAA for a period of 5 years. To calculate the number of respondents, the Drug Abatement Division used the number of return-to-duty drug and alcohol tests reported in the MIS reports for January 1, 2024, through December 31, 2024, for flight crewmember employees only. Based on the time it takes a DER to prepare a report and submit it to the Drug Abatement Division, it was determined it would take the DER 0.25 hours per report. To maintain the record, the Drug Abatement Division estimated it would take the DER 0.25 hours per report.

Foreign Repair Stations

Estimated Foreign Repair Station Annual Paperwork Burden for Drug and Alcohol Testing Program Operations Specification and Program Maintenance

Annual Paperwork Burden	# of Respondents	# of Responses per Respondent	Hours per Response	Total # of Responses	Total Hours
Antidrug and Alcohol Misuse Prevention Program Operations Specification (A449)	1,045	1	0.33 ²	1,045	348
Parent Corporation Information Collection	69	1	0.33	69	23
Paperwork Burden for Drug and Alcohol Testing Program Development and Maintenance	917	1	16	917	14,672

Note: These numbers are subject to rounding error.

Explanation: Each foreign repair station would devote resources to obtain the Drug and Alcohol Testing Program Operations Specification (A449) from its Principal Maintenance Inspector (PMI) in accordance with 14 CFR §§ 120.117 and 120.225. The 2005 regulatory analysis for the final rule entitled, Antidrug and Alcohol Misuse

² For the first-year hour burden, the FAA estimates one hour is needed to obtain the Drug and Alcohol Testing Program Operations Specification (A449) from the PMI in the first year. Thus, the total over three years is 0.33 hours (1 hour / 3 years) annually.

Prevention Programs for Personnel Engaged in Specified Aviation Activities [71 FR 1666], estimated that it would take one hour to obtain the Drug and Alcohol Testing Program Operations Specification (A449) from the PMI in the first year. Although these estimates are from 2005, the FAA finds them to still be accurate.

Individuals or corporations who own and operate multiple foreign repair station certificates have the option to request a registration from the Drug Abatement Division to cover each of their repair station certificates and their safety-sensitive employees under a single drug and alcohol testing program registration. The Drug Abatement Division requires the submission of additional information in order to process registration requests. Each individual or corporation that would like to register a combined program must register the Drug and Alcohol Testing Program and update the information as changes occur. The Drug Abatement Division also asks that registrations are renewed on a three-year timeline. To calculate the number of respondents, the Drug Abatement Division estimated that 917 respondents³ would devote resources to develop a drug and alcohol testing program to obtain a Drug and Alcohol Testing Program Operations Specification through its Principal Maintenance Inspector (PMI) in the FAA Flight Standards Service in accordance with 14 CFR §§ 120.117 and 120.225. FAA estimates 69 respondents will be parent corporations representing 197 subsidiary foreign repair stations. These 69 parent corporations prepare specific information and notify the Drug Abatement Division. This parent corporation processing is estimated to take the respondent 1.0 hour.

All 917 respondents will need to develop and maintain a drug and alcohol testing program. The 2005 regulatory analysis for the final rule entitled, Antidrug and Alcohol Misuse Prevention Programs for Personnel Engaged in Specified Aviation Activities [71 FR 1666], estimated that it would take 16 administrative hours to develop a testing program using available guidance in the first year. Although this estimate is from 2005, the FAA finds them to still be accurate. Each foreign repair station or foreign repair station's parent company would also incur annual program maintenance: e.g., updates to the program; the space to conduct the testing; the random pool list; and the overall testing process. The estimated time of this maintenance is 16 hours per year. Therefore, FAA anticipates that each individual or corporation would spend 16 hours on program development or maintenance annually.

Estimated Annual Number of Records for All 917 Foreign Drug and Alcohol Testing Programs

³ FAA assumed parent corporations would develop a drug and alcohol testing program for all that parent company's foreign repair stations within the same country. FAA estimates that 69 parent companies (representing 197 subsidiary foreign repair stations) and 848 independent foreign repair stations would develop drug and alcohol testing programs.

Documentation	# of Repair Stations	Average # of Responses per Respondent	Hours per Response	Total # of Responses	Total Hours
Training records	917	164	0.25	150,132	37,533
Test records: records related to the alcohol and drug collection process, test results, refusal to test, employee dispute records, SAP reports, follow-up tests.	917	45	5.0	40,844	204,221

Note: These numbers are subject to rounding error.

Explanation: Foreign repair stations would be required to document an employee's previous drug and alcohol testing records, training records, test records (records related to drug and alcohol collection process, test results, refusal to test, employee dispute records, substance abuse professional (SAP) reports, follow-up tests), and annual MIS reports of testing statistics.

In the first year, there would be 416,186 training records as all current employees and supervisors would need to be trained. In the following years, there would be less training as only new employees would be required to take the training and any recurring training that may be required. In years two and three, respectively, there would be 31,762 and 31,919 training records. Taking the average of these three years results in 159,956 total responses per year and 164 responses per respondent. The FAA estimates that it would take 0.25 hours per response.

For test records, in the first year there would be no test records to report. In the second and third year, there would be 65,114 and 65,436, respectively. The average over the three years is 43,517 and 45 responses per respondent. The FAA estimates that it would take five hours per response.

Alternative Means of Compliance (Low-Cost Case)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	33		
# of Responses per respondent	1		
Time per Response	20		

Total # of responses	33		
Total burden (hours)	660		

Explanation: Each respondent must submit a request demonstrating that repair stations within their territories comply with the alternative means of compliance to the FAA. To calculate the number of respondents, the FAA used the number of countries that have part 145 certified repair stations outside of the territory of the United States. The FAA has determined that it would take 20 hours for a country's representative to prepare the request and submit it to the FAA. Specifically, the FAA estimates that it will take a government program analyst 15 hours to prepare the submission and 5 hours for a manager to review and submit the request. This estimate includes time for any necessary coordination with additional Agencies or Departments. The FAA assumes that it will take 2 years for all 65 countries to submit and their submissions to be reviewed. Therefore, the FAA estimates that approximately half, 33, will be completed in the first year and the remaining 32 in the second years. These submissions will only need to be completed once.

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

All the costs for currently domestic regulated aviation entities and foreign repair stations are accounted for 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 following information will document the different tasks and costs associated with processing intake of registration applications for domestic entities and certificated foreign repair stations that must comply with the FAA's final rule, correcting drug and alcohol paragraphs under the OPSS, processing and managing the MIS reporting, and processing reports of violations by the industry.

Annual Registration and OPSS Tracking

During January 1, 2024, and December 31, 2024, the following expenses applied to the Drug Abatement Division personnel who processed registration applications/amendments and corrected drug and alcohol paragraph issues:

Task	Number of Events	Number of Hours per Event	Hourly rate	Total Cost
Process intake of Registration applications	512	2	\$87.46	\$89,559
Correcting drug and alcohol paragraph (A449/A049)	94	2	\$129.88	\$24,417
Total:				\$113,976

Explanation: Upon receipt of a registration application or amendment, a junior program analyst in the Drug Abatement Division conducts a review to determine if the information is sufficient. Each registration is entered into the Drug Abatement Division's Compliance and Enforcement Tracking Subsystem (CETS) and given a specific control number. The junior program analyst prepares and sends the final correspondence to the respondent. The entire process takes approximately two hours for each respondent.

A senior program analyst in the Drug Abatement Division addresses issues or concerns related to respondents with an FAA operating certificate and drug and alcohol paragraph (A449/A049) in the OPSS. These matters are more complex and require coordination with multiple stakeholders, and it takes approximately two hours for each respondent.

The junior program analyst's salary used to calculate this is equivalent to a FAA Technical Pay Band, high H Band with Washington, D.C. locality Salary for a wage of \$64.19 per hour⁴. With overhead costs of 36.25 percent added⁵, the total salary is \$87.46 per hour.

The senior program analyst's salary used to calculate this is equivalent to a FAA Technical Pay Band, high J Band with Washington, D.C. locality Salary for a wage of \$95.33 per hour⁶. With overhead costs of 36.25 percent added⁷, the total salary is \$129.88 per hour.

Annual MIS Report Tracking & Analysis

⁴ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

⁵ MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES, Office of Management and Budget, March 11, 2008, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf.

⁶ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

⁷ MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES, Office of Management and Budget, March 11, 2008, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf.

The following are costs associated with the Drug Abatement Division and contractor processing the MIS reports for January 1, 2024, through December 31, 2024:

Task	Number of Events	Number of Hours per Event	Hourly rate	Total Cost
MIS contract expenses with DOT Vendor, VOLPE, for DAMIS support.	N/A	N/A	N/A	\$4,702
MIS Preparation	1	380	\$129.88	\$49,354
MIS Analysis & Tracking	2,500	0.50	\$129.88	\$162,350
MIS Data Entry	318	0.25	\$129.88	\$10,325
Total:				\$226,731

Explanation: To prepare for the annual MIS reporting each year, the Drug Abatement Division works with the contractor to prepare the final list of all active companies.

A senior program analyst in the Drug Abatement Division finalizes the list and provides the notification letter for the contractor and works with accounting to finalize the annual contract for approval. Once the steps are completed, the contractor sends out the notification to the respondents.

The senior program analyst's salary used to calculate this is equivalent to a FAA Technical Pay Band, high J Band with Washington, D.C. locality Salary for a wage of \$95.33 per hour⁸. With overhead costs of 36.25 percent added,⁹ the total salary is \$129.88 per hour.

After January 1, the reporting starts and the Drug Abatement Division's senior program analyst provides access information, guidance on MIS reporting and tracks responses to ensure the information is reported. Communication with respondents happens daily and requires an average of 30 minutes for each respondent.

While most respondents submit their data electronically via DAMIS, about 20% still submit a paper copy via email or fax or United States Postal Service. The Drug Abatement Division's senior program analyst enters the data directly into DAMIS. Each report takes approximately 15 minutes to enter.

⁸ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

⁹ MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES, Office of Management and Budget, March 11, 2008, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf.

Annual Processing Violation & Refusal Reports

The following are costs associated with the Drug Abatement Division processing reports of part 67 violations, refusals, and other non-certificated reporting between January 1, 2024, and December 31, 2024:

Task	Number of Events	Number of Hours per Event	Hourly rate	Total Cost
Processing required reports of drug and alcohol testing violations for part 67 medical certificate holders	78	1	\$88.05	\$6,868
Processing voluntary reports of drug and alcohol testing violations for all other types of safety-sensitive employees	162	1	\$88.05	\$14,264
Processing required reports of drug and alcohol refusals by part 61, 63, 65 certificate holders	65	1	\$88.05	\$5,723
Processing voluntary reports of drug and alcohol refusals	35	1	\$88.05	\$3,082

by all other types of safety-sensitive employees				
Total				\$29,937

Explanation: Upon receipt of a required or voluntary report, a junior compliance investigator in the Drug Abatement Division conducts a review to determine if the information is sufficient and verifies the certificate information, if applicable. The information is entered into CETS and the Drug Abatement Division's local tracking tool for assignment to a special investigator.

Due to changes in the personnel who conduct these reviews, the FAA has revised the estimation of labor from the previous supporting statement. Two compliance investigator's salaries are used to calculate the weighted average hourly wage for a compliance investigator. A senior investigator incurs 60% of the hourly burden, and a junior investigator incurs 40% of the hourly burden.

A junior compliance investigator's salary used to calculate this is equivalent to a FAA Technical Pay Band, average G Band with Washington, D.C. locality salary for a wage of \$43.95 per hour.¹⁰ With overhead costs of 36.25 percent added,¹¹ the total salary is \$59.88 per hour.

A senior compliance investigator's salary used to calculate this is equivalent to a FAA Technical Pay Band, average J Band with Washington, D.C. locality salary for a wage of \$78.41 per hour.¹² With overhead costs of 36.25 percent added,¹³ the total salary is \$106.83 per hour.

Based upon the junior and senior compliance investigator's estimated salary and burden, FAA estimates the weighted average salary is \$88.05 per hour.¹⁴

Annual Total Currently Domestic Regulated Aviation Entities Cost to the Federal Government: \$370,644

Foreign Repair Stations

¹⁰ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

¹¹ MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES, Office of Management and Budget, March 11, 2008, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf.

¹² https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

¹³ MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES, Office of Management and Budget, March 11, 2008, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf.

¹⁴ $\$88.05 = \$59.88 * 40\% + \$106.83 * 60\%$

The FAA would establish an International Compliance and Enforcement Branch (or Center) located in Washington, DC that would oversee and inspect all foreign part 145 repair stations using practices described in FAA Order 9120.1, Drug and Alcohol Compliance and Enforcement Inspector Handbook.

Domestically, the FAA has three regional Compliance and Enforcement Centers, a Program Administration Branch, a Program Policy Branch, and a Special Investigations Branch that provides oversight of drug and alcohol testing program inspections and investigations. As a result of the final rule, the FAA will merge all international inspections and associated processes together into one new branch. The FAA will hire one K-band manager to oversee the branch, four I-band program analysts to oversee the waiver reviews, procedures, guidance, policy development, the inspection scheduling activities, and six J-band inspectors that each will conduct inspections and possibly investigate the complaints associated with rule violations or allegations under 14 CFR part 120 and 49 CFR part 40.

Annual Staffing Cost for Waivers and Inspections

Title	Salary Including Benefits ¹⁵	Number of Employees	Total Annual Staffing Cost
Manager, K-band ¹⁶	\$204,909	1	\$204,909
Management/Program Analysts, I-band ¹⁷	\$141,160	4	\$564,640
Inspectors, J-band ¹⁸	\$174,261	6	\$1,045,566
Annual Personnel Cost			\$1,815,115

Annual MIS Report Tracking & Analysis – Foreign Repair Stations

The following are predicted costs associated with the Drug Abatement Division and contractor processing the annual MIS reports for an additional 917 foreign drug and alcohol testing programs:

Task	Number of Events	Number of Hours per Event	Hourly rate	Total Cost
MIS Analysis & Tracking	917	0.50	\$129.88	\$59,550
MIS Data Entry	46	0.25	\$129.88	\$1,494

¹⁵ A fringe benefit factor of 36.25 percent was used to calculate the total salary with fringe benefits.

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES, Office of Management and Budget, March 11, 2008, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf.

¹⁶ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

¹⁷ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

¹⁸ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

Total:				\$61,044
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Explanation: MIS contract expenses with the DOT vendor, VOLPE, for DAMIS support and MIS preparation are already accounted for under the currently domestic regulated aviation entities table above. These expenses are not included for foreign repair stations because they are one-time expenses included in the preparation of MIS reporting.

Once MIS reporting begins, the Drug Abatement Division's senior program analyst provides access information, guidance on MIS reporting and tracks responses to ensure the information is reported. Communication with respondents happens daily and requires an average of 30 minutes for each respondent. Since all 917 foreign drug and alcohol testing program holders would be completing the MIS reporting for the first time, FAA assumes all would communicate with the FAA. Therefore, the estimated number of events is 917.

The senior program analyst's salary used to calculate this is equivalent to a FAA Technical Pay Band, high J band with Washington, D.C. locality Salary) for a wage of \$95.33 per hour.¹⁹ With overhead costs of 36.25 percent added,²⁰ the total salary is \$129.88 per hour.

While most domestic respondents submit their data electronically via DAMIS, about 5% still submit a paper copy via email or fax or United States Postal Service. To estimate the MIS data entry events, 5 percent of the 917 foreign drug and alcohol testing programs was used to determine the estimated 46 number of events. The Drug Abatement Division's senior program analyst enters the data directly into DAMIS. Each report takes approximately 15 minutes to enter.

Annual Total Foreign Repair Stations Cost to the Federal Government:
\$1,876,159

Annual Total Cost to the Federal Government: \$2,246,803

Alternative Means of Compliance (Low-Cost Case)

The following section discusses the information collection regarding the low-cost case for the alternative means of compliance. These costs are not in addition to the main information collection analysis preceding this section.

Alternative Means of Compliance Request Review

Task	Number of	Number of	Hourly rate	Total Cost
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¹⁹ https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

²⁰ MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES, Office of Management and Budget, March 11, 2008, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf.

	Events	Hours per Event		
Review of request	33	20	\$70.93	\$46,816

Explanation: The FAA estimates that each request will be reviewed by an FAA program analyst for 18 hours. Additionally, an FAA manager will review the request for 2 hours for a total of 20 hours of burden for the FAA. The FAA assumes it will take 2 years for all 65 countries to submit the request and their submissions to be reviewed. Therefore, the FAA estimates that approximately half, 33, will be completed in the first year and the remaining 32 in the second year. These submissions will only need to be completed once.

The FAA program analyst's salary used to calculate this hourly rate is equivalent to an FAA Technical Pay Band, I Band with a Washington D.C. locality for a wage of \$67.87 per hour which includes fringe benefits.²¹ The FAA manager's salary used to calculate this hourly rate is equivalent to an FAA Technical Pay Band, K Band with a Washington D.C. locality for a wage of \$98.51 per hour which includes fringe benefits.²² The weighted average of the two wages is used to calculate the \$70.93 hourly rate.²³

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

- The Drug Abatement Division continues to require all domestic aviation entities and certificated foreign repair stations that must comply with the FAA's final rule, Drug and Alcohol Testing of Certificated Repair Station Employees Located Outside of the United States, to complete and submit a MIS report to the FAA, which allows the agency to base estimations on actual data provided by the industry.
- To renew the information collection, as required every three years, updates were made under items 12, 13, and 14 to include more recent wage data and to update each ICR with the most recently available data. The FAA explains some of the significant changes here:
 - o The FAA clarified in this update that the number of registrations accounted for in this collection includes new, amended, and renewed registrations. While the FAA previously included renewed registrations in the calculation, this update reflects more clearly that they are included.

²¹ FAA Technical Pay Band, I Band with Washington D.C. locality; effective Jan. 2026, minimum salary \$103,604. The total loaded salary of \$141,160 is divided by 2,080 hours to get the hourly wage. https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

²² FAA Technical Pay Band, K Band with Washington D.C. locality; effective Jan. 2026, minimum salary \$150,392. The total loaded salary of \$204,909 is divided by 2,080 hours to get the hourly wage. https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx, accessed March 2026.

²³ The calculation of the hourly rate is as follows: $((67.86 * (18/20)) + (98.51 * (2/20))) = \70.93 .

- o The FAA corrected the section for “Refusal to Take Alcohol Test Report to FAA” to include voluntary refusal reports received from aviation entities in the “disclosure” column. This is now in line with the “Positive Drug Test Report to FAA” section, which already included voluntary reports in the disclosure section. This inclusion in the “Refusal to Take Alcohol Test Report to FAA” section more accurately reflects the number of reports the FAA receives.

- o The FAA adjusted its estimation of the time required for the FAA to complete “MIS Preparation” from 40 to 380 hours. To prepare for the annual MIS reporting each year, the Drug Abatement Division works with the contractor to prepare the final list of all active companies so the contractor can send out the MIS notification to the respondents. Based on the most recent estimate from the MIS team, MIS preparation is spread out over 3 months (October through December) and involves, at a minimum, the following tasks:
 - Verifying the list of all active companies using multiple systems to validate points of contact, mailing addresses, and valid email addresses. This involves research into the company and current contact information. It often involves direct contact with the company.
 - Updating systems with new information (e.g., new contact information, correcting information where companies have combined or separated, removing companies that are no longer active).
 - Producing mailing letters for the reporting period and working to obtain funding and approvals for mailing information.
 - Working to validate email addresses and coordinating with other offices to send mass emails to companies.
 - Contacting consortiums to provide information and education regarding the upcoming reporting period.
 - Maintaining records regarding this process.

- o Due to changes in the FAA personnel who conduct reviews of violation and refusal reports, the FAA updated the labor estimation for these tasks. Now, the labor estimation more appropriately calculates the cost to the FAA for two compliance investigator's salaries are used to calculate the weighted average hourly wage for a compliance investigator. A senior investigator incurs 60% of the hourly burden, and a junior investigator incurs 40% of the hourly burden.

- The number of total repair station certificates located outside the United States increased from 977 to 1,045 since the previous supporting statement, based on more current certification information.
- The Drug Abatement Division made a significant change to the Foreign Repair Station information collection by adding the ability for foreign repair stations to combine their testing programs under a single registration in some cases. The purpose of the registration is to provide an individual or corporation that owns and operates multiple foreign repair station certificates in one country (or different countries without the need for a waiver or exemption) and who would like to fully implement [14 CFR part 120](#) and [49 CFR part 40](#) in each location, the option to request a single drug and alcohol testing program to cover all certificates by obtaining a foreign repair station registration from the FAA's Drug Abatement Division that covers all their certificates and safety-sensitive employees. The Drug Abatement Division requires the submission of additional information in order to process registration requests, which we account for in this renewal. Because of this change, the FAA estimates 69 individuals or corporations (parent companies) will request a registration to operate combined testing programs representing a total of 197 subsidiary foreign repair stations. The previous supporting statement estimated under the 'high estimate' option that each foreign repair station would independently operate their own drug and alcohol testing program, so the FAA recalculated the high estimate in this supporting statement to accommodate the most likely scenario – that 69 parent companies will operate a combined testing program covering 197 repair stations, plus the 848 independent foreign repair stations that would develop their own standalone drug and alcohol testing programs (917 total foreign drug and alcohol testing programs). Due to the change in the 'high' option, the FAA revised the ICs in the foreign repair station section of the Supporting Statement to include the burden of 1,045 foreign repair stations obtaining an A449, the burden of an estimated 69 parent companies obtaining a registration, and the burden of the maintenance of an estimated 917 total drug and alcohol testing programs.

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.

Using the MIS Reporting Data and the required refusal, alcohol violation or positive test reports, the Drug Abatement Division responds to information requests from the media or industry about program data limited to the number of safety-sensitive employees subject to testing or data that establishes annualized random testing rates for the following year. Using the MIS reporting data, the DOT publishes drug and alcohol testing data for each mode of transportation, including the FAA. Information is presented annually online²⁴ and includes:

²⁴ https://www.transportation.gov/odapc/DOT_Agency_MIS_Data

- 1) the total number of drug and alcohol tests by type of substance tested;
- 2) the drug and alcohol test results by type of substance tested;
- 3) the reason for the drug or alcohol test, such as pre-employment, random, post-accident, reasonable suspicion or cause, return-to-duty, or follow-up, by type of substance tested; and
- 4) the number of individuals who refused testing.

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.

No such approval is being requested.

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

There are no exceptions.