

## SUPPORTING STATEMENT

### A. JUSTIFICATION

1. Explain the circumstances that make the collection information necessary.

The Coast Guard is required by Title 46, United States Code, 10311 to provide merchant mariners with evidence of sea service to determine eligibility for various benefits, such as medical and retirement. The information collected is also used to show eligibility for an original, renewed or upgraded license or merchant mariner document, to develop maritime sea service statistics, and to provide information to the U. S. Maritime Administration (MARAD) on the availability of mariners in a time of national emergency. The Coast Guard's sea service database captures the information from the Certificates of Discharge and it is used by the Coast Guard's Regional Examination Centers to evaluate the qualifications of mariners who apply for originals, renewals, or upgrades to their license or merchant mariners document. The information from the database is compiled annually by MARAD to prepare congressionally mandated reports on mariner availability.

2. Indicate how, by whom, how frequently, and for what purposes the information is to be used and the consequence to the Federal program or policy activities if the collection of information was not conducted.

The information is used primarily, on an as needed basis, by mariners and the Coast Guard to establish sea service time and qualifications for issuing original, renewals or upgraded merchant mariner credentials; in claims against employers; in medical claims; and in qualifying for retirement benefits or insurance benefits.

3. Describe whether the collection of information involves the use of automated collection techniques.

At present the Coast Guard does not employ methods for collection of this information electronically or by any other automated process. The current format has been in use since World War II and was last revised in March of 1985. The Coast Guard is developing an online version in an editable .pdf format which will replace the current version of the form. The online version will be available to the general public via the internet and development is expected to be completed during this extension period.

4. Describe efforts to identify duplication.

As the requirements for documenting sea service are unique and very specific, no duplication of information collected is known. These are the only records available that specifically address these requirements.

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

The information collection does not impact small businesses.

6. Describe the consequences to the Federal program or policy activities if the collection were not conducted or conducted less frequently.

If the information is not collected, the statutory requirements (46 USC 10311) would not be met and the Department of Homeland Security would be vulnerable to legal action by merchant mariner unions and other interested parties. Additionally, if the information is not collected, MARAD would be unable to manage its manpower program and provide reports to Congress.

7. Explain any special circumstances.

No special circumstances exist for this collection of information.

8. Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB.

A request for comment was published in the Federal Register on September 19, 2006, (71 FR 54830) and provided a 60-day comment period. No comments were received.

9. Explain any decision to provide any payment or gift to respondents.

No payments or gifts are provided to respondents and no decisions have been made to do so.

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

Personal information regarding merchant mariners is protected under the Privacy Act of 1974 and the statutes related to Coast Guard recordkeeping (46 USC 7319). Although these assurances are not listed on the current version of the form, appropriate Privacy Act statements as required by the Privacy Act of 1974 will be provided as part of the new on-line version.

11. Provide additional justification for any questions of a sensitive nature.

There is no information of a sensitive (private) nature collected.

12. Provide estimates of the hour burden of the collection of information.

The latest data indicates that the approximate number of respondents is 1,937. On the average each respondent submits 30 discharges annually for a total annual submission of

58,110. Each response requires approximately 2 minutes (.03 hours) to execute. The total number of annual hours requested is 1743.3.

Annual cost burden to the respondent is estimated at \$87,165.00. This is based on the number of hours involved for reporting (1743.3) times an estimated average hourly wage of \$50.00.

13. Estimates of annualized capital and start-up costs.

There are no start-up costs associated.

14. Provide estimates of annualized cost to the Federal Government.

There will be no annual cost to the Federal Government as an adequate supply of the existing form will remain in stock until such time as the on-line version becomes available.

15. Explain reasons for any program changes.

Previous collections were calculated based on estimates of collections received. This collection utilized a query of the database and precise numbers were generated. The results of this query showed that previous estimates were greater than what was actually being received and the OMB-83I was adjusted to reflect this reduction.

16. For collection of information whose results will be published.

Each year a report is generated by MARAD showing the number of maritime workers employed. This report includes information that has been gathered by this collection, such as, job skill and number of employee days. These statistics are published annually as a supply and demand study by MARAD.

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

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

There are no exceptions.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.**

This information is not collected through the use of statistical methods.