

SUPPORTING STATEMENT
INFORMATION COLLECTION 2133-0030
“SUPPLEMENTARY TRAINING COURSE APPLICATION”

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.

This collection is a critical to supporting the Maritime Administration's (MARAD) fire fighting training program for merchant mariners. It supports the Secretary's strategic goal on safety. A specific outcome is that MARAD's fire fighting training will "Reduce the number of reportable transportation incidents and their related economic costs."

Section 1305 (a) of the Maritime Education and Training Act of 1980 specifies that, "the Secretary may provide additional training on maritime subjects, as the Secretary deems necessary, to supplement other training opportunities and may make any such training available to the personnel of the merchant marine of the United States and to individuals preparing for a career in the merchant marine of the United States." The Port and Tanker Safety Act of 1978 authorized the promulgation of regulations for establishing crew training and qualification standards for tank vessels. Finally, the U.S. Coast Guard (USCG) requires a fire-fighting certificate for U.S. merchant marine officers, effective December 1989, pursuant to the 46 CFR 10.205(g) and 10.207(f).

Additional training is part of a joint U.S. Coast Guard/Maritime Administration policy to improve the qualifications of U.S. mariners. The 1974 policy lists critical areas in which supplementing qualifying instruction is essential. Training standards are also being developed at the international level. The Standards of Training, Certification, and Watchkeeping (as amended) requires fire training for all mariners, internationally. Resolution A.437 (XI) of the United Nations Intergovernmental Maritime Organization (IMO) entitled, "Training of Crews in Firefighting," includes training elements for both basic and advanced fire training of ships crews in firefighting.

Mariners' ability to respond to shipboard fires is of ever increasing value, in terms of life, dollars, and environmental protection. Tracking this qualification is essential; therefore, a form is needed to administer and record this training.

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.

In accordance with the authority contained in the Merchant Marine Act, respondents are U.S. merchant seamen, both officers and unlicensed personnel. U.S. citizens employed in

other areas of waterborne commerce also may receive this training on a space available basis. The information on this form is needed to determine eligibility and record attendance. Without this information, the courses will not be documented. This application form is the only document of record and is used to verify that students have attended the course, to replace lost course certificates and to advise students of possible health risks.

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. Also describe any consideration of using information technology to reduce burden.

The application form is available on MARAD's website, however, since MARAD requires an original signature on the application the form is usually distributed in the classroom .

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

There is no duplication. MARAD provides the only marine firefighting training in the Catalog of Federal Domestic Assistance, the Government-wide compendium of assistance programs. MARAD also provides the only marine diesel training for U.S. merchant seamen identified in the catalog. The information is not available from any source other than the respondent. Finally the profession of U.S. merchant seamen is such that he or she changes employers regularly.

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

Each respondent fills out the form. Sponsoring organizations do not fill out the form.

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 the burden.

The training is provided generally on a one-time basis. While students are encouraged to take a refresher course every five years, there is no mandatory or legal requirement to do, so many students do not.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing data with other agencies for compatible confidential use; or
- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that require the collection of information to be conducted for other than the reasons stated in item 1 above.

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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Maritime Administration published a 60-day notice and request for comments on this information collection in the Federal Register (Vol. 72, No. 139, Pages 39887 and 39888) on July 20, 2007, indicating comments should be received by September 18, 2007. No comments were received. On November 9, 2007, a 30-day notice was published (Vol. 72, No. 217, Pages 63648 and 63649) with comments due December 10, 2007.

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

Not applicable.

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

The information requested is not of a confidential nature and, consequently, no assurance of confidentiality need be given. The protections under the Privacy Act of 1974 are provided and a PRIVACY ACT NOTICE is stated at the top of the application form.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any step to be taken to obtain their consent.

The information requested is not of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- o Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- o If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.
- o Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in item 14.

Respondents submit a form once. The estimated number of respondents for this collection is 500. It takes approximately .05 hours per response and there is one response per

respondent per year. Therefore, the hour burden for one year is 25 hours. At \$10.00 per hour, the estimated annual cost is \$250.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).
- o The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
 - o If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
 - o Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

(a) Total Capital and Start-Up Costs Estimate: None

(b) Total Operation and Maintenance and Purchase of Services Estimate: None

14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, such as equipment, overhead, printing, and support staff and any other expense that would not have been incurred without the paperwork burden.

This form is received, filled out, and filed at school locations. The forms are used to verify course attendance and/or issue duplicates of course certificates when students lose them. The annualized cost of processing to the Federal Government is estimated at \$271.25. This was arrived at by multiplying the typical annual attendance of 500 students by the estimated processing time (three minutes), then dividing the result by the minutes in an hour

and finally multiplying the second result by the typical staff hourly wage of \$10.85 (GS-5 Clerk). The estimated cost of printing 1000 forms for a one-year supply is \$70. Therefore, the estimated annualized cost to the Federal Government is \$341.25.

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

N/A.

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.

NOT APPLICABLE

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

We are not seeking approval to delete the OMB expiration date.

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

No exceptions are requested.