

**Supporting Statement  
for  
Course Approval and Records for Merchant Marine  
Training Schools**

**A. Justification.**

- 1) Circumstances that make the collection of information necessary.

Title 46 United States Code (U.S.C.) 7315 authorizes a license or document applicant to substitute the completion of an approved course for a portion of the required sea service. Title 46 Code of Federal Regulations (CFR) 10.302 specifies the information that must be submitted for the Coast Guard to evaluate and approve each course. Title 46 Code of Federal Regulations (CFR) 10.303 specifies recordkeeping requirements that a school teaching approved courses must meet for each student taking each course.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of Natural Resources

Marine Safety, Security and Stewardship Directorate (CG-5)

- Safety: Eliminate deaths, injuries and property damage associated with commercial maritime operations
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

- 2) By whom, how, and for what purpose the information is to be used.

On a daily basis, U.S. Coast Guard National Maritime Center (NMC) personnel review submitted information to ensure training courses and programs meet minimum standards for Coast Guard approval. Members of the public, including U.S. merchant mariners, attend approved courses to meet regulatory requirements or to enhance their ability to perform their jobs. The agency uses the information to enforce regulations, and to compare existing

courses with new international standards for specific training.

The recordkeeping requirements helps the Coast Guard monitor the performance of schools with approved courses.

3) Consideration of the use of improved information technology.

In May 2002, the National Maritime Center (NMC) established procedures for the electronic submission of requests for course approval. The details are contained in NMC Policy Letter 08-02. This policy provides the option for merchant marine training schools to submit requests for original course approval and the renewal of courses following the format prescribed in the policy letter.

We estimate that 100% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that 15% of the responses are collected electronically due to the limited success soliciting electronic requests on a voluntary basis.

4) Efforts to identify duplication. Why similar information cannot be used.

Similar data in this field is not available. The Coast Guard is the only agency collecting this information for use as described in the answer to item 2 above.

5) Methods to minimize the burden to small business if involved.

In general, both the reporting and recordkeeping burden is proportional to the number of courses that a school submits for approval. Thus, small businesses that offer only a few courses would have a reduced burden. Additionally, there is no application fee for respondents and direct communication between applicants and the Coast Guard is encouraged. Finally, all training schools seeking approval of courses must follow the same procedures.

6) Consequences to the Federal program if collection were conducted less frequently.

The Coast Guard's ability to evaluate training received by

mariners as an equivalent to service experience will be reduced. This may lead to less-qualified mariners and a corresponding increase in maritime accidents.

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

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

- 8) Consultation.

A 60 day Notice was published in the Federal Register to obtain public comment on this collection. (See [USCG-2008-0383], May 20, 2008, 73 FR 29141) The USCG has not received any comment on this information collection.

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

There is no offer of monetary or material value for this information collection.

- 10) Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection.

- 11) Additional justification for any questions of a sensitive nature.

There are no questions of sensitive nature.

- 12) Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

For the reporting requirement, we estimated that there would be about 700 annual requests for course approvals, including renewals, prepared by about 267 training schools. For the

recordkeeping requirement, we estimated that the 267 training schools would account for 2,064 Coast Guard approved courses. We estimated 20 hours are needed to draft a request for approval and assemble the necessary enclosures, and about 1 hour to type, edit and mail the request to the Coast Guard. Furthermore, we assume that GS-12/13/14 personnel, equivalent to \$83 per hour<sup>1</sup>, and GS-7 personnel, equivalent to \$42 per hour, would complete the request. (The GS-13 rate is used in order to more conservatively estimate the cost burden.)

Under these assumptions, the annual hour and cost burdens to respondents are the following:

Hour burden: 14,700 hours = 700 requests/year x 21 hours/request.  
 Cost burden: \$1,191,400 = 700 (20 hours/request x \$83/hour + 1 hour/request x \$42/hour).

The recordkeeping burden involves maintaining student records and issuance of course completion certificates for each student in each course. Allowing about 10 minutes per student, 20 students per class, and 12 class offerings annually; each course requires about 20 hours of recordkeeping. We assume that GS-9 personnel, equivalent to \$49, would complete the recordkeeping.

Recordkeeping hours = 10 minutes/students x 20 students x 12 classes/course  
 = 2,400 minutes = 40 hours/course.

Hour burden: 82,560 hours = 2,064 courses x 40 hours/course.  
 Cost burden: \$4,045,440 = 82,560 hours/year x \$49/hour.

Total annual hour burden: **97,260 hours** = 14,700 hours + 82,560 hours

Cost burden: **\$5,236,840** = \$1,191,400 + \$4,045,440.

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

There are no capital, start-up or maintenance costs associated with this information collection.

### 14) Estimates of annualized Federal Government costs.

The Coast Guard estimated that there would be about 700 annual requests for course approvals, including renewals, prepared by about 267 respondents. Field office personnel (GS-12/13/14) at the Regional Examination Centers (REC) conduct site inspections

<sup>1</sup> All hourly rates per Enclosure (2) to COMDTINST 7310.1K.

of training facilities. GS-7 personnel will draft, edit and mail site approval recommendations to NMC. At the NMC, approval requests are evaluated and determinations result in approval (or denial) letters and certificates being issued.

Using GS-13 (in order to more conservatively estimate the cost burden) and GS-7 hourly pay estimates of \$66 and \$36 per hour, respectively, with all other operational costs being usual and customary:

- (1) RECs  
 2hrs x \$66 = \$132  
 1hr x \$36 = \$36  
 700 responses (site visits) x \$168 = \$117,600.
- (2) NMC  
 8hrs x \$66 = \$528  
 1hr x \$36 = \$36  
 700 responses x \$564 = \$394,800.

The annual hour burden for the Federal Government: **8,400 hours** = (3 hours/request + 9 hours/request) x 700 requests/year.

The total annual cost for the Federal Government: **\$512,400** = \$117,600 + \$394,800.

15) Explain the reasons for the change in burden.

The change (i.e., increase) in burden--an ADJUSTMENT--is due to three factors. First, there is an increase the number of merchant mariner training schools from 230 to 267. Second, there is an increase in the annual estimate for the number of course approvals from 618 to 700. Third, there is an increase in the annual estimate for the number of classes per approved course. In past periodic renewals, we estimate that there would be only 6 class offerings per year. We now estimate 12 class offerings per year for each of the 2,064 approved classes. Thus, this doubling in class offerings, combined with more schools and more approved courses results in a large increase in burden from the last renewal.

16) For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

- 17) Explain the reasons for seeking not to display the expiration date for OMB approval of the information collection.

USCG will display the expiration date for OMB approval of this information collection.

- 18) Explain each exception to the certification statement.

USCG does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods.**

This information collection does not employ statistical methods.