

SUPPORTING STATEMENT
for
Certificate of Discharge to Merchant Mariners
1625-0012

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 Merchant Mariner Credentials (MMCs), to develop maritime sea service resource capabilities, 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 Certificates of Discharge and it is used by the Coast Guard's National Maritime Center to evaluate the qualifications of mariners who apply for originals, renewals, or upgrades to their Merchant Mariners Credential. 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 paper format (CG-718A) has been in use since World War II and was last revised in March of 1985. Shipping companies can order the form on the NMC website at <http://www.uscg.mil/nmc/cd.asp>. The Coast Guard is developing an online version in an editable .pdf format which will replace the current version of the form. Once the initial e-form development is completed, this form will be submitted to OMB for approval through the appropriate channels. The online version will be available to the general public via the internet. 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.

This information collection does not have an impact on small businesses or other small entities.

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 (5 U.S.C. 552; 46 U.S.C. Chapters 103 and 104; 46 U.S.C. 70105) 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.

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

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

A 60-day (See [USCG-2009-0588], July 20, 2009, 74 FR 35201) and 30-day (See [USCG-2009-0588], November, 10, 2009, 74 FR 58038) Notice have been published in the Federal Register requesting comments from the public. The USCG has not received any comments from these collections.

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 and the basis for the assurance in statute, regulation, or agency policy.

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

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

There are no questions of sensitive nature.

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

The total number of annual hours requested is 2,444.

Estimated # of Annual Hours Requested (Collection 1625-0012)						
	Per Month	Per Year	Total minutes to complete 1 CD Date Entry	Total minutes to Complete Data Entry (per yr)	Total Hours to Complete Date Entry	Annual Burdened Costs to Respondent
CD's	~6,109	~73,306	2	146,612	2,444	\$122,200

The above annual burdened costs are based on the number of hours involved for reporting [(2min)*(1 hr/60min) = 0.03333 hrs * 73,306 = 2,443.53 = 2,444 hrs] times an estimated average hourly wage of \$50.00 of vessel captains (\$50*2,444 = \$122,200). Due to unique nature of the commercial shipping industry, and, the fact that the maritime shipping industry has not published an hourly wage scale for ship Captains; the individuals who complete the Certificate of Discharge forms, the NMC believes, it is impossible to more accurately estimate the annual burdened costs to the respondent.

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

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

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

Once the Certificate of Discharge is received from the respondent, the US Coast Guard (CG) performs the appropriate data entry. This information is available to merchant mariner credential evaluators via the CG Merchant Mariner Licensing and Documentation (MMLD) system.

Annual Burdened Cost to Government						
	Per Month	Per Year	Total minutes to complete 1 CD Date Entry	Total minutes to Complete CD Data Entry (per yr)	Total Hours to Complete CD	Annual Burdened Costs to Government
CD's	~6,109	~73,306	.5	36,655	611	\$12,354

The estimated average hourly costs:

.5 min = 30 seconds

$30s * (1min/60s) * (1hr/60min) = .008333hrs * 73,306 = 610.8833 = 611 hrs$

$\$20.22 * 611 hrs = \$12,354.42 = \$12,354$

The hourly wage of \$20.22 was estimated by equating a respondent to a GS 7 step 1 position. (Info located at the following location http://www.opm.gov/oca/10tables/pdf/dcb_h.pdf).

15. Explain reasons for any program changes.

Previous collections were calculated based on a database query. This collection utilized actual numbers received and entered into the database. The results tracking of actual data entry showed that the previous database query though accurate did not account for the increase generated due to program consolidation and communication with/to industry advising of importance of information for mariner credentialing process. This communication to the maritime industry has resulted in an increase in receipt of correct/accurate submissions. Although there has been an increase in receipt of submissions there has been no substantial change to the collection instrument just changes to the positioning and formatting on the form but no change to the information collected.

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

This information collection will not be published for statistical purposes.

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.

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

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

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

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

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