

## SUPPORTING STATEMENT

Title: Continuous Discharge Book, Merchant Mariner Application, Physical Examination Report, Sea Service Report, Chemical Testing Form, and Entry Level Physical Examination Report

Agency Form #: CG-719B, CG-719K, CG-719S, CG-719P, and CG-719K/E

OMB #: 1625-0040

### A. JUSTIFICATION

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

Title 46, Code of Federal Regulations (46 CFR), parts 10.105(b) 10.205(a), 10.207(a), 10.209(a) (1) and 12.02-9(a) requires that each applicant for a license, certificate of registry or merchant mariner document make written application to the Coast Guard (CG Form 719B). 46 CFR parts 10.205 (a), 10.207 (e) (2) , 10.209 (d) (2) , 12.05-5 and 12.15-5 mandate that each applicant for a license or merchant mariner document must present a completed Coast Guard physical examination report (CG Form 719K) executed by the physician.

46 CFR part 10.211 mandates presentation of documentary evidence of sea service on vessels (CG Form 719S). 46 CFR parts 10.202(i) and 12.02-9(f) mandates that each applicant must produce evidence (CG Form 719P) of having passed a chemical test for dangerous drugs. 46 CFR part 12.02-17(e) requires entry-level merchant mariner document applicants to provide a statement from a qualified practitioner attesting to the applicant's medical fitness to perform the functions for which the document is issued. (CG Form 719KE)

#### 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 Coast Guard will evaluate this collected information against applicable statutes, regulations and policies solely for the purposes of determining eligibility for issuance of a merchant mariner credential(s), i.e. license, certificate of registry or merchant mariner document. This evaluation is performed on occasion, meaning as submitted by the respondent when he or she applies for a Coast Guard credential. Per the regulations, the Coast Guard needs this information to process applications only from, and issue credentials only to, applicants who can prove their identity, and whose backgrounds, training and certifications can be verified to ensure security and safety related requirements are met. This information assists the Coast Guard in its effort to help secure U.S. ports, waterways, marine infrastructure, and marine-related commercial activities, including international trade, by protecting the licensing and COR process from abuse or fraud. Additionally, the information is stored in the Merchant Mariner Licensing Database. Retaining the data in the application saves the government and the applicant

from having to repeatedly submit information and documents the basis upon which the license was issued.

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

Respondents currently have the option to obtain electronic formats of the forms for this collection. At this current time USCG does not have the capability for electronic submission. Issues pertaining to required third-party signatures, such as physicians and medical review officers, remain unresolved with respect to electronic submission. The information can be submitted via email.

4. Describe efforts to identify duplication.

As the requirements for a Coast Guard merchant mariner credential are unique and very specific, no duplication of information collected is known. These are the only records available that specifically address the requirements for issuance of a Coast Guard merchant mariner credential. No other Federal, State, or Local agencies collect this information.

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.

The Coast Guard is mandated by law to issue licenses, certificates of registry, and merchant mariner documents to individuals found qualified as to age, character, habits of life, experience, professional qualifications, and physical fitness. Without the ability to collect this information, the Coast Guard would be unable to adhere to statutory and regulatory requirements.

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. Describe efforts to consult with persons outside the agency.

A 60-day notice was published in the Federal Register on to obtain public comment on this collection (See [USCG-2008-0929], September 23, 2008, 73 FR 54843). USCG did not receive any comments.

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.

No assurance of confidentiality is provided to respondents.

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.

In FY 2007 65,299 applications (CG-719B forms) were received and processed. This is a good representation of an average year of application. An application itself takes approximately 10 minutes (= 0.167 hours) to complete, and may be hand carried or mailed to a Regional Examination Center (REC) for processing. The total hour burden based on FY 07 numbers will be approximately 10883 hours.

Total Application (TA):	65,299
Time to complete 1 application (TC):	0.167 hours per application
Total Burden hours: (TA X TC)	10,8333 hours

13. Provide estimates of the total annual cost burden to respondents.

There are no annualized capital and start-up costs.

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

The annual cost to the government is estimated at \$170,000.00. This cost is for the storage of the information collected in the Merchant Mariner Licensing Database (MMLD).

15. Explain reasons for any program changes.

The changed is due to an ADJUSTMENT to our program. Previous estimations in burden hours were an overestimate which erroneously considered travel time to and from Regional Exam Centers. Written applications may be mailed, and do not require travel time. Also CG-719A is a hardbound document that USCG will discontinue because all information is captured in all other forms associated with this collection.

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

There are no current plans to use the information 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.

The OMB expiration date should and will be displayed on reports.

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.