SUPPORTING STATEMENT

United States Merchant Marine Academy (USMMA) Alumni Survey

INTRODUCTION: This is a request to obtain Office of Management and Budget's (OMB) three year approval for the information collection entitled United States Merchant Marine Academy Alumni Survey, OMB Control No. 2133-NEW.

Justification

1. Explain the circumstances that make the collections 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.

The United States Merchant Marine Academy is an accredited federal service academy that confers BS and MS degrees. Title 46 U.S.C. 51309 authorizes the Secretary to prescribe regulations necessary to administer programs to maintain appropriate academic standards. The Academy is expected to assess its educational outcomes and report those findings to its Regional Accreditation authority in order to maintain the institution's degree granting status. Periodic survey of alumni cohorts and analysis of the data gathered is a routine higher education assessment practice in the United States. This collection of information supports DOT's Strategic Goal of Security, Preparedness and Response.

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.

The Academy will conduct an annual mail survey of its immediate, five-year and ten-year alumni, consisting of approximately 500 individuals each year. The survey will be administered by the Academic Division of the Academy under the supervision of the Assistant Superintendent for Academic Affairs/Academic Dean. The information gathered will be analyzed and used for program management and improvement. Summary findings will be included as supporting evidence to the five-yearly and ten-yearly reports to the Middle States Commission on Higher Education, the higher education accreditation authority that grants the Academy's degree-granting privilege. The last survey was conducted in 2004 by the Alumni Foundation.

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.

This information collection does not involve the use of automated, electronic, mechanical, or other technological collection techniques. The information collection will be carried out through a USPS mail survey.

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.

Similar information is not gathered currently by any other entity.

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

The only intended recipients of the survey are graduates of the Academy.

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.

If the collection is not done, it will impact the Academy's ability to maintain its accreditation and thereby, its ability to offer a Bachelor of Science degree. Current accreditation expectations include regular annual survey of alumni to gather information related to the effectiveness of academic programs.

- 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 in a manner described above.

8. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> 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.

MARAD published a 60-day notice and request for comments on this information collection in the <u>Federal Register</u> (74 F.R., No. 174), dated September 10, 2009, at 46640, indicating comments should be submitted on or before November 9, 2009. No comments were received.

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

No payments or gifts are provided to respondents.

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 respondents as part of this information collection. The Academy has no mechanism in place to identify individual respondents. Analysis will be done at the aggregate level and all reports produced will be at summary level.

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 steps to be taken to obtain their consent.

USMMA is not seeking authority to collect any PII or sensitive information.

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

- 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.
- 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.
- 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.

Approximately 500 alumni will receive the questionnaire. No recipient will respond to more than one questionnaire per year and a total of three during a ten year window. The estimated time for survey completion is 20 minutes. The hour burden in responding to the questions is as shown in the Table below. The calculations are based on the Mean Hourly Wage Estimate of \$20.32 per hour (U.S. Dept. of Labor, Bureau of Labor Statistics, 2009). Accordingly, the estimated annualized opportunity cost to respondents will be 166.67 hours x \$20.32 = \$3,386.73.

No. of estimated respondents	Response per respondent	Total estimated responses annually	Hours per response	Total hours annually	Annualized opportunity cost burden on recipients @ \$20.32 per hour
500	1	500	0.33	166.67	3,386.73

Source for Mean Hourly Wage estimate: http://www.bls.gov/oes/current/oes_nat.htm#b00-0000; viewed Feb. 7, 2010.

13. Estimate of total annual costs to respondents

There will be no annualized cost for survey respondents as they will receive a postagepaid envelope.

14. Estimate of cost to the federal government

The only costs involved will be the cost of printing and mailing the questionnaires and responses, and is estimated to be \$500. The data analysis will be part of regular work assignment of current civil service employees.

15. Explanation of program changes or adjustments

This is new data collection. USMMA alumni surveys were conducted by the Alumni Foundation in prior years.

16. Publication of results of data collection

Collected data will be analyzed and relevant results shared with internal program managers. Summary findings will be included in the self-study report to be submitted to Middle States Commission on Higher Education every five years.

17. Approval for not displaying the expiration date of OMB approval

MARAD is not seeking such an approval.

18. Exceptions to certification statement

N/A

Part B. Collections of Information Employing Statistical Methods

The purpose of the alumni survey is to document student perceptions about education received at USMMA and will not be used for any type of forecasting or projecting. The survey results will be tabulated and documented as indirect evidence for accreditation purposes. The accreditation authorities will not benchmark the results with any minimum requirement. The institution will track the results for its own continuous improvement.

1. Describe potential respondent universe and any sampling selection method to be used.

USMMA graduates approximately 200 students each year. The goal of USMMA alumni surveys is to seek perceptions from all those who graduated within the last ten years. Those entering the 10-year window will receive three surveys during that period. Overall, approximately 500 surveys will be mailed (as we expect not to have current address for at least 100 out of the 600 targeted alumni) and no sampling techniques will be used. We are not surveying each class every year for 10 years. We don't want representation from each year for each survey. What we want is feedback from alumni at defined intervals. It is a well known fact that alumni perceptions vary with the number of years after they leave their alma mater. So, our respondent universe each year is 500 (e.g., if we conduct an alumni survey this year as planned, we will survey the class of 2009, 2005 and 2000). Most recent college alumni are very vocal just after graduation and provide useful feedback or observations given the currency of their experience which is why they are surveyed just after graduation. During the 5th year and 10th year, typically the involvement with their alma mater gets a boost and they usually take a higher level of interest in providing quality feedback although their memory and currency may be lagging. This is why small colleges usually do their surveys at multiple intervals unlike the bigger universities that graduate 1000s of students each year and use rigorous statistical techniques.

2. Describe procedures for collecting information, including statistical methodology for stratification and sample selection, estimation procedures, degree of accuracy needed, and less than annual periodic data cycles.

The Academy's plan is to survey three different class years each year. All members of those classes will be contacted. One group of survey recipients would have graduated six months ago from the college, another group five years earlier and the 3rd group, 10 years ago. This is a standard technique used by small colleges to gather input from their alumni during the course of a ten-year window that follows graduation.

3. Describe methods to maximize response rate.

USMMA will seek assistance from the USMMA Alumni Foundation to encourage participation and maximize the response rate. The Alumni Foundation maintains a database of USMMA alumni and publishes a quarterly periodical in addition to

maintaining web presence. The Academy will announce the timing of alumni survey through these media so as to communicate with past students and encourage participation. The Academy will also seek the Foundation's help in getting any address updates. The expectation is get a 70% or higher response rate. USMMA alumni are very vocal and usually very generous with their comments.

4. Describe tests of procedures or methods.

All universities conduct alumni surveys routinely; they are required for maintaining institutional accreditation. No special tests are required. The Academy's plan is to survey each graduate three times during a 10 year window. The first survey will be six months after graduation, the second survey five years after graduation and the third survey ten years after graduation. This is a standard technique used by small colleges to gather input from their alumni during the course of a ten-year window that follows graduation.

5. Provide name and telephone number of individuals who were consulted on statistical aspects of the information collection and who will actually collect and/or analyze the information.

The surveys were prepared by the Academy's two degree granting departments, viz., Marine Transportation and Engineering under the supervision of the Academic Dean. Once the responses are received, faculty members from the two degree granting departments will compile and analyze the data under the supervision of the Academic Dean.

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