

Narrative of Changes

The purpose of the Narrative of Changes is to clearly indicate revisions to a collection since the previous approval

Collection Title: Claims Under the Oil Pollution Act of 1990

OMB Control No.: 1625-0067

Current Expiration Date: 11/30/2011

Collection Instruments:

There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and the methodology for calculating burden, remain unchanged.

The following listed below are changes to the collection:

- Updated working on Claims not paid by, to settled of submission or denied
- Added annotation to explain:
 - The number of claims anticipated will be updated once the full extent of the Deepwater Horizon (DWH) Oil Spill incident of 20 April 2010 is fully realized. DWH is the first ever Spill of National Significance (SONS) and a report that includes partial/incomplete data will adversely skew any conclusions reached based on it.
 - Prior to DWH, the claims submission trend showed an overall downward trend, with the number of claims decreasing, while their complexity trend moved in the opposite direction.
 - The effects of the late 2000s recession triggered an assumption of labor rates holding steady, therefore negating any increase in the overall costs previously presented.
 - The world-wide-web (internet) has been a facilitator for increasing potential claimants access to information on the OPA claims more quickly and effectively, whether directly from the RP or other sources, including the NPFC. For that reason, it is anticipated that these costs will likely remain constant and any increase be negligible.
- Updated Claimant Costs to comply with new Coast Guard Standard Rates Instruction, COMDTINST 7310.1M
- Updated Total Monetized Burden Estimates Table
- The Instruction Sheet has been added to this collection.