

**Supporting Statement
for
Course Approval and Records for Merchant Mariner
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) 11.302¹ specifies the information that must be submitted for the Coast Guard to evaluate and approve each course. Title 46 CFR 11.303² 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

¹ Available at -- <http://www.gpo.gov/fdsys/pkg/CFR-2011-title46-vol1/pdf/CFR-2011-title46-vol1-sec11-302.pdf>

² Available at -- <http://www.gpo.gov/fdsys/pkg/CFR-2011-title46-vol1/pdf/CFR-2011-title46-vol1-sec11-303.pdf>

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.

Information is submitted in writing or electronically via e-mail to D05-PF-NMC-2-Courses@uscg.mil. For guidance on electronic submissions, see NMC Policy Letter 08-02.^{3&4} 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.

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.

³ Available at- <http://www.uscg.mil/nmc/marpers/pag/08-02.pdf>

⁴ Available at- http://www.uscg.mil/nmc/announcements/course_approvals_email_info_bulletin.pdf

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

8) Consultation.

A 60-day and 30-day Notice were published in the *Federal Register* to obtain public comment on this collection (see [USCG-2011-1014], November 7, 2011, 76 FR 68772, and January 12, 2012, 77 FR 1942, respectively). The Coast Guard has not received any comment specific to this information collection. The Coast Guard did receive one comment to the 60-day Notice related to our Information Collection Request (ICR) process. We answered that comment in the 30-day Notice (see 77 FR 1943). The comment did not change the estimate of this ICR.

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 language.

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.⁵ We estimated 20 hours are needed to draft a request for approval

⁵ In general, the CG approves a course for a 5-year period. The 700 courses the CG estimates we will receive per year represent about 287 new courses and 413 renewals (2,064/5). As a training institution is not required to renew a course, we estimate for the next 3 years there will be a steady state of 2,064 approved courses. In other words, although CG estimates 287 new courses per year, CG believes a similar number will not be submitted for renewal.

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 hour⁶, 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 40 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 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.

⁶ All hourly rates per Enclosure (2) to COMDTINST 7310.1K.

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.

There is no change in burden. 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.

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.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18) Explain each exception to the certification statement.

The Coast Guard 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.