

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS
UNDER 5 CFR PART 1320
Information Collection: 2133-0010

A. Justification

1. Explain the circumstances that make the collection 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.

Regulations pertaining to the U.S. Merchant Marine Academy (USMMA) appeared in the Federal Register (Vol. 47, No. 98, p. 21811, dated May 20, 1982) as a final rule. Part 310.57(a) of 46 CFR provides for the collection of information from anyone who is a prospect for admission. It states that "all candidates shall submit an application for admission to the Academy's Admissions Office." Thus, the collection of information through the use of an application is the primary means by which selections for admission are made. The statutory authority for continued existence of this federally sponsored merchant marine academy is Title XIII of the Merchant Marine Act of 1936.

This information collection supports the Secretary of Transportation's Strategic Security Objective.

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 Candidate Application (KP 2-65) Part I is used to pre-screen applicants for basic eligibility and to enter them into the Department of Defense medical system. Part I of the Application is usually submitted to the USMMA Admissions Office approximately one month before Parts II and III.

The information on the Candidate Application Parts II and III is used by the USMMA admissions staff and its Candidate Evaluation Board to select the best qualified candidates for the Academy. Part II is completed by the applicant and Part III by an official at the secondary school where the applicant attends or has attended. The portion that the applicant completes contains general identifying information; personal history data; participant activities and achievements/awards earned; a biographical sketch and a statement that a Service Obligation Contract must be signed after reporting to the Academy. The portion of the application that the secondary school official completes contains transcript information, including standardized test results, and a guidance counselor or principal's evaluation of the applicant.

Selection of applicants for appointment is made in the order of merit. The order of merit is determined by: the score on the required college entrance examination; an assessment of the applicant's academic background; and by other factors considered by the USMMA as effective indicators of motivation and the probability that the applicant will complete the Academy's course of instruction.

If all these parts of the application were not completed, applicants would not meet an important requirement of all candidates for admission to the USMMA and basic eligibility for an appointment could not be determined.

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.

All persons interested in obtaining an appointment to the USMMA are sent the application form for admission, which includes all 3 Parts. The person is urged to complete Part I immediately for a determination of basic eligibility and to initiate the medical evaluation process. Parts II and III are subsequently returned to the USMMA, completing an official candidate file. This file on the candidate is maintained throughout the admissions recruiting/selection cycle. Candidates may also apply on-line through the Academy's website, www.usmma.edu, which has resulted in a significant reduction in paperwork.

The Admissions Office staff uses a computerized applicant processing system that enables them to use the information from the application to screen applicants quickly against the admission requirements. This immediate feedback is beneficial to the eligible and ineligible applicants, both of whom must do next-step planning. The individualized nature of the information on all three parts of the application and the increasing use of personal computers, FAX machines, e-mail and answering machines by applicants has helped to reduce the shared admissions process burden to some degree.

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.

Parts I, II, and III of the Candidate Application are the only three forms used to determine basic eligibility and selection of persons for admission to the USMMA. There are no other agency forms collecting this same information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information does not involve small business or other small entities. The collection of information on the three parts of the application is a one-time requirement for applicants seeking admission to the USMMA. The burden to the applicant is as minimal as statutes and regulations permit.

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 burden.

Completed Parts I, II, and III of the Admissions Application are absolute requirements for admission to the USMMA and must be obtained from each new applicant. This is a one-time requirement. The consequences from reduced or non-collection of this information would be to jeopardize the USMMA admissions process and the appointment of a candidate.

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 Federal Register 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.

The Maritime Administration published a 60-day notice and request for comments on this information collection in the Federal Register on January 3, 2012 (77 FR, 150) [copy attached] indicating comments should be submitted on or before March 5, 2012. 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.

The USMMA does not consult or discuss any information on any part of the application with anyone except the candidate or other individuals expressly designated by the candidate or as authorized by the provisions of the Privacy Act Notice. The applicant must sign an authorization indicating to whom the Admissions Office may disclose information regarding their candidacy. Information on a candidate is released only on a “need to know basis.” Candidate files are retained for four years and then destroyed.

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 question 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.

Not applicable. There are no questions of a sensitive nature.

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 2,500 applicants return completed applications to the USMMA annually. The time burden consists of 3.5 hours for the students and 1.5 hours for the school officials. The 3.5 hours for the students include accurately completing Parts I and II of the application and following up to assure all paperwork is submitted to the USMMA by the application deadline. The school officials spend approximately 1.5 hour collecting and sending transcripts and other official documents.

Number of		Application		Total		Hours		Total
<u>Applications</u>		<u>per</u>		<u>Applications</u>		<u>Per</u>		<u>Hours</u>
2,500	x	1	=	2,500	x	5	=	12,500

A determination of the estimated number of hours required per response was made after consultation with several respondents.

Cost of the time burden for students: 2500 responses x 3.5 hours (including submission time) x

\$7.25/hour = \$63,437.50

Cost of the time burden for school officials: 2500 responses x 1.5 hours x \$27/hour* = \$101,250.00

(Source: BLS Mean Hourly Wage for Secondary School Teachers,
http://www.bls.gov/oes/current/oes_nat.htm#25-0000)

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no cost for applying to the USMMA and no cost for returning application. (USMMA provides postage paid envelopes for each part of the application and there is no application fee). However, the cost to register for the college entrance exam (SAT) is \$47.00. The cost, \$117,500.00 for 2,500 applicants, is not included in the official cost to respondents, because the applicants would have SAT scores in the absence of this application.

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

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

The total estimated cost to the Federal Government to process the application packages (Parts I, II, and III of the Admissions Application) of the 2,500 persons who will apply to the USMMA each year is \$625,623.00. This amount includes the annual salaries of the ten USMMA Admissions staff persons which is \$687,223.00, the cost of composition and printing of all three parts of the Application which is \$2,700.00, and the estimated annual postage cost which is \$5,700.00.

Below are the titles of the ten Admissions Office staff persons. The time that each person devotes exclusively to the application process varies from 50% to 90%. However, the remainder of their time is spent performing duties that relate directly to the admissions process. The average hourly rate of pay for the ten staff persons is estimated to be \$33.51 per hour. The ten staff members are as follows.

- 1 Admissions Director
- 1 Assistant Director
- 4 Recruitment Specialists
- 1 Secretary
- 3 Admissions Assistants

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB Form 83-I.

No change in burden is anticipated.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions.

The information on the application is not tabulated and published for public use due to Privacy Act restrictions.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable, MARAD is not seeking such approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Not applicable, there are no exceptions to the certificate statement.