

SUPPORTING STATEMENT

Title: Application for Merchant Mariner Credential (MMC), Merchant Mariner Certificate Evaluation Report, Small Vessel Sea Service Form, DOT/USCG Periodic Drug Testing Form, Merchant Mariner Evaluation of Fitness for Entry Level Ratings, Merchant Mariner Credential

Agency Form #: CG-719B, CG-719K, CG-719S, CG-719P, CG-719K/E, CG-4610,

OMB #: 1625-0040

A. JUSTIFICATION

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

Title 46, Code of Federal Regulations, parts 10, 12, 13, and 16 mandate that each applicant for a merchant mariner credential (MMC) make written application to the Coast Guard (CG-719B); present a completed Coast Guard physical examination report (CG-719K or CG Form 719K/E) executed by a physician, attesting to the applicant's medical fitness to perform the functions for the credential sought; provide documentary evidence of sea service on vessels (CG-719S); and provide evidence (CG-719P) of having passed a chemical test for dangerous drugs.

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 the collection of information against applicable statutes, regulations and policies solely for the purposes of determining eligibility for issuance of a MMC. This evaluation is performed on occasion, meaning as submitted by the respondent when he or she applies for a MMC every 5 years. Per Code of Federal Regulations, the Coast Guard requires the information to process applications and issue credentials to applicants who can prove their identity, whose background, 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 Merchant Mariner Credentialing Program from abuse or fraud. Additionally, much of the information collected is stored in the Merchant Mariner Licensing and Documentation database, which is used during the evaluation of future MMC applications.

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

The forms under this collection were converted to a fillable version. The Coast Guard continues to work towards developing a system that will allow respondents to submit

electronically. Available resources and funding are factors that can influence this initiative. However, upon approval of this collection, respondents will have the option to obtain electronic fillable forms for this collection. The Coast Guard implemented email submission of MMC application packages to Regional Examination Centers (RECs) in January 2010. Please see Appendix A (attached) for submission instructions and a list of email addresses available to the public. Coast Guard also accepts submissions by fax and via paper copies.

4. Describe efforts to identify duplication.

As the requirements for a Coast Guard MMC 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 MMC. 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 MMCs 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 not be able to adhere to statutory and regulatory requirements.

7. Explain any special circumstances.

No special circumstances exist for this collection of information.

8. Solicitation of Comments.

A 60-day Notice was published in the *Federal Register* to obtain public comment on this collection (see [USCG-2012-0082]; March 23, 2012; 77 FR 17081). Additionally, a 30-day Notice was published in the *Federal Register* to obtain public comment on this collection (June 14, 2012; 77 FR 35701). The Coast Guard has not received any comments on this information collection.

9. Explain any decision to provide any payment or gift to respondents.

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.

Confidentiality is provided to respondents via a System of Records, 65 FR 19476-01, dated April 11, 2000.

11. Provide additional justification for any questions of a sensitive nature.

There is no “sensitive nature” information collected.

12. Provide estimates of the hour burden of the collection of information.

In 2011, approximately 56,500 applications (CG-719B) were received and processed. This is a good representation of an average year of applications. An application itself takes approximately 9 minutes to complete, and may be e-mailed, hand carried or mailed to a Regional Examination Center (REC) for processing. Applications are either accompanied by a CG-719K or CG-719K/E, which provide information for determining an applicant’s fitness for duty as a merchant mariner. The CG-719P and CG-719S are typically submitted with the applicant’s application as documentary evidence of having passed a chemical test for dangerous drug and evidence of sea service on vessels.

The total hour burden based on 2011 numbers will be approximately 44,258 hours, an increase of 33,425 from the previously approved OMB 83-I (10,833 indicated on the “Total annual hours requested” line). The previous OMB 83-I only accounted for the burden hours associated with the CG-719B (65,299 annual responses * 10 minutes (time to complete 1 CG-719B) = 10,883 hours), and did not account for the total burden hours associated with all instruments within the collection. Based on the total annual responses from the previous OMB 83-I, the total annual hours for this collection should have been 54,416 (65,299 annual responses * 50 minutes (CG-719B + CG-719K or CG-719K/E + CG-719S + CG-719P)). Based on the corrected information, the total annual responses for this collection revision decreased by 8,799 and decreased burden hours by 10,158.

The estimate cost of the hour burden is \$1,388,550.49 (\$22.41 (wage data retrieved using U.S. BLS website) * 1.4 (loaded factor) * 44, 258 hours).

Annual applications (CG-719B) completed:	56,500
Time to complete a CG-719B:	9 minutes
Original Burden Hours:	10,833
Notification of Change from previous renewal:	-2,358 (CG-719B)
Additional Burden Hours:	0
New Total Burden Hours for CG-719B:	8,475 rounded
Estimated number of Medical evaluations (CG-719K or CG-719K/E):	56,500
Time to complete 1 CG-719K or CG-719K/E:	18 minutes
Original Burden Hours:	21,766 rounded
Notification of Change from previous	-4,816 (CG-719K or CG-719K/E)

renewal:	
Additional Burden Hours:	0
New Total Burden Hours CG-719K or CG-719K/E:	16,950
Estimated number of Small Vessel Sea Service Forms completed (CG-719S):	56,500
Time to complete 1 CG-719S:	15 minutes
Original Burden Hours:	16,325 rounded
Notification of Change from previous renewal:	-8,799 (CG-719S)
Additional Burden Hours:	0
New Total Burden Hours for CG-719S:	14,125
Estimated number of DOT/USCG Periodic Drug Testing Forms (CG-719P):	56,500
Time to complete 1 CG-719P:	5 minutes
Original Burden Hours:	5,442 rounded
Notification of Change from previous renewal:	-8,799 (CG-719P)
Additional Burden Hours:	0
New Total Burden Hours for CG-719P:	4,708 rounded
New Total Burden Hours (CG-719B + CG-719K or CG-719K/E + CG-719S + CG-719P)	44,258

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.

Expense Type	Expense Explanation	Annual Costs (dollars)
Direct Costs to the Federal Government	Evaluation of forms (point of receipt to approval or rejection of forms)	\$11,394,464
	Merchant Mariner License and Documentation database	\$800,000
	Shipping costs	\$14,993
	Safety and Suitability databases	\$31,303
	Subtotal, Direct Costs to the Government	\$12,240,760
Contractor Expenses	In-Processing of forms/Production of credential	\$2,488,896
	Subtotal, Contracted Services	\$2,488,896

	TOTAL COST TO THE GOVERNMENT	\$14,729,656
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15. Explanation for Program Changes or Adjustments.

There are no program changes associated with this collection renewal; however, there is an adjustment (decrease) in the respondent's burden as a result of changes to the forms. Changes are not associated with new statutory or regulatory authority, but rather improvements to the flow and quality of content, user functionality, and to aid the USCG in processing forms. The adjustment in respondent's burden is a reduction of one minute for the CG-719B and a reduction of two minutes for the CG-719K or CG-719K/E.

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.

Appendix A: Submission of Merchant Mariner Credential (MMC) Applications to Regional Examination Centers (RECs) Using Email.



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December 10, 2009

SUBMISSION OF MERCHANT MARINER CREDENTIAL (MMC) APPLICATIONS TO REGIONAL EXAMINATION CENTERS (RECs) USING E-MAIL

Beginning January 4, 2010, the Coast Guard will begin accepting credential applications at the 17 Regional Examination Centers using e-mail. This bulletin provides basic information on how mariners can submit credential application packages using e-mail.

INSTRUCTIONS FOR E-MAILING APPLICATIONS TO AN REC:

- E-mail only complete application packages that meet the Coast Guard's [Application Acceptance Checklist](#) requirements.
- The subject line of your e-mail **must** be:
Your Last Name
Your First Name
Your Middle Initial
Your Mariner # (if known)
- Attach a complete application in .pdf format not exceed 10 MB in size.
- Applications must be scanned at a resolution not to exceed 300 dpi.
- The e-mail attachment must include a copy of your TWIC or TWIC application receipt.
- User fees (if applicable) must be paid using www.pay.gov. The e-mail attachment must include a copy of your pay.gov user fee receipt.

E-MAIL YOUR APPLICATION TO ONE OF THE FOLLOWING RECS:

Anchorage, AK	REC-ANC-AppSubmission@uscg.mil
Baltimore, MD	REC-BAL-AppSubmission@uscg.mil
Boston, MA	REC-BOS-AppSubmission@uscg.mil
Charleston, SC	REC-CHA-AppSubmission@uscg.mil
Honolulu, HI	REC-HON-AppSubmission@uscg.mil
Houston, TX	REC-HOU-AppSubmission@uscg.mil
Juneau, AK	REC-JUN-AppSubmission@uscg.mil
Long Beach, CA	REC-LOS-AppSubmission@uscg.mil
Memphis, TN	REC-MEM-AppSubmission@uscg.mil
Miami, FL	REC-MIA-AppSubmission@uscg.mil
New Orleans, LA	REC-NEW-AppSubmission@uscg.mil
New York, NY	REC-NYC-AppSubmission@uscg.mil
Oakland, CA	REC-OAK-AppSubmission@uscg.mil
Portland, OR	REC-POR-AppSubmission@uscg.mil
Seattle, WA	REC-SEA-AppSubmission@uscg.mil
St. Louis, MO	REC-SLM-AppSubmission@uscg.mil
Toledo, OH	REC-TOL-AppSubmission@uscg.mil

Questions regarding this new submission process should be directed to the NMC Mariner Information Call Center at 1-888-IASKNMC (1-888-427-5662). We thank you for your continued support and patience as we continue to improve service to mariners.

Sincerely,

David C. Stalfort
Captain, U. S. Coast Guard
Commanding Officer