

**Supporting Statement  
for  
Course Approval and Records for Merchant Mariner Training Schools**  
[as modified by USCG-2004-17914; RIN 1625-AA16]

**A. JUSTIFICATION**

**1. Circumstances making the proposed change in the current OMB approved collection 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) 10.402 specifies the information that must be submitted for the Coast Guard to evaluate and approve each course. Title 46 CFR 10.403 specifies recordkeeping requirements that a school teaching approved courses must meet for each student taking each course. Recent changes provide the Coast Guard the ability to fulfill its obligation under the STCW Convention to validate the training received by merchant mariners and for approved training to be part of a Quality Standards System (QSS).

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of Natural Resources

Prevention Policy & Response Policy Directorates (CG-5P & CG-5R)

- 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 proposed, additional 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 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 collection technology for proposed collection of additional information.**

Information is submitted in writing or electronically via e-mail to [D05-PF-NMC-2-Courses@uscg.mil](mailto:D05-PF-NMC-2-Courses@uscg.mil) or online at <http://www.uscg.mil/nmc/training/audit/mtad.asp>. For guidance on submissions, see <http://www.uscg.mil/nmc/training/default.asp>. We estimate that 100% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that 55% of the responses are collected electronically.

**4. Efforts to identify duplication of the proposed, additional collection. 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 additional burden to small entities 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 Coast Guard conducts the proposed, additional collection 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 proposed, additional information collection to be conducted in a manner inconsistent with guidelines.**

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

**8. Consultation**

The Coast Guard published on August 1, 2011, a Supplemental Notice of Proposed Rulemaking (SNPRM) entitled "Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements" [Docket No. USCG-2004-17914; RIN 1625-AA16; 76 FR 45908]. The rulemaking proposed to—

- change the medical exam requirements for STCW endorsed mariner from once every five years to once every two years;
- require documented evidence of training or knowledge for two groups of mariners

- personnel with security duties (except Vessel Security Officers, VSO) and all other mariners working aboard a vessel; and,
- recognize STCW endorsements issued by foreign governments.

As a signatory to the STCW Convention, the STCW FR is necessary to demonstrate to the International Maritime Organization that the United States has in place certain specific regulations that implement the international requirements and related amendments to the STCW Convention. The Coast Guard received no collection of information-related comments.

In the near future, the Coast Guard will publish the STCW Final Rule [xx FR xxxxxx].

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

There is no offer of monetary or material value for this information collection.

**10. Describe any assurance of confidentiality of information for the proposed additional collection requirements.**

There are no assurances of confidentiality provided to the respondents for this information collection.

**11. Additional justification for any proposed questions of a sensitive nature.**

There are no questions of sensitive language.

**12. Estimate of reporting and recordkeeping hour and cost burdens of the proposed revision to the current collection of information.**

- **The number of respondents is 285.**
- **The number of responses is 2,764 (700 rptg + 2,064 rdkpg).**
- **The total annual reporting and recordkeeping burden is 128,139 hours of which 30,879 hours are the result of the STCW Final Rule changes**
- **The total annual cost burden is \$5,952,024.**

a.) Existing Burden:

For the reporting requirement, we estimated that there would be about 700 annual requests for course approvals, including renewals, prepared by about 285 training schools. For the recordkeeping requirement, we estimated that the 285 training schools would account for 2,064 Coast Guard approved courses. We estimated 20 hours are needed to draft a request for approval and assemble the necessary enclosures, and about 1 hour to type, edit and mail the request to the Coast Guard. Furthermore, based on COMDTINST 7310.1L, we assume that GS-12/13/14 personnel, equivalent to \$73 per hour, and GS-7 personnel, equivalent to \$38 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:

Reporting / Request	Hours	Wage	Cost
Draft Request	20	X \$ 73.00	= \$ 1,460.00
Type/Edit Request	1	X \$ 38.00	= \$ 38.00
Totals / Request	21	--	\$ 1,498.00

Total Reporting	Annual Requests	Value / Request	TOTAL
Hour Burden	700	X 21	= 14,700
Cost Burden	700	X \$ 1,498.00	= \$ 1,048,600

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 20 hours of recordkeeping. We assume that GS-9 personnel, equivalent to \$45 per hour (COMDTINST 7310.1L), would complete the recordkeeping.

Recordkeeping Hours per Course	Values
Hours / Student (10 min.)	0.1667
Students / Course	x 20
Classes / Course	x 12
Total Hours / Course	= 40

Total Recordkeeping	Values
Annual Courses	2,064
Hours / Course	X 40
<b>Hour Burden</b>	<b>= 82,560</b>
Cost / Hour	X \$ 45.00
<b>Cost Burden</b>	<b>= \$ 3,715,200</b>

Existing Total annual hour burden: 97,260 hours = 14,700 hours + 82,560 hours

Existing Cost burden: \$4,763,800 = \$1,048,600 + \$3,715,200.

b.) STCW FR Changes:

The new STCW regulations (46 CFR Parts 10.408, 10.409 and 10.410) requires STCW training providers to adopt a quality standard system (QSS), maintain the QSS, and perform internal audits of the training provider midway during the validity period of a course’s acceptance. These new requirements will result in additional burden to STCW training providers in terms of reporting and recordkeeping. In order to comply with these new requirements the STCW training providers will have to: (1) write and maintain a QSS manual on STCW courses, and (2) participate in an audit twice every five years and keep audit records for Coast Guard inspection as needed. The estimated number of STCW approved training providers associated with NMC is 141.

Writing a QSS manual would take a STCW training provider approximately 206 hours in the first year (205 hours for reporting and 1 hour for recordkeeping), and maintaining it would take 9 hours every year (8 hours for reporting and 1 hour for recordkeeping).

Respectively, it would take 10 hours for each respondent to complete an internal audit twice every five years, or approximately 4 hours every year, (9 hours for reporting and 1 hour for recordkeeping).

This rule would increase the burden for 141 training providers by approximately 219 hours each. The total additional hours requested for this rulemaking is 30,879 [141 x (206 + 9 + 4)] from the previously approved burden of 97,260 hours increasing the total annual hours requested to 128,139. The requested hours can be divided into two categories: first year burden as STCW training providers adopt a QSS and annual burden to maintain the QSS once adopted. The new additional burden for the first year is 29,046 hours and about 1,833 hours each year after the first year. Although the additional hours will be distributed over a three year period as described above, 30,879 reflects the maximum number of burden hours that could be incurred in the first year.

In calculating the cost of the burden hours, the Coast Guard used a “loaded” wage rate, which means it includes the costs of employee benefits (vacation, health insurance, other overhead costs). The hourly average costs of reporting and recordkeeping are obtained by loading mean hourly wage rate of \$26 for Training and Development Specialists as reported by BLS (<http://www.bls.gov/oes/current/oes131073.htm>) with a factor 1.48. We believe \$38.48/hour is a reasonable average cost of the employees who would write and maintain a QSS manual, audit internally STCW courses and reports them annually to NMC.

The annual cost burden for the first year and each year after the first year are \$1,117,690 and \$70,534, respectively, for a maximum total of \$1,188,224.

c.) Combined Burden:

The current OMB inventory of total annual burden, as adjusted in May 2012, is 97,260 hours. Additional first-year hour burden from the STCW FR change is 30,879 hours. Therefore, the total annual hours requested are 128,139 hours [97,260 hours (current OMB inventory) + 30,879 hours (additional hours requested due to program change)].

The current OMB inventory of total annual cost, as adjusted in May 2012, is \$5,236,840. Additional first-year costs burden from the changes is \$1,188,224. Therefore, the total annual cost requested is \$5,952,024 [\$5,236,840 (current OMB inventory) + \$1,188,224 (additional cost requested due to program change)].

**13. Estimate of annualized capital and start-up costs to proposed collection requirements.**

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

**14. Estimate 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 285 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.

Using an in government GS-13 (in order to more conservatively estimate the cost burden) and GS-7 hourly pay estimates of \$67 and \$35 per hour, respectively, with all other operational costs being usual and customary:

REC Hours & Cost	Hours	Wage	Costs
Inspections	2	\$ 67.00	\$ 134.00
Draft & Edit	1	\$ 35.00	\$ 35.00
Cost per Visit	3	--	\$ 169.00
Number of site visits	X 700		X 700
<b>REC TOTALS</b>	<b>2,100</b>		<b>\$ 118,300</b>

NMC Hours & Cost	Hours	Wage	Costs
Evaluations	8	\$ 67.00	\$ 536.00
Draft & Edit	1	\$ 35.00	\$ 35.00
Cost per Eval	9	--	\$ 571.00
Number of Evals	X 700		X 700
<b>NMC TOTALS</b>	<b>6,300</b>		<b>\$ 399,700</b>

	Hours		Costs
<b>COMBINED TOTALS</b>	<b>8,400</b>		<b>\$ 518,000</b>

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: \$518,000 = \$118,300 + \$399,700.

The STCW FR does not impose any additional burdens on the Federal Government.

**15. Explain the reasons for proposed change in burden.**

The change in burden is a PROGRAM CHANGE due to the STCW rulemaking (see details in Section 8). The new STCW reporting requirements will result in an hour burden increase of 30,879 hours.

Also, we updated instruction sheet to account for individual IC burdens.

**16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication.**

There are no plans to use statistical analysis or to publish this additional information.

**17. Explain the reasons for seeking not to display the expiration date for OMB approval of the proposed information that would be collected.**

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 collection of information does not employ statistical methods.