

**Supporting Statement
for
Streamlined Inspection Program**

OMB No.: 1625-0085
COLLECTION INSTRUMENTS: Instruction

A. Justification.

1. Circumstances which make the collection of information necessary.

Title 46 U.S.C. 3306 authorizes the Coast Guard to prescribe regulations necessary to carry out the inspection of vessels required to be inspected under 46 U.S.C. 3301. The Streamlined Inspection Program (SIP) (33 CFR Part 8, Subpart E) offers owners and operators of inspected vessels a voluntary alternative to traditional Coast Guard inspection procedures. Vessel owners and operators opting to participate in the program will maintain a vessel in compliance with a Vessel Action Plan and have their own personnel periodically perform many of the tests and examinations conducted by Coast Guard marine inspectors. The Coast Guard expects that participating vessels will continuously meet a higher level of safety and readiness throughout the inspection cycle.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Maritime Stewardship

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. Purposes of the information collection.

The information collected constitutes an SIP application for the program and includes a Company Action Plan (CAP) and Vessel Action Plan (VAP). A CAP describes the company's organization and its commitment to the SIP. The CAP also details how the company will train its employees on their specific SIP responsibilities. The VAP describes the Coast Guard regulations that apply to the vessel and the company's detailed procedures for its employees to maintain and examine vessel systems to ensure these systems operate safely.

3. Considerations of the use of improved technology.

Information may be submitted in writing or electronically via e-mail, to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office. Contact info for CG OCMI's can be found at — <http://www.uscg.mil/top/units/>. Shipboard test, inspection and examination records may be maintained in written or electronic form. We estimate that 60% of the reporting and recordkeeping requirements are done electronically.

4. Efforts to identify duplication.

The Coast Guard is the only agency responsible for the regulation of inspected vessels. Some vessel owners and operators may already have this information on-hand. In those cases these owners and operators would be able to use this in their plans.

5. Methods to minimize burden to small businesses involved.

This information collection does not have an impact on small businesses or other small entities.

6. Consequences to the Federal program if the collection was conducted less frequently.

Information collected in support of the SIP is used by the Coast Guard to verify that companies comply with their plans. The timeliness and accuracy of SIP documents is imperative to ensure that vessels meet safety requirements.

7. Special collection circumstances.

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

8. Consultation.

A 60-day Notice (See [USCG-2014-0330], July 3, 2014, 79 FR 38051) and 30-Day Notice (September 19, 2014, 79 FR 56383) were published in the *Federal Register* to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9. Provide any payments or gifts to respondents.

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

10. Describe any assurances 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 annual hour and cost burdens to respondents.

- The estimated annual number of respondents is **27**.
- The estimated annual number of responses is **78**.
- The estimated annual hour burden is **2,334 hours**.
- The estimated annual cost burden is **\$228,732**.

The burden to respondents is provided in Appendix A. The Coast Guard estimates that future SIP participation will match current enrollment in the program. The total burden to respondents consists of the SIP application, the CAP, updates to the CAP, the VAP, and updates to the VAP.

a. Application: SIP requires an application for entrance into the program. We estimate 16 hours per SIP application, and that we will receive an annual number equal to 1/3 of the current number of companies in the program

b. Company Action Plan: SIP requires a CAP for each company in the program. We estimate 80 hours per CAP, and that we will receive an annual number equal to 1/3 the current number of companies in the program.

c. CAP Updates: Each company is required to update its materials once every two years. We estimate 10 hours per update, and that we will receive an annual number equal to 1/2 the current number of companies in the program.

d. Vessel Action Plan: SIP requires a VAP for each vessel in the program. We estimates 40 hours per VAP, and that we will receive an annual number equal to 1/3 the current number of vessels in the program.

e. Updates to VAP: SIP requires that each VAP be reviewed every five years. We estimate that each review will result in a VAP update. We estimate 10 hours per update, and that we will receive an annual number equal to 1/5 the current number of vessels in the program.

We expect that a senior shore-side representative would be responsible for the SIP documentation. The position of senior shore-side representative is analogous to a GS-14. The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series) for "Out-Government" personnel.

13. Total 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 cost.

The estimated annual Federal Cost is \$49,226 (See Appendix B). It takes the Coast Guard an average of 8 hours per SIP application review, 20 hours per CAP review, 10 hours per VAP review, and 2 hours per CAP update review or VAP update review. These tasks are typically performed by a Lieutenant (O-3). The rates (\$82 per hour) are in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15. Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e. decrease) in the number of SIP participants (i.e., companies and vessels). 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. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

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.

Appendix A: Total Estimated Annual Burden on Industry

Companies in SIP (Respondents)	27
Vessels in SIP	87

Annual Hour and Cost Burden					
	Responses	Hours per Response	Burden Hours	Wage Rate	Cost
SIP Application	9	16	144	\$98	\$14,112
Company Action Plan	9	80	720	\$98	\$70,560
CAP Update	14	10	140	\$98	\$13,720
Vessel Action Plan	29	40	1,160	\$98	\$113,680
VAP Update	17	10	170	\$98	\$16,660
Annual Total	78		2,334		\$228,732

Appendix B: Estimated Annual Federal Government Cost

Annual Cost		
	Hours	Cost
SIP Application Review	72	\$5,868
CAP Review	180	\$14,670
CAP Update Review	28	\$2,282
VAP Review	290	\$23,635
VAP Update Review	34	\$2,771
Annual Total	604	\$49,226