

SUPPORTING STATEMENT  
FOR

Application for Merchant Mariner Credential (MMC), Application for Merchant Mariner Medical Certificate, Application for Merchant Mariner Medical Certificate for Entry Level Ratings, Small Vessel Sea Service Form, DOT/USCG Periodic Drug Testing Form, Disclosure Statement for Narcotics, DWI/DUI, and/or Other Convictions, Merchant Mariner Medical Certificate, Recognition of Foreign Certificate  
OMB Control No.: 1625-0040  
Collection Instruments: CG-719B, CG-719K, CG-719K/E, CG-719S, CG-719P, CG-719C, CG-4610, CG-4610A, and CG-4610B

A. JUSTIFICATION

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

Certain national and/or international requirements mandate that each applicant for a Merchant Mariner Credential (MMC) or Medical Certificate make written application to the Coast Guard (CG-719B); present a completed Coast Guard physical examination report (CG-719K or CG-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); provide evidence of having passed a chemical test for dangerous drugs (CG-719P); and as needed, provide a statement for Narcotics, DWI/DUI, and/or Other Convictions (CG-719C).

The requirements are contained within:

Title 46, Code of Federal Regulations (CFR), parts 10, 11, 12, 13, and 16; as recently updated by the final rule entitled, "Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW), as Amended, and Changes to National Endorsements." (Docket No. USCG-2004-17914) published on December 24, 2013, and the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW Convention); and the STCW Code.

Some changes to the forms in this collection are associated with new regulatory authority. The also reflect improvements to the flow and quality of content, user functionality, and to aid the Coast Guard in processing applications.

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 an MMC and/or Medical Certificate. This evaluation is performed on occasion, meaning

as submitted by the respondent when he or she applies for an MMC or Medical Certificate every year, 2 years, or 5 years, as applicable. Per the CFR, the Coast Guard requires the information to process applications and issue MMCs or Medical Certificates to applicants who can prove their medically qualified, and 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 and Medical Certificate applications.

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

The forms under this collection are available in a .pdf-fillable version. The Coast Guard continues to work towards developing a system that will allow respondents to submit electronically. The Coast Guard implemented email submission of application packages to Regional Examination Centers (RECs) in January 2010. The Coast Guard also accepts submissions by fax and mail.

4. Describe efforts to identify duplication.

As the requirements for a Coast Guard MMC and Medical Certificate are unique and very specific, no duplication of information collected is known. The forms within this collection are the only instruments available that specifically address the requirements for issuance of a Coast Guard MMC or Medical Certificate. 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 and Medical Certificates 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. Consultation.

Title 46, Code of Federal Regulations (CFR), parts 10, 11, 12, 13, and 16; as recently updated by the final rule entitled, "Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW), as Amended, and Changes to National Endorsements." (Docket No. USCG-2004-17914) published on December 24, 2013, 78 FR 77796 and the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW Convention); and the STCW Code amended previous regulations as follows:

Previous to the recent regulation change, issuance of the Merchant Mariner Credential (MMC) constituted proof that the holder was medically suitable. With implementation of the new regulation, a separate medical certificate is now issued and is required to be carried to operate under the authority of the MMC (46 CFR Part 10 Subpart C and 46 CFR 15.401(c)). Thus the CG-719-K and CG-719-K/E forms are now stand-alone applications for a medical certificate. Accordingly their titles were changed, and "reference number", "occupation", "application type", "applicant proof of identity verified", and "please indicate best method(s) of contact..." boxes were added. The CG-719-B was also changed to remove the "height" and "weight" since that information would be accurately retrieved from the K and K/E forms.

The new regulation removed the requirement for character references so that data required in Section IV of the CG-719-B was removed.

The new regulation changed the requirement that the oath be taken before a Coast Guard official so the words "Coast Guard official must witness applicant signature" was removed from the oath section of the CG-719-B.

The new regulations allow the Coast Guard to post date renewal of an MMC up to 8 months to coincide with the expiration of their existing MMC. This is done automatically unless the applicant requests the MMC be effective immediately. A box was added to the CG-719-B to provide for this request. "FOR RENEWAL TRANSACTIONS ONLY: I request to have my merchant mariner credential (MMC) issued immediately and decline having its issuance coincide with my previous credentials expiration date".

The new regulations provide to the ability of Designated Medical Examiners to evaluate medical suitability of mariners so a box was provided on the CG-719-K and K/E to enter the examiners identification number.

The new regulation specified the functional speech discrimination test be carried out at 65 decibels so the CG-719-K was increased from 55dB to 65dB.

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.

The information will be kept private to the extent permitted by law. The information is used in accordance with a System of Records, 65 FR 19476-01, dated April 11, 2000.

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

Questions contained on the CG-719C form require the applicant to disclose all criminal and drug history if they have any in accordance of CFR 46 section 10.211 (Criminal Record Review). This information may be of a sensitive nature to the applicant and can include information about past drug use or convictions. Information is collected when needed and reviewed to determine the safety and suitability of an applicant that is applying for an MMC or any Endorsements. Disclosures about past drug use and convictions are used by the USCG to determine the safety and suitability of an applicant as defined in 46 CFR 10.107 and ensure that the applicant does not have a prior record which would indicate that their character or habits of life “ In accordance with 46 CFR 10.107, a safe and suitable person means “a person whose prior record including but not would support the belief that permitting such a person to serve under the MMC and/or endorsement sought would clearly be a threat to the safety of life or property, detrimental or adverse to the interests of the United States.”

Questions contained on either the CG-719K/E or the CG-719K forms require the applicant to disclose all medical information in accordance of CFR 46 section 10.215 (Medical and Physical requirements). This information may be of a sensitive nature to the applicant and can include personal medical history and current and past medical conditions, and prescription information. Medical information is collected in order to ensure that an applicant meets the medical and physical standards required under STCW Regulations I/9 and Section A-I/9 of the STWC Code and other applicable legislation. In order to determine an applicant’s fitness for duty and to issue the required medical certificate, a medical screening review of the information collected on the CG-719K or the CG-719K/E is conducted The Coast Guard screens applicants to determine if they: (1) have the physical capability to fulfill duty requirements; (2) demonstrate adequate hearing and speech to detect and communicate audible alarms; (3) have no medical condition, disorder or impairment what will prevent effective and safe conduct of the applicant’s routine and emergency duties; (4) are not suffering from any medical condition likely to be aggravated by service at sea, render the applicant unfit for service, or endanger that health and safety of other personnel; and (5) are not taking medication that has side effects that will impair judgment, balance, or any other requirements for effective and safe performance of routine and emergency duties onboard.

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

On average, the Coast Guard receives approximately 56,500 applications (CG-719B) annually. An application (CG-719B) itself takes approximately 9 minutes to complete, and may be e-mailed, faxed, mailed or hand carried to a Regional Examination Center for processing. Applications are either accompanied by a CG-719K (18 minutes to complete/ used by ~80% of respondents) or CG-719K/E (10 minutes to complete/used by ~20% of respondents), which provide information for determining an applicant's fitness for duty as a merchant mariner. In addition, it is estimated that another 12,000 mariners will apply for the Medical Certificate annually by completing the CG-719K (~80%) or CG-719K/E (~20%). The CG-719P (5 minutes to complete) and CG-719S (15 minutes to complete) 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 CG-719C, which is a new instrument being introduced into this collection can be used when an applicant must disclose use of narcotics, DWI/DUI, and/or other convictions (10 minutes to complete). The information requested on the CG-719C is not a new request for information as the applicant was required to provide it in a format of their own choosing attached to their MMC application. The CG-719C was created as an optional form to assist respondents who are legally required to disclose information to the Coast Guard allowing for more consistent processing and further support the movement to an electronic application system.

The burden associated with the additional 12,000 respondents (CG-719K & CG-719K/E) discussed in the paragraph above was overlooked and not accounted for in the last Supporting Statement, but is accounted for in the table below.

Based on the table below, the total burden hours will be approximately 47,444, an increase of 3,186 from the previously approved Supporting Statement.

The estimate cost of the hour burden is \$1,488,508.06 (\$22.41 (wage data retrieved using U.S. BLS website) \* 1.4 (loaded factor) \* 47,444 hours).

<b>CG-719B</b>	
Annual applications (CG-719B) completed:	56,500
Time to complete a CG-719B:	9 minutes
Original Burden Hours:	8,475
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719B:	<b>8,475</b>
<b>CG-719K</b>	
Estimated number of Application for Merchant Mariner Medical Certificate (CG-719K) (45,200 (80% of 56,500) + 9,600 (80% of 12,000/STCW)):	54,800

Time to complete a CG-719K:	18 minutes
Original Burden Hours:	13,560
Notification of Change from previous renewal:	2,880
Additional Burden Hours:	2,880
New Total Burden Hours CG-719K:	<b>16,440</b>
<b>CG-719K/E</b>	
Estimated number of Application for Merchant Mariner Medical Certificate for Entry Level Ratings (CG-719K/E) (11,300 (20% of 56,500) + 2,400 (20% of 12,000/STCW)):	13,700
Time to complete 1 CG-719K/E:	10 minutes
Original Burden Hours:	3,390
Notification of Change from previous renewal:	1,107
Additional Burden Hours:	0
New Total Burden Hours CG-719K/E:	<b>2,283</b>
<b>CG-719S</b>	
Estimated number of Small Vessel Sea Service Forms completed (CG-719S):	56,500
Time to complete 1 CG-719S:	15 minutes
Original Burden Hours:	14,125
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719S:	<b>14,125</b>
<b>CG-719P</b>	
Estimated number of DOT/USCG Periodic Drug Testing Forms (CG-719P):	56,500
Time to complete 1 CG-719P:	5 minutes
Original Burden Hours:	4,708
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719P:	<b>4,708</b>
<b>CG-719C</b>	
Estimated number of Disclosure Statement for Narcotics, DWI/DUI, and/or other Convictions (CG-719P) (15% of 56,500):	8,475
Time to complete 1 CG-719C:	10 minutes
Original Burden Hours:	0
Notification of Change from previous renewal:	1,413
Additional Burden Hours:	1,413

New Total Burden Hours for CG-719C:	<b>1,413</b>
<b>New Total Burden Hours (CG-719B + CG-719K + CG-719K/E + CG-719S + CG-719P + CG-719C)</b>	<b>47,444</b>

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	<b>\$12,240,760</b>
Contractor Expenses	In-Processing of forms/Production of credential	\$2,488,896
	Subtotal, Contracted Services	<b>\$2,488,896</b>
	<b>TOTAL COST TO THE GOVERNMENT</b>	<b>\$14,729,656</b>

15. Explanation for Program Changes or Adjustments.

There is an adjustment (increase) in the respondent's burden as a result of the 12,000 respondents (CG-719K & CG-719K/E) that were not accounted for in the last Supporting Statement, but were accounted for in the table above. The optional form CG-719C will not contribute to a burden increase because the information was required to be provided previously by the applicant in a format of their choosing attached to the application. By instituting a form this will allow faster and more consistent processing and support the future movement to a wholly electronic application system.

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.

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The OMB expiration date will be displayed on the CG-719B, CG-719K, CG-719K/E, CG-719S, CG-719P, and CG-719C, however, the CG-4610, CG-4610A, and CG-4610B are static credentials and certificates that are controlled and produced by the Coast Guard on a requested/approved basis.

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.