

SUPPORTING STATEMENT
FOR EMERGENCY APPROVAL OF

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

The Coast Guard is requesting emergency processing of ICR 1625-0040. Title 46, Code of Federal Regulations (CFR), parts 10, 11, 12, 13, and 16, and International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW Convention) and the STCW Code, including the STCW Final Rule (Docket No. USCG-2004-17914) published on December 24, 2013, 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). While considering this request the Coast Guard is also concurrently submitting the series through the normal established process.

A. JUSTIFICATION

Non-approval of these forms would cause an undue burden upon the customer and the Coast Guard. The final rule of 2009 eliminated the Merchant Mariner License/Document and combined the elements into a Merchant Mariner Credential. The final rule of 2013 further exacerbated this by creating a National and International Endorsement. The form versions currently being used are antiquated, using terms for credentials that no longer exist and terminology that no longer reflects the current regulation. This in turn causes confusion on the part of the customer and the Coast Guard. The customer is unsure of what to apply for and the Coast Guard has to spend extra time and resources to try and ascertain what the customer is looking for or qualified to do.

The 719B and 719C (new form) that we are proposing for approval also clarifies the information required and the time frame that customers need to supply any conviction information. Currently, it is not stipulated that the customer only needs to supply conviction information since their last application nor is there a format provided to collect the information. The 719C is being introduced in order to provide the customer a

formatted submittal that organizes their input and streamlines the Coast Guard's evaluation of that input. Currently our customers may be spending an inordinate amount of time unnecessarily obtaining all conviction information that may date back twenty years or more. This will also alleviate the Coast Guard from having to sort through an array of documents in multiple formats, to determine if the information is even pertinent to the current application.

The final rule of 2013 also separated the medical evaluation from the professional qualification evaluation by creating a separate Medical certificate. The separate medical certificate is being actively enforced by other port states and is required under the International Labour Convention and will soon be required by the International Maritime Organization under the Standards of Training Certification and Watchkeeping Convention which the U.S. is signatory to. While the US is not signatory to the Labour Convention, the convention does specifically allow member countries authority to reject and or delay access to vessels of any country whose mariners are not compliant. The customer is only required to submit a 719K or 719K/E to meet this requirement. However, the current versions do not contain complete biographical information, as they were previously always submitted with a 719B. Therefore if a mariner submits a 719K or 719K/E to meet the new requirement but has changed their biographic information the Coast Guard has no way of capturing it. If a certificate or credential were delivered incorrectly, this could cause an undue burden on the customer by preventing them from going to work with the proper documents. Also by potentially delivering these certificates to the incorrect address we are opening the government to a potential Personally Identifiable Information (PII) incident. The proposed 719K, 719K/E forms remedy that situation by requesting complete biographic information. The new 719K also significantly reduces the burden on customers and their physician's alike by reducing the potentially disqualifying conditions from 88 to 33.

It was also recently brought to our attention that the version of the series that we are currently using is not in compliance due to being superseded by the JAN 2013 approval. The Coast Guard, anticipating the release of the 2013 rule pulled this version stating there were some language contradictions between the form and the new regulation. Unbeknownst to us, OMB was never informed to withdraw that version. The Emergency approval of this collection would put the Coast Guard back in compliance. The version that we are proposing for approval had minor changes from the forms approved by OMB in JAN2013. These changes were made to assist the customers when filling out the two forms as well evaluating the forms for Coast Guard evaluators. The information collected on all of these forms is paramount to the maintenance of a safe and secure marine transportation system and fully supported by regulation.