

SUPPORTING STATEMENT
for
Certificate of Discharge to Merchant Mariners

OMB No.: 1625-0012

COLLECTION INSTRUMENTS: Instruction and CG-718A

A. JUSTIFICATION

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

Title 46, United States Code, 10311 and Title 46, Code of Federal Regulations, 14.301 requires each master or individual in charge of a vessel when Shipping Articles are required, to prepare a Certificate of Discharge for each merchant mariner being discharged. The Certificate of Discharge provides discharged mariners with evidence of sea service to determine eligibility for various benefits, such as medical and retirement. The information collected is also used to show eligibility for an original, renewed or upgraded Merchant Mariner Credential (MMC), and to provide information to the U.S. Maritime Administration (MARAD) on the availability of mariners in a time of national emergency. The Coast Guard's Merchant Mariner Licensing and Documentation system captures information from the Certificates of Discharge to Merchant Mariners, which is used by the Coast Guard's National Maritime Center as a means to evaluate the qualifications of mariners who apply for an MMC.

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 information is used primarily on an as needed basis by mariners and the Coast Guard to establish sea service time and qualifications for issuing original, renewal or upgraded MMCs; in claims against employers; in medical claims; and in qualifying for retirement benefits or insurance benefits. If the information is not gathered, the Coast Guard would not be able to determine if the mariner meets the required sea time for the rating that the individual is applying for in accordance the CFR.

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

At present, the Coast Guard does not employ methods for collecting this information through an automatic electronic collection process. Shipping companies and mariners submit this information to the USCG largely as documents attached within an email to the NMC. The only other method available for collecting this information is by direct mail. Shipping companies can obtain an electronic copy (editable .pdf version) of the CG-718A via the internet at <http://www.uscg.mil/nmc/cd.asp>.

4. Describe efforts to identify duplication.

As the requirements for documenting sea service are unique and very specific, no duplication of information collected is known. This is the only collection available that specifically address these requirements.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

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

6. Describe the consequences to the Federal program or policy activities if the collection were not conducted or conducted less frequently.

If the information is not collected, the statutory requirements (46 U.S.C. Chapter 103) would not be met and the Coast Guard would not be able to maintain copies of all mariner discharges. These discharges are used to calculate sea service times which are used to validate a mariner's employment on a particular vessel and determine if the mariner meets the requirements for the rating applied for.

7. Explain any special circumstances.

No special circumstances exist for this collection of information.

8. Solicitation of Comments.

A 60-Day Notice (See [USCG-2018-0134], March 2, 2018, 83 FR 9010) and 30-Day Notice (May 22, 2018, 83 FR 23698) 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. The 60-day FR Notice elicited one comment. The commenter expressed concern about the burden of the master signing all three copies of the collection in ink. The commenter explained that when the entire crew is discharged, the master must sign his name in excess of 60 times. The commenter also proposed allowing digital signatures on the collection. In response to the burden of signing a certificate more than once, the Coast Guard is bound by regulation in 46 CFR 14.307(a) to require the certificate and its copies to be ink signed. We may consider changing this regulation at a future time. The Coast Guard will not accept electronic signed certificates at this time because the regulation expressly states they must be ink signed. Additionally, the Coast Guard has not evaluated or selected any certain software for electronic signatures from the public and do not currently have the capabilities to implement electronic signature verification. Accordingly, no changes have been made to the Collections.

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.

No assurances of confidentiality are provided. The information is kept private to the extent permitted by the Privacy Act and the 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.

Approximately 44,332 Certificates of Discharge of Merchant Mariners (CG-718A) are received and processed annually. The completion of an average CG-718A takes approximately 2 minutes to complete, and is mailed to the Coast Guard. The total annual burden hours is approximately 1,478.

Annual CG-718As completed:	44,322
Time to complete a CG-718A:	2 minutes
Original Burden Hours:	1,478 hours
Notifications of Change:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-718A:	1,478 hours

13. Estimates of annualized capital and start-up costs.

The 44,322 annual submissions of the CG-718A are grouped and mailed to the Coast Guard in approximately 5,300 separate packages. The average shipping cost for each package is \$2, with an annualized capital cost of \$10,600.

14. Provide estimates of annualized cost to the Federal Government.

Once the Certificate of Discharge is received from the respondent, the Coast Guard performs the appropriate data entry. This information is available to the Coast Guard during the evaluation of MMC applications via the Merchant Mariner Licensing and Documentation (MMLD) database.

Annual Burdened Cost to Government						
	Per Month	Per Year	Total minutes to complete 1 CD Date Entry	Total minutes to Complete CD Data Entry (per year)	Total Hours to Complete CD Entries	Annual Burden Costs to Government
CD's	~3,694	~44,322	.5	22,161	~369	\$7,461

The estimated average hourly costs:

.5 min = 30 seconds

30 seconds * 44,322 = 1,329,660 seconds / 60 = 22,161 minutes / 60 = 369.35 hours

\$20.22 * 369 hours = \$7,461

The hourly wage of \$20.22 was estimated by equating a respondent to a GS 7 step 1 position. (Info located at the following location http://www.opm.gov/oca/10tables/pdf/dcb_h.pdf).

15. Explanation for Program Changes or Adjustments.

There are no program changes or new information associated with this collection. This IC was submitted for reinstatement due to the delay in posting the 60/30 Day Federal Register Notice. The 60 Day Federal Register Notice was withdrawn by the Federal Register due to improper signing. The Federal Register does not accept a “BYDIR” signature. The resubmission of the Federal Register Notice allotted the appropriate time for the public to provide comments.

16. For collection of information whose results will be published.

This information collection will not be published 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.