

Department of Transportation

SUPPORTING STATEMENT

U.S. Merchant Marine Academy Candidate Application for Admission

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) three-year approval clearance for the information collection entitled, U.S. Merchant Marine Academy Candidate Application for Admission (OMB Control No. 2133-0010, which is currently due to expire on October 31, 2018. The adjustment in the burden hours for this collection was due to a decline in the number of applicants who applied for possible enrollment into the USMMA's four year degree program.

Part A. Justification.

1. Circumstances that make collection of information necessary. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.

Regulations pertaining to the U.S. Merchant Marine Academy (USMMA) appeared in the Federal Register (Vol. 47, No. 98, p. 21811, dated May 20, 1982) as a final rule. Part 310.57(a) of 46 CFR provides for the collection of information from anyone who is a prospect for admission. It states that "all candidates shall submit an application for admission to the Academy's Admissions Office." Thus, the collection of information through the use of an application is the primary means by which selections for admission are made. The statutory authority for continued existence of this federally sponsored merchant marine academy is Title XIII of the Merchant Marine Act of 1936.

This information collection supports the Secretary of Transportation's Strategic Security Objective.

2. How, by whom, and for what purpose is the information used. INDICATE HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.

The Candidate Application (KP 2-65) Part I is used to pre-screen applicants for basic eligibility and to enter them into the Department of Defense medical system. Part I of the Application is usually submitted to the USMMA Admissions Office approximately one month before Parts II and III.

The information on the Candidate Application Parts II and III is used by the USMMA admissions staff and its Candidate Evaluation Board to select the best qualified candidates for the Academy. Part II is completed by the applicant and Part III by an official at the secondary school where the applicant attends or has attended. The portion that the applicant completes contains general identifying information; personal history data; participant activities and achievements/awards earned; a biographical sketch and a statement that a Service Obligation Contract must be signed after reporting to the Academy. The portion of the application that the secondary school official completes contains transcript information, including standardized test results, and a guidance counselor or principal's evaluation of the applicant.

Selection of applicants for appointment is made in the order of merit. The order of merit is determined by: the score on the required college entrance examination; an assessment of the applicant's academic background; and by other factors considered by the USMMA as effective indicators of motivation and the probability that the applicant will complete the Academy's course of instruction.

If all these parts of the application were not completed, applicants would not meet an important requirement of all candidates for admission to the USMMA and basic eligibility for an appointment could not be determined.

3. Extent of automated information collection. DESCRIBE WHETHER, AND TO WHAT EXTENT, THE COLLECTION OF INFORMATION INVOLVES THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY, E.G. PERMITTING ELECTRONIC SUBMISSION OF RESPONSES, AND THE BASIS FOR THE DECISION FOR ADOPTING THIS MEANS OF COLLECTION. ALSO, DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN.

The collection of information is executed 100% digitally through an online candidate portal accessed through the Academy's website, www.usmma.edu.

The Admissions Office staff uses a computerized applicant processing system that enables them to use the information from the application to screen applicants quickly against the admission requirements.

The paper-based Candidate Application (KP 2-65) is used solely as a backup should the digital application experience a technical failure.

4. Efforts to identify duplication. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSES DESCRIBED IN ITEM 2 ABOVE.

Parts I, II, and III of the Candidate Application are the only three forms used to determine basic eligibility and selection of persons for admission to the USMMA. There are no other agency forms collecting this same information.

5. Efforts to minimize the burden on small businesses. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.

The collection of information does not involve small business or other small entities. The collection of information on the three parts of the application is a one-time requirement for applicants seeking admission to the USMMA. The burden to the applicant is as minimal as statutes and regulations permit.

6. Impact of less frequent collection of information. DESCRIBE THE CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

Completed Parts I, II, and III of the Admissions Application are absolute requirements for admission to the USMMA and must be obtained from each new applicant. This is a one-time requirement. The consequences from reduced or non-collection of this information would be to jeopardize the USMMA admissions process and the appointment of a candidate.

7. Special circumstances. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- **REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;**
- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**
- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**
- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN THREE YEARS;**
- **IN CONNECTION WITH A STATISTICAL SURVEY, THAT IS NOT DESIGNED TO PRODUCE VALID AND RELIABLE RESULTS THAT CAN BE GENERALIZED TO THE UNIVERSE OF STUDY;**
- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**

- **THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE; OR**
- **REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.**

There are no special circumstances that require the collection of information to be conducted in a manner described above.

8. Compliance with 5 CFR 1320.8: **PROVIDE AN ELECTRONIC COPY AND IDENTIFY THE DATE, VOLUME NUMBER AND PAGE NUMBER OF THE PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE (FOR A 60-DAY AND A 30-DAY NOTICE), REQUIRED BY 5 CFR 1320.8(d), SOLICITING COMMENTS ON THE INFORMATION COLLECTION PRIOR TO SUBMISSION TO OMB.**

- **SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THOSE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.**
- **DESCRIBE EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS ON THE AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, THE CLARITY OF INSTRUCTIONS AND RECORD KEEPING, DISCLOSURE, OR REPORTING FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.**
- **CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS--EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.**

The Maritime Administration published a 60-day notice and request for comments on this information collection in the Federal Register on June 12, 2018 (F.R. 27368, Vol. 83, No. 113) [copy attached] indicating comments should be submitted on or before August 13, 2018, 2018. No comments were received. In addition, a 30-day notice was published on September 4, 2018

(F.R. 45010, Vol. 83, No. 171) indicating comments should be submitted on or before October 4, 2018, 2018.

9. Payments or gifts to respondents. EXPLAIN ANY DECISION TO PROVIDE A PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN ENUMERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts are provided to respondents.

10. Assurance of confidentiality: DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

The USMMA does not consult or discuss any information on any part of the application with anyone except the candidate or other individuals expressly designated by the candidate or as authorized by the provisions of the Privacy Act Notice. The applicant must sign an authorization indicating to whom the Admissions Office may disclose information regarding their candidacy. Information on a candidate is released only on a “need to know basis.” Candidate files are retained for four years and then destroyed.

11. Justification for collection of sensitive information: PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.

Not applicable. There are no questions of a sensitive nature.

12. Estimate of burden hours for information requested: PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

- **INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSES, CALCULATION FOR THE INDIVIDUAL BURDENS AND FOR THE TOTAL ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCES IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOUR FOR CUSTOMARY AND USUAL BUSINESS PRACTICES**

- **IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEMS 13 OF OMB FORM 83-I.**

- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOURLY BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.**

Approximately 2,000 applicants return completed applications to the USMMA annually. The time burden consists of 3.5 hours for the students and 1.5 hours for the school officials. The 3.5 hours for the students include accurately completing Parts I and II of the application and following up to assure all paperwork is submitted to the USMMA by the application deadline. The school officials spend approximately 1.5 hour collecting and sending transcripts and other official documents.

| | | | | | | | | |
|---|---|--|---|--|---|--|---|---|
| <u>Number of</u> <u>Applications</u> | | <u>Application</u> <u>per</u> <u>Applicant</u> | = | <u>Total</u> <u>Applications</u> <u>Annually</u> | | <u>Hours</u> <u>Per</u> <u>Application</u> | = | <u>Total</u> <u>Hours</u> <u>Annually</u> |
| 2,000 | x | 1 | | 2,000 | x | 5 | | 10000 |

A determination of the estimated number of hours required per response was made after consultation with several respondents.

Cost of the time burden for students: 2000 responses x 3.5 hours (including submission time) x \$7.25/hour = \$50,750.00

Cost of the time burden for school officials: 2000 responses x 1.5 hours x \$39.84/hour* = \$119,520 x 1.4 (benefits) = 167,328.

(Source: BLS Mean Hourly Wage for Secondary School Teachers (\$82,880 annual mean income), http://www.bls.gov/oes/current/oes_nat.htm#25-0000)

13. Estimate of total annual costs to respondents. **PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COSTS OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).**

- **INCLUDE A BREAKDOWN FOR TOTAL CAPITAL/START-UP COSTS AND OPERATION/MAINTENANCE. THE COST ESTIMATES SHOULD BE SPLIT INTO TWO COMPONENTS: (A) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER IT EXPECTED USEFUL LIFE); AND (B) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COSTS FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.**
- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**
- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEP RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There is no cost for applying to the USMMA and no cost for returning application. (USMMA provides postage paid envelopes for each part of the application and there is no application fee). However, the cost to register for the college entrance exams (SAT) and (ACT) is \$43.00 and 46.00 respectively. The cost of \$86,000.00 and 92,000 respectively

for 2,000 applicants is not included in the official cost to respondents because the applicants would have SAT and/or ACT scores in the absence of this application.

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

14. Estimate of cost to the Federal government. **PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COSTS, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATIONAL EXPENSES SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF, AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**

Include salary costs based on hours, overhead, printing, payment to contractors, and the like.

The total estimated cost to the Federal Government to process the admissions applications of the 2,000 persons who will apply to the USMMA each year is \$1,263,612 based on the annual salaries of the ten USMMA Admissions staff persons.

Below are the titles of the ten Admissions Office staff persons. The time that each person devotes exclusively to the application process varies from 50% to 90%. However, the remainder of their time is spent performing duties that relate directly to the admissions process. The average hourly rate of pay for the ten staff persons is estimated to be \$36.84. *The estimated Hourly wage was taken from the May 2017 BLS Wage Table for Financial Specialists, All Other. The ten staff members are as follows.

- 1 Admissions Director: .5 hours per application ($\$36.84 \times .5 \times 1 = \18.42)
- 1 Assistant Director: .5 hours per application ($\$36.84 \times .5 \times 1 = \18.42)
- 4 Recruitment Specialists: 2 hours per application ($\$36.84 \times 4 = \$147.36 \times 2 = \$294.72$)
- 1 Financial Aid Specialist: .25 hours per application ($\$36.84 \times .25 \times 1 = \9.21)
- 3 Admissions Assistants: 1 hour per application- ($\$36.84 \times 3 \times 1 = \110.52)

Estimated total cost - $\$18.42 + \$18.42 + \$294.72 + \$9.21 + \$110.52 = \451.29×1.4 (benefits) = $\$631.81 \times 2000$ (applications) = \$1,263,612.

(Source: 2017 BLS Table/Mean Hourly Wage for Financial Specialists, All Other, (13-2099), mean hourly wage of \$36.84 (\$76,630 Mean annual wage), <https://www.bls.gov/oes/current/oes132099.htm>.)

15. Explanation of program changes or adjustments. **EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.**

If this is not a new information collection, indicate whether any changes in current burdens (hours and/or costs) are because of a program change or an adjustment. A new information collection is a program change.

The adjustment in the burden hours is due to a decline in the number of applicants seeking enrollment into the USMMA.

16. Publication of results of data collection. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

The information on the application is not tabulated and published for public use due to Privacy Act restrictions.

17. Approval for not displaying the expiration date of OMB approval. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION, EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.

Explain any reasons that display of OMB's expiration date would be inappropriate.

Not applicable, MARAD is not seeking such approval.

18. Exceptions to certification statement. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

Explain only if any items from Page 2 of the OMB Form 83-I apply.

Not applicable, there are no exceptions to the certificate statement.