

**Supporting Statement
for
Merchant Mariner Credentialing – Job Task Analysis**

OMB No.: 1625-new
COLLECTION INSTRUMENTS: Instructions

A. Justification

1) Circumstances which make the collection of information necessary.

The Coast Guard establishes the requirements for the issuance of a Merchant Mariner Credential (MMC) with the officer or rating endorsements necessary for employment on U.S. flagged vessels. The individual requirements for an MMC endorsement may include sea service, training, practical assessment and/or a written examination. The credentialing process ensures that mariners meet the regulatory requirements for the endorsements and are qualified to perform their duties and responsibilities, including: (1) safety of life and property at sea; (2) public safety; (3) protection of the marine environment; and (4) homeland security. The Coast Guard issues credentials to merchant mariners in accordance with 46 CFR Subchapter B. The statutory authority to issue credentials is 46 U.S.C. Chapters 71, 73 & 75.

Section 315 of the Coast Guard Authorization Act of 2015 (Pub. L. 114-120) required the Coast Guard to conduct a formal review of the mariner credentialing examinations including an analysis of the topics and testing methodology, and the accuracy of the examination questions. In response to this requirement, the Coast Guard is conducting a Job Task Analysis (JTA) for national officer and rating endorsements in order to establish the content of the examinations. The information collected will be used to determine the occupational tasks associated with each credential endorsement including a measure of the difficulty, importance, and frequency of each task. This data will be used to evaluate the validity of credentialing examinations and mariner training curriculum content. The results will also inform future improvement decisions on other areas of the credentialing process. Focus group discussions and the administration of surveys will both be used to collect this occupational information. Participation in the JTA information collection activities is strictly voluntary.

2) Purposes of the information collection.

To improve the credentialing process, inform future decisions, and ensure the Coast Guard maintains standards reflecting industry and technological changes, the Coast Guard is conducting a JTA for each national officer and rating endorsement issued on an MMC. The JTA will be used to evaluate the validity of credentialing examinations and mariner training curriculum content. The results will also inform future decisions leading to improvements in the credentialing process.

The JTA initiative will be conducted for deck and engineering officer and rating endorsements. The Coast Guard will approach the JTAs in phases, grouping similar endorsements together for analysis. After existing data including job descriptions, credentialing examination regulations, and approved training curricula are reviewed; small focus groups (of under 10 individuals) will be formed. These focus groups will consist of subject matter experts who hold the endorsement being analyzed. The group will develop a list of core tasks that a mariner would be required to engage in when employed under the authority of the endorsement being reviewed. The list of core tasks will then be evaluated for technical accuracy and relevance by a different small group of mariners (of under 10 individuals) that are currently employed under the authority of the endorsement being analyzed.

Once the list has been validated, a survey will be designed to measure the difficulty, importance, and frequency of each task when performed in the shipboard environment. The survey is critical to the JTA process due to the population it targets. A valid measure of shipboard performance can only be derived through a sample that represents credentialed mariners who hold and are employed under the authority of the credential endorsement being analyzed. These mariners will be the focus of outreach for participation in the on-line administered survey to maximize their representation in the population.

Depending upon the endorsement being analyzed, the target audience will vary in size. The information collected through the survey will be used to determine the knowledge, understanding, and proficiency for each occupational task associated with each credential endorsement.

The data from each endorsement-specific survey will be collected and analyzed from which a report will be generated. Each JTA report will provide statistical data and supporting narrative that either validates or identifies the need to revise the standards associated with the credentialing examination process including development of questions, structuring of examinations, and training curriculum content and development. The Coast Guard will solicit for additional industry stakeholder input through tasking the appropriate federal advisory committees to review the individual JTA reports. The final JTA report for each endorsement and the applicable advisory committee recommendations will inform decisions regarding future regulatory and policy actions.

3) Considerations of the use of improved technology.

We estimate that 100% of the reporting requirements will be done electronically.

4) Efforts to identify duplication.

No Federal, State or local agency currently collects this information.

5) Methods to minimize burden to small businesses involved.

This 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.

For each rating and officer endorsement group, the JTA is a one-time activity to include focus discussion groups and administration of online surveys.

7) Special collection circumstances.

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

8) Consultation.

A 60-Day Notice (See [USCG-2019-0753], October 7, 2019, 84 FR 53451) and 30-Day Notice (December 16, 2019, 84 FR 68468) 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.

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There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Merchant Mariner Licensing and Documentation System (MMLDS) Privacy Impact Assessment (PIA) and Merchant Seamen's Records System of Records Notice (SORN). Links to the aforementioned PIA and SORN are provided below:

- <https://www.dhs.gov/publication/dhsuscgpia-015-merchant-mariner-licensing-and-documentation-system>
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14911.htm>

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 2,568.
- The estimated annual number of responses is 2,568.
- The estimated annual hour burden is 3,060 hours.
- The estimated annual cost burden is \$122,400.

The burden to respondents is in Appendix A. We estimate that it takes about 6 hours to participate in a focus group. Even though individual focus groups are projected to consist of less than 10 participants, for any given endorsement being analyzed, as many as 3 focus groups may be required to complete the JTA process. Focus groups for the purpose of developing task lists and identifying the knowledge, understanding, and proficiencies required for task performance shall generally consist of instructors, supervisors, and company officials considered to be subject matter experts in the credential endorsement being analyzed. Focus groups for the purpose of validating the task lists developed by the subject matter experts shall consist of currently active credential holders. Depending upon the credential endorsement under study, focus group panelists can range from ratings, officers, and port captains and port engineers.¹ We estimate that it takes about 45 minutes (0.75 hours) to complete the on-line survey. Survey respondents shall consist of mariners who currently hold and are employed under the authority of the credential endorsement being analyzed, as well as supervisors of the credential holders being analyzed. Additionally, we estimate that from the pool of potential merchant mariners with national deck or engine rating and officer endorsements, that we will have a 6% voluntary participation rate for our on-line survey.

13) Total annualized capital and start-up costs.

There are no estimated capital or start-up costs associated with this information collection.

14) Estimates of annualized Federal Government cost.

The estimated annual Federal Government cost is \$325,000 (see Appendix B). The cost includes both a JTA contract and Coast Guard MMC specialist (GS-13) time (50%/year). The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15) Reasons for the change in burden.

This is a new information collection.

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.

¹ Wage rate used is from Bureau of Labor Statistics (BLS) Occupational code 53-5021 Captains, Mates, and Pilots of Water Vessels at – <https://www.bls.gov/oes/current/oes535021.htm>. We use this wage rate for mariners and shoreside personnel with similar expertise (i.e., instructors, supervisors, company officials, port captains and port engineers).