

**Supporting Statement
for
Standards of Training, Certification and Watchkeeping for Seafarers (STCW),
1995, 1997, and 2010 Amendments to the International Convention**

OMB No.: 1625-0079
COLLECTION INSTRUMENTS: Instruction

A. Justification

1) Circumstances that make the collection of information necessary.

The collection of information is needed to ensure that mariners have completed training and assessment necessary to receive STCW certification or endorsement. Collection of information is also needed to demonstrate to the International Maritime Organization that the United States has in place certain specific regulations that implement the international requirements. The requirements generally reflect routine practices for U.S. ship operating companies and training institutions. The requirements are issued under the authority of Title 46 United States Code (U.S.C.) Chapter 71.

STCW requires seafarers serving on vessels affected by STCW to either take training, or demonstrate competency, in skills necessary to perform assigned duties. The regulation contains collection of information requirements for the following: documentation of curriculum for training courses used to receive STCW certification or endorsement; documentation of practical skills demonstration; documentation of training and assessment; documentation of medical fitness; maintenance of seafarers' records by vessel owners or operators; and, documentary evidence showing that the personnel serving on passenger ships on international voyages meet appropriate training.

There are no forms associated with this COI. Individuals/companies can develop whatever works for them as long as the info content follows the rules. The CG has published guidance on STCW requirements. Info can be found at – <https://www.dco.uscg.mil/nmc/stcw/> . There is no requirement to share or upload info electronically.

The table below identifies which part of the CFR corresponds to the subject.

Table 1
STCW requirements: CFR, Subject and Affected Population

46 CFR	Subject and Affected Population
10.404	a) Recording of training and assessment record books. <ul style="list-style-type: none"> • Candidates for an STCW certificate or endorsement as an officer in charge of an engineering watch applying to substitute approved training in place of required service. • Candidates for an STCW certificate or endorsement as an officer in charge of an engineering watch, for service in a seagoing vessel.
10.408	b) Documentation of training courses and student's performance. c) Documentation and submission of skills demonstration to the National Maritime Center (NMC). <ul style="list-style-type: none"> • Training and assessment providers.
11.1105, 12.905 and 15.1103	d) Documentary evidence showing that the personnel serving on passenger ships on international voyages meet appropriate training <ul style="list-style-type: none"> • All personnel serving on passenger ships

12.205, 10.301	e) Documentation of medical fitness. <ul style="list-style-type: none"> • All applicants for new merchant mariner credential w/ STCW endorsement • Medical examinations every 2 years for all mariners w/ STCW endorsement
15.1107, 12.625, 12.627, 11.1005	f) Maintenance of merchant mariners' records by owner or operator. <ul style="list-style-type: none"> • Seagoing vessels subject to the STCW. • Documented evidence of training for personnel with security duties • Documented evidence of security awareness for all other personnel • Documented evidence of foreign sea service
15.1111	g) Posting of watch schedules. <ul style="list-style-type: none"> • Seagoing vessels subject to the STCW.

a) Recording of training and assessment record books. Candidates for an STCW certificate or endorsement as an officer in charge of a navigational watch or engineering watch may use a combination of training and sea service to meet STCW requirements. When seagoing service is combined with training in order to qualify for STCW certification, training must be documented in a Coast Guard-accepted-training-record book. Documentation of sea-service will ensure that seafarers that opt to use sea-service as the basis for their qualifications have the experience that will allow them to meet the standards of competency outlined in STCW.

b) Documentation of training courses and student's performance. Where courses are required, objectives and criteria used for training not subject to Coast Guard approval must be documented and available for evaluation. Documentation of course objectives and training criteria will ensure that training and assessment activities prepare seafarers to meet the standards of competency outlined in STCW.

c) Documentation and submission of skills demonstration to the NMC. Under STCW, when courses are not required, candidates for original licenses and license renewals must demonstrate competency in skills necessary to perform assigned duties. Evidence of demonstrated competency must be documented and submitted to the NMC in order for candidates to receive STCW certification or documentation.

d) Documentary evidence showing that the personnel serving on passenger ships on international voyages meet appropriate training. STCW Regulation V/3 requires that each mariner who completes the required training receive a certificate. Every five years, completion of a refresher course would be documented in the mariner's record and it would show that the mariner has received such training, or has otherwise maintained competence in the required areas of knowledge, understanding and proficiency.

e) Documentation of medical fitness. Applicants for merchant mariners' documents must submit written reports from medical practitioners stating that they are medically fit to perform assigned duties once every two years. Documentation of medical fitness will ensure that seafarers are fit to perform assigned duties.

f) Maintenance of merchant mariners' records by owner or operator. Ship companies must ensure that information regarding the medical fitness, experience, and competency of seafarers serving on any vessel is maintained and accessible to management. Seafarers' records maintained by the owners/operators would be subject to Coast Guard review in its oversight function to ensure that seafarers employed on vessels affected by STCW have the skills and fitness level necessary to perform assigned duties.

g) Posting of watch schedules. Rest hour minima will require posting of rest hour schedules for each vessel. These recordkeeping requirements are largely consistent with good commercial practices and dictate good seamanship for safe navigation.

2) Purpose of the information collection.

The purpose of the information collection is to ensure compliance with international requirements and to maintain acceptable quality in activities associated with training and assessment of merchant mariners.

Documentation of objectives and criteria used for training and assessment would ensure that training programs meet the objectives required by the IMO. Documentation of skill demonstration and sea-service would ensure that seafarers have the skills and experience necessary to perform assigned duties. Ship company record maintenance and rest hour posting requirements would make companies responsible for verifying the credentials of seafarers employed in their service.

3) Considerations of the use of improved technology.

The information collection may be in written or electronic form. There are no forms, structured format or system required for maintaining the information. We estimate that about 50% of the reporting and recordkeeping requirements can be done electronically.

4) Efforts to identify duplication.

There are no State or local regulations relating to this issue. No similar information collection is conducted by other Federal agencies. Similar information does not exist.

5) Methods used to minimize the burden to small businesses if involved.

Domestic law generally excludes uninspected passenger vessels from regulations applicable to ocean-going vessels, the Coast Guard exempts personnel serving on uninspected passenger vessels from STCW requirements. Additionally, domestic regulations for small passenger vessels and for seagoing vessels less than 200 gross register tons are considered equivalent to STCW standards.

6) Consequences to the Federal program if collection were not conducted or conducted less frequently.

Failure to effect the required collection of information relating to skills and experience could render unverifiable compliance with STCW training and assessment requirements. Without an information collection, there would be no practical means for holding the owner or operator of a seagoing vessel accountable for inadequate navigational safety practices. Also, there would be no way to determine whether seafarers employed on vessels covered under STCW had successfully completed training or demonstrated competency in skills necessary to perform assigned duties.

7) Special collection circumstances.

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

8) Consultation.

A 60-day Notice (See [USCG-2019-0747], September 13, 2019, 84 FR 48362) and 30-Day Notice (December 3, 2019, 84 FR 66215) 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 payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

10) Assurances of confidentiality provided to respondents.

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 Privacy Impact Assessment (PIA) and the Merchant Seamen's Records System of Records Notices (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) Estimate of annual hour and cost burden to respondents.

- The estimated annual number of respondents is 37,731.
- The estimated annual number of responses is 48,873.
- The estimated annual hour burden is 29,234 hours.
- The estimated annual cost burden is \$2,280,850.

The burden to respondents is provided in Appendix A. Respondents are merchant mariners with a least 1 active STCW endorsement,¹ training providers that offer STCW-related course, and U.S. Flag vessels required to be manned by mariners with STCW endorsements.² All wage rates used are in accordance with the current edition of COMDTINST 7310.1(series) for "Out-Government" personnel.

a) We estimate that it takes 1 hour per recording of a training and assessment record and that a record is done by a technical specialist. The position of a technical specialist is equivalent to a GS-13. Additionally, we estimate that annually about 0.3% of the total STCW mariner population uses this type of record.

b) We estimate that it takes 1 hour to document a training course or a student's performance and that a record is done by an administrative specialist. The position of an administrative specialist is equivalent to a GS-7. Additionally, we estimate that this action is taken once for each STCW training provider and for each STCW course.

c) We estimate that it takes 0.5 hours to record and submit a skills demonstration to the NMC and that that action is done by a technical specialist. The position of a technical specialist is equivalent to a GS-13. Additionally, we estimate that annually about 0.3% of the total STCW mariner population uses this type of record.

d) We estimate that it takes about 5 minutes (0.083 hours) to record that personnel serving on passenger vessels are trained as required by STCW Regulation V/2 and that the action is done by a technical specialist. The position of a technical specialist is equivalent to a GS-13. Additionally, we estimate that annually about 2% of the total STCW mariner population uses this type of record.

e) We estimate that it takes about 15 minutes (0.25 hours) by a medical practitioner and 5 minutes (0.083 hours) by a mariner to record the mariner's medical fitness. The position of a medical practitioner is equivalent to a GS-15, and the mariner is equivalent to a GS-13. Medical fitness reviews are required every 2 years.

f) We estimate that it takes 3 hours to maintain seamen records per voyage on each U.S. Flag vessel with STCW mariners and that the work is done by an administrative specialist. The position of a technical specialist is equivalent to a GS-7. Additionally, we estimate that each vessel annually has 3 voyages (i.e., crew changes).

g) We estimate that it takes 15 minutes (0.25 hours) to post a watch schedule per voyage on each U.S. Flag vessel with STCW mariners and that the work is done by an administrative specialist. The position of a technical specialist is equivalent to a GS-7. Additionally, we estimate that each vessel annually has 3 voyages (i.e., crew changes).

¹ As a merchant mariner with an STCW endorsement only needs to take a medical examination every 2 years, the STCW mariner population used in this ICR is 50% of the total mariner population with STCW endorsements.

² This population is estimated by using the Coast Guard's Marine Information for Safety and Law Enforcement (MISLE) database—searching for Active, Inspected, Documented, US Flag Vessels with route type 'Oceans' and GRT, GT_ITC, or GRT_Simplified greater than or equal to 200.

13) Estimate of annualized capital and start-up costs.

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

14) Estimates of annualized cost to the Federal Government.

The annualized Federal Government cost estimate is \$825,585 (see Appendix B). We estimate that it takes a member of the Coast Guard about 30 minutes to review each (a) training and assessment record, (b) training course or student performance record, (c) skills demonstration, or (d) record that personnel serving on passenger vessels are trained as required by STCW Regulation V/2. We estimate that it takes a member of the Coast Guard about 30 minutes to review each (e) medical fitness record. We estimate that it takes a member of the Coast Guard about 30 minutes to review each (f) seamen record and (g) each watch schedule. Additionally, for seamen records and watch schedules, we estimate that the Coast Guard will spot check 25% of all records each year during inspections, boarding or post-casualty investigations. The Coast Guard member conducting each of these activities is analogous to a Lieutenant Junior Grade (LTJG, O-2). The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15) Reasons for change in the burden.

The change in burden is an ADJUSTMENT due to a change (i.e., decrease) primarily in the estimated annual number of vessel respondents. There is no proposed change to the reporting requirements of this collection. The reporting requirements, and the methodology for calculating burden, remain unchanged.

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) 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 does not employ statistical methods.