SUPPORTING STATEMENT – PART A

United States Merchant Marine Academy (USMMA) Alumni Survey

INTRODUCTION: This is to request to obtain Office of Management and Budget's (OMB) three-year approval for the information collection entitled United States Merchant Marine Academy Alumni Survey, OMB Control No. 2133-0542. The information collection expires March 31, 2020.

Justification

1. Explain the circumstances that make the collections 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.

The United States Merchant Marine Academy is an accredited federal service academy that confers BS and MS degrees. Title 46 U.S.C. 51309 authorizes the Secretary to prescribe regulations necessary to administer programs to maintain appropriate academic standards. The Academy is expected to assess its educational outcomes and report those findings to the Middle States Commission on Higher Education (MSCHE), which is the regional accrediting body for the Academy. The Middle States Commission on Higher Education is recognized by the U.S. Secretary of Education to accredit degree-granting institutions. Thus the Academy is required to conduct periodic surveys of alumni cohorts and analysis of the data to obtain the necessary information to meet these reporting requirements and to maintain the institution's degree granting status. This type of census survey is a routine higher education assessment practice in the United States. This collection of information supports DOT's Strategic Goal of Security, Preparedness and Response.

2. 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 Academy will conduct an annual survey of its immediate, five-year and ten-year alumni, consisting of approximately 600 individuals each year. The survey will be administered by the Academic Division of the Academy under the supervision of the Office of Institutional Assessment. The information gathered will be analyzed and used to measure success in meeting institutional and academic program goals and improvement of administrative and educational services provided to students. The survey contains four categories with numbered queries related to each. These categories are: 1) **Employment** which includes employment status, time to obtain employment, type of employment and position, and salary with results used to ensure job placement of graduates within the maritime industry; 2) **Education and Institutional Assessment** which surveys the Academy's overall academic program in preparing its graduates for employment with results used to modify institutional learning goals and/or Academic Division Goals to better prepare students for employment in the maritime industry and other administrative areas which are used to improve student support services; 3) **Departmental Assessment** which surveys specific department and course learning goals with results used to modify or improve the curriculum; and 4) **Program Assessment** which surveys the quality of the program in preparing students for the U.S. Coast license exam and whether the programs itself along with its particular components contains the requisite courses to best prepare graduates for today's workforce in a domestic and international environment. Summary of findings will serve as supporting evidence to inform senior leadership in decision-making in terms of the curriculum and allocation of resources and most importantly in meeting the criteria established by the Middle States Commission on Higher Education (MSCHE) by demonstrating continuous improvement in assessment and strategic planning efforts to meet the Academy's mission statement.

3. 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. Also, describe any consideration of using information technology to reduce burden.

This information collection involves the use of automated/electronic collection techniques. The information collection will be carried out using Survey Monkey (http://www.surveymonkey.com).

4. 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.

Similar information is not gathered currently by any other entity.

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

The only intended recipients of the survey are graduates of the Academy.

6. 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 the burden.

If the collection is not done, it will impact the Academy's ability to maintain its accreditation and thereby, its ability to offer a Bachelor of Science degree. Current accreditation expectations include regular annual survey of alumni to gather information related to the effectiveness of academic programs. In addition, if the collection of this data is not performed, the Academy will not be able to identify changes needed to improve overall administrative and educational services in terms of the curriculum, course offerings, and educational support services.

7. 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 statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing 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 this collection of information to be conducted in a manner described above.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's 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 these 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 three 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.

MARAD published a 60-day notice and request for comments on this information collection in the Federal Register dated November 4, 2019 (Vol. 84, No. 213, F.R. 59437), indicating comments should be submitted on or before January 3, 2020. Comments/No comments were received.
In addition, a 30-day notice requesting comments was published on March 3, 2020, 2019 (Vol. 85, No. 42, F.R. 12653), indicating comments should be submitted by April 2, 2020

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

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.**

There are no assurances of confidentiality provided to respondents as part of this information collection. The Academy has no mechanism in place to identify individual respondents. Analysis will be done at the aggregate level and all reports produced will be at summary level.

11. **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.**

USMMA is not seeking authority to collect any PII or sensitive information.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, 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 burden and explain the reasons for the variance. Generally, estimates should not include burden hours 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 item 13 of OMB Form 83-I.**

- **Provide estimates of annualized cost to respondents for the hour 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.**

Number of Respondents	Response per Respondent	Total Responses Annually	Hours Per Response	Total Hours Annually

600	1	600	0.25	150

- Approximately 600 recipients will receive the questionnaire annually.
- Estimated time for completion is 15 minutes.
- The survey contains four categories with numbered queries related to each. These categories are: 1) Employment, 2) Education and Institutional Assessment, 3) Departmental Assessment, and 4) Program Assessment. As the contents of each questionnaire is consistent and customized for each major, the estimated time for completion by respondents is identical.
- Estimated response rate expected at 25%.

13. Estimate of total annual costs to respondents

There will be no annualized cost for any survey respondents as they will receive an e-mail link to complete the survey.

14. Estimates of costs to the Federal Government.

The estimate of annualized cost to the federal government is $1321.60. The method used to estimate costs included quantification of hours to review the design and tabulate questions and data required (6 hours), support staff costs, and costs related to the amount of time required to properly analyze (6 hours) and employ results (5 hours).

The Federal Government cost for employees responsible for overseeing the survey is:

Supervisory (GS-14 step 10) - $75.57 x 6 hours	=	$453.42
Analyst (GS-12 step 5) - $53.78 x 6 hours	=	$322.68
Office Assistant (GS-8 step 10) - $33.58 x 5 hours	=	$167.90
Total	=	$944.00
Miscellaneous = 1.4 x $923.80	=	$1321.60

Total Cost to the Federal Government is: $1321.60

15. Explanation of program changes or adjustments

No significant program changes have been reported; the burden hours have been adjusted to reflect the actual time for completing required survey.

16. Publication of results of data collection

Collected data will be analyzed and relevant results shared with internal program managers. Summary findings will be included in the self-study report to be submitted to MSCHE every five/ten years as required to maintain accreditation.

17. Approval for not displaying the expiration date of OMB approval

MARAD is not seeking such an approval.

18. Exceptions to certification statement

There are no exceptions to the certificate statement.