

**Department of Transportation**  
**MARITIME ADMINISTRATION (MARAD)**  
**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS**  
**UNDER 5 CFR PART 1320**  
**Information Collection: 2133-NEW**  
**Center of Excellence for Domestic Maritime Workforce Training and Education**  
**Annual Applications for Designation**

**INTRODUCTION**

This is to request the Office of Management and Budget’s (OMB) three-year approval clearance for a new proposed information collection entitled, “Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) –Applications for Designation” (OMB Control No. 2133-NEW). Pursuant to 46 U.S.C. 54102, the Secretary of Transportation, acting through the Maritime Administrator, may designate eligible and qualified training entities as Centers of Excellence for Domestic Maritime Workforce Training and Education (CoE). Interested covered training institutions will voluntarily apply to MARAD with sufficient information to demonstrate they meet the designation criteria.

**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.

This collection of information is necessary to implement Section 3507 of the National Defense Authorization Act of 2018, Public Law 115–91 (the “Act”), codified at 46 U.S.C. 54102, which provided the Secretary of Transportation with the discretionary authority to designate eligible and qualified entities as CoEs. CoE designations will serve to assist the maritime industry in obtaining and maintaining the highest quality workforce.

Following the enactment of the Act, MARAD developed a procedure to recommend to the Secretary the designation of eligible institutions as Centers of Excellence for Domestic Maritime Workforce Training and Education (CoE). Pursuant to the Act, the Secretary of Transportation may designate certain eligible and qualified training entities as CoEs and may subsequently execute Cooperative Agreements with CoE designees. Authority to administer the CoE program is delegated to MARAD in 49 CFR 1.93(a).

Qualified training entities seeking to be designated as a CoE need to apply to MARAD. MARAD has developed a policy to provide interested parties with comprehensive agency guidance on how to apply for CoE designation and how the CoE program will be administered. Applications should include information to demonstrate that the applicant institution meets certain eligibility requirements, selection criteria, and qualitative attributes consistent with Section 3507 of the Act.

The MARAD application procedure and program details will be available to the public on its website <https://www.maritime.dot.gov/education/maritime-centers-excellence>.

As the first step in developing a CoE policy, MARAD issued a notice requesting comments on its proposed application process entitled Centers of Excellence for Domestic Maritime Workforce Training and Education, 83 FR 25109 (May 31, 2018). In response to the notice, we received 18 written comments. Then on July 19, 2019, MARAD published another notice in the Federal Register (84 FR 34994) in which we responded to comments received and sought new comments on the proposed policy to which five more comments were received. Responses to the five comments received from the July notice are summarized immediately below. Upon receipt of the Information Collection Review(ICR) approval from OMB, MARAD will issue a Federal Register Notice requesting applications from qualified training entities seeking to be designated as a CoE. and on the MARAD website at [www.MARAD.dot.gov](http://www.MARAD.dot.gov).

This information collection is required to administer the CoE program. It also supports the DOT strategic goal, Economic Competitiveness, and the MARAD strategic goal, Maintain and Modernize the Maritime workforce.

**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 information received will be used by MARAD to administer the CoE program. MARAD will use the collected information to evaluate the applicant institutions for designation as a CoE,

**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 proposed collection of information will encourage electronic submission via electronic mail of the applications along with any supporting information and documents. Respondents can email electronic files of their application letters, supporting information and documents to MARAD. Respondents will not be required to fill out any agency mandated forms and may submit the required information in their existing formats which is the least burdensome for them. This approach reduces the burden on the respondents.

**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.**

The CoE program is a new program established by Congress in December 2017. MARAD has not collected similar information before the enactment of the CoE program. This is a voluntary program and each covered training entity under the statute must decide if it wishes to apply for the CoE designation. The applicant institution will provide unique supporting information to demonstrate how it meets the designation criteria. Any duplications will be unlikely due to the differences in the specific information submitted by each applicant institution.

An examination of the Catalog of Federal Domestic Assistance and the Catalog of Federal Paperwork Requirements did not reveal any similar information collections.

**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.**

Not applicable. The statute enacting the CoE program limits the eligibility to certain “Community or Technical Colleges” and “Maritime Training Centers operated by or under the supervision of a State”. These covered training entities are not small businesses or other small entities as defined by the Small Business Administration criteria.

**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.**

If this information collection is not conducted, MARAD will be unable to implement the congressionally mandated CoE program.

**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;**

Not applicable. Interested covered training entities seeking CoE designation are only required to submit their applications and supporting information annually.

- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**

Not applicable. Upon receipt of ICR approval from OMB, MARAD will publish a final Federal Register Notice inviting interested covered training entities to submit applications for CoE designation. The FRN will provide respondents a minimum of 60 days to submit their applications.

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**

Not applicable. CoE respondents will be required to submit only one copy electronically and one original of any signed documents.

- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN THREE YEARS;**

Not applicable. CoE designees will not be required to collect, maintain or retain any new records specifically for the CoE designation which are in addition to the routine records they already maintain and retain as a training institution without a CoE designation.

- **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;**

Not applicable. This information is not utilized for a statistical survey

- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**

Not applicable.

- **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**

Not applicable.

- **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.**

Not applicable.

**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.**

On May 31, 2018, MARAD issued a Federal Register Notice requesting comments on its proposed application process entitled Centers of Excellence for Domestic Maritime Workforce Training and Education, [83 FR 25109](#) . In response to the notice, we received 18 written

comments which are summarized below.

On July 19, 2019, MARAD published a 60-day Federal Register Notice [84 FR 34994](#), entitled Centers of Excellence for Domestic Maritime Workforce Training and Education Designation Program Guidance: Proposed New Policy and Information Collection Request. In this notice, we responded to comments received and sought new comments on the proposed new policy and information collection request. The five comments received from the July notice and the agency responses are summarized below.

On March 06, 2020, MARAD published a 30-day Federal Register Notice, entitled Final Policy: Centers of Excellence for Domestic Maritime Workforce Training and Education Designation Program Guidance; Information Collection Request for Comments, [85 FR 13231](#). This notice announced the agency's final CoE designation program guidance and invited submittal of public comments on the information collection requirements in this final policy by 04 April 2020 to OMB on the docket.

The unabridged comments are available for review electronically at [www.regulations.gov](http://www.regulations.gov) by searching DOT Docket Id "MARAD-2018-0888".

- **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.**

I. Public Comments received in response to the May 31, 2018 30-day Federal Register Notice, [83 FR 25109](#):

MARAD received no comments related to the cost and burden of the proposed information collection.

MARAD received comments from thirteen different commenters proposing a total of twenty-nine suggested changes and/or clarifications to our definitions section. Where not in conflict with the explicit language of the statute, we have made those recommended changes to our definitions.

MARAD received comments from ten different commenters proposing a total of nineteen suggested changes and/or clarifications to the eligibility criteria, designation criteria and designation attributes. We have made those recommended changes which were not in conflict with the explicit language of the statute.

MARAD received one comment recommending that the MARAD approval process for temporary use of training ships, as a form of specific federal assistance to designated CoEs under a Cooperative Agreement, include consultation with the relevant State Maritime Academy. Our approval process for third -party requests for use of training ships already includes this consultation with the relevant State Maritime Academy.

MARAD received one comment requesting clarifications regarding the timeline

for the CoE application process and the application preparation time which would be provided to interested applicant training institutions. We have incorporated these clarifications.

MARAD received one comment recommending that a formal bonding of the competencies trained in industry and military is necessary to better crosswalk the skills of the workforce and serve the transition from military to mariner. We agree. The draft guide included a provision encouraging CoEs to award students credit for prior experience, including military service.

MARAD received one comment recommending the CoE designation renewal process like that of the Maryland Higher Education Commission (MHEC). The revised policy provides for annual CoE designations and does not include a renewal process.

MARAD received one comment inquiring if grant writers will be needed to prepare CoE applications. We do not expect that training institutions will need grant writers to prepare their CoE designation applications.

MARAD received one comment suggesting that electronic filing of applications using an enterable forms database will be the least burdensome method to evidence application qualification. We partially agree and have included provisions to encourage electronic submission of applications. However, we do not have the resources at this time to create an online CoE application form and online database.

MARAD received one comment recommending that institutional administration of the career programs offered should be simplified with standard format data entry facilitated by web-based and smart-phone technology to reduce administrative burden. We do not have the resources at this time to develop and implement such applications.

MARAD received one comment recommending that a MARAD website should be established to share CoE information, references, case studies and lessons learned. We agree and will establish a CoE section on the MARAD website.

MARAD received one comment recommending that MARAD compile and provide a particular set of labor data that specifically outlines the needs of the United States Maritime Industry. We do not have the resources at this time to implement this recommendation.

MARAD received one comment recommending that the CoE program be expanded, beyond the items specifically authorized by the statute, to include:

- a. Development of maritime industry cluster maps to include central organizations such as shipyards, ports and harbors along with support businesses.
- b. Development of expectations and incentives for public-private partnerships between state, maritime community, maritime industry, trade associations and foundations.

c. Provisions to include foreign investment.

We have noted the recommendations but do not have the resources at this time to implement them. MARAD has no authority to encourage foreign investment under the CoE program but foreign investment in CoEs is not prohibited.

MARAD received and has noted two comments supporting other comments.

MARAD received one comment endorsing a particular training institution and nine comments providing background information about the commenters and/or their organizations. We have noted these comments. However, the government's designation decision will be based upon our evaluation of the information submitted in each application to demonstrate compliance with the designation criteria.

MARAD received one comment stating that the CoE program for afloat and ashore careers can help provide pathways and career technical education that sustains and improves the US maritime industries and economy. We agree.

MARAD received one comment from the Offshore Marine Service Association strongly supporting the CoE program as improving the competency of the maritime industry, providing better pathways to good-paying U.S. jobs and recognizing the important roles that Community Colleges and Technical Colleges play in this process. We agree.

MARAD received one comment which did not pertain to the CoE Federal Register Notice and requires no action on our part.

II. Public Comments received in response to the July 19, 2019 60-day Federal Register Notice [84 FR 34994](#) :

MARAD received comments from five (5) different commenters.

No comments addressed the cost and hour burden for this information collection.

The North Carolina Ferry Division recommended that MARAD include provisions to ensure geographic diversity, with a special focus on rural areas. We agree that geographical diversity including rural representation would be beneficial. However, this is dependent upon the receipt of acceptable applications from qualified entities in geographically diverse and rural areas. The statute does not establish any quotas and we intend to designate all qualified entities. The government's designation decision will be based upon our evaluation of the information submitted in each application to demonstrate compliance with the designation criteria.

The North Carolina Ferry Division suggested that another possible benefit for these CoE facilities could be support with curriculum development and growth. Certainly, knowledge sharing on industry trends, job needs, and career progression would benefit these centers. We agree.

The Community and Technical College Maritime Workforce Consortium (CTCMWC), submitted the following 12 comments on behalf of 18 community and technical colleges located in coastal areas, the Great Lakes, and inland waterways:

1. CTCMWC requested clarification of ‘voluntary’ as used in this document. The draft Policy stated that participation is entirely voluntary. We have further clarified the Policy.
2. CTCMWC suggested that it is important to define ‘institution’ and submitted a proposed definition. We do not agree because “institution” is a commonly used word with a commonly accepted meaning and the proposed definition would result in a set of circular definitions.
3. CTCMWC recommended adding the term “public” and language to reflect State operation or supervision to the definition of a community or technical college. We disagree because not all technical colleges are necessarily State institutions
4. CTCMWC recommended adding the term “public” to the definition of a Maritime Training Center. We disagree because under the statute, Maritime Training Centers can be privately owned and operated. Including the word “public” would narrow the scope of the statute. Such narrowing would restrict Maritime Training Centers that otherwise would be eligible under the statute.
5. CTCMWC suggested that to be considered for designation, a program should demonstrate a period of sustained program performance, student retention, data generation, and rigor and relevance in meeting industry workforce needs. CTCMWC recommended that both community and technical colleges and maritime training centers be required to have a maritime or maritime-related program in place for a period of five years prior to applying for CoE designation. We disagree because including such requirement for a maritime or maritime-related program to be in place for a period of five years prior to applying for a CoE designation would narrow the scope of the statute. Such narrowing would restrict groups that otherwise would be eligible under the statute.
6. CTCMWC stated that a number of programs serve multiple industries (e.g. welding, HVAC, diesel, transportation and logistics, advanced manufacturing, and cyber security). Therefore, CTCMWC suggested that expanding the scope of the eligibility language to include maritime-related programming would be inclusive and appropriate to best serve the needs of the maritime workforce. CTCMWC proposed including “maritime -related industry training program in its curriculum” within the eligibility criteria at 1.b.1 for community and technical colleges. We disagree because programs that serve multiple industries are not prohibited under the eligibility criteria for a community or technical college at 1.b.1, if at least some of the training is for the domestic maritime workforce. We note, however, that the selection criteria at 2.I.a.2 includes programs offering Ashore Career preparation tracks in the United States Maritime Industry which has been defined quite broadly. Each institution’s application may explain how their maritime related programs provide Ashore Career preparation tracks in the United States Maritime Industry.
7. CTCMWC suggested that MARAD recognize the alignment of some community and technical colleges and maritime centers structuring as consortia or alliances that will apply for designation in this form, with one entity within that consortium or alliance operating as the lead. CTCMWC



recommended that the eligibility criteria be modified to include a consortium or alliance of public Community or Technical Colleges and/or Maritime Training Center(s). We agree and have clarified our policy regarding applications by a group of otherwise qualified entities and the expectations we have for such filings.

8. CTCMWC suggested expanding the scope of the language with regard to high school engagement to include high schools with maritime-related programming. According to this commenter, the expansion will support: broader outreach, outreach to underserved and underrepresented communities, and support greater awareness of career pathways, educational and apprenticeship opportunities in the industry. CTCMWC recommended corresponding changes to the text at II.g. to reflect broader scope regarding high school engagement. We agree and have incorporated appropriate changes in the Policy.
9. CTCMWC suggested that Maritime academy engagement may not be a viable strategy for all Domestic Maritime Centers of Excellence. This may be due to geographic, industry, program and other factors. According to this commenter, changing the language to be more expansive, would be appropriate, and provide a more dynamic and flexible platform from which the designated Domestic Maritime Centers of Excellence can operate. CTCMWC recommended corresponding changes to the text at II.h. to reflect flexible engagement with maritime academies and broader engagement with applicable institutions for advanced proficiency and higher education. We agree and have incorporated appropriate changes in the Policy.
10. CTCMWC suggested that the policy require a mandatory written agreement between MARAD and all designated Domestic Maritime Centers of Excellence to address intent, scope of work, performance, compliance, fiduciary guidelines, if applicable, etc. CTCMWC recommended that “may” be replaced by “shall” in “After issuance of the designation, MARAD may enter into a cooperative agreement with the CoE.” We disagree because imposing mandatory requirements in this guidance document would be inconsistent with the Administrative Procedure Act and DOT processes. See 49 C.F.R. § 5.29(e).
11. CTCMWC submitted their consensus position that a one-year designation period is not feasible, and places an onerous burden not only on an institution, but MARAD as well. CTCMWC recommended that successful applicants receive a five-year designation and may reapply for designation at the end of the five-year period. We understand the concerns identified by CTCMWC and previously weighed the potential of a five-year designation period. However, we believe that the one-year period is workable and protects the accuracy and value of our designations. A five-year period would necessitate the development of a regulation and impose additional administrative burdens, i.e. oversight mechanisms, not necessary with a one-year CoE designation. In addition, we believe that this policy based program is the most responsive means to exercise our discretionary authority. Consistent with other MARAD programs, this new policy will allow experience to dictate whether and how a regulation may be developed to best administer the program in the future. For

now, we believe this new policy, overall, is in the best interest of potential CoE designees.

12. CTCMWC proposed that item # 3.d, addressing non-profit certification, under 'Information to include in your application' be deleted, as eligible applicants are from public community and technical colleges and maritime training centers operated under the supervision of a state. We do not agree because non-profit certification is required to be submitted only if applicable and a maritime training center could be a non-public entity.

The American Waterways Operators expressed support for the CoE program and encouraged MARAD to ensure that those community and technical colleges that receive the CoE designation are ready to assist the maritime industry in obtaining and maintaining the highest quality workforce. The CoE designation will provide further opportunities and avenues for these institutions to expand their reach, thus benefitting the entire maritime industry. We agree.

The University of Alaska (UA) supported the CTCMWC comments. In addition, UA noted that it has expanded its efforts to partner with the State of Alaska Department of Labor and Workforce Development Alaska Vocational Technical Center (AVTEC) to develop the Alaska Maritime Education Consortium (AMEC). Partnering as a single consortium will strengthen their abilities to meet the maritime workforce needs in Alaska. UA strongly recommended that MARAD allow a consortium of otherwise eligible community and technical colleges and maritime training centers, to be eligible to apply for the CoE designation within a State. Alaska's nearly 34,000 miles of coastline borders the Beaufort and Chukchi Seas to the North (both of which merge into the Arctic Ocean), the Bering Sea to the west, and the Gulf of Alaska and Pacific Ocean to the south. UA has coastal campuses in Ketchikan, Sitka, Juneau, Valdez, Homer, Kodiak, Soldotna, Dillingham, Bethel, Nome, and Kotzebue. AVTEC is located on the coast in Seward. It is neither practical nor prudent in a State like Alaska, to designate a single geographical location as a CoE. UA hopes to apply for the CoE designation as a single, integrated statewide consortium to leverage the location, programs, and expertise of UA and AVTEC, into one, robust, networked, center of excellence model. We agree and have clarified our policy regarding applications by a group of otherwise qualified entities and the expectations we have for such filings.

The Pacific Maritime Industries Education Alliance submitted comments which were identical to the comments submitted by CTCMWC.

- **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.**

MARAD published a Federal Register Notice (FRN) on 31 May 2018, as referenced above, to submit public comments on the Proposed Applicant Guide. Additionally, MARAD issued a 60-day FRN and a 30-day FRN, as listed above, to solicit comments on this information collection.

Since the enactment of the authorizing statute on 12 December 2017, MARAD has met with numerous interested stakeholders outside MARAD to receive their perspectives.

Additionally, MARAD participated in the National Maritime Workforce Conference (titled “Shared Quarters”) held in Texas on June 5-6, 2018. The conference brought together academia and industry professionals from across the country to focus on how to enhance and expand maritime, marine technology and port management workforce training taking place at 2-year public colleges. MARAD received perspectives from approximately 75 representatives from technical and community colleges, state maritime academies, universities, shipyards, port authorities and other maritime industry stakeholders in the CoE program. MARAD staff encouraged interested stakeholders to submit their comments on the docket in response to the May 31 Federal Register Notice.

- **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.**

MARAD will continue to meet with CoE stakeholders to obtain their perspectives.

MARAD will also attend future Maritime Workforce Conferences to consult with representatives of CoE stakeholders who must provide information under this information collection.

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

No payments or gifts are or will be 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 respondents will be requested not to submit any privacy information covered under the Privacy Act or any information covered by an exemption under the Freedom of Information Act (FOIA).

To enable commenters to provide comments confidentially, the following provision was included in the above listed Federal Register Notices:

If you wish to submit comments under a claim of confidentiality, you should submit three copies of your complete submission, including the information you claim to be confidential business information, to the Department of Transportation, Maritime

Administration, Office of Legislation and Regulations, MAR-225, W24-220, 1200 New Jersey Avenue SE, Washington, DC 20590. Include a cover letter setting forth with specificity the basis for any such claim and, if possible, a summary of your submission that can be made available to the public.

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. Respondents are not required to submit any information commonly considered private or 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.**

Under the authorizing statute, only “Community Colleges or Technical Colleges” and “Maritime Training Centers” in certain eligible locations are eligible to apply for CoE designation. Additionally, only “Maritime Training Centers” with a maritime training program in operation on 12 December 2017 are eligible under the statute. MARAD estimates that the total pool of eligible covered training entities is under 200.

- a. Estimated maximum number of respondent Applications: 200
- b. Frequency of response: Annual
- c. Estimated Average Burden Man-Hours per Application: 24 hours
- d. Total Annual Burden Hours for all respondents: 200 x 24 = 4800 hours

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

It is estimated that one employee will require approximately 24 hours of effort to collect, compile and submit the required information with each application for CoE designation.

The total one-time cost to the respondents is estimated as follows:

| Estimated Maximum Number of Applications | Estimated Burden Hours per Application | Total Burden Hours for all Respondents | Mean Hourly Wage <sup>1</sup> | Total Cost of Burden Hours    | Overhead and G & A <sup>2</sup> | Estimated Total Annual Cost   |
|--|--|--|-------------------------------|-------------------------------|---------------------------------|-------------------------------|
| 200                                      | 24                                     | **<br>Expression is faulty **          | \$53.47                       | **<br>Expression is faulty ** | **<br>Expression is faulty **   | **<br>Expression is faulty ** |

<sup>1</sup>The median hourly wage for “Education Administrators, Postsecondary” was taken from the Bureau of Labor Statistics May 2018 National Occupational Employment and Wage Estimates at <https://www.bls.gov/oes/current/oes119033.htm>.

<sup>2</sup>Overhead and General & Administrative expenses estimated @ 40%.

**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.**

**(a) Total Capital and Start-Up Costs Estimate:**

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

**(b) Total Operation and Maintenance and Purchase of Services Estimate:**

There are no operation and maintenance costs associated with this information 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.**

The total annual cost to the Federal Government for processing this information collection is estimated below.

Review Applications for CoE Designation – Annual Cost

a. Estimated MARAD cost to review and process each application is as follows:

| A, 1 | B              | C           | D                                 | E              | F                            | G                                    | H                                       |
|------|----------------|-------------|-----------------------------------|----------------|------------------------------|--------------------------------------|---|
| 2.   | Employee Grade | Office Code | Employee Activity                 | Employee Hours | Hourly Salary <sup>1,2</sup> | Salary Cost                          | Total Cost <sup>3</sup> per application |
| 3.   | GS-7           | MAR-600.3   | File                              | 0.5            | \$26.43                      | **<br>Expressi<br>on is<br>faulty ** | 0                                       |
| 4.   | GS-13          | MAR-650     | Review                            | 4              | \$55.75                      | **<br>Expressi<br>on is<br>faulty ** | 0                                       |
| 5.   | GS-14          | MAR-650     | Review                            | 4              | \$65.88                      | **<br>Expressi<br>on is<br>faulty ** | 0                                       |
| 6.   | GS-15          | MAR-650     | Review                            | 4              | \$77.49                      | **<br>Expressi<br>on is<br>faulty ** | 0                                       |
| 7.   | GS-15          | MAR-660     | Review                            | 4              | \$77.49                      | **<br>Expressi<br>on is<br>faulty ** | 0                                       |
| 8.   | GS-15          | MAR-600.32  | Coordinate,<br>Review,<br>Process | 6              | \$77.49                      | **<br>Expressi<br>on is<br>faulty ** | 0                                       |
| 9.   | GS-15          | MAR-221     | Review                            | 4              | \$77.49                      | **<br>Expressi<br>on is<br>faulty ** | 0                                       |
| 10.  | SES            | MAR-600.3   | Review                            | 4              | \$80.69                      | **<br>Expressi<br>on is              | 0                                       |

|   |                  |          |             |          |  |                                      |                                  |
|---|------------------|----------|-------------|----------|--|--------------------------------------|----------------------------------|
|   |                  |          |             |          |  | faulty **                            |                                  |
| 11.   | SES <sup>2</sup> | MAR- 600 | Concurrence | 0.5      | \$80.69  | **<br>Expressi<br>on is<br>faulty ** | 0                                |
| 12.   | SES <sup>2</sup> | MAR- 220 | Concurrence | 0.25     | \$80.69  | **<br>Expressi<br>on is<br>faulty ** | **<br>Expression is<br>faulty ** |
| 13.   | SES <sup>2</sup> | MAR- 220 | Concurrence | 0.15     | \$80.69  | **<br>Expressi<br>on is<br>faulty ** | **<br>Expression is<br>faulty ** |
| 14.   | <b>TOTAL</b>     |          |             | <b>0</b> | <b>**<br/>Expressi<br/>on is<br/>faulty **</b> | <b>0</b>                             | <b>0</b>                         |
| <sup>1</sup> GS hourly salary is based upon 2087 hours/year and Step-5 annual salary in the <a href="#">Salary Table 2020-DCB</a> .<br><sup>2</sup> SES hourly salary is based upon ES Level 3 Pay in the <a href="#">Salary Table No. 2020-ES</a><br><sup>3</sup> Total Cost = Salary cost times 1.4 |                  |          |             |          |  |                                      |                                  |

b. Estimated MARAD cost to process all applications for CoE designations.

|   |   |                  |
|---|---|------------------|
| MARAD Annual Cost per application                   | = | \$3,206          |
| Estimated number of applications                    | = | 200              |
| Total Annual MARAD cost to process all applications | = | <b>\$641,200</b> |

**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.**

This is a new information collection.

**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 names of the designated CoEs and the effective period of the CoE designations will be published on the MARAD website at [www.marad.dot.gov](http://www.marad.dot.gov).

No complex analytical techniques will be utilized for collection or review of this information collection.

The estimated time schedule is as follows:



| <u>Activity</u>  | <u>Completion Date</u> |
|--|------------------------|
| Published Federal Register Notice (FRN), 83 FR 25109, to solicit comments on CoE designation process     | 31 May18               |
| Comments Received  | 02 Jul 18              |
| Issued 60-day FRN, 84 FR 34994, to solicit comments on draft CoE Policy and ICR                          | 19 July 19             |
| 60-day FRN Comments Due to MARAD   | 17 Sep 19              |
| Published Final CoE Policy and 2 <sup>nd</sup> (30-day) FRN, 85 FR 13231, to solicit ICR comments to OMB | 06 Mar 20              |
| 2nd FRN (30-day) Comments Due to OMB   | 04 Apr 20              |
| OMB Approval for Information Collection Number Received  | 04 Jun 20              |
| Publish FRN Inviting CoE Applications  | 16 Jun 20              |
| CoE Applications Due to MARAD  | 15 Aug 20              |
| <b>Announce CoE designations on MARAD website</b>  | <b>28 Dec 20</b>       |

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.**

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.**

Not applicable. There are no exceptions to the certificate statement.

#### **ATTACHMENTS:**

1. Section 3507 of the National Defense Authorization Act of 2018, Public Law 115–91 (the “NDAA”), codified at 46 U.S.C. 54102.
2. 30-day Federal Register Notice, [83 FR 25109](#), to invite public comments on MARAD’s proposed CoE application process and applicant guide.
3. 60-day Federal Register Notice, [84 FR 34994](#), entitled “Centers of Excellence for Domestic Maritime Workforce Training and Education Designation Program Guidance: Proposed New Policy and Information Collection Request”.
4. 30-day Federal Register Notice, [85 FR 13231](#), entitled “Final Policy: Centers of Excellence for Domestic Maritime Workforce Training and Education Designation Program Guidance; Information Collection Request for Comments”.

