DEPARTMENT OF TRANSPORTATION

SUPPORTING STATEMENT
Merchant Marine Medals and Awards

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) three-year approval clearance for the information collection entitled, Merchant Marine Medals and Awards (OMB Control No. 2133-0506, which is currently due to expire on April 30, 2020. There were no reported program changes since the last OMB approval.

A. Justification

1. 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 information collection provides a method of awarding merchant marine medals and decorations to masters, officers, and crew members of United States ships in recognition of their service in areas of danger during the operations by the Armed Forces of the United States in World War II, Korea, Vietnam, Operations Desert Shield and Desert Storm, Operations Enduring Freedom, Iraqi Freedom Somalia Conflicts and the replacement of awards previously issued. This information collection is in support of the Department of Transportation's strategic goal for National Security.

These medals are authorized by Public Law 100-324, "The Merchant Marine Decorations and Medals Act."

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.

This information is acquired and used by MARAD personnel to assist in processing and verifying requests for seamen's service awards. The issuance of awards is based upon regular requests received from the public. Without this information collection, merchant seamen who have valiantly served their nation during war-time or risked their lives to rescue other seamen during peace-time would have no other method to obtain actual or replacement service decorations.

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.

The agency provides a total electronic option; however, we estimate actual electronic submission to be 50%.

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.

MARAD is the only Federal agency collecting the information and is the only agency issuing these types of decorations.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection does not involve small businesses. The requests come from individual seamen or their families and information collected is the minimum required to effectively administer the program and maintain internal controls.

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 burden.

Medals and other decorations are issued only by request from individual citizens, and without the collection, merchant seamen would have no other method of obtaining actual or replacement service decorations.

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 the collection of information to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

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 recordkeeping, 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.

The Maritime Administration published a 60-day notice and request for comments on this information collection in the Federal Register on December 26, 2019, (FR 84, 247), copy attached. Comments were due by February 24, 2020. No comments were received. In addition, a 30-day notice was published on March 18, 2020, (FR 85, 15568), copy attached.

Contact with persons outside MARAD on the conduct of this program is continuous and extensive. Hundreds of applications/requests are processed each year and contacts with requestors and feedback opportunities are commonplace.

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

No, MARAD does not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No assurances of confidentiality are provided to respondents.

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.

No questions of a sensitive nature are asked of respondents.

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		Responses Per Respondent		Total Responses Annually		Hours Per Response		Total Hours Annually
550	x	1	=	550	x	1	=	550

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

*** The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its 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 cost 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.**

The annual cost burden to the respondents per response is as follows:

(a) Total Capital and Start-Up Costs Estimate: N/A

(b) Total Operation and Maintenance and Purchase of Services Estimate: N/A

**14.	Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, 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 the collection is estimated as follows:

Requests for medals are received by one employee of the Office of Sealift Support, who has the sole responsibility for reviewing and processing requests as well as preparing, photocopying and mailing awards. The estimated time required for these tasks is one hour at an hourly wage of $67.82 (GS 14 step 6).

Annual Costs: $52,222.50

Number of Employees		Hourly Wage		Project Time		Benefits		Cost Per Application
1	x	$67.82	x	1 hour	x	1.4	=	$94.95

Total annual cost to the Federal Government is: $94.95 x 550 = $52,221.40

Hourly wage for a GS-14 step 6 was verified via the General Schedule Salary Table 2020-Incorporating the Locality Payment of 30.48% for the Locality Pay Area of Washington-

Baltimore-Arlington, DC-MD-VA-WV-PA. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB Form 83-I.

There were no changes reported in items 13 or 14 of the OMB Form 83-I.

16. 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.

There are no plans to publish the results of this information collection for statistical purposes.

17. 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. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.iy

There are no exceptions to the certificate statement.