

**Supporting Statement
Vessel Entrance or Clearance Statement
1651-0019**

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.**

CBP Form 1300, *Vessel Entrance or Clearance Statement*, was developed through agreement by the United Nations Intergovernmental Maritime Organization (IMO) in conjunction with the United States and various other countries. The form was developed as a single form to replace the numerous other forms used by various countries for the entrance and clearance of vessels. CBP Form 1300 is authorized by 19 U.S.C. 1431, 1433, and 1434, and provided for by 19 CFR 4.7-4.9.

This form is accessible at <http://www.cbp.gov/newsroom/publications/forms?title=1300&=Apply>.

- 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 .**

CBP Form 1300 is used to collect essential commercial vessel data at time of formal entrance and clearance in U.S. ports. The form allows the master to attest to the truthfulness of all CBP forms associated with the manifest package, and collects detailed information on the vessel, cargo, purpose of entrance, certificate numbers and expiration for various certificates. It also serves as a record of fees and tonnage tax payments in order to prevent overpayments.

- 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, 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 .**

Currently this form can be filled out online, printed, and submitted on paper at the port.

CBP-OFO has built and is testing a system, known as the Vessel Entrance and Clearance System (VECS), for the electronic submission, review, and processing of this CBP form however, development of a public facing portal is still required. With recent DHS and CBP prioritization of VECS the plan is to have an initial public portal by September 2021, pending requirements gathering, levels of efforts, and

directional decisions on which platform is best to meet the agency and trade community needs. Even with an initial portal, CBP will still need to perform testing and a potential pilot with a small universe of stakeholder before nationwide roll out. A plan and timeline for testing will be developed once we have direction on and once more progress is made on the portal.

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.

Some of this information may be provided via eNOAD, however, Office of Field Operation (OFO) personnel does not have access to eNOAD as it is strictly a Coast Guard system. Efforts are being made to automate the process and link information being transmitted to eNOAD to populate like data fields into CBP's system. Some of this information is also available via ACE and ATS data. ACE, ATS, and eNOAD data will all be integrated into the VECS. Currently, all information is complete by hand by a Vessel Agent, who only has access to any information that is publicly available, information which they submitted to CBP through eNOAD or ACE, or is provided to them by the carrier/master of the vessel.

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

This information collection does not have an impact on small businesses or other small entities.

6. Describe consequences 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 was conducted less frequently CBP could not fulfill its regulatory requirements to verify vessel manifest documents, would lose its ability to accurately assess fees and taxes, levy fines, and keep accurate records of vessel arrival and departure information.

7. Explain any special circumstances.

This information is collected in a manner consistent with the guidelines of 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.

Public comments were solicited through two Federal Register notices including a 60-day notice published on January 25, 2021 (86 FR 6896) on which no comment was received, and a 30-day notice published on April 9, 2021 (86 FR 18550) on which no comment has been received.

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

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

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

All data submitted is entered into the Vessel Management System (VMS) which is a sub-database of the Automated Target System (ATS) and a SORN for ATS, dated May 22, 2012 (Vol. 77, Page 30297) will be included in this ICR. PIA coverage is provided by DHS/CBP/PIA-006 Automated Targeting System.

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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

FORM	TOTAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES	TIME PER RESPONSE
CBP Form 1300	94,464	2,624	72	188,928	30 minutes or (0.5) hours

Public Cost

The estimated cost to the respondents is \$4,841,280. This is based on the estimated burden hours (94,464) multiplied by the average loaded hourly wage rate for ship and boat captains and operators (\$51.25). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2019 median

hourly wage rate for Ship and Boat Captains and Operators (\$33.60) by the ratio of BLS' average 2019 total compensation to wages and salaries for Transportation and Material Moving occupations (1.5252), the assumed occupational group for ship and boat captains and operators, to account for non-salary employee benefits.¹ This figure is in 2019 U.S. dollars and CBP assumes an annual growth rate of 0 percent; the 2019 U.S. dollar value is equal to the 2020 U.S. dollar value.

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.

There are no recordkeeping, capitalization or start-up costs associated with this collection.

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.

The estimated annual cost to the Federal Government associated with the review of these records is \$1,646,349. This is based on the number of responses that must be reviewed (188,928) multiplied by the time burden to review and process each response (8 minutes or 0.133 hours) = 25,127.424 hours multiplied by the average hourly loaded rate for a CBP Officer (\$65.52)² = \$1,646,349.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

There has been a decrease in the estimated annual burden hours previously reported for this information collection due to updated agency estimates. There is no change to the information being collected.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

1 Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2019 National Occupational Employment and Wage Estimates United States." Updated March 31, 2020. Available at https://www.bls.gov/oes/2019/may/oes_nat.htm. Accessed June 12, 2020. The total compensation to wages and salaries ratio is equal to the calculated average of the 2019 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Transportation and Material Moving occupations (\$30.3550) divided by the calculated average of the 2019 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$19.9025). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. Employer Costs for Employee Compensation Historical Listing March 2004 – December 2019, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2019." March 2020. Available at <https://www.bls.gov/web/ecec/ececqrtn.pdf>. Accessed June 12, 2020.

2 CBP bases this wage on the FY 2020 salary and benefits of the national average of CBP Officer Positions, which is equal to a GS-11, Step 7. Source: Email correspondence with CBP's Office of Finance on July 2, 2020.

This information collection will not be published 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.**

CBP will display the expiration date for OMB approval of this information collection.

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions".**

CBP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.