

## **Supporting Statement for Streamlined Inspection Program**

OMB No.: 1625-0085  
COLLECTION INSTRUMENTS: Instruction

### **A. Justification**

1. Circumstances which make the collection of information necessary.

Title 46 U.S.C. 3306 authorizes the Coast Guard to prescribe regulations necessary to carry out the inspection of vessels required to be inspected under 46 U.S.C. 3301. The Streamlined Inspection Program (SIP) (33 CFR Part 8, Subpart E) offers owners and operators of inspected vessels an alternative to traditional Coast Guard inspection procedures. Vessel owners and operators opting to participate in the program will maintain a vessel in compliance with a Company Action Plan and a Vessel Action Plan and have their own personnel periodically perform many of the tests and examinations conducted by Coast Guard marine inspectors. The Coast Guard expects that participating vessels will continuously meet a higher level of safety and readiness throughout the inspection cycle. The statutory authority for this collection is 46 U.S.C. 3301 and 3306.

2. Purposes of the information collection.

The information collected constitutes application for the program and the Company and Vessel Action Plans (CAP and VAP). A CAP describes the company's organization and its commitment to the SIP. The CAP also details how the company will train its employees on their specific SIP responsibilities. The VAP describes the Coast Guard regulations that apply to the vessel and the company's detailed procedures for its employees to maintain and examine vessel systems to ensure these systems operate safely.

3. Considerations of the use of improved technology.

Information may be submitted in writing or electronically via e-mail, to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office. Contact info for CG OCMI's can be found at—  
<https://www.uscg.mil/Units/Organization/>. Shipboard test, inspection and examination records may be maintained in written or electronic form. We estimate that 60% of the reporting and recordkeeping requirements are done electronically.

4. Efforts to identify duplication.

There is 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 to minimize burden to small businesses involved.

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

6. Consequences to the Federal program if the collection was conducted less frequently.

Information collected in support of the SIP is used by the Coast Guard to verify that companies comply with their plans. The timeliness and accuracy of SIP documents is imperative to ensure that vessels meet safety requirements.

7. Special 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 was published in the Federal Register to obtain public comment on this collection (See [USCG-2021-0044]; February 18, 2021, 86 FR 10125) and 30-Day Notice (April 28, 2021 86 FR 22445) 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 payments or gifts to respondents.

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

10. Describe any 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 Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- [https://www.dhs.gov/sites/default/files/publications/privacy\\_pia\\_uscg\\_misle.pdf](https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf)
- <http://edocket.access.gpo.gov/2009/E9-14906.htm>

11. Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

- The estimated annual number of respondents is 42.
- The estimated annual number of responses is 827.
- The estimated annual hour burden is 13,298 hours.
- The estimated annual cost burden is \$917,562.

The burden to respondents is provided in Appendix A. We estimate that the number of new SIP/CAP/VAP submissions is 5% of the current number of company and/or vessel participants. The Coast Guard estimates that an SIP application<sup>1</sup> takes 16 hours to complete. We estimate that it takes 80 hours for a CAP, and 10 hours for a CAP update. Each company is required to review/update its CAP materials once every 2-years. We estimate that it takes 40 hours for a VAP, and 10 hours for a VAP update. Each company is required to review/update its VAP materials once every 5-years.

We expect that a technical specialist (company SIP agent) will draft and submit these documents. For the wage rate, we used the Bureau of Labor Statistics (BLS) wage rate for Management Analysts (13-1111) [May 2019, mean hourly wage, loaded 50%, and rounded].<sup>2</sup>

13. Estimates of annualized capital and start-up costs.

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

14. Estimates of annual cost to the Federal Government.

The estimated annual Federal Cost is \$273,564 (see Appendix B). It takes the Coast Guard an average

<sup>1</sup> SIP requires an initial application for entrance into the program. This application is made by letter and sent to the cognizant OCMI. It must contain a statement that the company and vessel(s) qualify for the program, a summation of the company's standing in regard to development of a CAP and VAP, the name and number of the vessel(s), and the name of the company's appointed SIP agent. Each operator wishing to participate must submit at least one application per fleet; it is not necessary to submit applications for each individual vessel.

<sup>2</sup> <https://www.bls.gov/oes/2019/may/oes131111.htm>

of 8 hours to complete an SIP Application review, 20 hours to complete a CAP review, 2 hours to complete a CAP Update review, 10 hours to complete a VAP review, and 2 hours to complete a VAP Update review. The reviews are typically conducted by either a Lieutenant (LT, O-3) or Lieutenant Commander (LCDR, O-4). The wage rate used is an average of the 2 ranks. The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series)<sup>3</sup> for “In-Government” personnel.

15. Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e. increase) in the number of SIP participants (i.e., companies and vessels). There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping 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. Explain each 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 collection does not employ statistical methods.

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<sup>3</sup> Commandant Instruction 7310.1U dated 27 Feb 2020