

Department of Transportation

SUPPORTING STATEMENT

U.S. Merchant Marine Academy Candidate Application for Admission

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) three-year approval clearance for the information collection entitled, U.S. Merchant Marine Academy Candidate Application for Admission (OMB Control No. 2133-0010, which is currently due to expire on February 28, 2022).

Part A. Justification.

1. Circumstances that make collection of information necessary.

Regulations pertaining to the U.S. Merchant Marine Academy (USMMA) appeared in the Federal Register (Vol. 47, No. 98, p. 21811, dated May 20, 1982) as a final rule. Part 310.57(a) of 46 CFR provides for the collection of information from anyone who is a prospect for admission. It states that "all candidates shall submit an application for admission to the Academy's Admissions Office." Thus, the collection of information through the use of an application is the primary means by which selections for admission are made. The statutory authority for continued existence of this federally sponsored merchant marine academy is Title XIII of the Merchant Marine Act of 1936.

This information collection supports the Secretary of Transportation's Strategic Security Objective.

2. How, by whom, and for what purpose is the information used.

The Candidate Application (KP 2-65) Part I is used to pre-screen applicants for basic eligibility and to enter them into the Department of Defense medical system. Part I of the Application is usually submitted to the USMMA Admissions Office approximately one month before Parts II and III.

The information on the Candidate Application Parts II and III is used by the USMMA admissions staff and its Candidate Evaluation Board to select the best qualified candidates for the Academy. Part II is completed by the applicant and Part III by an official at the secondary school where the applicant attends or has attended. The portion that the applicant completes contains general identifying information; personal history data; participant activities and achievements/awards earned; a biographical sketch and a statement that a Service Obligation Contract must be signed after reporting to the Academy. The portion of the application that the secondary school official completes contains transcript information, including standardized test results, and a guidance counselor or principal's evaluation of the applicant.

Selection of applicants for appointment is made in the order of merit. The order of merit is

determined by: the score on the required college entrance examination; an assessment of the applicant's academic background; and by other factors considered by the USMMA as effective indicators of motivation and the probability that the applicant will complete the Academy's course of instruction.

If all these parts of the application were not completed, applicants would not meet an important requirement of all candidates for admission to the USMMA and basic eligibility for an appointment could not be determined.

Note: The form is obsolete and no longer utilized. Information for applicants applying to USMMA are currently captured using a digital application.

3. Extent of automated information collection.

The collection of information is executed 100% digitally through an online candidate portal accessed through the Academy's website, www.usmma.edu.

The Admissions Office staff uses a computerized applicant processing system that enables them to use the information from the application to screen applicants quickly against the admission requirements.

The paper-based Candidate Application (KP 2-65) is used solely as a backup should the digital application experience a technical failure.

4. Efforts to identify duplication.

Parts I, II, and III of the Candidate Application are the only three forms used to determine basic eligibility and selection of persons for admission to the USMMA. There are no other agency forms collecting this same information.

5. Efforts to minimize the burden on small businesses.

The collection of information does not involve small business or other small entities. The collection of information on the three parts of the application is a one-time requirement for applicants seeking admission to the USMMA. The burden to the applicant is as minimal as statutes and regulations permit.

6. Impact of less frequent collection of information.

Completed Parts I, II, and III of the Admissions Application are absolute requirements for admission to the USMMA and must be obtained from each new applicant. This is a one-time requirement. The consequences from reduced or non-collection of this information would be to jeopardize the USMMA admissions process and the appointment of a candidate.

7. Special circumstances.

There are no special circumstances that require the collection of information to be conducted in a special manner.

8. Compliance with 5 CFR 1320.8:

- The USMMA Admissions Office has not consulted with persons outside of the agency regarding the elements of the candidate application.
- The Maritime Administration published a 60-day notice and request for comments on this information collection in the Federal Register on August 5, 2021 (F.R. 42977, Vol. 86, No. 148) [copy attached] indicating comments should be submitted on or before October 4, 2021. No comments were received. In addition, a 30-day notice was published on _____, 2021 (F.R. _____, Vol. 86, No. ____) indicating comments should be submitted on or before _____, 2021.

9. Payments or gifts to respondents.

No payments or gifts are provided to respondents.

10. Assurance of confidentiality:

The USMMA does not consult or discuss any information on any part of the application with anyone except the candidate or other individuals expressly designated by the candidate or as authorized by the provisions of the Privacy Act Notice. The applicant must sign an authorization indicating to whom the Admissions Office may disclose information regarding their candidacy. Information on a candidate is released only on a “need to know basis.” Candidate files are retained for four years and then destroyed.

11. Justification for collection of sensitive information:

Not applicable. There are no questions of a sensitive nature.

12. Estimate of burden hours for information requested:

Approximately 2,000 applicants return completed applications to the USMMA annually. The time burden consists of 3.5 hours for the students and 1.5 hours for the school officials. The 3.5 hours for the students include accurately completing Parts I and II of the application and following up to assure all paperwork is submitted to the USMMA by the application deadline. The school officials spend approximately 1.5 hour collecting and sending transcripts and other official documents.

<u>Number of Applications</u>		<u>Application per Applicant</u>	=	<u>Total Applications Annually</u>		<u>Hours Per Application</u>	=	<u>Total Hours Annually</u>
2,000	x	1	=	2,000	x	5	=	10000

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

Cost of the time burden for students: 2000 responses x 3.5 hours (including submission time) x

$\$7.25/\text{hour} = \$50,750.00 \times 1.4 = \$71,050.$

Cost of the time burden for school officials: $2000 \text{ responses} \times 1.5 \text{ hours} \times \$28.75/\text{hour} = \$86,250$
 $\times 1.4 \text{ (benefits)} = \$120,750.$

(Source: Hourly minimum wage was used for the students and the BLS May 2020 Wage Table; Mean Hourly Wage for Educational Instruction and Library Occupations (25-0000) was used for the school officials: http://www.bls.gov/oes/current/oes_nat.htm#25-0000)

13. Estimate of total annual costs to respondents.

- There is no cost for applying to the USMMA and no cost for returning application. (USMMA provides postage paid envelopes for each part of the application and there is no application fee). However, the cost to register for the college entrance exams (SAT) and (ACT) is \$52.00 and \$60.00 respectively. The cost of \$104,000 and \$120,000 respectively for 2000 applicants is not included in the official cost to respondents because the applicants would have SAT and/or ACT scores in the absence of this application. The totaled cost for respondents is \$224,000.
- There are no capital, start-up, or operation and maintenance costs associated with this collection.

14. Estimate of cost to the Federal government.

Include salary costs based on hours, overhead, printing, payment to contractors, and the like.

The total estimated cost to the Federal Government to process the admissions applications of the 2,000 persons who will apply to the USMMA each year is \$1,263,612 based on the annual salaries of the ten USMMA Admissions staff persons.

Below are the titles of the ten Admissions Office staff persons. The time that each person devotes exclusively to the application process varies from 50% to 90%. However, the remainder of their time is spent performing duties that relate directly to the admissions process. The average hourly rate of pay for the ten staff persons is estimated to be \$39.66. *The estimated Hourly wage was taken from the 2021 General Schedule (GS) Locality Pay Tables, New York-Newark, NY-NJ-CT-PA. The eleven staff members are as follows.

- 1 Admissions Director (GS-14-4): .5 hours per application ($\$66.31 \times .5 \times 1 = \33.15)
- 1 Assistant Director GS13-2): .5 hours per application ($\$52.72 \times .5 \times 1 = \26.36)
- 4 Recruitment Specialists GS-11-8): 2 hours per an application ($\$44.15 \times 4 = \353.20)
- 1 Financial Aid Specialist GS-11-1: .25 hours per application ($\$35.79 \times .25 \times 1 = \8.95)
- 1 Senior Admissions Assistant GS-7-6: .5 hours per application ($\$28.22 \times .5 \times 1 = \14.11)
- 3 Admissions Assistants GS 6-9: 1 hours per an application ($\$27.57 \times 3 = \82.71)

Estimated total cost - $\$33.15 + \$26.36 + \$353.20 + \$8.95 + \$14.11 + \$82.71 = \$518.48 \times 1.4 \text{ (benefits)} =$
 $\$725.87 \times 2000 \text{ (applications)} = \$1,451,744.00$

(Source: 2021 General Schedule (GS) Locality Pay Tables, New York-Newark, NY-NJ-CT-PA;

wages based on Grade and average employee Step. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2021/general-schedule/>.

15. Explanation of program changes or adjustments.

Since the last approval, there has been no program changes. The hourly wages for the respondents and federal government have been updated to reflect the current hourly wages for both.

16. Publication of results of data collection.

The information on the application is not tabulated and published for public use due to Privacy Act restrictions.

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

Not applicable, MARAD is not seeking such approval.

18. Exceptions to certification statement.

Not applicable, there are no exceptions to the certificate statement.