

**Supporting Statement
for
Applications for Merchant Mariner Credentials and Medical Certificates**

[w/ proposed changes per USCG-2020-0069; RIN 1625-AC63]

OMB No.: 1625-0040

COLLECTION INSTRUMENTS: CG-719B, CG-719C, CG-719K, CG-719K/E,
CG-719P, CG-719S and Instruction

A. Justification_

1. Circumstances that make the collection of information necessary.

Title 46, Code of Federal Regulations (CFR), parts 10, 11, 12, 13, and 16, and International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW Convention) and the STCW Code, require that each applicant for a Merchant Mariner Credential (MMC) or Medical Certificate make written application to the Coast Guard.

The forms associated with this collection are—

- Application for Merchant Mariner Credential // CG-719B
- Application for Medical Certificate // CG-719K
- Application for Medical Certificate, Short Form // CG-719K/E
- Small Vessel Sea Service Form // CG-719S
- DOT/USCG Periodic Drug Testing Form // CG-719P
- Disclosure Statement for Narcotics, DWI/DUI, and/or Other Convictions // CG-719C

An applicant will submit on a form CG-719B, Application for Merchant Mariner Credential, and provide documentation that they are medically fit to perform the functions of the credential sought on a Form CG-719K or Form CG-719K/E. The regulations also require that applicants for a MMC provide documentary evidence of sea service or accepted substitute of sea service; evidence of having passed a chemical test for dangerous drugs, and, documentation of safety and suitability, to include a criminal record review and information supplied by the Transportation Security Administration (TSA). Optional forms CG-719S, CG-719P, and CG-719C are provided that applicants may use to meet these additional reporting requirements.

2. Purpose of the information collection.

The Coast Guard conducts this collection of information solely for the purposes of determining eligibility for issuance of an MMC and/or Medical Certificate, in accordance with applicable statutes and regulations. This evaluation is performed on occasion, meaning as submitted by the respondent when he or she applies for an MMC or Medical Certificate. In general, applicants for a MMC submit the CG-719B every five years for renewal or when seeking a new MMC endorsement, and applicants for the medical certificate submit the 719K every two years or every five years, depending upon the type of credential or endorsements held and the applicant's medical status. The Coast Guard evaluates the collected information to determine whether applicants are qualified to serve under the authority of the requested credential with respect to their medical fitness, their professional qualifications, and their safety and suitability. Upon review of the information, the Coast Guard processes applications and issues MMCs and/or Medical Certificates to applicants who are qualified to serve without posing a significant threat to safety of life or property. If this collection of information was not performed, the Coast Guard's credentialing and prevention missions would be impaired; and the agency's ability to ensure the safety and security of U.S. ports and waterways would be significantly curtailed.

3. Consideration of the use of improved collection techniques.

The forms in this collection are available as a fillable PDF online at <https://www.dco.uscg.mil/nmc/forms/>. Applicants requesting a MMC or Medical Certificate may apply to any of the Regional Exam Centers (RECs) or other location designated by the Coast Guard. Applicants may contact the National Maritime Center (NMC) by mail at 100 Forbes Drive, Martinsburg, WV 25404, by email at IASKNMC@uscg.mil, or by contacting an agent in the Customer Service Center by telephone at 1-888-427-5662 or 304-433-3400. The Coast Guard estimates that 90% of the responses are submitted electronically.

4. Efforts to identify duplication.

Each form in the CG-719 series collects a unique set of information, specific to a regulatory requirement for credentialing of merchant mariner applicants. However, since there is no requirement to attach forms to one another, or to submit all forms at the same time, each form collects sufficient personal identification data to ensure that forms may be properly matched to the correct applicant.

5. Methods to minimize the burden to small businesses if involved.

The information collection does not impact small businesses.

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

The Coast Guard is mandated by law to issue MMCs and Medical Certificates to individuals found qualified as to age, character, habits of life, experience, professional qualifications, and physical fitness. Without the ability to collect this information the Coast Guard would not be able to adhere to statutory and regulatory requirements.

7. Special collection circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation.

The Coast Guard published respectively on August 27, 2021, and November 4, 2022, a Notice of Proposed Rulemaking (NPRM) and a Final Rule entitled "Pilots' Medical Certificate Validity Period" (PMC) [USCG-2020-0069; RIN 1625-AC63; 86 FR 48090 and 87 FR 66575. The rulemaking—

- extend the maximum period of validity of merchant mariner medical certificates issued to first-class pilots and masters or mates serving as pilot from 2 years to 5 years. This proposed rule would reduce the frequency of medical certification application submissions to the Coast Guard. First-class pilots and masters and mates who serve as pilot on vessels of 1,600 gross registered tons or more would be required to submit the results of their annual physical examinations to the Coast Guard between medical certificate applications if: The mariner does not meet the physical ability requirements; the mariner has a condition that does not meet the medical, vision, or hearing requirements; the mariner is deemed "not recommended" by a medical practitioner for a medical certificate; or upon request by the Coast Guard. The proposed rule will not compromise safety because it maintains the requirement for pilots to obtain annual physicals and because it provides the Coast Guard opportunity to review the medical examination of pilots who may become medically unqualified between medical certificate applications.

9. Provide any payment or gift to respondents.

The Coast Guard does not provide payments or gifts to respondents in exchange for a benefit sought.

10. Describe any assurance 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 Merchant Mariner Licensing and Documentation System (MMLDS) Privacy Impact Assessment (PIA) and Merchant Seamen's Records System of

Records Notice (SORN). Links to the aforementioned PIA and SORN are provided below:

- <https://www.dhs.gov/publication/dhsuscgpia-015-merchant-mariner-licensing-and-documentation-system>
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14911.htm>

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

Questions of a sensitive nature are included to the extent required by the statute and the regulation and used by the Coast Guard to determine whether an applicant meets the safety and suitability, medical, and professional qualification standards for issuance of a Merchant Mariner Credential and medical certificate.

12. Estimates of annual hour and cost burdens to respondents.

- The estimated number of annual respondents is 68,500.
- The estimated number of annual responses is 245,962.
- The estimated hour burden is 47,290 hours.
- The estimated cost burden is \$2,409,643.

The burden to respondents is provided in Appendix A. We estimate that an application (CG-719B) itself takes approximately 9 minutes to complete, and may be e-mailed, faxed, mailed or hand carried to a Regional Examination Center for processing. Applications may be accompanied by a CG-719K (18 minutes to complete/ used by ~95% of respondents) or CG-719K/E (10 minutes to complete/used by ~5% of respondents). In addition, other mariners, annually, only apply for the Medical Certificate by completing the CG-719K (~95%) or CG-719K/E (~5%). Optional forms CG-719P (5 minutes to complete), the CG-719S (15 minutes to complete) and the CG-719C (10 minutes to complete) may be used to provide documentary evidence of meeting additional certification requirements. We estimate that 100% of MMC applicants submit a form CG-719P, 100% a form CG-719S and 5% a form CG-719C.

For the wage rate, we averaged the Bureau of Labor Statistics (BLS) wage rate for Captains, Mates, and Pilots of Water Vessels (53-5021) and Sailors and Marine Oilers (53-5011) [May 2020, mean hourly rate, loaded 50%, and rounded].¹

13. Total annualized capital and start-up costs.

There are no annualized capital and start-up costs.

14. Estimates of annualized cost to the Federal Government.

The estimated annual Federal Government cost is \$14,729,656 (see Appendix B). The cost is based on both Direct Costs to the Government and Indirect Costs (i.e., Contractor).

15. Reasons for the change in burden.

The change in burden is a PROGRAM CHANGE due to the 1625-AC63 PMC NPRM. The reporting and recordkeeping requirements, and the methodology for calculating burden, remain unchanged.

Additionally, to simplify it, the COI title is changed

from— Applications for Merchant Mariner Credentials (MMC), Application for and Medical Certificates, Application for Medical Certificate -Short Form, Small Vessel Sea Service (Optional) Form, DOT/USCG Periodic Drug Testing (Optional) Form, and Disclosure Statement for Narcotics, DWI/DUI, and/or Other Convictions (Optional) Form.

to— Applications for Merchant Mariner Credentials and Medical Certificates.

¹ For the 1625-AC63 rulemaking element, we used just the BLS 53-5021 wage rate as it impacts only Pilots.

16. Plans for tabulation, statistical analysis and publication.

There are no current plans to publish the results of the collection of information.

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.