

**Supporting Statement
for
Credentialing and Manning Requirements for Officers of Towing Vessels**

OMB No.: 1625-0078
COLLECTION INSTRUMENTS: Instruction.

A. Justification

1. Circumstances that make the collection of information necessary.

The U.S. Coast Guard has requirements in 46 CFR Part 11 for credentialed individuals that operate towing vessels. The Coast Guard defines a "towing vessel" as any commercial vessel engaged in towing another vessel astern, alongside, or by pushing ahead. These regulations help to ensure that towing vessels operating on the navigable waters of the United States are under the control of mariners who comply with standards for experience and professional qualifications. The information collection requirements described in this supporting statement are necessary to comply with 46 CFR parts 10 and 11. The Coast Guard requires that vessel employees maintain documentation of ongoing participation in training and drills if they are seeking an endorsement as master or mate of towing vessels or for renewal of the credential. Recording this information is necessary so those mariners are able to demonstrate proficiency in: vessel management, seamanship, navigation, watchkeeping, radar operation, fire prevention/fighting, emergency procedures, lifesaving training, and environmental regulations. Information collection activities are logged in a towing officers' assessment record to confirm mariner qualifications for towing vessel officer endorsements. The Coast Guard requires a final evaluation by a designated examiner to verify a mariner's qualification for an endorsement as mate (pilot) of towing vessels.

The need for the collection of information is to ensure that the mariner's training information is available to assist in determining an individual's overall qualification to hold a Coast Guard issued merchant mariner's towing vessel endorsement.

The statutory authority is 46 U.S. Code 2103, 3703 and Chapters 71 and 75.

2. Purposes of the information collection.

The purpose of the information collection is to document a mariner's qualifications and ensure that the mariner maintains a record of experience and professional qualifications. The information collection requires crewmembers on towing vessels to maintain documentation of ongoing participation in training and drills. These recordkeeping requirements are consistent with good commercial practices and dictates good seamanship for safe navigation.

Documentation of ongoing participation in training and drills (10.227(e)(6)). This requires currently credentialed towing vessel operators to submit documentation of ongoing participation in training and drills when renewing their credentials. Therefore, the mariners should maintain records of ongoing participation in training and drills.

Towing Officers' Assessment Record (TOAR)(11.464(c) & (g) and 11.465(a), (d) & (f)). This requires each mariner seeking an endorsement as master or mate of towing vessels to complete a TOAR as well as master or mate of self-propelled vessels seeking an endorsement for towing vessels, to complete a TOAR.

Final Check-Ride Review 10.227(e)(6) and 11.465(d) & (f). The final check-ride is one of 3 options available to demonstrate proficiency. We estimate that 30% of entering and 5% of existing mariners will choose this option.

Companies have to maintain evidence 10.464(f) and 10.465(c) that every vessel it operates is under the

direction and control of an appropriately credentialed mariner with appropriate experience.

3. Consideration of the use of improved information technology.

The information collection may be in written or electronic form, and must be retained by the companies, onboard the vessel or made readily available to the Coast Guard upon request. We estimate that 100% of the recordkeeping can be done electronically. At this time, we estimate that 90% are done electronically.

Regarding Usability Testing, this ICR—

- Public-facing instructions were tested by the staff of the CG Office of Standards Evaluation and Development (CG-REG) to ensure the use of plain language. Usability testing participants reported that they had no difficulty understanding the instructions. As a result, the USCG did not make any changes to the collection.
- Is not related to a public benefit program as detailed in OMB M-22-10 (titled “Improving Access to Public Benefits Programs Through the Paperwork Reduction Act” dated April 13, 2022).
- Does not require the use of a form or specify a reporting format/method.
- Is required by international treaty, statute, and/or regulation as noted in section 1 of the Supporting Statement.

4. Efforts to identify duplication.

There are no State or local regulations relating to this issue. Other Federal agencies do not conduct similar information collection. Similar information does not exist.

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

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

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

If the Coast Guard conducted information collection less frequently, compliance with the training and credentialing requirements for towing vessel operations would delay review of mariners’ qualifications and processing credentialing transactions. Although the Coast Guard finds that most prudent operators already maintain records on their own, these regulations are intended to ensure compliance by those companies not conforming to the safety practices of the majority of the industry.

Without an information collection, the owner or operator of a towing vessel would not be assured that there has been sufficient training for proper credentialing of its personnel and operation of their vessels.

7. Special collection 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-2024-0381]; June 10, 2024, 89 FR 48903) and 30-Day Notice (December 13, 2024, 89 FR 101023) 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 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 Marine Information for Safety and Law Enforcement (MISLE) and Merchant Mariner Licensing and Documentation System Privacy Impact Assessments (PIAs) and the MISLE and Merchant Seamen's Records System of Records Notices (SORNs). Links to the aforementioned PIAs and SORNs 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.

There are no questions of sensitive language.

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

- The estimated number of annual respondents is 23,574.
- The estimated number of annual responses is 24,030.
- The estimated hour burden is 25,006 hours.
- The estimated cost burden is \$1,688,810.

The burden to respondents is provided in Appendix A. The reporting and recordkeeping burden includes time to update and review training records and oversee and maintain final evaluations.

Respondents are existing licensed mariners, prospective licensed mariners, and companies with licensed mariners. The burden is estimated as follows:

1) Existing mariners: The regulations require all towing vessel personnel to submit documentation of ongoing participation in training and drills as a prerequisite for renewal of credentials. The Coast Guard estimates that about 95% of towing vessel licensed mariners will choose this method of renewal. This recordkeeping is also required of individuals seeking endorsements as master or mate of towing vessels or for restricted local areas. We estimate that this recordkeeping takes a Vessel Crewmember about 1 hour per year. While renewal requests are submitted once every 5 years, the required recordkeeping is constant.

We expect that 5% of existing mariners will choose the check-ride method for renewal over a 5-year period. Therefore, we expect that about 1% of existing mariners will renew by this method per year. The burden for check-rides is estimated at 0.5 hours per applicant per year.

For the wage rate, we used the Bureau of Labor Statistics (BLS) wage rate for Captains, Mates, and Pilots of Water Vessels (53-5021) [May 2023, mean hourly wage, loaded 50%, and rounded].¹

2) Prospective mariners: For new entrants (i.e., prospective Vessel Crewmembers) to the industry, we estimate the burden for recordkeeping and the application process is about 1 hour per applicant per year, and the burden for check-rides is estimated at 0.5 hours per applicant per year. For the wage rate, we used the BLS wage rate for Captains, Mates, and Pilots of Water Vessels (53-5021) as above.

3) Companies: Towing companies are required to maintain evidence that every vessel they operate is under the direction and control of a credentialed mate or master with appropriate experience, including 30 days of observation and training on the intended route. We estimated the annual time burden for a company's Clerical Specialist is about 2 hours. For the wage rate, we used the BLS wage rate for Information and Record Clerks, All Other (43-4199) [May 2023, mean hourly wage, loaded 50%, and

¹ <https://www.bls.gov/oes/2023/may/oes535021.htm>

rounded].²

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

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

14. Estimates of annualized Federal Government costs.

The estimated annual Federal Government cost is \$262,297 (see Appendix B). The Federal Government burden is the time it takes Coast Guard personnel to review the documentation of ongoing participation in training and drills for existing mariners as well as the service records, applications and check-ride results of entry mariners. These reviews are expected to take 1 hour each for documentation of ongoing participation in training and drills and entry mariners' service records and applications. Check-ride reviews will take 0.5 hours. The total renewal requests per year are 20% of the existing mariner population, as renewals are required only once in 5 years. We estimate that the reviews are conducted by a Technical Specialist (GS-8). For the wage rate, we used Office of Personnel Management (OPM) data [2024-RUS Salary Table, GS-8-Step 5, hourly basic rate, loaded 65%, and rounded].³

15. Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., increase) in the estimated annual number of respondents. There is no proposed change to the reporting and 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. 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 collection does not employ statistical methods.

² <https://www.bls.gov/oes/2023/may/oes434199.htm>

³ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS_h.pdf