

Department of Transportation (DOT)
Maritime Administration
Information Collection Request (ICR)
OMB 2133-0549
Center of Excellence (CoE) for Domestic Maritime Workforce Training and Education
Annual Applications for Designation

SUPPORTING STATEMENT

INTRODUCTION

This submission is to request a three-year approval from the Office of Management and Budget (OMB) for the renewal of the information collection entitled OMB 2133-0549 (Center of Excellence (CoE) for Domestic Maritime Workforce Training and Education), which expires on December 31, 2024. Since the last renewal, there was a reduction in the total respondents, responses, and total burden hours associated with this collection. There are no other changes, as such, this collection will be submitted as *an extension with change of a currently approved collection*.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

This collection of information is required to implement Section 3507 of the National Defense Authorization Act (NDAA) of 2018, Public Law 115–91 (the “Act”), codified at 46 U.S.C. 51706, which provided the Secretary of Transportation with the discretionary authority to designate eligible and qualified entities as Centers of Excellence (CoEs). CoE designations will serve to assist the maritime industry in obtaining and maintaining the highest quality workforce.

Further, the ongoing annual collection of information is necessary to administer the COE program, which supports the DOT strategic goal of Economic Competitiveness, and the MARAD strategic goal to Maintain and Modernize the Maritime workforce.

Following the enactment of the Act, MARAD developed a procedure to recommend to the Secretary the designation of eligible institutions as CoEs. Pursuant to the Act, the Secretary of Transportation may designate certain eligible and qualified training entities as CoEs. Authority to administer the CoE program is delegated to MARAD in 49 Code of Federal Regulation (CFR) 1.93(a).

Qualified training entities seeking to be designated as a CoE need to apply to MARAD. MARAD has developed a policy to provide interested parties with comprehensive agency guidance on how to apply for CoE designation and how the program will be administered. Applications should include information to demonstrate that the applicant institution meets

certain eligibility requirements, selection criteria, and qualitative attributes consistent with Section 3507 of the Act.

The MARAD application procedure and program details are available to the public on its website <https://www.maritime.dot.gov/education/maritime-centers-excellence>.

On July 19, 2022, MARAD published a Notice (87 FR 43103) inviting eligible and qualified institutions to apply by September 19, 2022 for designation for the 2022 CoE program year. Thirty-six applications for designation were received. However, before MARAD could complete final agency action on these applications, Congress enacted the Fiscal Year (FY) 2023 NDAA, which amended CoE designation eligibility categories. MARAD terminated action on the 2022 applications, which were based on eligibility criteria no longer valid under current law.

To conform to the FY 2023 NDAA, MARAD published a Federal Register Notice on July 20, 2023 (88 FR 46829), entitled Centers of Excellence for Domestic Maritime Workforce Training and Education; Designation Policy Update and Notice of Opportunity To Apply for Designation for 2023, announcing termination of agency action on the 2022 applications, issuing an updated CoE designation policy, and soliciting applications from eligible and qualified training entities for 2023 CoE designations. Section 6 on pages 46832-46833 provides a detailed list of the information requested from the applicants. The application period closed on September 18, 2023. Thirty-four applications for designation were received. Upon the Secretary's approval, thirty-two entities were designated on February 22, 2024. Pursuant to United States Code (USC) 51706, the Secretary of Transportation, acting through the Maritime Administrator, may designate eligible and qualified training entities as CoEs for Domestic Maritime Workforce Training and Education. Individuals interested in obtaining a CoE designation for their training institutions must apply to MARAD with sufficient information to demonstrate their eligibility.

Since the last approval of this information collection, the FY2023 NDAA amended CoE designation eligibility categories. Previously, the definition of "covered training entity" was restricted to institutions specifically identifying as a "Community or Technical College" or "Maritime Training Center." The FY 2023 NDAA replaced those terms with new categories that include postsecondary educational and vocational entities, apprenticeship sponsors, and structured experiential learning training programs. Designation has also been extended from one to five years.

2. Purpose and Use of the Information

MARAD personnel use the collected information to administer the CoE program and to evaluate the eligibility of an institution for CoE designation.

3. Automation or Use of Information Technology

The Federal Register notice (85 FR 46829) of July 20, 2023, announcing the Notice of Opportunity to Apply specifically required electronic submission via electronic mail of

applications including all supporting information to MARAD for CoE designation. Section 6 on pages 46832-46833 of the notice also provides a detailed list of the information requested from the applicants. Respondents could submit the requested information any digital format and were not required to fill out an agency form.

4. Efforts to Identify Duplication

CoE is a voluntary program. Each applicant institution provides unique supporting information (i.e., enrollment trends, engagement practices, and community feedback etc.), to demonstrate how it meets the eligibility and designation criteria. Duplication is highly unlikely due to the differences in the specific information submitted by each applicant institution. No other information collection requires similar data as the CoE program.

5. Impact on Small Businesses or Other Small Entities

This collection has no impact on small businesses or other small entities.

6. Impact of Not Conducting or Less Frequent Collection of Information

MARAD will be unable to continue the congressionally mandated CoE program without this collection of information.

7. Special Circumstances Relating to the Guidelines 5 CFR 1320.5

There are no special circumstances associated with this collection of information such as those outlined below:

- Requiring respondents to report information to MARAD more often than quarterly;
- Requiring respondents to prepare a written response in fewer than 30 days after receipt of a collection instrument;
- Requiring respondents to submit more than one original copy of any document;
- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- Requiring the use of any statistical data that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- Requiring any pledge of confidentiality; or
- Requiring respondents to submit any proprietary or trade secrets.

8. Public Comments in Response to the Federal Register Notice and Outside Consultation

MARAD will publish both a 60-day and a 30-day notice in the Federal Register to solicit public comments.

Since the enactment of the authorizing statute on 12 December 2017, MARAD has met with

numerous interested stakeholders outside MARAD to receive their perspectives. MARAD participated in the following conferences, webinars, and information sessions with CoE stakeholders:

- April 16, 2024: DOT “Mariner Work-Life Balance Symposium”, Washington DC
- March 6, 2024: “Centers of Excellence Designee Briefing”
- July 27 & August 1, 2023: MARAD “Center of Excellence Designation Application Submission Walk-Through”
- October 16-17, 2023: SOCP “Building the Maritime Workforce of the Future”, Linthicum, MD
- August 2 & 18, 2022: MARAD “Center of Excellence Application Webinar”
- May 26, 2022: MARAD “2021 Centers of Excellence: Designation Anniversary Meeting”
- February 9, 2022: MPSEC & Tall Ships America “Centers of Excellence: Navigating a Stronger Future”
- November 18, 2021: SOCP “Building Maritime Workforce Pathways through the Centers of Excellence Program”

Each of these conferences brought together academia and industry professionals from across the country to focus on how to enhance and expand maritime, marine technology and port management workforce training taking place at community and technical colleges. At each conference, MARAD received perspectives from approximately 45 -75 representatives from technical and community colleges, maritime training centers, state maritime academies, universities, shipyards, port authorities and other maritime industry stakeholders of the CoE program.

MARAD personnel will continue to meet with CoE stakeholders to consult with them and obtain their perspective on program operation. MARAD personnel also cooperate with CoE designees on the planning of a nationwide CoE conference in 2025.

9. Explanation of Payments or Gifts to Respondents

No payments or gifts are or will be provided to respondents.

10. Assurance of Confidentiality and Protection of Privacy

The respondents are requested to avoid submitting any privacy information covered under the Privacy Act or any information covered by an exemption under the Freedom of Information Act (FOIA).

11. Justification for Sensitive Questions

Respondents are not required to submit any information commonly considered private or of a sensitive nature.

12. Estimate of Annualized Burden Hours and Cost

a. Estimated Annualized Burden Hours

Under the authorizing statute, only postsecondary education and vocational institutions, apprenticeship sponsors, and structured experiential learning training programs in certain eligible locations are eligible to apply for CoE designation. MARAD estimates that the total pool of eligible covered training entities is around 200.

However, after consultation with several potential respondents, it is estimated that personnel from a total 50 eligible institutions will take approximately 48 hours to apply for CoE designation once annually. Therefore, the total burden hours associated with this collection is 2,400, which can be calculated as shown in the table below:

Total Respondents		Total Responses per Respondent		Total Responses		Average Time Taken to Respond (Hour)		Total Burden Hours
50	*	1	=	50	*	48	=	2,400.00

b. Estimated Annualized Cost Burden

The Bureau of Labor Statistics (BLS)¹ estimates that the average hourly wage for Education Administrators, Postsecondary professionals (11-9033) is \$ 58.66. When combined with the total compensation rate of 29%², the total annualized hourly wage rate is: \$75.67. Therefore, the total annualized cost burden for individuals associated with preparing and submitting data in response to this collection is: \$ 181,608.00.

Additionally, overhead, and general administrative costs associated with the preparation and submission of applications for the CoE program is estimated to be 40% of the total annualized cost or \$72,643.20. Therefore, the combined total annualized cost burden associated with this collection is: \$ 254,251.20, which can be calculated as shown in the table below:

¹ The median hourly wage for “Education Administrators, Postsecondary” was taken from the Bureau of Labor Statistics May 2023 National Occupational Employment and Wage Estimates at <https://www.bls.gov/oes/current/oes119033.htm>

² Per BLS Employee Compensation Memo, the total compensation rate for the private sector is 29%: <https://www.bls.gov/news.release/pdf/ecec.pdf>

Title and Code of Respondents	Hourly Wage	Compensation Rate of 29%	Number of Employees	Total Compensation Rate for Each Respondent	Total Annualized Burden Hours	Total Annualized Cost Burden
Education Administrator, Post Secondary (11-9033)	\$ 58.66	\$ 75.67	1	\$ 75.67	2,400	\$ 181,608.00
					Overhead and General Administrative Costs (40% of Total Annualized burden)	\$ 72,643.20
					COMBINED TOTAL ANNUALIZED COST BURDEN	\$ 254,251.20

13. Estimate of the Total Annual Costs to Respondents and/or Recordkeepers

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

14. Estimate of Federal Government Costs

The total annual cost to the Federal Government for processing this information collection is: \$ 241,666.

According to the Office of Personnel Management (OPM)³ wage table, the average hourly wage for the following Federal Employees (i.e., GS-11, Step 5 is \$ 44.94, GS-14, Step 5 is \$ 75.70, GS-15, Step 5 \$ 89.04). Additionally, the hourly wage rate for Senior Executive Schedule (SES)⁴ Level 3 staff is \$ 98. When combined with the Federal Compensation Rate of 31%⁵, the hourly rate for each professional is as follows: Federal Employees (i.e., GS-11, Step 5 is \$ 58.87, GS-14, Step 5 is \$ 99.17, GS-15, Step 5 \$ 116.64) and an SES Level is \$ 128.38 respectively. All eleven (11) employees spend a combined total 33.0 hours performing various tasks (i.e., administer, review, and concur) with applications received for CoE program for a total cost of \$ 4,833.32 per application. Therefore, the total combined Federal Government cost associated with processing a total 50 CoE applications annually is \$241,666, which can be calculated as shown in the tables below:

³ The hourly Federal Government wage is taken from OMB 2024 wage tables: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB_h.pdf

⁴ SES hourly salary is based upon ES Level 3 Pay is taken from: <https://www.federalpay.org/ses/level-3>

⁵ Per BLS Employee Compensation Memo, the total compensation rate for the Federal Government is 31%, :<https://www.bls.gov/news.release/pdf/ecec.pdf>

FTE Grade and Step, Program Task, and MAR Code	Hourly Wage	Average Hourly Wage Rate with 31% Compensation		Total Employees		Total Time for Per application (Hours in decimals)		Total Federal Government Wages per Application
GS-11 (Step 5): Administer and Review (MAR 600.3)	\$ 44.94	\$ 58.87		1		8		\$ 470.96
GS-14 (Step 5): Review (MAR 650)	\$ 75.70	\$ 99.17		2		8		\$ 1,586.72
GS-15 (Step 5): Review (MAR 650)	\$ 89.04	\$ 116.64		1		4		\$ 466.56
GS-14 (Step 5): Review (MAR 520)	\$ 75.70	\$ 99.17		2		8		\$ 1,586.72
SES: Review & Concurrence (MAR 600.3)	\$ 98.00	\$ 128.38	*	1	*	4	=	\$ 513.52
GS-14 (Step 5): Review (MAR 221)	\$ 75.70	\$ 99.17		1		1		\$ 99.17
GS-15 (Step 5): Review (MAR 221)	\$ 89.04	\$ 116.64		1		0.5		\$ 58.32
SES: Concurrence (MAR 220.1)	\$ 98.00	\$ 128.38		1		0.25		\$ 32.10
SES: Concurrence (MAR 220)	\$ 98.00	\$ 128.38		1		0.15		\$ 19.26
COMBINED TOTAL				11		33.9		\$ 4,833.33

Total Cost to Process Each Application	Total Applications	Total Federal Government Wages
\$ 4,833.33	50	\$ 241,666.50

15. Explanation of Program Changes or Adjustments

Since the last renewal of the collection, the CoE authorizing legislation revised institution eligibility categories and duration of designation. Applicant responsibilities to the collection of information activity remain the same. The actual number of responses received was lower than the number estimated in the previously approved collection. Given the change in designation duration, the estimated total respondents and responses were reduced from 100 to 50. Consequently, the total annual estimated burden hours were reduced from 4,800 to 2,400 hours.

16. Publication of Data Collection Results.

The names of the designated CoEs and the effective period of the CoE designations will be published on the MARAD website at www.marad.dot.gov. No complex analytical techniques will be utilized for collection or review of the collected information.

The estimated time schedule is as follows:

Activity	Estimated Completion Date
Publish 60-day FRN, XX FR XXXXX , to solicit comments on CoE ICR	X-Sept-24
60-day FRN Comments Due to MARAD	X-Nov-24
Publish 2 nd (30-day) FRN, XX FR XXXXX , to solicit ICR comments to OMB	X-Nov-24
2nd FRN (30-day) Comments Due to OMB	X-Dec-24
OMB Approval for Information Collection Number Received – for 3 years	X-Jan-25
Publish FRN Inviting CoE Applications	X-Jul-25
CoE Applications Due to MARAD	2-Sept-25
Announce CoE designations on MARAD website	X-Jan-26

17. Display of the OMB Expiration Date

MARAD is not seeking approval to avoid displaying the OMB Expiration Date.

18. Exceptions to the Certification Statement

There are no exceptions to the certificate statement.