

**Supporting Statement
for
Course Approval and Records for Merchant Mariner Training Schools**

(w/ proposed changes per USCG-2021-0097, RIN 1625-AC75)

OMB No.: 1625-0028

COLLECTION INSTRUMENTS: Instruction

A. Justification

1) Circumstances that make the collection of information necessary.

Title 46 U.S. Code (U.S.C.) 2103 authorizes the Secretary (under which the Coast Guard is operating) to prescribe regulations to carry out the provisions of Subtitle II regarding Vessels and Seamen, including the interests of marine safety and seamen's welfare. Title 46 U.S.C. 2104 provides that the Secretary may delegate such duties to any officer, employee, or member of the Coast Guard, which would include National Maritime Center (NMC) personnel. Additionally, 46 U.S.C. 7315 authorizes an applicant for a Merchant Mariner Credential (MMC) to substitute the completion of an approved course for a portion of the required sea service. Title 46 Code of Federal Regulations (CFR) 10.402 specifies the information that must be submitted for the Coast Guard to evaluate and approve each course. Title 46 CFR 10.403 specifies recordkeeping requirements that a school teaching approved courses must meet for each student taking each course. The Coast Guard is obligation under the STCW Convention¹ to validate the training received by merchant mariners and to ensure that the approved training is part of a Quality Standards System (QSS).

The statutory authority is 46 U.S.C. 2103, 2104 and 7315. This authority is delegated to the Coast Guard through the Department of Homeland Security Delegation No. 00170.1, Revision No. 01.3. (II)(92).

2) Purpose of the information collection.

On a daily basis, NMC personnel review submitted information to ensure training courses and programs meet minimum standards for Coast Guard approval. Members of the public, including U.S. merchant mariners, attend approved courses to meet regulatory requirements or to enhance their ability to perform their jobs. The agency uses the information to enforce regulations, and to compare existing courses with new international standards for specific training.

The recordkeeping requirements helps the Coast Guard monitor the performance of schools with approved courses.

3) Consideration of the use of improved technology.

Information is submitted in writing or electronically via e-mail to NMCCourses@uscg.mil. For guidance on submissions, see Coast Guard Navigation and Vessel Inspection Circular (NVIC) [03-14](#) (Change-1). We estimate that 100% of the reporting and recordkeeping requirements can be done electronically. Currently, we estimate that 90% of the responses are collected 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.

¹ International Convention on Standards of Training, Certification and Watchkeeping for Seafarers.

- 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.

Similar data in this field is not available. The Coast Guard is the only agency collecting this information for use as described in the answer to item 2 above.

5) Methods to minimize the burden to small entities if involved.

In general, both the reporting and recordkeeping burden is proportional to the number of courses that a school submits for approval. Thus, small businesses that offer only a few courses would have a reduced burden. Additionally, there is no application fee for respondents and direct communication between applicants and the Coast Guard is encouraged. Finally, all training schools seeking approval of courses must follow the same procedures.

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

The Coast Guard’s ability to evaluate training received by mariners as an equivalent to service experience will be reduced. This may lead to less-qualified mariners and a corresponding increase in maritime accidents.

7) Special collection circumstances.

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

8) Consultation.

The Coast Guard published on May 5, 2023, a Notice of Proposed Rulemaking (NPRM) entitled “Electronic Submission of Mariner Course Completion Data” (e-Submit) [USCG-2021-0097; RIN 1625-AC75; 88 FR 29013]. The rulemaking proposed to—

- require Coast Guard-approved training providers to electronically submit student course completion data to the Coast Guard within 5 business days of completing a Coast Guard-approved course. The National Maritime Center would use this information to validate mariner course completion as part of an application for a Merchant Mariner Credential. In addition, the Coast Guard proposes to replace gendered titles for certain officer and rating endorsements in keeping with Coast Guard policy of using gender-neutral language. We expect these proposed changes to lessen the probability of credentials being issued to mariners who have not met the professional requirements for their endorsements and to appropriately conform terms that should be gender neutral.

The NPRM 60-day comment period closed on July 5, 2023. The Coast Guard received no collection of information-related comments to the NPRM.

9) Provide any payment or gift 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 not privacy sensitive therefore, it does not require coverage from a Privacy Impact Assessment or a System of Records Notice.

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 annual number of respondents is 329.
- The estimated annual number of responses is 4,225.
- The estimated annual hour burden is 199,950 hours.
- The estimated annual cost burden is \$7,207,052.

The burden to respondents is provided in Appendix A. Respondents are training providers (some, but not all, offer STCW-related course).

We estimate that it takes from 6 hours to 31 hours per course approval submission and that a submission is done by a Training Specialist. For the wage rate, we used the Bureau of Labor Statistics (BLS) wage rate for Training and Development Specialist (13-1151) [May 2022, mean hourly wage, loaded 50%, and rounded].²

We estimate that it takes 40 hours to 56.33 hours per approved course for student recordkeeping³ and that a submission is done by an Administrative Specialist. For the wage rate, we used the BLS wage rate for Information and Records Clerk, All Other (43-4199) [May 2022, mean hourly wage, loaded 50%, and rounded].⁴

We estimate that it takes 206 hours to develop a new STCW QSS Manual and complete the associated recordkeeping and that the work is done by a Training Specialist. Additionally, we estimate that annually will receive new QSS Manuals from about 5% of the total number of STCW training schools.

We estimate that it takes 9 hours to annually review an STCW QSS Manual and complete the associated recordkeeping and that the work is done by a Training Specialist.

We estimate that it takes 10 hours to conduct an internal audit of the STCW QSS and complete the associated recordkeeping and that the work is done by a Training Specialist. Audits are done twice in a 5-year period (i.e., 40% of the total STCW training schools annually).

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

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

14) Estimate of annualized Federal Government costs.

The annualized Federal Government cost estimate is \$1,149,632 (see Appendix B). We estimate that it takes a member of a CG Regional Examination Center about 2 hours to conduct a course review (& if needed, a site visit write-up). We estimate that it takes a member of the CG NMC about 10 hours to conduct a course (& site visit) evaluation and another 1 hour to complete a course approval determination. All Coast Guard activities are done by a GS-13. For the wage rate, we used Office of Personnel Management (OPM) data [2023-RUS Salary Table, GS-13-Step 5, hourly basic rate, loaded 65%, and rounded].⁵

15) Explain the reasons for the change in burden.

² <https://www.bls.gov/oes/2022/may/oes131151.htm>

³ Estimated by 12 classes/course, 20 students/class, and 10 min. to 14 min. (0.1667 hrs to 0.2355 hrs) burden/student record.

⁴ <https://www.bls.gov/oes/2022/may/oes434199.htm>

⁵ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf

The change in burden is a PROGRAM CHANGE due to the 1625-AC75 rulemaking. Also, the change in burden is an ADJUSTMENT due to a change (i.e., increase) in the number of approved courses. The methodology for calculating burden remains 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 information collection does not employ statistical methods.