

SUPPORTING STATEMENT  
for

Application for Merchant Mariner Credential (MMC), Application for Medical Certificate, 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.

OMB CONTROL NO.: 1625-0040

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

A. JUSTIFICATION

1. Explain the 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, including the STCW Final Rule (Docket No. USCG-2004-17914) published on December 24, 2013, require that each applicant for a Merchant Mariner Credential (MMC) make written application to the Coast Guard 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, Application for Medical Certificate, or Form CG-719K/E, Application for Medical Certificate – Short Form, as appropriate. 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 (Small Vessel Sea Service Form), CG-719P (DOT/USCG Periodic Drug Testing Form), and CG-719C (Disclosure Statement for Narcotics, DWI/DUI, and/or Other Convictions) are provided as forms that applicants may use to meet these additional reporting requirements.

The changes to the forms in this collection are not associated with new statutory or regulatory authority, but rather improvements to the flow and quality of content, user functionality, and to aid the Coast Guard in processing applications. The form CG-719K has undergone significant reorganization in response to recommendations from the Merchant Mariner Medical Advisory Committee (MEDMAC) and comments from the public provided at the September 2015 MEDMAC public meeting. As an example, the wording, location and specificity of form instructions were revised to provide better clarity and to improve ease of use. Key instructions are now located within the corresponding section of the form to reduce the need for mariner applicants and their medical practitioners to flip back and forth between pages to search for instructions. This improvement is also expected to reduce processing delays caused by submission of

incomplete forms. Changes to each form are discussed in detail in the attached Narrative of Changes Tables (see Enclosure 1).

2. Indicate how, by whom, how frequently, and for what purposes the information is to be used and the consequence to the Federal program or policy activities if the collection of information was not conducted.

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 719-B 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. Describe whether the collection of information involves the use of automated collection techniques.

The forms in this collection are available as a fillable PDF online at [www.uscg.mill/nmc](http://www.uscg.mill/nmc). 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](mailto: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 continues toward the development of a fully automated application system.

4. Describe efforts to identify duplication.

Each form in the 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. If the collection of information impacts small businesses or other small entities describe the methods used to minimize burden.

The information collection does not impact small businesses.

6. Describe the consequences to the Federal program or policy activities if the collection were not conducted or 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. Explain any special circumstances.

No special circumstances exist for this collection of information.

8. Solicitation of Comments.

The Coast Guard published 60-day Notices (See [USCG-2015-0694], October 15, 2015, 80 FR 62079) and 30-Day Notice (February 17, 2016, 81 FR 8085) were published in the Federal Register to solicit comments on the information collection prior to submission to OMB. The Coast Guard received one comment in response to the notices published: "The process is great however, if in the process there could be a more informative way, to give more detail to how and what is going on when your processing, a new original MMC document, to someone who has not been through the process, of receiving for the first time." Detailed information on the Merchant Mariner Credentialing Program and processes, as well as video application guidance and live customer service chat function are available online at the NMC website: [www.uscg.mil/nmc](http://www.uscg.mil/nmc). Additional information and assistance is available by contacting the NMC Customer Service Center at 1-888-427-5662 or 304-433-3400.

The Coast Guard obtained additional public comment and formal recommendations from the Merchant Mariner Medical Advisory Committee (MEDMAC) on the Application for Medical Certificate, Form CG 719K, and the Application for Medical Certificate – Short Form, Form CG 719K/E during the September 2015 public meeting of MEDMAC. These comments and formal recommendations were used to guide the revisions to the medical forms.

Additionally, the Coast Guard published another 60-day Notice (See [USCG-2015-0694], October 26, 2017, 82 FR 49639) and 30-day Notice (January 26, 2018, 86 FR 3757). This was required to allow adequate time for public commenting on changes to certain forms associated with this information collection. The additional Notices elicited no comments. Accordingly, no changes have been made to the collection.

9. Explain any decision to 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 and the basis for the assurance in statute, regulation, or agency policy.

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>

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. Provide estimates of the hour burden of the collection of information.

On average, the Coast Guard receives approximately 56,500 applications (CG-719B) annually. 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 ~80% of respondents) or CG-719K/E (10 minutes to complete/used by ~20% of respondents). In addition, another 12,000 mariners, annually, only apply for the Medical Certificate by completing the CG-719K (~80%) or CG-719K/E (~20%). The CG-719P (5 minutes to complete), the CG-719S (15 minutes to complete) and the CG-719C (10 minutes to complete) are optional forms that may be used to provide documentary evidence of meeting additional certification requirements.

Based on the table below, the total burden hours will be approximately 47,444. The estimate cost of the hour burden is \$1,488,508.06 (\$22.41 (wage data retrieved using U.S. BLS website) \* 1.4 (loaded factor) \* 47,444 hours).

<b>CG-719B</b>	
Annual applications (CG-719B) completed:	56,500
Time to complete a CG-719B:	9 minutes
Original Burden Hours:	8,475
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719B:	<b>8,475</b>
<b>CG-719K</b>	

Estimated number of Application for Merchant Mariner Medical Certificate (CG-719K) (45,200 (80% of 56,500) + 9,600 (80% of 12,000/STCW)):	54,800
Time to complete a CG-719K:	18 minutes
Original Burden Hours:	16,440
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours CG-719K:	<b>16,440</b>
<b>CG-719K/E</b>	
Estimated number of Application for Merchant Mariner Medical Certificate for Entry Level Ratings (CG-719K/E) (11,300 (20% of 56,500) + 2,400 (20% of 12,000/STCW)):	13,700
Time to complete 1 CG-719K/E:	10 minutes
Original Burden Hours:	2283
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours CG-719K/E:	<b>2,283</b>
<b>CG-719S</b>	
Estimated number of Small Vessel Sea Service Forms completed (CG-719S):	56,500
Time to complete 1 CG-719S:	15 minutes
Original Burden Hours:	14,125
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719S:	<b>14,125</b>
<b>CG-719P</b>	
Estimated number of DOT/USCG Periodic Drug Testing Forms (CG-719P):	56,500
Time to complete 1 CG-719P:	5 minutes
Original Burden Hours:	4,708
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719P:	<b>4,708</b>
<b>CG-719C</b>	
Estimated number of Disclosure Statement for Narcotics, DWI/DUI, and/or other Convictions (CG-719P) (15% of 56,500):	8,475
Time to complete 1 CG-719C:	10 minutes

Original Burden Hours:	1413
Notification of Change from previous renewal:	1,413
Additional Burden Hours:	0
New Total Burden Hours for CG-719C:	<b>1,413</b>
<b>New Total Burden Hours (CG-719B + CG-719K + CG-719K/E + CG-719S + CG-719P + CG-719C)</b>	<b>47,444</b>

13. Provide estimates of the total annual cost burden to respondents.

There are no annualized capital and start-up costs.

14. Provide estimates of annualized cost to the Federal Government.

Expense Type	Expense Explanation	Annual Costs (dollars)
Direct Costs to the Federal Government	Evaluation of forms (point of receipt to approval or rejection of forms) <sup>1</sup>	\$20,650,750
	Merchant Mariner License and Documentation database	\$800,000
	Shipping costs	\$14,993
	Safety and Suitability databases	\$31,303
	Subtotal, Direct Costs to the Government	<b>\$12,240,760</b>
Contractor Expenses	In-Processing of forms/Production of credential	\$2,488,896
	Subtotal, Contracted Services	<b>\$2,488,896</b>
	<b>TOTAL COST TO THE GOVERNMENT</b>	<b>\$14,729,656</b>

15. Explanation for Program Changes or Adjustments.

There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and the methodology for

<sup>1</sup> On average 10 employees are involved in evaluating the form. The salary for the 10 employees ranges from a GS-5 with a hourly rate of \$13.54/hour to a GS-12 with an hourly rate of \$38.68/hr, resulting in an average base wage rate of \$26.11/hr and a fully loaded wage rate of \$36.55/hour (\$15/hour x 1.4 benefit multiplier).

To review 56,500 responses annually, the staffing cost is \$36,550 (56,500 x 10 x \$36.55)

calculating burden, remain unchanged. The changes to the forms in this collection are not associated with new statutory or regulatory authority, but rather improvements to the flow and quality of content, user functionality, and to aid the Coast Guard in processing applications.

16. For collection of information whose results will be published.

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that displaying the expiration date would be inappropriate.

Not Applicable.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submission”.

There are no exceptions.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.**

This information is not collected through the use of statistical methods.