

**Department of Transportation
Maritime Administration
Information Collection Request (ICR)
OMB 2133-0005
Uniform Financial Reporting Requirements**

SUPPORTING STATEMENT

INTRODUCTION

This submission is to request a three-year approval from the Office of Management and Budget's (OMB) for the information collection entitled OMB 2133-0005 (Uniform Financial Reporting Requirements), which expires on July 31, 2025. Since the last renewal, the public burden was updated to include the mailing costs for respondents. Consequently, 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

The Maritime Administration (MARAD) administers a variety of programs aimed at promoting a strong U.S. Merchant Marine for the water-borne carriage of U.S. foreign and domestic commerce and for national defense purposes. In furtherance of these objectives, MARAD administers financial assistance programs for ship construction and ship operations. The Maritime Security Program pays subsidies to U.S. shipping companies to offset the higher cost of operating vessels involved in foreign trade under the American flag. The Title XI Federal Ship Financing Guarantees program provides direct government guarantees of private sector loans made to finance or refinance the construction or reconstruction of American-flag vessels in U.S. shipyards, and for financing the modernization of U.S. shipyards.

The Uniform Financial Reporting Requirements are used as a basis for preparing and filing semi-annual and annual financial statements with MARAD. Regulations requiring financial reports to MARAD are authorized by Section 801, Merchant Marine Act, 1936, as amended (46 Appendix United States Code (USC 1211)). Financial Reports are also required by regulation of purchasers of ships from MARAD on credit, companies chartering ships from MARAD, and of companies having Title XI guarantee obligations (46 Code of Federal Regulations (CFR) Part 298).

This information collection supports the Department of Transportation's Global Connectivity Outcome 3 Enhanced international competitiveness of U.S. transport providers and manufacturers by providing access to funding to finance the modernization of U.S. flag vessels and shipyards.

2. Purpose and Use of the Information Collection

Forms are sent to and prepared by companies doing business with MARAD in order to determine compliance with regulatory and contractual requirements. To this end, the data collected is used by MARAD in analyses and reviews. Also, the data is used to evaluate companies, measure industry segments, and chart industry financial trends. It would be difficult to accomplish this without the MA-172 (Financial Report of Ship Carriers (Part 1)).

3. Automation or Use of Information Technology

The extent of technology used in data collection and form preparation is at the discretion of the individual company. MARAD does not dictate collecting or preparing methods since we are amenable to most means of submission.

4. Efforts to Identify Duplication

Financial data is available in a variety of forms. However, MARAD requires financial reporting as prescribed by generally accepted accounting principles (GAAP), as well as financial information regarding vessel operations that are not commonly reflected in financial statements prepared in accordance with GAAP. This provides the agency with standard terminology, defined accounting methodology, and reliability. The result is a report-by-report consistency: Review for compliance with regulatory and contractual requirements and interpretation of operating results becomes more accurate; analyses of the industry, its segments, and individual company performance is more reputable; and compliance with financial requirements and with covenants of financial agreements is more apparent. The coordination of financial reporting requirements for the maritime industry, as well as simplifying and reducing the volume of data being reported, assures that duplicate reporting is avoided.

5. Impact on Small Businesses or Other Small Entities

The collection has minimal impact on small business and small entities. There is no discriminating difference of burden between businesses except that of the number of participants. The more vessels enrolled in the programs, the longer a respondent may take to prepare the required MA-172.

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

Infrequent collection of data for this effort would cause our analysis to be inconsistent and unresponsive, thus ineffective to MARAD goals. Collections must be timely and consistent to be purposeful.

7. Special Circumstances Relating to the Guidelines 5 CFR 1320.5

There are no special circumstances that require the collection of information to be conducted in a manner described 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 published a 60-day notice and request for comments on this information collection in the Federal Register (90 FR 17880, Vol. 90, No. 81) on April 29, 2025, indicating comments should be submitted on or before June 30, 2025. No comments were received. A 30-day notice will now be published in the Federal Register to solicit public comments.

9. Explanation of Any Payment or Gifts to Respondents

No payments or gifts are provided to respondents.

10. Assurance of Confidentiality and Protection of Privacy

The information collected is handled as confidential in compliance with the Freedom of Information Act, the Privacy Act of 1974, and OMB Circular A-108. All the information involves financial data from business operations and is protected from disclosure.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimate of Annualized Burden Hours and Cost

a. Estimated Annualized Burden Hours

There are 50 business entities providing financial data to MARAD twice a year in response this collection. This estimate is based on feedback from respondents about

their experience responding to this collection. Therefore, the total responses expected annually is 100. Each respondent will take an average 9.5 hours to complete each response, which may vary by the nature of each company and the number and purpose of their enrolled vessels. Therefore, the total burden hours associated with this collection is 950 hours, which can be calculated as shown in the table below:

Type of Respondent	Total Respondents		Total Responses per Respondent		Total Responses		Average Time Taken to Respond (Hour)		Total Burden Hours
Preparation and submission of application information	50	*	2	=	100	*	9.5	=	950

b. Estimated Annualized Cost Burden

The Bureau of Labor and Statistics (BLS)¹ that the average hourly wage of Secretaries and Administrative Assistants (43-6010) is \$ 25.03. When combined the total compensation rate of 29%², the annualized hourly rate is \$32.29. Therefore, the total annualized cost burden associated with preparing and submitting data for this collection is \$ 30,675.50, which can be calculated as follows:

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
Secretaries and Administrative Assistants (43-6010)	\$ 25.03	\$ 32.29	1	\$ 32.29	950	\$ 30,675.50

13. Estimate of the Total Annual Cost Burden to Respondents or Recordkeepers

a. Total Capital and Start-Up Costs Estimate: There are no capital or start-up costs associated with this collection.

b. Total Operation and Maintenance and Purchase of Services Estimate: In addition to personnel costs listed in item 12, it is estimated that each respondent will spend approximately \$13.37 for copying, postage, and other mailing costs. Therefore, the total cost to respondents to respond to this collection is \$ 1,337.00, which can be calculated as

1 The hourly wage estimate is taken from current BLS tables: <https://data.bls.gov/oes/#/industry/000000>

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

shown in the table below:

APPLICATIONS (100 Responses)	
Activity	Cost
Copying @ 2 (total copies of the applications per person) *22 (total pages per application) * \$.26 ³ (copy cost per page)	\$ 11.44
Envelope @ 1 (total envelopes needed) * \$.47 ⁴ (total cost per envelope)	\$ 0.47
Postage @ 2 (total stamps per package) * \$.73 ⁵ (cost per stamp)	\$ 1.46
Combined Total	\$ 13.37
Total Cost: \$13.37 (total cost per respondent) * 100 (total responses)	\$ 1,337.00

14. Estimate of Federal Government Cost

The total annual cost to the Federal Government for processing applications associated with this collection is: \$ 2,534.25.

According to the Office of Personnel Management (OPM)⁶ wage tables, the hourly wage rate for a GS 14 (Step 5) Federal employee with a Washington-Baltimore-Arlington locality pay is \$ 77.38. When combined with the Federal Employee Compensation rate of 31%⁷, the total hourly wage rate for this employee is \$101.37. It is estimated that this employee will take one 15 minutes (.25) hours to review the annual statement received from respondents, enter the needed amount in the program ledger, and files the statement. Therefore the total combined cost for this effort is \$ 2,534.25, which can be calculated as shown in the table below:

FTE Grade and Step & CRF Program Related Task	Hourly Wage	Average Hourly Wage Rate with 31% Compensation	Total Employees	Total Time for Per application (Ave. Hours)	Response s per Person	Frequency of Responses	Total Federal Government Wages
---	-------------	--	-----------------	--	-----------------------	------------------------	--------------------------------

3 Black and White Copying costs taken from FedEx Copying services:

https://www.office.fedex.com/default/copies.html?s_kwcid=AL!20832!10!78477847004553!78478051016025&gclid=e4adcfe3587519bb48cda8098396c16c&gclsrc=3p.ds&&CMP=KNC-8000047-68-9-950-1110000-US-US-EN-123855:123898:2201401&ds_k=fedex+office&mssclkid=e4adcfe3587519bb48cda8098396c16c

4 Cost of Individual Quality Park Clasp & Moistenable Glue Kraft Catalog Envelopes, 10" x 13", taken from Staples: [Quality Park Clasp & Moistenable Glue Kraft Catalog Envelopes, 10" x 13", Kraft, 100/Box \(QUA37797\) | Staples](#)

5 Regular Postage cost for each Forever stamp is taken from the United States Postal Service: : https://store.usps.com/store/product/us-flags-2024-stamps-S_684904

6 The hourly Federal Government wage is taken from OPM 2024 wage tables: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/DCB_h.aspx

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

GS 14 (Step 5): Review, record, and file annual statement	\$ 77.38	\$ 101.37	1	0.25	50	2	\$ 2,534.25
---	----------	-----------	---	------	----	---	-------------

15. Explanation of Program Changes or Adjustments

Since the last renewal the public burden was updated to include the mailing costs for responding to this collection.

16. Publication of Data Collection Results

The collected information will not be published.

17. Display of the OMB Expiration Date

MARAD is not seeking approval to avoid displaying the OMB expiration date.

18. Exception to the Certification Statement

There are no exceptions to the certification statement.