

**Department of Transportation
Maritime Administration
Information Collection Request (ICR)
OMB 2133-0509
Maritime Administration Annual Service Obligation Compliance Report**

SUPPORTING STATEMENT

INTRODUCTION: This submission is to request a three-year approval from the Office of Management and Budget (OMB) for the information collection entitled OMB 2133-0509 (Maritime Administration Annual Service Obligation Compliance Report), which expires on August 31, 2025. There are no changes since the last renewal, so this collection will be submitted *as an extension without change of a previously approved collection.*

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Maritime Education and Training Act of 1980, Public Law 96-453, imposes a service obligation on every graduate of the U.S. Merchant Marine Academy (USMMA) and every subsidized State maritime academy graduate who received a Student Incentive Payment (SIP). This service obligation is for the Federal financial assistance the graduates received as students. The information collection is necessary to determine if a graduate of the USMMA or a State maritime academy graduate who received SIP is complying with the terms of their service obligation for that year. This collection supports the Departmental strategic goal for National Security by ensuring sufficient qualified maritime personnel are available and capable to serve in the event of a national emergency.

2. Purpose and Use of the Information Collection

Every student and graduate of the USMMA and State maritime academy (SMA) Student Incentive Payment (SIP) Program graduates incur a mandatory service obligation in the U.S. merchant marine. This obligation is in exchange for Federal funds utilized for the student's education. The obligation consists of (1) completing the course of instruction at their maritime academy; (2) maintaining U.S. Coast Guard merchant mariner credentials and officer endorsements (unlimited license) as an officer in the merchant marine of the United States for at least six years following graduation from an academy; (3) serving as a commissioned officer in the U.S. Naval Reserve, the U.S. Coast Guard Reserve or any other reserve unit of an armed force of the United States for at least eight years following graduation from an academy; and (4) serving as a merchant marine officer on U.S.-flag vessels, as an employee in a U.S. maritime-related industry ashore or as a commissioned officer on active duty in an armed force of the United States, National Oceanic Atmospheric Administration (NOAA) Corps or U.S. Public Health Service (USPHS) Corps. The employment obligation is three years for State maritime academy SIP graduates and five years for USMMA graduates.

The reporting form, MA-930 *Maritime Administration Annual Service Obligation Compliance Report*, is used by the graduates to report to the U.S. Maritime Administration (MARAD) their compliance with their service obligation.

MARAD reviews the graduate's record in the MARAD computer system Maritime Service Compliance System (MSCS), to determine if the graduate is complying with their service obligation. Those graduates who are found to have breached their obligation are subject to being called to active duty in the U.S. armed forces or may be required to reimburse the Federal Government for the cost of their education. SMA graduates entering the SIP Program and signing the SIP contract revised in 2018, may also be required to repay their SIP funds received.

Failure to collect this compliance information from the graduates prevent MARAD from monitoring compliance with statutory requirements.

3. Automation or Use of Information Technology

MARAD provides a total electronic option for this collection. The information is confidential and personal in nature. The electronic web-based internet system, Maritime Service Compliance System (MSCS), is available for submitting annual reports or updating personal information. Graduates can submit the required annual information from virtually anywhere in the world, removing many burdens to submitting the information. Graduates, although encouraged not to, also still have the option of electronically forwarding their annual reports in an email or by regular mail.

4. Efforts to Identify Duplication

There is no duplication of information collection, since the content of the service obligation compliance report forms is not required of the graduates by any other source. There are no other Federal agencies collecting or maintaining the in-depth employment reporting required by Public Law 96-453.

5. Impact on Small Businesses or Other Small Entities

The requested information does not impact small businesses or other small entities. The reporting burden is minimized by allowing the graduate to report annually in lieu of reporting individual employment periods. For example, a graduate engaged in afloat employment may make several voyages with different steamship companies in a year.

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

Reporting annually is considered the minimum frequency of reporting to stay within the intent of Public Law 96-453. There would be no technical or legal obstacles if the use of improved information technology were considered or used to reduce the burden.

7. Special Circumstances Relating to the Guidelines 5 CFR 1320.5

There are no special circumstances that would require this information collection to be conducted in a manner covered 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 (FR 24192, Vol. 90, No. 208) on June 5, 2025, indicating comments should be submitted on or before August 5, 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 payment or gift is provided to respondents.

10. Assurance of Confidentiality and Protection of Privacy

A Privacy Act Notice is contained in the service obligation contract that each student signs. This notice states that any information provided by the graduate will not be divulged without prior written authorization to anyone other than persons involved in monitoring the service obligation (e.g., school officials, employers, (i.e., Department of Defense (DOD), U.S. Coast Guard and NOAA). Further, the only information released is that which is specific to the request. The revised form has also omitted the graduate's social security number, and replaced it with a U.S. Coast Guard reference number, unique to each student, and issued with the graduate's merchant mariner credentials.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

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

a. Estimated Annualized Burden Hours

An estimated 2,100 respondents will each respond once (1) annually to this collection. Each respondent will take approximately twenty minutes to complete their responses. Therefore the total burden hours related to this collection of information is 699.999993 or 700, 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
2,100	*	1	=	2,100	*	0.3333333 (20 Minutes)	=	699.99993/ 700

b. Estimated Annualized Cost Burden

The Bureau of Labor and Statistics (BLS)¹ estimates that the average hourly wage for Secretary/ Administrative Assistant (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 for all tasks associated with preparing and submitting a response in reference to this collection is \$ 22,603, which can be calculated as shown in the table below:

Title and Code of Respondents	Hourly Wage	Compensation Rate of 29%	*	Number of Employees	*	Total Annualized Burden Hours	=	Total Annualized Cost Burden
Secretary/ Administrative Assistant (43-6010)	\$ 25.03	\$ 32.29	*	1	*	700	=	\$ 22,603.00

13. Estimate of the Total Annual Cost Burden to Respondents and/or Record Keepers

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

14. Estimates of Federal Government Costs

The total annual cost to the Federal Government for processing applications associated with this collection is: \$ 215,380.80

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/ecec.pdf>

According to the Office of Personnel Management (OPM)³ wage tables, the hourly rate for the following Federal employees who analyze compliance reports submitted for this collection, with a Washington-Baltimore-Arlington locality pay is as follows: GS 14 (Step 8) is \$ 84.20, GS-13 (Step 5) is \$ 65.48, and GS 11 (Step 3) is \$ 43.24. When combined with the Federal Employee Compensation rate of 31%⁴, the total hourly wage rate for each Federal employee is as follows: GS 14 (Step 8) is \$ 110.30, GS-13 (Step 5) is \$ 85.78, and GS 11 (Step 3) is \$ 56.64 respectively. Each employee will spend on average 4 minutes to analyze each compliance reports. The total cost for these efforts is \$35,380.80, 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 (Avg. Hours)		Total Applications/ Reports		Frequency of Responses		Total Federal Government Wages
GS 14 (Step 8): Analyze Compliance Reports	\$ 84.20	\$ 110.30	1		0.06666667		2,100		1		\$ 15,442.00
GS 13(Step 5): Analyze Compliance Reports	\$ 65.48	\$ 85.78	1	*	0.06666667	*	2,100	*	1	=	\$ 12,009.20
GS 11 (Step 3): Analyze Compliance Reports	\$ 43.24	\$ 56.64	1		0.06666667		2,100		1		\$ 7,929.60
TOTAL COMBINED FEDERAL WAGES											\$ 35,380.80

In addition, the estimated annual cost for maintaining the MSCS system that holds the information collected is \$180,000.00. Therefore, the total combined Federal Government cost for this collection is: \$ 215,380.80, which can be calculated as shown in the table below:

Estimated Grand Total	
Federal Employees Costs	\$ 35,380.80
MSCS System	\$ 180,000.00
TOTAL	\$ 215,380.80

15. Explanation of Program Changes or Adjustments

There are no program changes since the last renewal of this collection.

³

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

⁴ Per BLS Employee Compensation Memo, the total compensation rate for the Federal Government is 31%, :<https://www.bls.gov/news.release/pdf/ecec.pdf>

16. Publication of Data Collection Results

The information collected is intended for internal use only. There are no plans to publish any information for statistical use.

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 certificate statement.