

**Department of Transportation
Maritime Administration
Information Collection Request (ICR)
OMB 2133-0553
Mariner Cadet Training-Agreements, Compliance Reporting, and Audits**

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 2133-0553 (Mariner Cadet Training-Agreements, Compliance Reporting, and Audits), which expires on January 31, 2026. Since the last renewal, this collection is being updated to remove references to collection instruments that will no longer be implemented, which has contributed to a reduction in the total public burden. As such this collection will be submitted as *an extension of a current approved collection*.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

In accordance with its delegation of authority at 49 Code of Federal Regulations (CFR) 1.93(a), and pursuant to 46 United States Code (U.S.C.) Section (§) 50101(a)(4), the Maritime Administration (MARAD) is charged with ensuring that the United States Merchant Marine is manned with trained and efficient citizen personnel. Furthermore, 46 U.S.C. § 51322 requires MARAD to protect cadet mariners from sexual assault onboard vessels, and, in so doing, to establish sexual assault policy and conduct random and targeted unannounced checks of commercial vessels.

MARAD must obtain information from commercial vessel operators in order to meet its statutory objectives of setting sexual assault policy and monitoring compliance – objectives essential to its mission of ensuring a well-trained U.S. Merchant Marine.

To meet these statutory requirements and protect cadets from sexual assault onboard vessels, MARAD established the Every Mariner Builds A Respectful Culture (EMBARC) Standards on December 15, 2021. MARAD conducts random and targeted unannounced checks of commercial vessels to validate compliance on a sampling basis. However, MARAD also relies on information obtained from commercial vessel operators to verify that all vessel operators in the program have measures in place to ensure compliance with EMBARC Standards year-round. MARAD's confirmation of the implementation of, and compliance with the EMBARC requirements will help provide a safe and secure merchant marine training environment, protect the U.S. Merchant Marine against disruptions from prohibited behavior, and improve the integrity of the nation's merchant mariner workforce pipeline. A well-trained United States Merchant Marine is necessary to promote economic strength, the safe transportation of waterborne commerce, and strategic sealift support for national security.

2. Purpose and Use of the Information Collection

The collected information is used to confirm acceptance of MARAD sexual assault policies by commercial vessel operators. This data also helps establish a process to oversee and monitor continued compliance through reporting and auditing of commercial vessel operators during initial enrollment and subsequent Sea Years.

3. Automation or Use of Information Technology (IT)

The collection of information will be administered electronically using email, reports, and other supporting digital documentation. MARAD compliance reviews conducted on site may also generate hard copy materials including written communications and investigation reports, which can be scanned and stored electronically. Adopting these methods of information collection supports conventional MARAD operations and facilitates commercial vessel operators' ability to comply with MARAD requirements.

4. Efforts to Identify Duplication

The information being sought is not available through any other existing or planned sources. Acceptance of MARAD's sexual assault and sexual harassment policies as well as monitoring of commercial vessel operators cannot be obtained from any other source.

5. Impact on Small Businesses or Other Small Entities

This collection does not impact small businesses or other small entities.

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

This collection of information specifically concerns vessel operators' acceptance of and sustained compliance with MARAD's EMBARC Standards. Forms *MA-1084 EMBARC Checklist* (MA-1084) and *MA-1085 EMBARC Statement of Compliance* (MA-1085) are collected on an annual basis, while Form *MA-2012 EMBARC Job Aid* (MA-2012) is collected following an incident involving sexual assault or sexual harassment. Collecting this information less frequently would prevent MARAD from verifying that vessel operators are providing a safe training environment for cadets.

7. Special Circumstances Relating to the Guidelines 5 CFR 1320.5

This collection is necessary to carry out, and is consistent with, MARAD's statutory authority under 46 U.S.C. § 51322 to conduct targeted checks on commercial vessels carrying cadet mariners in order to protect against sexual assault and sexual harassment. The information also enables commercial vessel operators to inform MARAD of events on the vessel in a timely manner, which is necessary to promptly alert authorities to the occurrence of sexual assault or sexual harassment. Due to the seriousness of the potential harm to cadet mariners, MARAD seeks to establish highly active and clearly defined channels of communication with commercial vessel operators carrying cadets.

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 54859, Vol. 90, No. 227) on November 28, 2025, indicating comments should be submitted on or before January 27, 2026. No comments were received. A 30-day notice will now be published in the Federal Register to solicit public comments.

MARAD hosted quarterly EMBARC meetings between July 2022 and January 2025 to learn from the individual experiences of participants how to improve its EMBARC program including reporting requirements covered under this collection. Participants represented a wide range of stakeholders including vessel owners and operators, maritime labor organizations, United States Merchant Marine Academy (USMMA) midshipmen and faculty, Society of Maritime Arbitrators (SMAs), United States Coast Guard (USCG), and Military Sealift Command (MSC).

9. Explanation of Any Payments or Gifts to Respondents

There are no payments or gifts to commercial vessel operators under this action.

10. Assurance of Confidentiality and Protection of Privacy

The proprietary and confidential information gathered will be kept confidential pursuant to the Freedom of Information Act, 5 U.S.C. § 552 and DOT implementing regulations at 46 CFR Part 7.

11. Justification for Sensitive Questions

This basic information gathered is not sensitive in nature. Information compiled during follow-up investigations, depending on whether they be criminal or otherwise, could be sensitive and will be protected under the Privacy Act or Family Educational Rights and Privacy Act (FERPA).

12. Estimate of Annualized Burden Hours and Cost

a. Estimated Annualized Burden Hours

A total of thirty-five (35) vessel operators will take approximately two (2) hours to complete Form MA-1084 once annually, for a total seventy (70) hours. A total of thirty-five (35) vessel operators will take one-quarter of an hour (0.25) to complete Form MA-1085 once annually for a total of eight and three-quarters (8.75) hours. An estimated five (5) vessel operators will take six (6) hours to complete Form MA-2012 upon a reported incident of sexual assault or sexual harassment for a total of thirty (30) hours. Therefore, the combined respondents associated with this collection is seventy-five (75), while the total burden hours 108.75 or 109, 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 |
|--------------------|-------------------|---|--------------------------------|---|-----------------|---|--------------------------------------|---|--------------------|
| FORM MA-1084 | 35 | * | 1 | = | 35 | * | 2 | = | 70 |
| FORM MA-1085 | 35 | | 1 | | 35 | | 0.25 | | 8.75 |
| FORM MA-2012 | 5 | | 1 | | 5 | | 6 | | 30 |
| TOTAL | 75 | | | | 75 | | | | 108.75/ 109 |

b. Estimated Annualized Cost Burden

The Bureau of Labor and Statistics (BLS)¹ estimates that the average hourly wage for Ship and Boat Captains and Operators (53-5020) is \$45.67 and for Auditors and Accountants (13-2011) is \$44.96. Wages and salaries constitute 70.2%, and benefits comprise 29.8% of the total compensation for private industry workers². Hence, the total compensation is $100/70.2 = 142.45\%$ of the hourly wage. The two adjusted total compensation hourly rates are \$65.06 and \$64.05 respectively. Therefore, the total annualized cost burden for all tasks associated with preparing and submitting responses to this collection is \$7,020.36, per the calculations in the table below.

| Title and Code of Respondents | Hourly Wage | Total Compensation Rate of 142.45% | | Number of Employees | | Total Annualized Burden Hours | | Total Annualized Cost Burden |
|--|-------------|------------------------------------|---|---------------------|---|-------------------------------|---|------------------------------|
| Ship and Boat Captains and Operators (53-5020) | \$ 45.67 | ** Expression is faulty ** | * | 1 | * | 54.375 | = | 0 |
| Accountants and Auditors (13-2011) | \$ 44.96 | ** Expression is faulty ** | | 1 | | 54.375 | | 0 |
| TOTAL | | | | | | 0 | | 0 |

13. Estimate of the Total Annual Costs Burden to Respondents and/or Record Keeper

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

14. Estimate of Federal Government Costs

According to the Office of Personnel Management (OPM)² 2026 wage tables, the hourly

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

² The 2025 Federal Government hourly wage estimates are taken from OPM: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/DCB_h.aspx

rate for a (GS 15, Step 10) Federal employees with Washington-Baltimore-Arlington locality pay is \$94.49. When combined with the Federal Employee Compensation rate of 31%³, the total hourly wage rate for this employee is \$122.52. This employee will take one (1) hour to complete all tasks related to processing thirty-five (35) completed Form MA-1084 at a total cost of \$4,288.20 and one (1) hour to complete all tasks related to processing thirty-five (35) completed Form MA-1085 at a total cost of \$4,288.20. This employee will take one (1) hour to complete all tasks related to the processing of five (5) completed Form MA-2012 at a total cost \$612.60.

In addition, according to OPM 2026 wage tables, the hourly rate for a GS 14, Step 10 Federal employee with Washington-Baltimore-Arlington locality pay is \$89.65. When combined with the Federal Employee Compensation rate of 31%, the total hourly wage rate for this employee is \$116.28. This employee will take one (1) hour to complete all tasks related to the processing of thirty-five (35) completed Form MA-1084 at a total cost \$4,069.65 and one (1) hour to complete all tasks related to processing thirty-five (35) completed Form MA-1085 at a total cost of \$4,069.65. This employee will take one (1) hour to complete all tasks related to the processing of five (5) completed Forms MA-2012 at a total cost \$581.40.

In addition, according to OPM wage tables, the hourly rate for a GS 13, Step 10 Federal employee with Washington-Baltimore-Arlington locality pay is \$75.86. When combined with the Federal Employee Compensation rate of 31%, the total hourly wage rate for this employee is \$98.39. Two of these employees will take one (1) hour to complete all tasks related to the processing of thirty-five (35) completed Form MA-1084 for a total cost \$6,887.59 and one (1) hour to complete all tasks related to processing thirty-five (35) completed Form MA-1085 for a total cost of \$6,887.59. Two employees will take one (1) hour to complete all tasks related to the processing of five (5) completed Form MA-2012 at a total cost \$983.94.

Therefore, the total combined Federal Government cost associated with this collection is \$32,668.50, which was calculated as shown in the table below:

| FTE Grade and Step & CRF Program Related Task | Hourly Wage ¹ | Average Fully Burdened Hourly Cost ² to Federal Government | | Total Employees | | Total Time Per application (Avg. Hours) | | Total Applications | | Total Federal Government Cost |
|--|--------------------------|---|---|-----------------|---|---|---|--------------------|---|-------------------------------|
| GS 15 (Step 10): All tasks associated with MA-1084 | \$93.53 | \$122.52 | * | 1 | * | 1 | * | 35 | = | \$ 4,288.20 |
| GS 15 (Step 10): All tasks associated with MA-1085 | \$93.53 | \$122.52 | | 1 | | 1 | | 35 | | \$ 4,288.20 |

³ 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 15 (Step 10): All tasks associated with MA-2012 | \$93.53 | \$122.52 | 1 | 1 | 5 | \$ 612.60 |
| GS 14 (Step 10): All tasks associated with MA-1084 | \$88.76 | \$116.28 | 1 | 1 | 35 | \$ 4,069.80 |
| GS 14 (Step 10): All tasks associated with MA-1085 | \$88.76 | \$116.28 | 1 | 1 | 35 | \$ 4,069.80 |
| GS 14 (Step 10): All tasks associated with MA-2012 | \$88.76 | \$116.28 | 1 | 1 | 5 | \$ 581.40 |
| GS 13 (Step 10): All tasks associated with MA-1084 | \$75.11 | \$98.39 | 2 | 1 | 35 | \$ 6,887.30 |
| GS 13 (Step 10): All tasks associated with MA-1085 | \$75.11 | \$98.39 | 2 | 1 | 35 | \$ 6,887.30 |
| GS 13 (Step 10): All tasks associated with MA-2012 | \$75.11 | \$98.39 | 2 | 1 | 5 | \$ 983.90 |
| TOTAL FEDERAL GOVERNMENT COST | | | | | | \$ 32,668.50 |

15. Explanation of Program Changes or Adjustments

Since the last renewal the total respondents, responses, and burden hours have reduced from 428, 428, and 1,615 hours to 75, 75, and 108.75 hours respectively. This change is due to the removal of placeholders for collection instruments that will no longer be implemented. The cost burden is also being eliminated since this collection is fully electronic.

16. Publication of Data Collection Results

There are no plans to publish the results of this information collection for statistical purposes.

17. Display of the OMB Expiration Date

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

18. Exceptions to the Certification Statement

There are no exceptions to the certificate statement.