

Justification for 9000-0157, Architect-Engineer Qualifications (SF 330)

A. Justification.

1. **Administrative requirements.** This is a request to renew an existing information collection requirement concerning 9000-0157, Architect-Engineer Qualifications (SF 330).

An interagency ad hoc committee developed Standard Form 330 based on Federal Facilities (FCC) Council Technical Report No. 130, "[Joint Federal-industry] Survey on the Use of Standard Forms 254 and 255 for Architect-Engineer Qualifications," 1996. The Federal Facilities Council is an arm of the Congressionally chartered National Academy of Sciences. The report states that Federal agencies and the architect-engineer industry strongly endorse maintaining a structured format for presenting architect-engineer qualifications. The report also concludes that the Standard Forms 254 and 255 need improvement.

Standard Form 254 was used by all Executive agencies to obtain uniform information about a firm's experience in architect-engineering projects. Architect-engineer firms were encouraged to update the form annually. The information obtained on this form was used to determine if a firm should be solicited for architect-engineer projects.

Standard Form 255 was used by all Executive agencies to obtain information from architect-engineer firms interested in a particular project. The information on the form was reviewed by a selection panel composed of professional people and assisted the panel in selecting the most qualified architect-engineer firm to perform the specific project. The form was designed to provide a uniform method for architect-engineer firms to submit information on experience, personnel, and capabilities of the architect-engineer firm to perform along with information on the consultants they expected to collaborate with on the specific project.

Both Federal and industry architect-engineer practitioners believed that the forms needed to be both streamlined and updated to facilitate electronic usage. Hence, the Standard Form 254 and Standard Form 255 have been consolidated into Standard Form 330. The Standard Form 330 reflects current architect-engineer practices in a streamlined and updated form organized in data blocks that readily support automation.

Standard Form 330 replaces Standard Forms 254 and Standard Form 255.

The Standard Form 330 accomplishes the following:

- Merges the Standard Form 254 and 255 into a single streamlined Standard Form 330.
- Expands essential information about qualifications and experience. The required new data includes:
 - An organizational chart of all participating firms and key personnel.
 - For all key personnel, a description of their experience in 5 relevant projects.
 - A description of each example project performed by the project team (or some elements of the project team) and its relevance to the agency's proposed contract, instead of a simple listing of projects by title as now required on the Standard Form 255.
 - A matrix of key personnel who participated in the example projects. This matrix graphically illustrates the degree to which the proposed key personnel have worked together before on similar projects.
- Reflects current architect-engineer disciplines, experience types and technology.
- Eliminates information of marginal value. The eliminated data includes:
 - A list of all offices of a firm (whether or not they will be involved in the contract).
 - The number of personnel in each office.
 - All work currently being performed for Federal agencies.
 - Requires only annual average professional services revenues over the last 3 years in lieu over each of the last 5 years as currently required by the Standard Form 254. The revenue information is primarily used to evaluate a firm's capacity to perform a contract in the required time period, by

- comparing the estimated contract amount to the firm's annual volume of work. Revenue for each recent year is more detailed than for this purpose.
- Permits limited submission length thereby reducing costs for both the architect-engineer industry and the Government. Lengthy submissions do not necessarily lead to a better decision on the best-qualified firm. The proposed Standard Form 330 indicates that agencies may limit the length of firm's submissions, either certain sections or the entire package. The Government's right to impose such limitations was established in case law (Coffman Specialties, Inc., B-284546. N-284546/2, 2000 U.S.Comp.Gen.LEXIS 58, May 10, 2000).
 - Facilitates electronic usage by organizing the form in data blocks. Standard Forms 254 and 255 are not organized in this manner.
 - Permits companies to maintain electronic copies of the form to reduce the burden of filling out a new form for each bid proposal.

This information collection, in compliance with 40 U.S.C. 541-544, is necessary to select architect-engineer contractors.

2. Uses of information. Standard Form 330, Part I is used by all Executive agencies to obtain information from architect-engineer firms interested in a particular project. The information on the form is reviewed by a selection panel composed of professional people and assists the panel in selecting the most qualified architect-engineer firm to perform the specific project. The form is designed to provide a uniform method for architect-engineer firms to submit information on experience, personnel, and capabilities of the architect-engineer firm to perform along with information on the consultants they expect to collaborate with on the specific project.

Standard Form 330, Part II is used by all Executive agencies to obtain general uniform information about a firm's experience in architect-engineering projects. Architect-engineer firms are encouraged to update the form annually. The information obtained on this form is used to determine if a firm should be solicited for architect-engineer projects.

3. Consideration of information technology. We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically. The new Standard Form 330 was designed to facilitate electronic usage by organizing the form in data blocks. The two standard forms, i.e., Standard Forms 254 and 255, are not organized in a manner to facilitate electronic usage.

4. Efforts to identify duplication. This requirement is being issued under the Federal Acquisition Regulation (FAR) which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

5. If the collection of information impacts small businesses or other entities, describe methods used to minimize burden. The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices. The Standard Form 330 requires only annual average professional services revenues over the last 3 years in lieu over each of the last 5 years required by the old Standard Form 254. The revenue information is primarily used to evaluate a firm's capacity to perform a contract in the required time period, by comparing the estimated contract amount to the firm's annual volume of work. Revenue for each recent year is more detailed than for this purpose. Further, the 4 and 5-year-old revenue information is not very meaningful. The 3-year basis for annual average revenue also correlates with the period used in defining the small business size standard for architect-engineer firms.

6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently. Collection of information on a less frequent basis is not practical. The information is needed to select an architect-engineer firm for a contract.

7. Special circumstances for collection. There are no special circumstances associated with this collection.

8. Efforts to consult with persons outside the agency. Under the procedures established for development of the FAR, agency and public comments were solicited. A notice was published in the Federal Register at 71 FR 67341, November 21, 2006. No comments were received.

9. **Explanation of any decision to provide any payment or gift to respondents, other than reenumeration of contractors or guarantees.** Not applicable.

10. **Describe assurance of confidentiality provided to respondents.** This information is disclosed only to the extent consistent with prudent business practices and current regulations.

11. **Additional justification for questions of a sensitive nature.** No sensitive questions are involved.

12. **Estimated total annual public hour burden.** The old Standard Form 254, Architect-Engineer and Related Services Questionnaire, stated it took 1 hour to complete; and the old Standard Form 255, Architect-Engineer and Related Services Questionnaire for Specific Project, stated it took 1.2 hours to complete. From experience, it was proven that these hours were substantially underestimated. The Standard Form 330, Architect-Engineer Qualifications, has been developed by an interagency ad hoc committee, based on Federal Facilities (FCC) Council Technical Report No. 130, "[Joint Federal-industry] Survey on the Use of Standard Forms 254 and 255 for Architect-Engineer Qualifications," 1996.

Public reporting burden for this collection of information is estimated to average 29 hours (25 hours for Part I and 4 hours for Part II) per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Because of the tailoring required by the form for each project submittal, there are virtually no savings in burden hours by repeat submittals. The annual reporting burden is estimated as follows:

Annual Reporting Burden

	<u>Proposed</u>
Respondents.....	5,000
Responses per year.....	<u>x 4</u>
Total annual responses.....	20,000
Review time per response.....	<u>x 29*</u>
Total burden hours.....	580,000

Average wages + overhead (\$46/hr + 75%OH).... x \$80.50
 Total cost to the public.....\$46,690,000

*25 hours for Part I and 4 hours for Part II.

A new analysis was not conducted because there were no changes made to this collection that would affect the burden and no comments were received from any respondent. Therefore, it is determined that no changes to this collection are warranted.

13. **Estimated total annual public cost burden.** We estimate no annual cost burden other than the burdens shown in Items 12 and 14.

14. **Estimated cost to the Government.** We estimate 4 hours total for Standard Form 330, Part I and 1 hour total for Part II. This estimate is based on a review panel of 4 persons at the GS 13 level.

Proposed

Total responses.....20,000
 Review hours per response.....x 5*
 Total burden hours.....100,000
 Average wages + overhead (\$61/hr.+100%OH)....x \$122**
 Total Government cost.....\$12,200,000

*Based on a review panel of 4 persons (4 hours total for Part I and 1 hour total for Part II).

** \$61hr.(GS 13 Step 1)/100%OH

15. **Explain reasons for program changes or adjustment reported in Item 13 or 14.** Not applicable.

16. **Outline plans for published results of information collection.** Results of this information collection will not be published.

17. **Approval not to display expiration date.** Not applicable.

18. **Explanation of exception to certification statement.** No applicable.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.