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## 19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3). Appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official:  X	Date:
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Signature of Senior Officer or Designee:  X Lillian L. Deitzer, Departmental Reports Management Officer Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer	Date:
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# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The HUDAR (48 CFR 24) contains the Department's supplement to the Federal Acquisition Regulations (FAR) 48 CFR Chapter 1. The FAR sets forth uniform policies and procedures applicable to Federal agencies in the procurement of personal property and non-personal services (including construction) and the procurement of real property by lease.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Proposed HUDAR requirements for the collection of information are:

HUDAR 2452.208-70, Selection of Contractor for Task Orders Under GSA Schedule Contracts, requires contractors under GSA schedule contracts who wish to compete for a HUD-issued task order to submit information concerning their technical ability, proposed personnel, past performance, and use of small business subcontracting. This information is collected once during the competitive task order award process to evaluate contractors' proposed prices and other factors (e.g., past performance under other orders, qualifications of proposed staff) relevant to the task orders.

HUDAR 2452.209-70, Potential Organizational Conflicts of Interest, is inserted in solicitations if the HUD contracting officer has information that indicates that the requirements of the proposed contract may lead to organizational conflicts of interest. The contracting officer provides a specific description of those portions of the contract's requirements that are considered to present potential conflicts of interest. Offerors only address potential conflicts with those specific portions and not with the entire solicitation. All offerors must submit a written statement describing any past, present or planned interests (financial, contractual, organizational, or otherwise) relating to the specific portions of the proposed contract cited in the provision and bearing on whether the offeror has a possible organizational conflict of interest. Offerors are not required to provide any information unless the contracting officer identifies any area(s) of potential conflict of interest. This information is collected once from offerors during the contract proposal solicitation process.

HUDAR 2452.209-72, Organizational Conflict of Interest, in part, requires contractors to provide a written description of potential or actual conflicts of interest which arise during contract performance and their plan for mitigating or eliminating the conflict. This information is required infrequently, approximately two submissions annually.

HUDAR 2452.215-70, Proposal Content and Outline, is included in all solicitations for negotiated contracts. It provides standard instructions on proposal preparation (e.g., contents and format) and submission. If the proposed contract requires contractor employees to have access to Departmental information systems, the provision is used with its Alternate II. This Alternate requires offerors to describe the security measures they propose to use to protect the systems and data to which they will have access, as required by HUDAR clause 2452.239-70. This information is collected once during the contract proposal solicitation process.

HUDAR 2452.216-72, Determination of Award Fee Earned is included in solicitations and contracts when the Contracting Officer has determined that use of a cost-plus-award-fee type contract is appropriate in accordance with FAR Subpart 16.4. This clause permits contractors to provide a self-evaluation in support of their award fee to be earned. Submission is solely at the contractor's discretion. This information is provided when the award fee for each contract period is determined, usually no more frequently than annually.

HUDAR 2452.216-78, Ordering Procedures, Alternate II, requires contractors to submit information when competing for completion type task orders under multiple-award indefinite-quantity contracts other than GSA Schedule contracts, in accordance with FAR 16.505. Typically, such information may include pricing, past performance information and the qualifications of proposed key staff. This information is collected once for each task order competition. Only those contractors wishing to compete for the immediate order are required to submit the information. HUD does not

award a significant number of its own multiple-award indefinite-quantity contracts. Rather, it issues the vast majority of its competitive task orders under GSA Federal Supply Schedule contracts. Therefore, the incidence of use for this clause is quite low.

HUDAR 2452.219-70, Small Business and Small Disadvantaged Business Subcontracting Plan, requires other than small businesses to submit with their initial offers the subcontracting plan required by FAR clause 52.219-9. This enables HUD to make a timely review of the plans and negotiate an acceptable plan with the successful offeror by contract award. This information is also used to perform the evaluation provided for under HUDAR 2452.215-71 (see above). This information is collected during the contract proposal solicitation process. Revisions to the plan may be required during this process.

HUDAR 2452.237-70, Key Personnel, is included in contracts when the Contracting Officer determines it is necessary to ensure contract performance by identifying the contractor's key personnel who will be assigned to the contract. The clause prohibits contractors from diverting any of the individuals named in the clause from working on the contract without prior notification to the Contracting Officer. The notification must include the justification for the individual's removal, replacement or reduction in hourly effort. The contractor normally submits a curriculum vitae or other similar documentary evidence of the replacement personnel's qualifications. This information is collected initially during the contract proposal solicitation process and once per individual replacement during the contract's performance period.

HUDAR 2452.237-75, Access to HUD Facilities is included in contracts when contractor employees will have access to HUD facilities. It requires contractors to submit existing standard forms which have separate OMB clearance and no burden is included (Standard Form (SF) 85, "Questionnaire for Non-sensitive Positions;" and a partially-completed Optional Form (OF) 306, "Declaration for Federal Employment") providing information needed by the Department to perform background investigations of such contractor employees in accordance with Federal Information Processing (FIPS) Standards 201, Department of Homeland Security Presidential Directive (HSPD) 12, and Office of Management and Budget Memorandum M-05-24, Implementing Guidance for HSPD-12. Principal collection is made once at the beginning of the contract. Information on additional contractor employees is collected as needed (e.g., new employee hires or assignments to the contract). If the contract also includes HUDAR clause 2452.239-70, these forms will be collected only once for use in conducting the background investigation required by both clauses, i.e., there will be no duplication of collection for the two clauses.

HUDAR 2452.239-70, Background Investigations for Sensitive Automated Systems/Applications, is included in contracts that involve work on, or access to, sensitive Departmental automated information systems or applications. The clause requires contractors to submit standard forms which have separate OMB clearance and no burdens are included, (Standard Form (SF) 85, "Questionnaire for Non-sensitive Positions;" SF-85P, Questionnaire for Public Trust Positions; a partially-completed Optional Form (OF) 306, "Declaration for Federal Employment") providing information needed by the Department to perform background investigations of such contractor employees in accordance with Federal Information Processing (FIPS) Standards 201, Department of Homeland Security Presidential Directive (HSPD) 12, and Office of Management and Budget Memorandum M-05-24, Implementing Guidance for HSPD-12. Principal collection is made once at the beginning of the contract. Information on additional contractor employees is collected as needed (e.g., new employee hires or assignments to the contract). If the contract also includes HUDAR clause 2452.237-75, only those additional forms required by this clause not will be collected from contractor employees, i.e., there will be no duplication of collection for the two clauses.

HUDAR 2452.242-71, Project Management System, requires all contracts for professional or technical services of a developmental or analytical nature exceeding \$500,000 to include a requirement for the use of systematic project planning and progress reporting. Collection of the initial plan information is made once at the beginning of the contract. Revisions may be required if and when there is a change to the contract requirements or to the contractor's approach to performing the work. Reporting is no more frequent than monthly.

HUDAR 2453.227-70, Form HUD-770, Report of Inventions and Subcontracts, is required in contracts under which the work may require the development of inventions by the prime contractor or any subcontractor. This information is collected once at contract completion.

Contractor's Release is required from all contractors under cost-reimbursement type contracts upon contract completion as part of the administrative closeout process in accordance with FAR Subpart 4.8. It releases HUD from any liabilities, claims and demands with noted exceptions. This information is collected once at contract completion.

Contractor's Assignment of Refunds, Rebates, Credits and Other Amounts is required from all contractors under cost-reimbursement type contracts upon contract completion as part of the administrative closeout process in accordance with FAR Subpart 4.8. This assigns to HUD all rights, title and interest to all refunds, rebates, etc. arising out of performance of the contract. This information is collected once at contract completion.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Information and access to information collection instruments (forms) for likely respondents is provided at our websites. A single automated response process is not practicable. It is not cost effective to automate at this time.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Procurements of services and products are conducted on a discrete, as-needed basis. HUD program officials are required to conduct formal planning for their procurement requirements, which includes ensuring that services and products to be procured are not already being provided via an existing contract, or are otherwise available within the Government. All of the reporting requirements listed in 2 above are contract specific, and therefore, cannot be duplicative.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.

HUD seeks to not impose any more burden on small businesses or other small entities than is minimally required to meet the data collection requirements of the Federal Acquisition Regulation and other Federal contracting-related guidance (e.g., OMB Circulars). The Department has eliminated all of its existing non-statutorily based solicitation certifications.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The minimum amount of information is collected to avoid waste, abuse and fraud and comply with Federal regulations.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies 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;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than 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;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

HUDAR 2452.242-71, Project Management System—The information reporting required by this clause enables HUD to monitor contractor progress on large, high dollar value, developmental contract efforts and determine if the contractor is making the most beneficial use of resources, methods, etc. Without this information, HUD would not be able to track contractor expenditures against completion of work and would risk expenditure of contract funds without project completion and/or receipt of inappropriate or unusable products.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in

response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

- Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
- Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), the agency's notice soliciting public comments was announced in the *Federal Register* on January 16, 2009 (Vol. 74, No. 11, pages 3093). No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment is provided.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.

In accordance with FAR 3.104-4, it is agency policy that all offers received for contract awards are kept confidential. No information contained in offers is provided to the public or HUD staff without a need to know prior to award. Prior to award, no information contained in offers is disclosed to the general public or to HUD personnel who do not have a need to know. HUD employees who serve on contractor selection panels must certify in writing their compliance HUD's confidentiality policy in writing. After award, HUD strictly follows the release of information rules provided for under the Freedom of Information Act and FAR Subpart 24.2.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

None of the information collection described herein includes questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;
- if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
- provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13. Estimate of burden: (Cost computed using hourly rate equivalent to GS-12. This is an average rate considering that submissions require varying degrees of expertise in their completion.)

	<u>Number of Respondents</u>	<u>Frequency of Response</u>	<u>Hours to Prepare Response</u>	<u>Total Hours</u>	<u>Total Cost</u>
HUDAR:					
2452.208-70	700	1/annum	8.0	5,600	\$191,240
2452.209-70	250	1/annum	0.5	125	4,269
2452.209-72	5	1/annum	1.0	5	171
2452.215-70	275	1/annum	80.0	22,000	751,300
2452.215-70 ALT II	25	1/annum	40.0	1,000	34,150
2452.216-72	5	4/annum	2.0	40	1,366
2452.216-78 ALT II	1,500	1/annum	4.0	6,000	204,900
2452.219-70	150	1/annum	0.5	75	2,561
2452.237-70	150	1/annum	1.0	150	5,123
2452.237-75	500	1/annum	1.0	500	17,075
2452.239-70	500	1/annum	1.0	500	17,075
2452.242-71	40	1/annum	8.0	320	10,928
(plan)					
2452.242-71	40	12/annum	6.0	2,880	98,352
(reports)					
HUD 770	2	1/annum	0.5	1	34
Totals:	3,200**			39,196	\$1,338,544

\*The following forms have separate OMB clearance- no burden included here:

SF-85 Questionnaire for Non-Sensitive Positions 3206-0005

SF-85P Questionnaire for Public Trust Positions 3206-0191

OF-306 Declaration for Federal Employment 3206-0182

\*\*Total number of respondents is difficult to quantify as there is significant duplication among the various information collection populations.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The information collection under the HUDAR does not impose any additional capital and start-up costs or operation and maintenance purchase of services beyond those reasonably expected of businesses performing the services required under HUD's contracts. Contractors are expected to have in place the basic office equipment and services that will also be used for information submission.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Pre-award collection activity:

Proposal Evaluation. Approximately 250 proposals are received annually. Each proposal is evaluated by an average of three technical/program staff (average grade of GS-12) and the Contract Specialist (CS)<sup>1</sup>. Each review takes an average of 4 hours.

250 proposals x 4 persons x 4 hours x \$27.13/hr = \$108,520

HUDAR 2452.208-70, Selection of Contractor for Task Orders Under GSA Schedule Contracts. Approximately 700 responses are submitted annually. Each submission is reviewed by the CS and one technical/program staff person (normally, the Government Technical Representative<sup>2</sup>, GTR, which is HUD's title for the "Contracting Officer's Technical Representative," or "COTR"). Each review takes approximately 2 hours.

700 submissions x 2 persons x 2 hours x \$34.15/hr = \$95,620

HUDAR 2452.209-70, Potential Organizational Conflicts of Interest. Review to ensure this certification has been included and completed takes a CS approximately 0.1 hour.

250 proposals x 0.10 hour x \$34.15/hr = \$854

HUDAR 2452.215-70, Proposal Content and Outline ALT II. HUD reviews approximately 275 proposals annually under this provision. Review of proposals to verify submission of all information required by this provision takes approximately 1.0 hour by a CS.

275 proposals x 1 hour x \$34.15/hr = \$9,391

HUDAR 2452.219-70, Small Business and Small Disadvantaged Business Subcontracting Plan. Approximately 150 plans are submitted for review annually. Review by a CS takes approximately 1.0 hour.

150 Subcontracting plans x 1.0 hour x \$34.15/hr = \$5,123

Post-award collection activity:

HUDAR 2452.209-72, Organizational Conflict of Interest. Approximately 5 contracts are affected annually, requiring one submission per contractor. The CS (3 hours) and Contracting Officer<sup>3</sup> (CO) (3 hours) must review this information and determine a course of action.

5 contracts x 3 hours x \$34.15/hr = \$512

5 contracts x 3 hours x \$48.00/hr = \$720

Subtotal \$1,232

HUDAR 2452.216-72, Determination of Award Fee Earned. Review of contractor's self-assessment for award fee earned is made by a panel of contracting and technical staff (average grade of GS-14). Review is conducted quarterly on approximately 5 contracts. Review takes 3 hours.

5 contracts x 4 quarterly submissions x 3 persons x 3 hours x \$48/hr = \$8,640

HUDAR 2452.216-78, Ordering Procedures. Requires review of pricing and other information related to task order selection. An estimated 1,500 submissions are reviewed annually. Each submission is reviewed by CS and a technical staff person (e.g., GTR). Estimated 1.0 hour required per review.

1,500 submissions x 2 persons x 1.0 hour x \$34.15/hr = \$102,450

HUDAR 2452.237-70, Key Personnel. Requires review of contractor's justification to divert key personnel from the work under the contract. Approximately 150 submissions annually. Review conducted by CS (0.5 hour) and GTR (1 hours).

150 contracts x 1.5 hours x \$34.15/hr = \$7,684

HUDAR 2452.237-75, Access to HUD Facilities. Clearance forms are reviewed by GTR (0.25 hour) and Personnel Security Specialist (GS-12; 0.75 hour) prior to forwarding for investigation. Approximately 500 submissions are made annually.

500 submissions x 1.0 hour x \$34.15/hr = \$17,075

HUDAR 2452.239-70, Access to HUD Systems. Background information forms are screened by the GTR (0.25 hour) and then reviewed by Personnel Security staff (GS-12; 0.75 hour). Approximately 500 submissions require review annually.

500 submissions x 1.0 hour x \$34.15/hr = \$17,075

HUDAR 2452.242-71, Project Management System. Approximately 40 contracts require these monthly reports. Each report is reviewed by the GTR (1.0 hrs) and the CS (1.0 hrs).

40 contracts x 12 reports/annum x 1.0 hours x 2 persons x \$34.15/hr = \$32,784

HUDAR 2453.227-70, Form HUD-770, Report of Inventions and Subcontracts. Approximately 2 contracts per year require submission of this report. The report is reviewed by the CS (0.5 hr).

2 reports x 0.5 hour x \$34.15/hr = \$34

#### Payment requests:

Vouchers. Approximately 100 cost-reimbursement contracts have vouchers submitted monthly for payment. Each invoice is reviewed by the GTR (0.5 hour), CS (0.5 hour) and Accounts Payable Clerk GS-9 (0.5 hour).

100 contracts x 12 vouchers x 0.5 hour x 2 persons x \$27.13/hr = \$32,556

100 contracts x 12 vouchers x 0.5 hour x 1 person x \$18.71/hr = \$11,226

Subtotal \$43,782

Invoices. Approximately 300 invoices for payment under fixed-price contracts and simplified acquisitions are received annually. Each invoice is reviewed by the GTR (0.5 hour), CS (0.5 hour) and an Accounts Payable Clerk GS-9 (0.5 hour).

300 invoices x 2 persons x 1.0 hour (GTR + CS) x \$27.13/hr = \$16,278

300 invoices x 1 person x 0.5 hr x \$18.71/hr = \$2,807

Subtotal \$19,085



Contractor's Release and Contractor's Assignment of Refunds, Rebates, Credits and Other Amounts. This information is submitted by contractors at the completion of cost-reimbursement type contracts as part of contract closeout. Approximately, 150 contracts are closed out annually. The CS reviews the information (1 hr).  
 150 contracts x 1 hour x \$27.13/hr = \$4,070

Summary of Costs to the Government:

Proposal Evaluation \$

HUDAR:

- 2452.208-70
- 2452.209-70
- 2452.209-72
- 2452.215-70, ALT II
- 2452.219-70
- 2452.216-72
- 2452.216-78
- 2452.237-70
- 2452.237-75
- 2452.239-70
- 2452.242-71
- 2453.227-70, Form HUD-770

Review of vouchers/invoices  
 Contractor's Release/Assignment

Total cost to Government \$

<sup>1</sup> Unless specifically otherwise indicated, the hourly rate for a Contract Specialist is that of a Grade 12, Step 5 from the General Schedule for the Washington, DC locality - \$34.15.  
<sup>2</sup> Unless specifically otherwise indicated, the hourly rate for a Contracting Officer is that of a Grade 14, Step 5 from the General Schedule for the Washington, DC locality - \$48.  
<sup>3</sup> Unless specifically otherwise indicated, the hourly rate for a GTR is that of a Grade 12, Step 5 from the General Schedule for the Washington, DC locality - \$the GTR hourly rate is calculated at the Grade 12, Step 5 amount from the current General Schedule, i.e., \$28.73.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.  
 This is an extension of a currently approved collection. There are no changes or adjustments. This requires competing contractors to submit pricing and other information. Based upon historical information, approximately 700 submissions from competing contractors will be obtained annually and preparation of offers that comply with the standard criteria will take approximately 8 hours each.
16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.  
 HUD has no plans to publish any of the information collected.
17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.  
 HUD is not seeking to not display the OMB expiration date.
18. Explain each exception to the certification statement identified in item 19.  
 None

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**B. Collections of Information Employing Statistical Methods**

None

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