**Supporting Statement for Paperwork Reduction Act Submission**
**3090-0014 –Standard Form (SF) 123/123-A, Transfer Order-Surplus Personal Property and Continuation Sheet**

## 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 SF 123/123A is required by the Administrator of General services to carry out his discretionary authority under 40 USC to transfer Federal surplus personal property for donation. A copy of the statute and the promulgating regulation is attached.

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.**

If the forms were to be discontinued, the Government would be in the anomalous position of being unable to donate its surplus property as required by law. Rather than being a request to the public for information, the SF 123/123-A serves as the instrument for transferring Government surplus property to eligible recipients. Initially, the form is used to request the transfer of donable property. When the property request is approved, the form becomes a binding contract between the Government and the recipient that spells out the terms and conditions under which the property is being transferred. The form is authorized for use by—

a. State Agencies for Surplus Property requesting transfer approval of property to public agencies for public purposes, such as conservation, economic development, education, parks and recreation, public health, public safety, programs for the homeless, and programs for the elderly; to nonprofit educational or public health activities, including programs for the homeless; and to nonprofit activities that conduct programs for the elderly;

b. Service educational activities (any educational activity designated by the Secretary of Defense as being of special interest to the armed services. Includes maritime academies or military, naval, Air force or Coast Guard preparatory schools and the following national organizations: American National Red Cross, Armed Services YMCA of the USA, Big Brothers/Big Sisters of America, Boy Scouts of America, Boys Clubs of America, Campfire, Inc., Center for Excellence in Education, Girl Scouts of the USA, Little League Baseball, Inc., National Ski Patrol System, Inc., Naval Sea Cadet Corps, Operation Raleigh, United Serves Organizations, Inc., United States Olympic Committee, and the Young Marines of the Marine Corps League); and

c. Public airport managers and State aeronautical commissions for public airport purposes.

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.**

Standard Form 123 is now generated electronically by the property management computer system – GSAXcess®. State Agencies for Surplus Property need only enter the quantity of the item they are requesting and verify other data that is resident in the system and will be printed on the form.

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.**

Duplicative forms were eliminated when the SF 123/123-A was first issued. After March 1, 1965, the SF 123/123-A replaced Form 13, Application for Donation of Surplus Personal Property (Service Educational Activities, Department of Defense); HEW Form 135, Application for Surplus Property; HEW Form 136, Notice of Determination, Surplus Personal Property; and FAA Form 3130, Application for Donation of Surplus Personal Property.

5. **If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.**

Not applicable. Small businesses or other small entities are not involved.

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.**

There is no set frequency for submitting a SF 123/123-A; the form may be submitted whenever an eligible donee has a need for the property that is available for donation.

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 often than quarterly;**
- **Prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Submit more than an original and 2 copies of any document;**
- **Retain records, other than health, medical, government contracts, grant-in-aid, or tax records, for more than 3 years;**

- **In connection with a statistical survey, that is not designed to produce valid, reliable results that can be generalized to the universe of study;**
- **Require the use of a statistical classification that has not been reviewed and approved by OMB;**
- **Include 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**
- **Submit proprietary trade secrets, 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.**

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.**

The notice published in the *Federal Register* at 78 FR 18715, April 24, 2009, made this requirement available to the public and requested comments. No comments were received.

**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 on 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 may preclude consultation in a specific situation. These circumstances should be explained.**

The form is used in a manner consistent with the guidelines in 5 CFR 1320.8.

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

Records on earlier outside consultations are not available.

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

No assurance of confidentiality is provided.

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.**

No questions of a sensitive nature are asked.

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 for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13.**
- **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.**

The estimated number of respondents annually is 45,413. 1% of the responses are done manually (454 forms) requiring an estimated 8 minutes to prepare (.15 hours), the other 99% of the forms (44,959 forms) are completed electronically requiring an estimated 1 minute to prepare (.017), for at total of 810 hours

Cost Computation (SF 123)

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| Hourly wage | $10.00 |
| Number of burden hours | 810 |
| Annual number of completed forms | 45,413 |

Annual hour burden cost to respondents $8099

13. **Provide an estimate for 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) total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and 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.**

Burden hours for the SF 123/123-A are based on the number of transfer documents that are approved by GSA. See current SF 83 for estimates of burden.

14. **Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include qualification 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Estimate of the burden hours to the Federal Government is 1135 hours. Reviewing and processing each response should take approximately 1.5 minutes; the total number of responses is estimated to be 45413 each year. 40 forms are processed an hour x 45413 responses = 1135 hours.

The estimated annual cost to the taxpayer is $39,736.38 (using the above reference of 1135 burden hours x $35 per hour [GS-12, step 1 salary GA]).

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| Total annual request | 45413 |
| Estimated processing time | 1.5 minutes |
| Burden hours | 1135 |
| Average Cost/hr | $35 |
| Total Government Cost | $39,736.38 |

15. **Explain the reasons for any program changes or adjustments reported in Items 13 or 14.**

There is no change in requirement.

16. **For collections 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.**

Not applicable. Results are not published for statistical use.

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.**

Not applicable.

18. **Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act Submissions".**

None.

## B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results.

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

   - Statistical methodology for stratification and sample selection,
   - Estimation procedure,
   - Degree of accuracy needed for the purpose described in the justification,
   - Unusual problems requiring specialized sampling procedures, and
   - Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved it they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency