

**Supporting Statement for Paperwork Reduction Act Submission
3090-0112 – Federal Management Regulation; GSA Form 3040, State Agency
Monthly Donation Report of Surplus Property**

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.

GSA Form 3040 - is required by the Administrator of General Services to carry out his authority under Public Law 94-519 the Federal Property and Administrative Services Act of 1949. The law provides for a partnership of Federal and State governments in the conduct of the donation program, fair and equitable distribution of available property, and periodic submission of reports provide program overview. A copy of the statute and 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.

The 3040 reports are required by the Administrator of General Services to carry out his discretionary authority to transfer surplus personal property for donation and to report to Congress on the status and progress of the donation program. Data provided by State agencies on the GSA Form 3040 is used by the GSA Central Office Donation Division in the preparation of the annual and biennial reports to Congress, as well as in evaluating regional and State agency performance in carrying out their donation responsibilities.

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.

GSA is initiating discussion with State Agencies to determine the feasibility of electronically transmitting information in the future. This would require interfacing between a multitude of varying State disposal systems and the Federal Electronic Disposal System.

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.

The 3040 report is the only means of collecting this information we solely depend on the submission of this report by the States to collect this information.

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5. If the collection of information impacts small businesses or other small entities (item 5), 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.

The quarterly reports are required by GSA to track trends donation activity as well as for cross-referencing and defining other reports for the purpose of overseeing the Donations Program.

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.**

Not applicable – Federal Property Management Regulation 102-37.360 requires submission of the 3040 Report on a quarterly basis. Frequencies for less than quarterly would not provide GSA with the timely information needed for effective program overview and control.

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

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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 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.

Not applicable

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

Not applicable

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.**

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- **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.**

Estimates were obtained through discussions with selected respondents on the time required to collect, prepare, and transmit the information on the form. There are currently 55 State agencies, each of which are required to submit four reports each year. It takes an administrative assistant about a half hour to assemble reports and input figures. It takes 1 hour to review and analyze information. Annual cost to the respondents is unknown. Collection processes and administrative procedures impacting the cost vary for each State Agency.

Estimated respondents/yr.....	55
Number of response per respondent.....	<u>4</u>
Total Responses annually	220
Estimated hours/response	<u>1.5</u>
Estimated total burden hours	330

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**

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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.**

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.

Estimated annual cost to the Federal Government. The Federal cost has been estimated at \$6241.40. It was calculated as follows, based on the wages of a GS-5 and GS-12 who take a combined total of approximately 1.5 burden hours to process each form:

GS-5 @ \$11.59 per hr = 30 minutes @ \$5.80
 GS-12 @ \$25.47 per hr = 60 minutes @ \$25.47
 Total = \$31.27 per form
 220 reports = \$6241.40

GS-5

Reviewing Time/hr	30 minutes
Requests/year	<u>220</u>
Review Time/year	110 hours
Average Cost/hr	<u>\$5.80</u>
Government Cost	\$638.00

GS-12

Reviewing Time/hr	1 hour
Requests/year	<u>220</u>
Review Time/year	220 hours
Average Cost/hr	<u>\$25.47</u>
Government Cost	\$5603.40

Government Cost (GS-5 and GS-12)	\$638.00
	<u>\$5603.40</u>
Total Government Cost	\$6241.40

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

The adjustment is due to a combination of factors. One, it takes the administrative assistant less time (half hour less) to assemble packages and input figures, but more time to review and analyze information (one hour more). This causes an increase of a half hour per report.

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.

The 3040 reports are tabulated and analyzed by General Services Administration on a quarterly basis and used to evaluate regional and State agency performance in carrying out their donation responsibilities. Biennially, a report containing cumulative 3040 data and an evaluation of the Donation Program is published and submitted to Congress for their review

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 Item 19, “Certification for Paperwork Reduction Act Submissions”.

. No exceptions

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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. When Item 17 is checked, “Yes,” the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

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 if 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