

Supporting Statement for Department of Veterans Affairs (VA)
Acquisition Regulation (VAAR) Provision 852.211-72,
Technical Industry Standards,
OMB No. 2900-0586

A. Justification

1. This Paperwork Reduction Act (PRA) submission seeks an extension of Office of Management and Budget (OMB) approval No. 2900-0586 for collection of information for both commercial and non-commercial item, service, and construction solicitations and contracts using provision 852.211-72, Technical Industry Standards. The provision number has been changed from 852.210-75 to 852.211-72 with no other changes.
2. VAAR provision 852.211-72, Technical Industry Standards, requires that items offered for sale to VA under the solicitation conform to certain technical industry standards, such as Underwriters Laboratory (UL) or the National Fire Protection Association, and that the contractor furnish evidence to VA that the items meet that requirement. The evidence is normally in the form of a tag or seal affixed to the item, such as the UL tag on an electrical cord or a tag on a fire-rated door. This requires no additional effort on the part of the contractor, as the items come from the factory with the tags already in place, as part of the manufacturer's standard manufacturing operation. Occasionally, for items not already meeting standards or for items not previously tested, a contractor will have to furnish a certificate from an acceptable laboratory certifying that the items furnished have been tested in accordance with, and conform to, the specified standards. Only firms whose products have not previously been tested to ensure the products meet the industry standards required under the solicitation will be required to submit a separate certificate. The information will be used to ensure that the items being purchased meet minimum safety standards and to protect VA employees, VA beneficiaries, and the public.
3. Collection efforts do not involve the use of automation. The information is specific to each solicitation and to each item of equipment and must accompany the bid or offer. There are no opportunities to use information technology to reduce the reporting burden.
4. There are no duplicated efforts. Each reporting situation is unique and the testing data that must be submitted is unique to the product being offered for sale to the Government.
5. There is no significant impact on small businesses.
6. Failure to collect the information would have a negative impact on VA's ability to ensure that the items being purchased meet minimum safety standards and to protect VA employees, VA beneficiaries, and the public.

7.

a. The information is needed on each product offered for sale to the Government rather than quarterly. There might not be another occasion to require this same information for this same product.

b. The information is submitted with each quotation, bid, or offer. The time for response is the same as the time for submission of the quotation, bid, or offer, which may be fewer than 30 days, especially for lower dollar value solicitations or for commercial items.

c. Only one original is required.

d. There are no records retention requirements.

e. This is not a statistical survey.

f. This does not require the use of statistical data classification.

g. This does not include a pledge of confidentiality.

h. This does not require the submission of proprietary information.

8. Notice regarding use of this clause in all applicable solicitations was published in the Federal Register on March 18, 2010. There were no comments received.

9. No payments or gifts will be provided.

10. No assurances of confidentiality will be provided to respondents.

11. The request for information does not include any questions of a sensitive nature.

12.

a. Estimated number of respondents: 100.

b. Estimated frequency of responses: One response for each contract to be awarded.

c. Estimated average burden per collection: 30 minutes.

d. Estimated total annual reporting burden: 50 hours.

e. Estimated annualized cost: \$750 (50 hours at \$15 per hour).

13.

- a. N/A. There are no capital costs or operating or maintenance costs.
- b. N/A. Costs are not expected to vary widely.
- c. N/A. There are no equipment costs.

14. Estimated annualized cost to the Government: \$275 (50 hours at \$10 per hour plus \$25 printing costs). The information is evaluated upon receipt. If acceptable, no further action is required. Although printing costs are shown, there would be no savings from elimination of this provision, as the provision is included as part of an entire solicitation package and elimination of this one provision would not eliminate any pages from the solicitation.

15. There are no program changes.

16. The results will not be published.

17. This request seeks approval to not display the expiration date for OMB approval. This is an on-going requirement. VA has a continuing need for this information in order to ensure that items being purchased meet minimum safety standards and to protect VA employees, VA beneficiaries, and the public. VA expects to continue use of this provision indefinitely and an expiration date would only tend to confuse the public.

18. This submission does not contain any exceptions to the certification statements.

Collection of Information Employing Statistical Methods:

Statistical methods will not be employed.