

Supporting Statement for Department of Veterans Affairs
Acquisition Regulation (VAAR) Clause 852.270-3, Shellfish
OMB No. 2900-0589

A. Justification

1. This Paperwork Reduction Act submission seeks an extension of Office of Management and Budget approval No. 2900-0589 for collection of information for both commercial and non-commercial item, service, and construction solicitations and contracts for clause 852.270-3, Shellfish.

2. VAAR clause 852.270-3, Shellfish, requires that a firm furnishing shellfish to VA must ensure that the shellfish is packaged in a container that is marked with the packer's State certificate number and State abbreviation. In addition, the firm must ensure that the container is tagged or labeled to show the name and address of the approved producer or shipper, the name of the State of origin, and the certificate number of the approved producer or shipper. This information normally accompanies the shellfish from the packer and is not information that must be separately obtained by the seller. The information is needed to ensure that shellfish purchased by VA comes from a State- and Federal-approved and inspected source. The information is used to help ensure that VA purchases healthful shellfish.

3. Collection efforts do not involve the use of automation. The information required is required to be attached to or made a part of the shellfish packaging at the packing plant. The information is specific to that particular package of shellfish and the information collection cannot be automated.

4. There are no duplicated efforts. Each reporting situation is unique and the 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 shellfish purchased by VA comes from a State- and Federal-approved and inspected source and to help ensure that VA purchases only healthful shellfish.

7.

a. The information is needed with each shipment of shellfish rather than quarterly. Each package or container of shellfish is unique and each must be individually labeled.

b. The information is submitted with each package or container of shellfish provided. The time for response is the same as the time for delivery of the shellfish, which may be fewer than 30 days, depending on the delivery needs of the Government. This should impose no hardship on the seller, since the shellfish is supposed to already be labeled when packaged at the packing plant.

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, page 13211. 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: 1,000.

b. Estimated frequency of responses: One response for each package shipped or delivered.

c. Estimated average burden per collection: 60 seconds.

d. Estimated total annual reporting burden: 17 hours.

e. Estimated annualized cost: \$170 (17 hours at \$10 per hour).

13.

a. There are no capital costs or operating or maintenance costs.

b. Costs are not expected to vary widely.

c. There are no equipment costs.

14. Estimated annualized cost to the Government: None. The tag or label is checked upon receipt of the shellfish to ensure that the product meets specification requirements. The costs to check the tag or label are negligible.

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 the purchase of safe shellfish. VA expects to continue use of this clause indefinitely and an expiration date would only tend to confuse the public.

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

B. Collection of Information Employing Statistical Methods: Statistical methods will not be employed.