

Supporting Statement: 2700-0078

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The NASA Mentor-Protégé Program is designed to incentivize NASA prime contractors to assist small disadvantaged business (SDB) concerns, Historically Black Colleges and Universities (HBCUs), minority institutions (MIs), women-owned small businesses (WOSB) concerns, veteran owned small businesses (VOSB), historically underutilized business zones (HUBZone), NASA SBIR Phase II companies or a nonprofit agency employing the blind or severely disabled (Ability One) in enhancing their capabilities to perform NASA contracts and subcontracts, foster the establishment of long-term business relationships between these entities and NASA prime contractors, and increase the overall number of these entities that receive NASA contract and subcontract awards.

Information is required by NASA to monitor the performance and progress of both the mentor and the protégé firms in this developmental assistance program, as delineated in the mentor-Protégé Agreement. The NASA Office of Small Business Programs (OSBP) is required to manage the Program. One of the internal controls established by the OSBP to achieve the stated program objectives, by serving as a check and balance against undesired actions or consequences, include the review of semi-annual progress reports submitted by the mentors and protégé's, on the protégé's development against the master plan contained in the approved agreement. It is also imperative that regular surveillance occur on these mentor protégé arrangements since approved mentor firms are eligible to earn an award fee associated with their performance as a mentor under the Pilot Program.

The mentor and protégé's progress reports are required by NFS 1819.7213. These semi-annual reports will serve as an internal control measure to achieve Agency objectives and by serving as a check and balance against undesired action or consequences. This requirement is codified at 48 CFR Subpart 1819.72.

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

The information, collected semi-annually on 12 agreements (2009 will be utilized by the OSBP in its program management role to ensure that the Agency objectives are met. Specifically, the OSBP will utilize the reports as a method of determining if developmental assistance provided to small disadvantaged business (SDB's) by prime contractor meets the standards established in NASA policy, which is to enhance the SDB's "high-tech" capability. The prime contractor's performance will determine the degree to which the contractor will be incentivized by earning additional performance fee(s). The Agency's ability to manage the program effectively would be greatly diminished without receiving the described reports, which are part of the ongoing performance fee evaluation process. Absent the reports, NASA would have to expend

resources (financial and manpower) to monitor contractor performance by way of extensive site visits to firms approved for the Mentor-Protégé Program.

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. Also describe any consideration of using information technology to reduce burden.

Reporting is done primarily through electronic submissions via email. There are currently no known plans to implement web-based submissions.

4. Describe efforts to identify duplications.

Clause 1852.219-79, Mentor Requirements and Evaluation, of the NASA FAR Supplement clearly states the reporting requirements of all Mentor-Protégé participants. See answer to question 6 for more detail on the clause requirements

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

The mentor firms that will prepare reports (with some assistance from the protégés) will be large prime contractors. Therefore, the impact on small businesses will be minimal.

6. Describe the consequences to Federal programs or policy activities if the collection is not conducted or is conducted less frequently.

The Mentor-Protégé Program is an initiative that has been institutionalized as a way of doing business and as such its effectiveness in promoting socioeconomic programs is measured through the collection of the semi-annual reports. To continually address the trends in Federal contracting with respect to small disadvantaged businesses, women-owned businesses, historically black colleges and universities, and other minority institutions, veteran owned small businesses, historically underutilized business zones, SBIR Phase II companies, the reports provide the necessary data as a means to evaluate the quality and quantity of subcontracts. In accordance with NASA FAR Supplement clause, 1852.219-79, Mentor Requirements and Evaluation, semi annual reports shall be submitted by the mentor to the NASA Mentor-Protégé Program Manager, NASA Headquarters OSBP, and include the following:

(1) Specific actions taken by the contractor, during the evaluation period, to increase the participation of protégés as subcontractors and suppliers;

(2) Specific actions taken by the contractor during this evaluation period to develop the technical and corporate administrative expertise of a protégé as defined in the agreement;

(3) To what extent the protégé has met the developmental objectives in the agreement;
and

(4) To what extent the firm's participation in the Mentor-Protégé Program resulted in the protégé receiving competitive contract(s) and subcontract(s) from private firms and agencies other than the mentor.

7. Explain any special circumstances that would cause an information collection to be conducted in certain manners.

Each agreement and Mentor-Protégé relationship under the program is a separate and distinct arrangement. The report outlining the progress of each mentor-protégé relationship is unique and cannot be used or modified to describe the progress of other mentor-protégé relationships.

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

Federal Register notice numbers/dates provided in ROCIS.

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

The incentives for a prime contractor performing as a mentor, center primarily on the mentor's ability to earn additional fees under the prime contract with NASA. The aforementioned semi-annual progress reports are intended to become integrated into the fee evaluation process.

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

Not applicable

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.

Not applicable

12. Provide estimates of the hour burden of the collection of information.

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|-------------------------------|------------|
| Number of respondents | 10 |
| Total annual reports | 12 |
| Hours per response, less than | <u>1.5</u> |
| Total Annual Hour Burden | 18 |

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

The estimated annual cost to the contractor is calculated by multiplying the estimated hours (see item 12) by an estimated cost of \$40.00 per hour. The total is \$480 however the respondents are government contractors, who will be reimbursed for their response to the collection, which means they incur no real cost.

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, and any other expenses that would not have been incurred without this collection of information.

Costs associated with this effort are as follows:

Approximate contractor reimbursement for generation of reports – \$480 (\$40x12 hrs)
Small Business Specialist review, incl. filing and record keeping - \$600 (\$50x12 hours)

15. Explain the reason for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

No Change

16. For collections of information intended for publication, outline plans for tabulations and publications.

Data from these reports may be used in Award Fee Evaluations which are not publicized but instead are only shared with the contractor and kept as a part of the contract files. Data from these reports may be included in annual reports initiated by the SDBU office.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display may be inappropriate.

Not Applicable

18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.

Not Applicable