

## SUPPORTING STATEMENT

### A. JUSTIFICATION

1. This is a request for extension of OMB Clearance Number 0704-0231, which will expire on September 30, 2007. In order to incorporate another requirement from Part 237, the title has been changed to "DFARS Subpart 237, Service Contracting, the associated clauses at DFARS 252.237, and DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS)".

The current information collection requirement covered DFARS 237.70 and the clause at 252.237-7011, which requires DoD contractors that provide mortuary services to furnish information regarding the results of the embalming process.

In addition, in order to consolidate the information collection requirements relating to DFARS Part 237 in one clearance, we have transferred 5 hours from OMB Clearance 0704-0187 (currently approve through February 28, 2009), which covers the provision at DFARS 252.237-7000, Notice of Special Standards of Responsibility, paragraph (c), which is for use in solicitations for audit services. Paragraph (c) requires the apparently successful offeror to give the contracting officer evidence that it is licensed by the cognizant licensing authority in the state or other political jurisdiction where the offeror operates its professional practice.

2. The information is used by the contracting officer to-

- a. Verify that the apparently successful offeror in response to a solicitation for audit services is licensed by the cognizant licensing authority in the state or other political jurisdiction where the offeror operates its professional practice.

- b. Ensure that the contractor has properly prepared the body, and by the contract carrier so that the body can be shipped by that carrier. When additional preparation of the body is required subsequent to shipment, information regarding the initial preparation of the body may be used by the contractor for mortuary services to whom the body has been shipped.

3. Improved technology is used to the maximum extent possible. Contractors are now able to obtain and complete DD Form 2063 electronically. Block 13c of DD Form 2063 requires a signature

by the contractor. The government is still developing its procedures to accept electronic signatures from contractors.

4. This rule applies only to the Department of Defense and does not duplicate any other regulation. Similar information is not readily available from any other source.

5. The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

6. Failure to collect this information may result in-

a. Awarding a contract to an offeror that is not licensed by the cognizant licensing authority in the state or other political jurisdiction where the offeror operates its professional practice.

b. Inability to timely verify preparation history, incurring unnecessary expense, or risk of improper preparation of the body when additional preparation is required subsequent to shipment.

7. There are no special circumstances that require the collection of this information to be conducted in any manner cited at 5 CFR 1320.5(d).

8. Collection is consistent with the guidelines in 5 CFR 1320.6. Public comments were solicited in the Federal Register on April 26, 2007 (72 FR 20840) (TAB A). No responses were received.

9. No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

10. This information is disclosed only to the extent consistent with prudent business practices, current regulations, and statutory requirements.

11. No sensitive questions are involved.

12. Estimate of public burden.

a. **252.237-7000, Notice of Special Standards of Responsibility, paragraph (c).** This provision is prescribed at 237.270(d)(1) for use in solicitations for audit services. Paragraph (c) requires the apparently successful offeror to give the contracting officer evidence that it is licensed by the cognizant licensing authority in the state or other political jurisdiction where the offeror operates its professional practice.

We estimate not more than 10 respondents, 1 response per respondent, .5 hours per response, and an estimated cost of \$28 per hour (the equivalent of a GS-9 , step 5 salary plus 32.45 percent burden):

Respondents	10
Responses/respondent	x 1
Responses	10
Hours per response	x .5
Total hours	5
*Cost per hour	x \$28
Total annual cost to public	\$140

b. DFARS 252.237-7011, Preparation History, and DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS). The use of this clause is prescribed at 237.7003(b)(8). The clause states that the contractor will complete a form furnished by the contracting officer. We do not estimate any change from the 2004 estimates with regard to mortuary services, which were based on discussions with mortuary services personnel in the Department of Defense. We estimate that the total cost to the public is as follows:

Number of respondents	800
Responses per respondent	1
Total annual responses	800
Hours per response	0.5
Total response hours	400
*Cost per hour	\$28.00
Total annual estimate of public burden	\$11,200

\* Cost per hour (Based on GS-09 step 5 salary plus 32.45 percent fringe benefit rate. Salary data is from the Office of Personnel Management's 2007 General Schedule. The fringe benefit rate is derived from the Circular No. A-76 Revised Supplemental Handbook (March 1996) (updated through transmittal memorandum 29 May 2003).

c. Total

Number of respondents	810
Responses per respondent	1
Total annual responses	810
Hours per response	0.5
Total response hours	405
*Cost per hour	\$28.00
Total annual estimate of public burden	\$11,340

13. None. We estimate that there are no nonrecurring expenses, (e.g. capital and start-up, or operation and maintenance costs).

14. Annual cost to the Government. The time estimates are based on receiving, reviewing, and analyzing the information submitted by the contractor. We estimate that the time associated with this task is .25 hours per response.

Number of respondents	810
Responses per respondent	1
Total annual responses	810
Hours per response	.25
Total hours	202
*Cost per hour	\$28.00
Total annual cost to the Government	\$5,656

\*Based on GS-09 step 5 salary plus 32.45 percent burden. Salary data is from the Office of Personnel Management's 2003 General Schedule. The fringe benefit rate is derived from the Circular No. A-76 Revised Supplemental Handbook (March 1996) (updated through transmittal memorandum 29 May 2003).

15. Burden increased as a total of the 5 hours have been transferred from OMB Clearance 0704-0187, in order to consolidate Part 237 information collection requirements.

16. Results of this collection will not be published.

17. We do not seek approval to not display the expiration dates for OMB approval of the information collection.

18. There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.**

Statistical methods will not be employed.