Supporting Statement for Information Collection Submission
3090-0080 – Contract Financing Final Payment
(GSAR Part 532 and 552.232-72; GSA Form 1142, Release of Claims)

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.

Monthly payments of building service contractors may be adjusted if the services do not conform with contract requirements. The contractor is notified of the proposed deductions and may provide facts, which justify reconsideration and/or adjustment of the proposed amount to be deducted. However, payments are not delayed or withheld pending resolution of disputes regarding proposed deductions. The contracting officer shall insert the clause at GSAR 552.232-72, Final Payment in all solicitations and contracts for recurring building services expected to exceed the simplified acquisition threshold. This clause requires building services contractors to submit GSA Form 1142, Release of Claims before final payment is made. A similar release is required for construction contractors under FAR clause 52.532-5, Payments Under Fixed Price Construction Contracts.

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 contracting officer will not approve final payment on a construction or building service contract prior to receipt of GSA Form 1142, Release of Claims.

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.

Improved information technology to obtain this information has not been developed. GSA Form 1142, Release of Claims may be completed online and submitted electronically to the Contracting Officer. Savings potential is minimal due to the limited scope of this collection.

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 nature of this requirement is such that it relates to a single contract and cannot be duplicated.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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

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.

Collection of the information on a basis other than contract by contract is not practicable. GSA Form 1142, Release of Claims is used to achieve uniformity and consistency in the release of claims process. Completion of GSA Form 1142, Release of Claims ensures that construction and building services contractors are paid in accordance with their contract requirements and for work performed.

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.**

Collection of the information is not inconsistent with guidelines contained in 5 CFR 1320.6

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 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.

A notice published in the *Federal Register* at 77 FR 2726, on January 19, 2012. No comments were received.

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.

This information is disclosed only to the extent consistent with agency regulations and applicable statutes.

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 sensitive questions are involved.

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.**
- **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.

The estimated number of respondents annually is **2000** service contracts with each response requiring **.1** hour to complete the form, for a total of **200** hours.

The estimated annualized cost to the public is $4200 (Using the above reference, 2000 service contracts at .1 hour per request = 200 total burden hours x $21 per hour ($12 plus (75 percent of $12) $9) = $4200.

Total Annual Requests	2000	
Estimates hours/response	.1	
Estimated total burden/hours	200	
Average Cost/hour	$21	($12/hour + 75%)
Total Cost to Public	$4200	

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 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.**

Not applicable. All costs are included in Item 12 above.

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.

Estimate of the burden hours to the Federal Government is 200 hours annually. Reviewing and processing each response should take approximately .1 hour; the total number of responses is estimated to be 2000 service contracts each year. 2000 responses x .1 hour = 200 hours.

Based on the 200 burden hours to the Government, using the annual salary of a Government Procurement Assistant, grade 5, step 4, paid $30,359 annually includes fringe benefits; $14.55 per hour x 200 hours =$2910.

Reviewing Time/hr	.1 hour
Requests/year	2000
Review Time/year	200 hours
Average Cost/hr	$14.55
Total Government Cost	$2910

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

No changes have been made to item 14.

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 results will not be published.

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.

GSA is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions”.

There are no exceptions to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions".

B. Collections of Information Employing Statistical Methods

Not applicable. This collection does not employ statistical methods.