

**Supporting Statement for Information Collection  
3090-0262 – Identification of Products with Environmental Attributes**

**A. Justification**

**1. Circumstances that make the collection of information necessary.** The General Services Administration Acquisition Regulation (GSAR) was amended to require contractors that submit offers under Multiple Award Schedule solicitations to identify products that they market commercially that have environmental attributes and to briefly describe the environmental benefits associated with those products. This information will be used to assist Federal Agencies in meeting their responsibilities under a number of statutes and executive orders, including the Energy Policy and Conservation Act (42, U.S.C. 6201 et seq.), the Energy Policy Act of 1992 (Public Law 102-486), the Clean Air Act Amendments of 1990 (Public Law 101-549), the Resource Conservation and Recovery Act (42 U.S.C. 6901 et seq.), and Executive Orders 12843, 12845, 12873 and 12902.

**2. Use of information.** Federal Agencies will utilize this information to determine if such products will meet their needs and meet the Federal acquisition statutes in preference to other products that meet their needs, but do not have the environmental attributes.

**3. Consideration of using information technology.** We use improved information technology to the maximum extent practicable. Where both the General Services Administration and contractors are capable of electronic interchange, the contractors may submit information requirements electronically.

**4. Describe efforts to identify duplication.** We did not identify any duplication of information being collected. Our review did not identify any similar data.

**5. If the collection of information impacts small businesses or other small entities (item 5), describe any methods used to minimize burden.** The burden usually applies equally to small organizations that want to do business with GSA but is the minimum necessary to meet the specific objectives of the solicitation or contract.

**6. Describe the consequence to Federal activities if the collection is not conducted or is conducted less frequently.** Government would not be able to identify products that have environmental attributes and benefits.

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7. **Special circumstances for collection.** None.
8. **Efforts to consult with persons outside the agency.** A notice published in the *Federal Register* at 77 FR 17481, on March 26, 2012. No comments were received.
9. **Explanation of any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.** GSA makes no such payments under this collection.
10. **Describe assurance of confidentiality provided to respondents.** GSA makes no such payments under this collection.
11. **Additional justification for questions of a sensitive nature.** No sensitive questions are involved.
12. **Estimated total annual public hour burden.**

The estimated number of respondents annually is 9,000 with each response requiring 3 hours for a total of 27,000 hours.

Based on estimates of number of contracts; estimated burden hours to the public:

Estimated respondents/yr	9,000
Number of submissions per respondent	<u>1</u>
Total responds annually	9,000
Estimated hours/response	<u>3</u>
Estimated total burden hours	27,000

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,

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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.

See response number 12.

14. **Estimated cost to the Government.** Estimate of the burden hours to the Federal Government is 9,000 hours. Reviewing and processing each response should take approximately .5 hour; the total number of responses is estimated to be 9,000 each year. 9,000 responses x .5 minutes = 4,500 hours.

Reviewing time/hr	.5
Responses/yr	9,000
Review time/yr	4,500
Average wages/hr	<u>\$40.66</u>
Total Government cost	\$182,970

The cost of \$40.66 per hour is based on GS-12, step 5 salary (Salary Table 2011-DCB Washington-Baltimore, DC-MD-VA-WV, Effective January 2011).

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**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14.** There are two factors that have resulted in decreased collection respondents and burden hours. Previously the collection process was handled manually. Today, the collection process for this information has changed to electronic submission. Additionally, approximately half of the contracts are service contracts without environmental attributes therefore no need to supply this information.

**16. Outline plans for published results of information collection.** Data collected will be used for internal administration of contracts.

**17. Approval not to display expiration date.** GSA is not seeking such approval for this collection.

**18. Explanation of exception to certification statement.**

GSA has no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods.**