

**SUPPORTING STATEMENT
FOR INFORMATION COLLECTION SUBMISSION
3090-0286, GSA Mentor-Protégé Program**

A. Justification.

1. Administrative requirements. The General Services Administration is proposing to amend the General Services Administration Acquisition Manual (GSAM) to implement a GSA Mentor-Protégé Program. Implementation will be a result of proposed GSAM regulation Subpart 519.70 consisting of 519.7001 through 519.7017 and two clauses (GSAM 552.219-75 and GSAM 552.219-76).

2. Uses of information. In accordance with the Small Business Act, it is the policy of the Government to provide maximum practicable opportunities in its acquisitions to small business, veteran-owned small business, service-disabled veteran-owned small business, Historically Underutilized Business Zone (HUBZone) small business, small disadvantaged business, and women-owned small business concerns. Such concerns must also have the maximum practicable opportunity to participate as subcontractors in the contracts awarded by any executive agency. The purpose of implementing the General Services Mentor-Protégé Program is to assist in this policy by encouraging GSA prime contractors to assist small businesses in enhancing their capabilities to perform contracts and subcontracts.

3. Consideration of information technology. We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically.

4. Efforts to identify duplication. GSA currently has a Mentor-Protégé Program (GSAM 519.70). GSA recognized that the various contracting activities were interested in a Mentor-Protégé program, therefore rather than have various programs, GSA initiated the implementation of one GSA-wide Mentor-Protégé Program. Therefore, there is no duplicate program within GSA.

5. If the collection of information impacts small businesses or other entities, describe methods used to minimize burden. The Mentor-Protégé Program is not a

mandatory program. However, if a small business chooses to participate, the benefits from the program outweigh the minimal information collection required by each small business.

6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently. Without the information collection covered by this clearance, the General Services Administration will be unable to have the correct information for the Mentor-Protégé relationship and the information to assess the participants and the program.

7. Special circumstance for collection. Collection is consistent with the guidelines in 5 CFR 1320.6.

8. Efforts to consult with persons outside the agency. A notice was published in the *Federal Register* at 77 FR 9659, on February 17, 2012. No comments were received. A second notice was published at 77 FR 31016, on May 24, 2012. Two comments were received.

Comment from Center for Equal Opportunity: Concern regarding the notice using the language of the notice suggests how is the term "disadvantaged" defined this program is using racial, ethnic and gender classifications and preferences by what statutory authority?

Response: Section 8(d)(4)(E) of the Small Business Act (15 USC 637(d)(4)(E)) authorizes Federal agencies to develop incentives to encourage subcontracting opportunities for certain categories of small businesses; the specified categories include small business concerns owned and controlled by the socially and economically disadvantaged individuals and small business concerns owned and controlled by women. Regarding the definition of "disadvantaged" as used in the Small Disadvantaged Business program, please refer to 13 CFR 123.1012, as well as the relevant portions of the Small Business Act such as 15 USC 637(a), 15 USC 637(d), and 15 USC 644(g). The Small Disadvantaged Business program is developed by the Small Business Administration.

Comment from TechAmerica: The agency estimate does not accurately reflect burden as is based on invalid assumptions and flawed methodology, as the estimate does not reflect the total burden each respondent faces to comply. The agency

estimated burden hours should be modified upward as identified in FAR Case 2007-006 to consider the time necessary for collection and review of the information prior to submission.

Response: The burden was reviewed for the value of time, effort and financial resources expended by persons to generate, maintain, retain, disclose and provide information the Federal agency. The requirement is authorized by statute and rate for both the total Government cost and estimated burden rate to the public have been reviewed.

9. Explanation of any decision to provide any payment or gift to respondents, other than reenumeration of contractors or guarantees. Not applicable.

10. Describe assurance of confidentiality provided to respondents. Information in the applications and agreements is confidential. As applicable, information collected will be subject to review and release in accordance with the Freedom of Information Act.

11. Additional justification for questions of a sensitive nature. No questions of a sensitive nature are asked.

12/13. Estimated total annual public hour burden and cost burden. Estimated total annual burden to the public applies to the Mentor-Protégé Agreement and Application as well as the mandatory semiannual reports for mentors and voluntary semiannual reports for protégés.

Public reporting burden for this collection of information is estimated to average 3 hours for the various responses, including the time for reviewing instructions, search existing data sources, gathering and maintaining the data needed, and completing and reviewing the information collection.

The Respondents total is determined to be 300, or 150 large and 150 small businesses.

Annual Burden and Cost to Public

Respondents	300
Responses per respondent	X 4
Total responses	1200

Preparation hours per response	X	3
Total response burden hours		3600
Hourly rate	X	\$42
Total Cost		\$151,200

Hourly rate is based on the task being accomplished by midlevel personnel equivalent to a GS-14, step 2, salary.

14. Estimate of annualized costs to the Federal Government.

Government hours per response are based on the time required to review the Mentor-Protégé Application and Agreement and the semiannual reports.

Annual Reporting Burden and Cost

Total responses		1200
Hours per response	X	2
Total hours		2400
Average cost per hour	X	\$42
Total cost to Government		\$100,800

Hourly rate is based on the task being accomplished by midlevel personnel equivalent to a GS-14, step 2, salary.

15. Explain reasons for program changes or adjustments reported in Item 13 or 14. Continuation of information collection.

16. Outline plans for published results of information collections. Results of this collection will not be published.

17. Approval not to display expiration date. Not applicable.

18. Explanation of exception to certification statement. Not applicable.

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