

**Supporting Statement for Information Collection:
Proposal to Lease Space, GSA Forms 1364A, 1364A-1, 1364B, 1364C, and 1364D,
(OMB Control No. 3090-0086)**

A. Justification.

1. **Administrative requirements.** In accordance with GSAR 570.802 (c), the GSA Form is used to obtain information about property being offered for lease to house Federal agencies. The form also provides an equitable way to compare lessor proposals. (Note: OMB Control No. 3090-0086 is referenced under GSAR 501.106, OMB Approval Under the Paperwork Reduction Act.)
2. **Uses of information.** The information is used by leasing contracting officers to evaluate lease proposals and negotiate lease contract terms and conditions in a competitive environment.
3. **Consideration of information technology.** Currently, proposals are manually completed and submitted by offerors. This form is electronically available and can be posted electronically for solicitation purposes. GSA is pursuing the use of electronic proposals in its leasing program but is currently not ready to implement a national Information Technology solution mandating the use of electronic proposals. In addition, the marketplace does not yet support the sole use of electronic solicitations and submission of offers.
4. **Efforts to identify duplication.** These Form 1364 versions are products of a GSA Lease Reform Initiative to improve the lease acquisition process for GSA, client agencies, and the private sector. As a direct result of the reform, five lease contract models have been developed that are targeted to meet the needs of the national leased portfolio. Four of the lease models require offerors to complete a GSA Form 1364. The new versions of GSA Form 1364 require the submission of information specifically aligned with the leasing models and avoid mandating submission of information that is not required for use in evaluation and award under each model.

The nature of this requirement is such that it relates to a single procurement/lease; therefore no duplication exists. The new versions of GSA Form 1364 require the submission of information specifically aligned with GSA's new lease contract models. With the exception of the Simplified Model that requires both Forms 1364A and 1364A-1 be submitted, GSA requires that the offerors submit only one version of the form with their offer. With the issuance of forms applicable to a model, GSA will avoid offeror submission of information that is not required for use in evaluation and award under that specific lease model.

5. **If the collection of information impacts small businesses or other entities, describe methods used to minimize burden.** The burden applies equally to small businesses that opt to do business with GSA. This information collected is necessary to meet the specific objectives of the solicitation or contract.

6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently. GSA would be unable to readily and equitably evaluate offers fairly and competitively.

7. Special circumstance for collection.

- **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.

No special circumstances exist.

8. Efforts to consult with persons outside the agency. A notice was published in the *Federal Register* at 78 FR 303, on January 3, 2013. No comments were received.

9. Explanation of any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or guarantees. N/A

10. Describe any assurance of confidentiality provided to respondents. N/A

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

12/13. Estimated total annual public hour burden and cost burden: The estimates are based on number of projects, number of offers per project, number of preparation hours per offer, and the offeror's hourly salary. The average time to complete each form from region to region varied between 1 hour and 3.7 hours.

	Simplified	Streamlined	Standard	Succeeding/ Superseding	Total
Total Projects	243	109	423	528	1,303
Number of Responses	3.7	3.7	4.1	1	3,565
Estimated Hrs/Response	2	2.7	2.8	1.7	
Estimated Total Burden Hours	1,798	1,089	4,856	898	8,641
Average Cost per hour	\$ 40.87	\$ 40.87	\$ 40.87	\$ 40.87	\$ 40.87*
Total Cost to Public	\$ 73,492.43	\$ 44,503.75	\$ 198,466.35	\$ 36,684.91	\$ 353,147.45

Total annual responses 3,565
Estimates hours/response 2.4238 hr (average)
Estimated total burden/hrs 8,641
Average cost per hour \$40.87 hr
Total cost to the public \$353,147

* According to a National Association of Realtors (NAR) survey of members, commercial real estate brokers report an average annual income of \$85,000. When divided by 2080 hours per year, that equals \$40.87 per hour. The NAR survey results were reported on the job site monster.com.

14. Estimate of annualized costs to the Federal Government.

	Simplified	Streamlined	Standard	Succeeding/ Superseding	Total
Total Projects	243	109	423	528	1,303
Number of Responses	3.7	3.7	4.1	1	
Est. Review and Evaluation Time/Response	2.3	2.3	2.3	1.9	
Review Time/Yr	2,068	928	3,989	1,003	7,988
Average Cost per hour	\$ 40.42	\$ 40.42	\$ 40.42	\$ 40.42	\$ 40.42
Total Cost to government	\$ 83,586	\$ 37,493	\$ 161,231	\$ 40,549	\$ 322,859.20

Responses/yr 3,565
Reviewing time/hour 2.2406 hr (average)
Review time/yr 7,988
Average cost per hour \$40.42
Total Government cost \$322,859

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

This submission requests OMB's approval of an information collection requirement in the GSAR. This information collection requirement in the GSAR remains unchanged. However, the number of responses has increased from 3,200 in 1991 to 5,016 in 2001 and decreased to 3,565 in 2012. We attribute this change to increased data accuracy in GSA reporting systems.

16. Outline plans for published results of information collections. Results will not be tabulated or published. Data collected will be used for internal administration of contracts.

17. Approval not to display expiration date. N/A

18. Explanation of exception to certification statement. N/A.

B. Collections of Information Employing Statistical Methods. GSA regional leasing services officers estimated the average number of responses and hours required by the public and the government to complete, review, and evaluate the information submitted on each form. Forecasting is based on empirical data for number of actions and salaries.