

**PAPERWORK REDUCTION ACT  
CHANGE WORKSHEET**

Agency/Subagency  
OUSD(AT&L) DPAP/DARS

OMB control number

0 7 0 4 - 0 2 5 3

*Enter only items that change*

Current record

New record

Agency form number(s)

252.244-7001

252.244-7001

Annual reporting and recordkeeping hour burden

Number of respondents

90

95

Total annual responses

Percent of these responses collected electronically

%

%

Total annual hours

1,440

1,520

Difference

0

Explanation of difference

Program change

+80

Adjustment

Annual reporting and recordkeeping cost burden (in thousands of dollars)

Total annualized Capital/Startup costs

Total annual costs (O&M)

Total annualized cost requested

0.00

0.00

Difference

0.00

Explanation of difference

Program change

Adjustment

Other changes\*\*

The clause at DFARS 252.244-7001 includes 24 criteria that a contractor's purchasing system must include. This proposed DFARS change does not add or delete any of these 24 criteria. It only clarifies that 3 of the 24 criteria also must address counterfeit parts.

Signature of Senior Official or designee:

*Meredith Murphy*  
*Amy G. Williams*

Date:

1-30-13

For OIRA Use

\*\*This form cannot be used to extend an expiration date.

*Patricia J. Joppa, DoD Clearance Officer*  
3-20-2013

Supporting Statement for 0704-0253, submitted 04/23/2010:

Item 12:

- Estimated that 90 contractors a year are required to submit plans
- Based on information from DCMA
- Each plan takes avg. 16 hours to prepare and submit.
- DCMA estimated 120 reviews to be completed in FY 2010; and about  $\frac{3}{4}$  (or 90) contractors were required to submit plans.
- Plans completed by equivalent of GS 11, step 5.
- DFARS clause 252.244-7001, Contractor Purchasing System Administration, required contractor compliance with 24 elements of a purchasing system. Requirement applicable only to CAS-covered contractors.

2012-D055:

- Proposed rule will not increase the number of contractors required to submit a plan under 252.244-7001, Contractor Purchasing System Administration.
- However, new clause (Contractor Purchasing System Administration—Alternate I) will require approximately 5% (per DCMA) other contractors (not CAS-covered, but subject to the purchasing system requirements for counterfeit electronic part avoidance and detection regarding purchases from their suppliers and subcontractors) to comply with 3 of the 24 purchasing system elements.
  - $90 \times .05 = 4.5$ , rounded to nearest whole number, or 5.
  - DCMA conducts the purchasing system reviews and is therefore considered the best source for data regarding such reviews.
- Although the new requirements address 3 elements in lieu of 24 elements, we used the 16-hour preparation time allotted in 0704-0253 for preparation of the 24-element plan because non-CAS-covered contractors would be less familiar with such requirements and would likely need a longer time to prepare, review, and submit their purchasing system plan.
  - 5 respondents  $\times$  16 hours/response = 80 hours added.
  - Total hours adjusted from 1,440 to 1,520:  $1,440 + 80 = 1,520$ .
- The entirety of the change is due to a program adjustment, i.e., adding a requirement for approximately 5 non-CAS-covered contractors annually to submit a purchasing system plan.