

**PAPERWORK REDUCTION ACT
CHANGE WORKSHEET**

Agency/Subagency OUSD(AT&L) DPAP/DARS	OMB control number 0 7 0 4 - 0 2 5 3
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Enter only items that change

	Current record	New record
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Agency form number(s)	252.244-7001	252.244-7001
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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: <i>Meredith Murphy</i> <i>Amy G. Williams</i>	Date: 1-30-13	For OIRA Use
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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.