

Data Item Descriptions in ASSIST Database
(formally Acquisition Management Systems and Data Requirements Control List (AMSDL))
OMB 0704-0188

Supporting Statement

JUSTIFICATION

1. Circumstances that make the collection necessary. Information collection requests are contained in Department of Defense (DoD) contractual actions for supplies, services, hardware, and software that support the defense materiel acquired under the provisions of Title 10, U.S.C. Chapter 137. DoD 5010.12- M, *Procedures for the Acquisition and Management of Technical Data*, describes the uniform approach to the acquisition and management of data required from contractors. The information requested from the public is necessary for DoD to support the design, test, manufacture, training, operation, maintenance, and logistical support of items it acquires, including weapon systems critical to national defense.

2. How, by whom, and for what purpose the information is to be used. The Military Departments and Defense Components purchase the information, which is the by-product of contracts to provide supplies, services, hardware, and software, from its contractors. The information requested is identified in a solicitation and imposed in a contract or order that addresses any aspect of data; i.e., that portion of a contractual tasking requirement associated with the development, generation, preparation, modification, maintenance, storage, retrieval, and delivery of data.

The information is used to: administer, manage, control cost, and enforce contractual requirements; evaluate engineering design; control configuration; satisfy safety, human engineering, and personnel manning requirements; monitor and evaluate progress and results associated with qualification, system, and equipment components performance; meet the requirements of reliability, maintainability, survivability, and electromagnetic compatibility; meet requirements for technical reporting; computer modeling of design parameters and performance; support procurement, production, scheduling facilities, and tooling; obtain technical publications to support the installation, operation, maintenance, overhaul of equipment, and training of personnel; and, provide preparation and operational support including transportation, handling, preservation, and packing/packaging items of defense materiel.

The Data Item Descriptions (DIDs) are listed in the ASSIST database (<https://assist.dla.mil>). Users must first register to obtain a user account and password. DIDs may also be accessed from the ASSIST Quicksearch website (<https://quicksearch.dla.mil>).

3. Consideration of information technology. Technology is used to the maximum practical extent possible. Automated word processing, contractor automated databases, and electronic access or transfer is used wherever they exist in the information preparation process. Industry and DoD are moving toward distributed, object-oriented, digital databases. As a result, DoD will

often not take formal delivery of documents as it has in the past. DoD will access a contractor's working database on an ad hoc basis and use whatever data objects contained in the database that are appropriate to the task. DoD acquisition reform guidance encourages acquisition managers to accept standard industry data in the contractor's format whenever possible.

4. Efforts to identify duplication. The Defense Standardization Program Office (DSPO) continues to review its data requirements, purging duplicative and unnecessary information requests from the system, controlling the generation of requirements, and minimizing and preventing the proliferation of data requirements. Data is required to meet the minimum essential need and requests are "tailored" to give priority to commercial data wherever feasible and available. The reductions reported are attributable to business process improvements and to policy and procedural changes brought about by various DoD initiatives such as Acquisition Reform. The burden reduction covered by this information collection request has been reduced significantly through both the use of electronic means and the acceptance of contractor formats, as a result of in-depth reviews, consolidation of documents with similar applications, and overall reduction in kinds of information collected.

5. Method(s) used to minimize the burden on small entities. There is no significant impact on small entities. Procurement statutes of the Defense Acquisition Regulations cite monetary thresholds that negate the need for certain information from small businesses and other entities.

6. Consequence to the Federal program if the collection is not conducted or conducted less frequently. The collection of the information is necessary to meet DoD mission requirements: to assist DoD personnel engaged in the acquisition and management of data in achieving optimum effectiveness and economy in the development, acquisition, and use of data for systems and equipment procured for the Department of Defense. Failure to collect this information, or to collect the information less frequently, would mean DoD could not support the acquisition and sustainment of systems and equipment, which would have an adverse and detrimental effect on DoD acquisition programs and the National Security.

7. Circumstances that require the collection to be conducted in a specific manner. This information collection is consistent with guidelines in 5 CFR 1320.5(d)(2).

8. Provide date and page number of publication in the Federal Register. The 60-day notice was published on April 3, 2013, in Vol. 78, Number 64, page 20095 of the Federal Register. Comments were received from TechAmerica on 4 June, 2013. In short, TechAmerica commented that, "The Agency's estimate does not accurately reflect the public burden because it is based on invalid assumptions and a flawed methodology. Consequently, TechAmerica opposes granting the Agency's requested extension under the Paperwork Reduction Act (the "Act"). Specific questions posed by TechAmerica and DSPO's responses are:

a. "Who are the respondents? Beyond "business" and "not-for-profit institutions," how would a specific organization know they are affected by this information collection?"

Response: The respondents are business entities who compete for and are awarded a government contract. A specific business entity would only be affected by this information collection if they (1) submitted a bid in response to a Request for Proposal (RFP) issued by a Military Department or Defense Component, and (2) was awarded a contract as a result of a winning bid. A specific organization would know of the possibility of being affected by this information collection by thoroughly reading the data requirements in the RFP, to include obtaining copies of and reviewing any and all DIDs cited in the RFP.

b. “Why only 944 respondents? The notice remarks that “Information collection requests are contained in DoD contract actions for supplies, services, hardware, and software.” Many thousands of vendors provide contracts for supplies, services hardware, and software. Are they the respondents? If so, then the 944 number is grossly unrealistic.”

Response: Determining the respondents is based on the number of DIDs in ASSIST. It is estimated that each DID is used 432 times per year. The number of respondents reflected in the 60-day notice (944) has been revised to correctly reflect the number of DIDs in ASSIST at this time (1140). If each of the 1140 DIDs is used 432 times per year, the number of responses would be 492,490.

c. “What products covered by the above wide-ranging contracts are included in the AMSDL?”

Response: As stated previously, the AMSDL has been cancelled. The AMSDL was simply a listing of all the approved DoD DIDs. That listing is now included in the ASSIST database. The products covered by the DIDs cuts across wide ranging disciplines (Administrative, Management, Financial, etc.). A listing of the disciplines into which DIDs are placed is available in Standardization Directory 1 (SD-1) which can be downloaded from ASSIST.

d. “What information was culled from the ASSIST Online database? This database is the only source of information cited in the notice. What is included in the database? What queries did the Agency run?”

Response: ASSIST is the official source for DoD DIDs. All of the DIDs are listed in the ASSIST, along with a PDF copy of each DID available to the public for downloading.

Further public comments on the collection proposal are being solicited in a subsequent 30 day Federal Register Notice published at the time of submission of this proposal. Other efforts include a requirement in all major contracts for contractors to offer their own information products (contractor content and format) as an alternative to the stated Government information collection request; adoption of industry standards related to information products, and continuing interface with various industry associations.

9. Decision to provide payment or gift to respondents. There will be no payment or gift to respondents other than provided under the contract. However, contractors bill DoD for hours

used to collect and submit data required as part of a contract's requirements and they factor those costs into their estimate when submitting a bid in response to an RFP.

10. Assurance of confidentiality provided to respondents. This information is consistent with prudent business practices and current regulations and statutory requirements.

11. Justification for any questions of a sensitive nature. The collection does not solicit any sensitive information.

12. Estimates of the hour burden of the collection of information. The current estimate of the annual burden hours for ASSIST's 1140 information collection requests (DIDs) and the method used to calculate this burden is described below. Each request for information is used an average of 432 times per year. Therefore, $1140 \times 432 = 492,480$ contractor responses. Each contractor response is an average of 8 pages (based on an estimated 20 percent reduction from the last ICR). The average man-hours (MHS) required to prepare each request is 8.25 MHS per page (8×8.25) or 66 MHS per response. This results in $492,480 \times 66 \text{ MHS} = 32,503,680$ annual burden hours.

The total cost to the public is estimated at \$1,300,147,200.00: $32,503,680 \times \$40.00$ (average hourly rate).

This formula is based on an agreement reached years ago by DoD and OMB. The number of "respondents" is based on the number of data item descriptions (DIDs) in ASSIST and the assumption that each DID is used 432 times per year. DSPO has since developed capabilities to determine how many times each DID has been downloaded in ASSIST. Based on a recent query of this information in ASSIST, DSPO feels that, if anything, the assumption that each DID is used 432 times per year might be an over-estimation. However, it can't be assumed that just because a DID was downloaded means that it was used in a contract any more than it can be assumed that just because DIDs were not downloaded means that they were not put on contract. Any formula to determine the burden hours for DIDs would have to be based on assumptions and it is for this reason that DSPO believes the formula agreed to by OMB and DOD should remain, as it provides at a minimum, a consistent method of determining burden hours. The AMSDL was cancelled in 2007 and all the DIDs now listed in the ASSIST database have been assigned the OMB control number 0704-0188. A specific organization would only be affected by this information collection if they have been awarded a Government contract that calls out a requirement for them to provide data (in which case a DID or DIDs would be used to describe the format and content). It should also be noted that any organization that provides the required data to the government is being paid to do so. Organizations and the public are not required to provide this data unless awarded a Government contract.

13. Estimate of the total annual cost burden to respondents resulting from the collection of information. There are no capital, start-up, or operational and maintenance costs associated with this collection of information.

14. Provide estimates of annualized cost to the Federal Government. The estimated annualized cost to the Federal Government is \$78,796,800. There have been no capital equipment or start up costs incurred by the Government since October 1,1995. The annual cost reported is the cost of integrating the information collected into DoD information systems (both digital and hard copy)

maintained to support normal Departmental business functions. These systems would be required to support the government's business process even if no information were collected from the private sector. The cost impact of collecting data from the private sector is limited to the costs of receiving, inspecting, indexing, and entering the information into the existing information systems. We estimate that the average hourly rate for personnel performing these tasks essentially requires the same skills as those required of the respondents or \$40.00 per hour. We estimate that it takes an average of four hours per contractor response to receive, inspect, index, and store the information collected. The calculation (492,480 contractor responses X 4 hours X \$40.00/hour) results in a total cost to the Government of \$78,796,800.

15. Reason(s) for any program changes or adjustments reported. This is an extension of a currently approved collection of information that will expire 06/30/13.

16. Plans for tabulation and publication of results. There are no plans to publish the information collected.

17. Display of expiration date. In accordance with DoD 5010.12-M, *Procedures for the Acquisition and Management of Technical Data*, when a Data Item Description (DID) requires an associated form to be completed by a contractor in preparation of the data product, the form will be approved by the DoD Components forms control office and will display the OMB control number and the Agency Disclosure Notice (burden statement and public protection clause) at the top of the form. There are numerous forms associated with this collection: the Department of Defense alone has 70+ forms and the Military Departments and Defense Components, each have a similar number. Consequently, an inordinate expense would be incurred in the printing, stocking, distribution, and electronic maintenance for this number of forms. The Department requests under this proposal that the previously granted approval for nondisplay of the expiration date as provided for in 5 CFR 1320.7(e)(1), be continued for this collection.

18. Exceptions to the certification statement. There will not be any exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Results will not be tabulated. Statistical methods will not be employed.