A. Justification

1. Circumstances that make the collection of information necessary. The General Services Administration Acquisition Regulation (GSAR) clause 552.238-81 Modifications requires vendors to request a contract modification by submitting a request to the Contracting Officer for approval.

2. Use of information. The information collected will be use to evaluate and process modification requests from vendors.

3. Consideration of using information technology. We use improved information technology to the maximum extent practicable. Where both the General Services Administration and contractors are capable of electronic interchange, the contractors may submit information requirements electronically.

4. **Describe efforts to identify duplication.** We did not identify any duplication of information being collected. Our review did not identify any similar data.

5. If the collection of information impacts small businesses or other small entities (item 5), describe any methods used to minimize burden. The burden usually applies equally to small organizations that want to do business with GSA but is the minimum necessary to meet the specific objectives of the solicitation or contract.

6. Describe the consequence to Federal activities if the collection is not conducted or is conducted less frequently. Government would not have current and innovative products available to meet their Agency mission and programmatic needs.

7. Special circumstances for collection. None.

8. **Efforts to consult with persons outside the agency.** A 60-day notice was published in the *Federal Register* at 81 FR 12731 on March 10, 2016. No comments were received. A 30-day notice was published in the *Federal Register* at 81 FR 33535 on May 26, 2016.

9. Explanation of any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees. GSA makes no such payments under this collection. 10. **Describe assurance of confidentiality provided to respondents.** GSA makes no such payments under this collection.

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

12. **Estimated total annual public hour burden**. The annual estimated number of respondents is 19,500 with 2 submissions per respondent, totaling 39,000 annual responses. Each response is estimated at 5 hours for an estimated total burden of 195,000 hours.

Based on estimates of number of contracts; estimated burden hours to the public:

Estimated respondents/yr	19,500
Number of submissions per respondent	2
Total responds annually	39,000
Estimated hours/response	5
Estimated total burden hours	195,500

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.

We estimate the total annual public cost burden for these elements to be \$13,260,000 based on the following:

Respondents:	19,500
Responses per respondent:	2
Total annual responses:	39,000
Preparation hours per response:	5
Total response burden hours:	195,000
Average hourly wages(\$50.00+36% overhead):	68.00
Estimated cost to the public:	\$13,260,000.

The estimated cost per response is approximately \$340.

14. Estimated cost to the Government. The estimated total cost to the Federal Government is \$2,461,680. The estimated total number of requests received annually is 39,000 each year with each request taking an estimated 1.5 hours to review (39,000*1.5). The total estimated review time per year is 58,500. The total estimated review time per year is 58,500. The total estimated review time per year multiplied by the average wage of \$42.08 (58,500*\$42.08)equals \$2,461,680.

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Reviewing time/hr Responses/yr Review time/yr Average wages/hr Total Government cost 1.5 <u>39,000</u> 58,500 <u>\$42.08</u> \$2,461,680

The cost of \$42.08 per hour is based on the GS-12, step 5 salary. (Salary Table 2016-DCB Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Effective January 2016).

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14. GSA amended the GSAR to add an Alternate I to the Modifications clause. Alternate I of the clause, allows for electronic submission of modification requests. This in turn, has decreased the number of modification submissions per respondent.

16. Outline plans for published results of information collection. Data collected will be used for internal administration of contracts.

17. Approval not to display expiration date. GSA is not seeking such approval for this collection.

18. Explanation of exception to certification statement. GSA has no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods. Statistical methods are not used in this information collection.