**SUPPORTING STATEMENT**

**FOR PAPERWORK REDUCTION ACT SUBMISSION**

**OMB Control No. 9000-0047, PLACE OF PERFORMANCE**

**A. Justification.**

**1.** **Administrative requirements**. The information relative to the place of performance and owner of plant or facility, if other than the prospective contractor, is a basic requirement when contracting for supplies or services (including construction). This information is instrumental in determining bidder responsibility, responsiveness, and price reasonableness. A prospective contractor must affirmatively demonstrate its responsibility. Hence, the Government must be apprised of this information prior to award.

The contracting officer must know the place of performance and the owner of the plant or facility to—

 (a) Determine bidder responsibility;

 (b) Determine price reasonableness;

 (c) Conduct plant or source inspections; and

 (d) Determine whether the prospective contractor is a manufacturer or a regular dealer.

**2.** **Uses of information**. The information is used to determine the firm's eligibility for awards and to assure proper preparation of the contract.

**3.** **Consideration of information technology**. For the most part, this information will be collected electronically in the System for Award Management (SAM). Contractors will be able to complete the provision electronically; however, because the data being collected could change for a specific solicitation, contractor’s will still be required to submit place of performance information on an exceptional basis; that is, whenever the place of performance for a specific solicitation is different from the place of performance shown in SAM.

**4.** **Efforts to identify duplication**. This requirement is being issued under the Federal Acquisition Regulation (FAR) which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

**5.** **If the collection of information impacts small businesses or other entities describe methods used to minimize burden**. The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

**6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.** Collection of information on a basis other than solicitation-by-solicitation is not practical.

**7.** **Special circumstances for this information collection**. Collection is consistent with guidelines in 5 CFR 1320.6.

**8.** **Efforts to consult with persons outside the agency**. Under the procedures established for development of the FAR, agency and public comments were solicited and each comment addressed before finalization of the text. A notice published in the Federal Register at 79 FR 41286, July 15, 2014. One commenter submitted two comments.

 One respondent submitted public comments on the extension of the previously approved information collection. The analysis of the public comments is summarized as follows:

 **Comment:** The respondent commented that “place of performance”information is competitive data**.** The respondent expressed concern that the manufacturer of its supplies would be revealed to competitors if the information was provided to the contracting officer.

 **Response:** The information relative to the place of performance and owner of plant or facility is instrumental in determining bidder responsibility, responsiveness, and price reasonableness. The information is used to determine the firm’s eligibility for awards and to assure proper preparation of the contract.

 **Comment:** The respondent stated that the “place of performance” field on the DD Form 1155 is mandatory throughout the Department of Defense (DoD) and recommended that it be required throughout the Federal government.

 **Response:** This comment is outside the parameters of this information collection. The DD Form 1155 was developed by DoD for use by DoD contracting activities.

**9.** **Explanation of any decision to provide any payment or gift to respondents, other than remuneration of contractors or guarantees.** Not applicable.

**10.** **Describe assurance of confidentiality provided to respondents**. This information is disclosed only to the extent consistent with prudent business practices and current regulations.

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

**12 & 13.** **Estimated total annual public hour and cost burden.** Time required to read, prepare, and record information is estimated at 2.73 minutes per completion. The Federal Procurement Data System (FPDS) shows that for fiscal year 2013, there were 2,090,428 new actions (including contracts and orders, excluding modifications) for manufacturing in the United States. The 2,090,428 actions will be used as the new basis for total annual responses.

Estimated respondents/yr 149,316

Responses annually x 14

Total annual responses 2,090,428

Preparation time per response x .0455

Total burden/hrs 95,114

Average wage ($32.73/hr[[1]](#footnote-1) + 36.25% OH[[2]](#footnote-2)) x $44.59

Estimated cost to public $4,241,133

**14.** **Estimated cost to the Government**. Time required for Governmentwide review is estimated at 1 minute (.017 hr.) per response.

Annual Reporting Burden and Cost

Total annual responses 2,090,428

Review time per response x .017

Total burden hours 35,537

Average wages + overhead ($32.73/hr. + 36.25% OH) x $44.59

Total Government cost $1,584,595

**15.** **Explain reasons for program changes or adjustments reported in Items 13 or 14**. The total number of burden hours changed substantially due to the basis for the re-calculation of the new burden hours number. The new burden hours number was derived by using data from the Federal Procurement Data System (FPDS).

**16.** **Outline plans for published results of information collections.** Results will not be tabulated or published.

**17.** **Approval not to display expiration date**. Not applicable.

**18.** **Explanation of exception to certification statement**. Not applicable.

1. **Collection of Information Employing Statistical Methods.**

Statistical methods are not used in this information collection.

1. The cost of $32.73 per hour is based on a GS-12 Step 5 salary (Base GS Salary Table 2012). [↑](#footnote-ref-1)
2. The 36.25% fringe benefit rate is derived from OMB Memorandum M-08-13, dated March 11, 2008. [↑](#footnote-ref-2)