

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
9000-0157, Architect-Engineer Qualifications
(SF-330)**

A. Justification.

1. Administrative requirements. This is a request to renew an existing information collection requirement concerning 9000-0157, Consolidated Form for Selection of Architect-Engineer Contracts. FAR Part 36 is the reference point for the form.

The Standard Form 330 accomplishes the following:

- Expands essential information about qualifications and experience data including:—
 - An organizational chart of all participating firms and key personnel.
 - For all key personnel, a description of their experience in 5 relevant projects.
- A description of each example project performed by the project team (or some elements of the project team) and its relevance to the agency's proposed contract.
- A matrix of key personnel who participated in the example projects. This matrix graphically illustrates the degree to which the proposed key personnel have worked together before on similar projects.
- Reflects current architect-engineer disciplines, experience types and technology.
- Permits limited submission length thereby reducing costs for both the architect-engineer industry and the Government. Lengthy submissions do not necessarily lead to a better decision on the best-qualified firm. The proposed Standard Form 330 indicates that agencies may limit the length of firm's submissions, either certain sections or the entire package. The Government's right to impose such limitations was established in case law (Coffman Specialties, Inc., B-284546. N-284546/2, 2000 U.S.Comp.Gen.LEXIS 58, May 10, 2000).
- Facilitates electronic usage by organizing the form in data blocks.

This information collection, in compliance with 40 U.S.C. 541-544, is necessary for the selection of qualified architect-engineer contractors.

2. Uses of information. Standard Form 330, Part I is used by all Executive agencies to obtain information from architect-engineer firms interested in a particular project. The information on the form is reviewed by a selection panel composed of professionals and assists the panel in selecting the most qualified architect-engineer firm to perform the specific project. The form is designed to provide a uniform method for architect-engineer firms to submit information on experience, personnel, and capabilities of the architect-engineer firm to perform along with information on the consultants they expect to collaborate with on the specific project.

Standard Form 330, Part II is used by all Executive agencies to obtain general uniform information about a firm's experience in architect-engineering projects. Architect-engineer firms are encouraged to update the form annually. The information obtained on this form is used to determine if a firm should be solicited for architect-engineer projects.

3. Consideration of information technology. We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically. The Standard Form 330 was designed to facilitate electronic usage by organizing the form in data blocks. The two standard forms, i.e., Standard Forms 254 and 255, were not organized in a manner to facilitate electronic usage.

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. The revenue information is primarily used to evaluate a firm's capacity to perform a contract in the required time period, by comparing the estimated contract amount to the firm's annual volume of work. Revenue for each recent year is more detailed than for this purpose. Further, the 4 and 5-year-

old revenue information is not very meaningful. The 3-year basis for annual average revenue also correlates with the period used in defining the small business size standard for architect-engineer firms.

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 less frequent basis is not practical. The information is needed to select an architect-engineer firm for a contract.

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

8. Efforts to consult with persons outside the agency. A notice was published in the *Federal Register* at 79 FR 38030, on July 3, 2014. Two respondents submitted comments.

Comment: The respondent stated "When I team with a larger firm, I put in approximately 40 hours of paperwork. If short listed for an interview or further analysis, it takes another 40 hours of financial or detail work."

Response: The Government has increased the number of review hours per response based upon the information provided by the respondent; however, the overall number of burden hours has decreased based upon updated FPDS data for the number of respondents.

Comment: The respondent stated that "If I pursue a project as a prime, it takes about 80 hours of work to compile the SF330 and print it."

Response: The Government has increased the number of review hours per response based upon the information provided by the respondent; however, the overall number of burden hours has decreased based upon updated FPDS data for the number of respondents.

Comment: The respondent suggests that SF330 be limited to one hard copy or better yet, one emailed pdf copy and the Government should consider having each department of the Federal government having interested firms submit one annual copy with a checklist of interests and resources.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: The respondent stated that considering the varying specific instructions and contract specific requirements for each SF330 Part I submittal, the 29 hours per response appears to be low. For large project contracts, with many team members, the submission can involve thousands of person hours.

Response: The Government has increased the number of review hours per response based upon the information provided by the respondent; however, the overall number of burden hours has decreased based upon updated FPDS data for the number of respondents.

Comment: The respondent suggests that the Government provide guidance on customizing the forms, while keeping the basic layout. Also should standardize across agencies, if possible.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: The respondent suggests that the Government should allow emailing of SF 330s in PDF format as an option.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: Section C should be modified to show each team member's project management office and their project role,

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: Section E should change the "other professional qualifications" box to a narrative description of the individual's relative experience.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: Section F project descriptions should be limited to 2 pages, standardized across all agencies, at the discretion of the submitter.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: Section G should be eliminated. It provides no basis for comparison; there is no threshold for involvement a person must have on a project in order to receive a check.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: Section H needs individual clarification regarding what information each agency would really like to see. The more explicit RFQ language is regarding Section H, the better.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

Comment: In Part II- General Qualifications, instructions need to clarify which parts are for the whole firm, and which are for an office.

Response: This comment is outside the scope of this information collection, however, the comment will be forwarded to the acquisition community to gather any interest in opening a FAR case to address this issue.

9. Explanation of any decision to provide any payment or gift to respondents, other than reenumeration 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. **Estimated total annual public hour burden.**

Public reporting burden for this collection of information is estimated to average 80 hours (70 hours for Part I and 10 hours for Part II) per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Because of the tailoring required by the form for each project submittal, there are virtually no savings in burden hours by repeat submittals. The annual reporting burden is estimated as follows:

Annual Reporting Burden

	<u>Proposed</u>
Respondents.....	1,789*
Responses per year.....	x 2*
Total annual responses.....	3,578
Review time per response.....	x 80**
Total burden hours.....	\$286,240
Average wages + overhead x.....	\$54
Total cost to the public	
.....	
.....	\$15,456,960***

*Based on FPDS data. 1,789 A&E awards were made during Fiscal Year 2013 to 971 vendors.

**70 hours for Part I and 10 hours for Part II.

***Based on the OPM GS-13/step 5 salary (\$39.31 an hour) plus 36.25 percent burden, rounded to the nearest dollar, or \$54 an hour. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition, as updated by OMB for the current year. Reference Salary Table 2014-GS, Effective January 2014, found at www.opm.gov).

13. **Estimated total annual public cost burden.** We estimate no annual cost burden other than the burdens shown in Items 12 and 14.

14. **Estimated cost to the Government.** We estimate 4 hours total for Standard Form 330, Part I and 1 hour total for Part II. This estimate is based on a review panel of 4 persons at the GS 13 level.

Proposed

Total responses.....	1,789
Review hours per response.....	x 5*
Total burden hours.....	8,945
Average wages + overhead.....	x \$54**
Total Government cost.....	\$483,030

*Based on a review panel of 4 persons (4 hours total for Part I and 1 hour total for Part II).

**Based on the OPM GS-13/step 5 salary (\$39.31 an hour) plus 36.25 percent burden, rounded to the nearest dollar, or \$54 an hour. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition, as updated by OMB for the current year. Reference Salary Table 2014-GS, Effective January 2014, found at www.opm.gov).—

15. **Explain reasons for program changes or adjustment reported in Item 13 or 14.** The public burden hours for the information collection has decreased by 293,760 hours. The Government has increased the number of review hours per response based upon the information provided by the respondents; however, the overall number of burden hours has decreased based upon updated FPDS data for the number of respondents.

16. **Outline plans for published results of information collection.** Results of this information collection will not be published.

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

18. **Explanation of exception to certification statement.** No applicable.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.