2014 SUPPORTING STATEMENT

for

USDA Web Based Supply Chain Management System OMB NO. 0581-0273

A. Justification.

1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.

Agriculture Marketing Service (AMS) purchases commodities for various domestic nutrition assistance programs and provides support for commodity markets with surplus inventory. For the domestic nutrition assistance program purchases, AMS issues solicitations for offers to purchase agricultural commodities. In response to the solicitations, contractors, vendors, and suppliers must submit competitive offers, or sealed bids, in order to sell their domestic agricultural commodities. The bids enable AMS to evaluate offers impartially and purchase commodities equitably and fairly in an effort to maximize transparency. Without this information collection, AMS is unable to evaluate offers and meet program requirements.

AMS purchases agricultural commodities for the following programs:

- National School Lunch Program / Child & Adult Care Food Program (Section 32)
- National School Lunch Program / Child & Adult Care Food Program (Section 6a & e)
- Nutrition Service Incentive Program (Section 311)
- Food Distribution Program on Indian Reservations (Section 4a and b)
- Commodity Supplemental Food Program (Section 17)
- The Emergency Food Assistance Program (Section 104)
- Disaster Feeding (Section 32C)

The following acts authorize AMS Procurement Branches to prepare and issue announcements for the purchase and sale of perishable agricultural commodities.

- Section 32 of the Act of August 24, 1935, as amended (Section 32 Public Law 74-320; 7 U.S.C. 612c),
- Sections 6 (a) and (e), 13, and 17 of the National School Lunch Act, as amended, (42 U.S.C. sections 1751, 1761, and 1766),
- Section 4 (a) (2) of the Agriculture and Consumer Protection Act of 1973, as amended, (7 U.S.C. 612c note),
- Section 4 (b) of the Food Stamp Act of 1977, as amended; 7 U.S.C. 2013,
- Section 5 of the Agriculture and Consumer Protection Act of 1973, as amended, (7 U.S.C. 612c note),
- Section 3A of the Commodity Distribution Reform Act and

- WIC Amendments of 1987, (7 U.S.C. 612c note),
- Section 311 (a) of the Older Americans Act of 1965, as amended; 42 U.S.C. 3030a,
- Section 17 of the Child Nutrition Act of 1966, as amended; 42 U.S.C. 1786,
- The Emergency Food Assistance Act of 1983, as amended, ; 7 U.S.C. 7501 *et seq.*,
- The Hunger Prevention Act of 1988, as amended; 7 U.S.C. 2011 *et seq.*,
- 2. INDICATE HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.

AMS issues solicitation for offers in order to solicit bids for commodities for delivery to domestic nutrition assistance programs. Vendors respond by making electronic offers using the secure Web Based Supply Chain Management System (WBSCM) http://www.usda.gov/WBSCM. Vendors must be registered, and have an ID and password, in order to submit bids electronically through WBSCM via the internet. The information will change in response to the needs of the domestic feeding programs and each solicitation. It is necessary to collect the information recorded on the offer screens to determine who the successful bidder is under solicitations to purchase products and services.

The types of information have been consolidated into three processes as follows:

1. **New Vendor Application**: This is a one-time process for vendors that have not previously registered with AMS to submit bids. The System of Award Management (SAM) is the primary registrant database for the U.S. Federal Government. The SAM.gov system (<u>www.sam.gov</u>) is a combination of Federal procurement systems The SAM.gov system collects, validates, stores, and disseminates data in support of agency acquisition missions, including Federal agency contracts, grants, cooperative agreements, and other forms of Federal assistance and assistance awards. The following registrations have been consolidated by GSA to form the System for Award Management (SAM) and are currently reported under GSA: Central Contractor Registration; Online Representations and Certifications Application; Automated Clearing House payment enrollment (SF-3881); and the current financial statement. This change is reflected in AMS-71. Please see the screen shot explaining SAM. (About SAM) Once vendors register in SAM they are then instructed to turn in several documents, one of which is the WBSCM Vendor Registration Form (See screenshots in *WBSCM* registration.docx).

- 2. **Bid Solicitation:** In order for USDA to consider a bid from a vendor, the company must; a) submit their offer (bid) under a specific Solicitation through WBSCM (see screenshots in *Submit Solicitation.docx*); b) amend their offer, as necessary (see a); c) enter any limitations for supplying product by submitting their production constraints (see screenshots in *Submit Constraints.docx*). Both the vendor amending their offer (b) and submitting constraints (c) have been combined with the vendor submitting a specific solicitation (a); this change is reflected in the AMS -71.
- 3. Contract Delivery, Invoice Submission and Inspection Results: After a vendor is awarded a contract, the vendor must perform on the contract and provide the following information, via WBSCM,; a) the advance shipping notice which advises the recipient on when to expect delivery (see screenshots in *Advance Shipping Notice.docx*); b) submits inspection results, which is required for payment (see screenshots in *Submit Inspection Results.docx*); this has been merged with the vendor entering an advance shipping notice. This change is reflected in the AMS-71. c) submit the vendor invoice for final payment (see screenshots in *Submit Invoice.docx*).

Vendor information, annual certification information, and all domestic commodity offer information is entered and received electronically in WBSCM. Vendors are be able to access WBSCM to see the date and time the system shows for receipt of bid, bid modification, or bid cancellation information. At bid opening date and time, the bid information is evaluated through the WBSCM system. Acceptances are sent to the successful offerors electronically. Awarded contracts are posted on the AMS Website.

3. DESCRIBE WHETHER, AND TO WHAT EXTENT, THE COLLECTION OF INFORMATION INVOLVES THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY, E.G. PERMITTING ELECTRONIC SUBMISSION OF RESPONSES, AND THE BASIS FOR THE DECISION FOR ADOPTING THIS MEANS OF COLLECTION. ALSO DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN.

Vendor information is entered and received electronically in the WBSCM, while the annual certifications are submitted directly through an internet based application. Company's financial statements and automated clearing house payment information are entered via www.sam.gov and are a onetime submission. The entire Bid Solicitation process is submitted electronically in WBSCM. And the data and documents required under the Contract Delivery, Invoice Submission and

Inspection Results processes are submitted electronically in WBSCM. Vendors will be able to access WBSCM to see the date and time the system shows for receipt of bid, bid modification, or bid cancellation information.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.

Similar information is not collected by any other Government office. WBSCM maintains one set of data for purposes of data collection. The system also maintains one set of data for purposes of documenting purchases.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEMS 5 OF THE OMB FORM 83-I), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The data collected is used to determine whether a business (whether small or large) is viable and capable of supplying product to the Federal government. The offer data collected (bid price) from vendors is used to make a determination to procure product that is in the best interest of the Federal government, and the invoice information collected is used to make payments to vendors. Since this information is readily available from vendor's records, this collection from the approximate 268 winning bidders, of which about 50 percent are small businesses, does not impose a special burden on small businesses or any other entity.

6. DESCRIBE THE CONSEQUENCE OF FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

The legislation outlined in number 1 sets forth the authority by which AMS receives offers and awards contracts to distribute, handle, store, and transport agricultural commodities. It is the responsibility of AMS to procure agricultural commodities to meet the mission of the domestic nutrition assistance programs. AMS must sustain the procurement process throughout the year, which requires the collection of information. Without this information, AMS could not meet program requirements.

The data collected from vendors assists AMS with making a determination whether a business is viable and capable of supplying product to the Federal government. This business determination is a requirement of the Federal Acquisition Regulations (FAR). If AMS does not make this determination, along with being in violation of the FAR, the agency could potentially award contract to businesses that are incapable

which would undermine the mission of the domestic nutrition assistance programs. Furthermore, the Federal government would waste a great deal of time and money funds in pursuit action against the incapable vendor as well as time and effort in procuring the product from a capable vendor.

- 7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:
- REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;

Information, in the form of a bid solicitation, is submitted in response to variable AMS offers. Solicitations for offers are scheduled according to commodity growing and harvest schedules and in consideration of the needs of the domestic nutrition assistance programs. As a result, information is collected more often than quarterly.

- REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;

AMS issues a solicitation for offers, requiring competitive offers usually within 7-20 days, depending on program needs. Submissions are not written, but submitted electronically.

- REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;

Respondents are not required to submit written documents.

- REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 YEARS:

Respondents need only retain records generated during the normal course of business and of a contractual nature. WBSCM does not require any additional records to be retained.

- IN CONNECTION WITH A STATISTICAL SURVEY, THAT IS NOT DESIGNED TO PRODUCE VALID AND RELIABLE RESULTS THAT CAN BE GENERALIZED TO THE UNIVERSE OF STUDY;

At this time, AMS does not anticipate any of the information collected to be used in any type of statistical survey, especially one that would produce invalid or unreliable results.

- REQUIRING THE USE OF A STATISTCAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;

There is no requirement for a statistical data classification. At this time, AMS does not anticipate any of the information collected to be used in any type of statistical survey.

THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE; OR

In the course of making procurements in WBSCM, internal users may be given access to or entrusted with sensitive Government information associated with the ongoing procurement of agricultural commodities. Sensitive Government information is identified as Business Sensitive, Procurement Sensitive, Proprietary (e.g., 41 USC section 423, the Procurement Integrity Act restrictive legend per Federal Acquisition Regulation (FAR) 52.215-1) or Source Selection Information (as defined in FAR 3.104-3). This sensitive information includes data derived from materials identified, by marking or subject matter content, as Source Selection, Business Sensitive, Procurement Sensitive and/or Proprietary Data (collectively referred to herein as "the data"). Upon logging into the WBSCM system, internal users must agree to the attached statement which states they will not discuss, disclose, release, reproduce or otherwise provide or make available the data, or any portion thereof, to any other Government or nongovernment employee, person, or organization unless that other employee, person, or organization has signed a non-disclosure statement consistent with this statement.

- REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.

Respondents are not required to submit proprietary trade secrets or other confidential information.

8. IF APPLICABLE, PROVIDE A COPY AND IDENTIFY THE DATE AND PAGE NUMBER OF PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE, REQIRED BY 5 CFR 1320.8(d), SOLICITING COMMENTS ON THE INFORMATION COLLECTION PRIOR TO SUBMISSION TO OMB. SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THESE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.

A *Federal Register Notice*, with a 60-day comment period regarding this information collection was published on March 04, 2014, Vol.79, Number 50, page 14471. No comments were received.

DESCRIBE EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS ON THE AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, THE CLARITY OF INSTRUCTIONS AND RECORDKEEPING, DISCLOSURE, OR REPORTING FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.

Consultation outside the agency on the agreements covered under this clearance package include vendors knowledgeable about AMS business practices and the information that would be collected. AMS consulted with these vendor representatives:

Vendor: Erin Badtke, Seneca Foods Corporation

Vendor: Gail Tidey, Burnette Foods, telephone: 269-621-3181 ext 115.

Vendor: Catherine Hamilton, Pacific Coast Producers, telephone: 209-367-6259.

CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS – EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

At this time, we do not know of any circumstances that would prevent AMS from consulting with representatives.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts were provided to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

Confidential business-related information is not collected. Some vendors provide us with their home phone number, which is used when business related problems arise after normal business hours. All data collected is handled according to AMS procedures in accordance with the Privacy Act and the Freedom of Information Act. Agency policy has established confidentiality as paramount in importance. We have assured respondents of this responsibility and we investigate any possible inadvertent disclosure of individual operations.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUTDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.

None of the activities of WBSCM requests nor requires information of a sensitive nature.

12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.

THE STATEMENT SHOULD:

- INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSE, ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN

THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.

Public reporting burden for collecting information is estimated to average 15 minutes 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. The complete public reporting burden is summarized on AMS-71.

- IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ON ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEM 13 OF OMB FORM 83-I.
- PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES.

The estimated cost to the respondents is \$2,535,146.57 this figure represents 47, 698 (rounded) burden hours x \$53.15, the average mean hourly earnings of professional, specialty and technical white collar occupations, and executive, administrative, and managerial white collar occupations by worker and establishment characteristics and geographic areas (metropolitan). Data for computation of this hourly wage were obtained from the U.S. Department of Labor Statistics' publication, May 2013 National Occupational Employment and Wage Estimates. This publication can also be found at the following website: http://www.bls.gov/oes/current/oes nat.htm#11-0000

- 13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).
- THE COST ESTIMATE SHOULD BE SPLIT INTO TWO COMPONENTS: (a) A TOTAL CAPITAL AND START-UP-COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (b) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO

ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE, MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.

- IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY,
 AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND
 EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF
 PURCHASING OR CONTRACTING OUT INFORMATION
 COLLECTION SERVICES SHOULD BE A PART OF THIS COST
 BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES,
 AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS
 (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION
 PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR
 REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE
 RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS
 APPROPRIATE.
- GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICE, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection. All documents are available to vendors via WBSCM without cost.

14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO

MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

WBSCM began development in October 2006, and was fully implemented in April 2011. During this period, AMS worked with the contractor to develop the procurement portion of the system affected by this information data collection which will support AMS procurements of \$1.45 billion in commodities per year.

WBSCM Development Costs – Contractor Support				
Cost Type	Period Covered	Cost to Date	Comments	
Operations and	4/2011 to Present	\$92,993,992*		
Maintenance				
Software Maintenance	10/2011 to Present	\$15,000,000*		

^{*} The contractor support cost is divided between three agencies: Agricultural Marketing Service (AMS); Food and Nutrition Service (FNS); and Farm Service Agency (FSA).

WBSCM Development Costs – Government Support				
Cost Type	Period Covered	Cost to Date	Comments	
Program Manager GS	10/2006 to Present	\$392,784	Full time on	
14 (1)			project	
Program Manager GS	3/2008 to Present	\$143,010	Full time on	
15 (1)			project	
Project Manager GS 14	10/2006 to Present	\$516,230	Full time on	
(1)			project	
Accounts Manager GS	10/2006 to Present	\$500,098	Full time on	
14 (1)			project	
Subject Matter Expert	10/2006 to Present	\$434,868	Full time on	
GS 14 (1)			project	
Subject Matter Experts	10/2006 to Present	\$955,622	Full time on	
GS 13 (2)			project	
Subject Matter Expert	10/2010 to Present	\$31,233	Full time on	
GS 11 (1)			project	

WBSCM Operations Costs – Government Support				
Cost Type	Period Covered	Anticipated Costs	Comments	
Team Lead GS 14 (1)	4/2011 to Present	\$59,619	Full time on	
			project	
Project Manager GS 14	4/2011 to Present	\$57,866	Full time on	
(1)			project	
Accounts Manager GS	4/2011 to Present	\$57,866	Full time on	
14 (1)			project	

WBSCM Operations – Government Users				
Cost Type	Period Covered	Anticipated Costs	Comments	
Division Director GS	Annually – 12	\$13,613	Approx 10% of	
15 (1)	month operations		time in WBSCM	
Procurement Branch	Annually – 12	\$11,924	Approx 10% of	
Chief GS 14 (1)	month operations		time in WBSCM	
Contracting Officers	Annually – 12	\$168,336	Approx 75% of	
GS – 14 (2)	month operations		time in WBSCM	
Assistant to the Chief	Annually – 12	\$80,129	Approx 75% of	
GS – 13 (1)	month operations		time in WBSCM	
Procurement Specialists	Annually – 12	\$700,054	Approx 75% of	
GS – 12 (11)	month operations		time in WBSCM	
Administration Branch	Annually – 12	\$11,924	Approx 10% of	
Chief GS 14 (1)	month operations		time in WBSCM	
Assistant to the Chief	Annually – 12	\$53,420	Approx 50% of	
GS – 13 (1)	month operations		time in WBSCM	
Marketing Specialists	Annually – 12	\$53,420	Approx 50% of	
GS – 13 (1)	month operations		time in WBSCM	
Marketing Specialists	Annually – 12	\$262,050	Approx 50% of	
GS – 12 (6)	month operations		time in WBSCM	
Program Assistant GS –	Annually – 12	\$6,965	Approx 5% of	
7 (3)	month operations		time in WBSCM	

The annual cost to the Federal Government is \$40,509,028.

15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

There is an overall decrease in respondents from the previous submission; however, there is a significant increase in burden due to the number of responses per respondent. Respondents submit bid submissions and offers in response to their desire to sell product to USDA. As USDA funding increases or decreases, program recipients desire more or different products, and recipient agencies adjust when and where they need product. AMS must make requisite changes to purchase cycles and schedules. These collective changes in quantity, selection, delivery schedule and purchase cycle caused AMS to require additional responses from respondents. These changes were not a result of any changes to regulations, but the requirement to provide USDA recipient programs with the products they require. Please see the Question 15 Breakout to show adjustments between 2011 and 2014.

16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

Purchase and contract award information is public and readily available on the AMS website.

17. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION, EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.

The Agency requests approval not to display the expiration date for OMB approval of the information collection. This requirement significantly affects mandatory programs by increasing costs since all the forms are screens in an online software application. And a change to the screens where information is input into the system requires a Change Request and equates to a significant cost to AMS. There is also some confusion among respondents thinking their application to submit bids expires since a date would be displayed, when in fact their participation does not expire, provided they perform on their contracts.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

There are no exceptions to OMB-83-1 certification statement. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

B. <u>COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL</u> <u>METHODS.</u>

This information collection does not employ statistical methods.