

SUPPORTING STATEMENT

OMB CONTROL NO. 2700-0054

NFS 1843 – Contract Modifications for Engineering Change Proposals (ECP)

Terms of Clearance: Extension Without Change Of A Currently Approved Collection

A. Justification.

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

This collection is required to ensure engineering change orders associated with NASA contracts are described, justified, and submitted to the NASA procuring office for review and processing. The requirement is 48 CFR Part 1843. The clause at 1852.243-70, Engineering Change Proposals (ECP) requires the information collection.

- 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.**

NASA procurement and NASA technical personnel use the information to manage a contract and to arrive at a fair price for engineering changes made during contract performance.

The affected public is businesses or other for-profit institutions under contract with NASA.

Change proposals are submitted whenever a change order results in an increase or decrease to the contractor's cost to perform services. Without change orders, NASA would often be unable to obtain the best goods and services at the best prices.

- 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.

NASA encourages the use of computer technology when preparing change proposals. NASA does not prescribe a format for submission, and most contractors have cost collection systems which are utilized for proposal preparation. Also, NASA participates in Federal efforts to extend the use of information technology to more Government processes via the Internet.

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.

NASA procurement procedures are continually being reviewed to eliminate duplication and other inefficiencies. Each engineering change is unique and the information required in an ECP is not available elsewhere. There is no duplication of information.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

Small businesses under contract with NASA may be required to submit an ECP or respond to an engineering change initiated by NASA. Small businesses must submit the same information as large businesses in order for NASA to have sufficient data to negotiate a fair and reasonable price. The cost of preparing an ECP is included in the proposal, and is reimbursable under the contract.

6. DESCRIBE THE CONSEQUENCE TO 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.

An engineering change proposal is a management tool. Without this information collection, NASA would not have a consistent and orderly process to effect change at a fair and reasonable price.

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;**
- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE**

TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**
- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 YEARS;**
- **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;**
- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**
- **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**
- **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.**

There are no special circumstances. The collection of information is conducted in a manner consistent with 48 CFR Part 1843, clause 1852.243-70, Engineering Change Proposals (ECP.)

- 8. IF APPLICABLE, PROVIDE A COPY AND IDENTIFY THE DATE AND PAGE NUMBER OF PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE, REQUIRED 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.

The 60-day FRN was published on January 29, 2014 - Vol.79, No 19. No comments were received from the public.

The 30-day FRN was published June 12, 2014 - Volume 79, No 113. No comments were received from the public.

- 9. 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 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.

NASA does not provide specific instructions or strict format for ECPs. In general, contractors are required to use Federal Acquisition Regulation (FAR) procedures for proposal submission which vary depending upon type and dollar value.

The data to be submitted is the contractor's own cost data, and is therefore only available from the contractor.

NASA consults with those from whom information is to be collected on an ongoing basis each time an engineering change takes place. NASA contracting officers discuss with individual contractors the information needed. Each engineering change is negotiated and the negotiation provides a forum for gathering information on the data collection.

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

No payments or gifts will be provided to respondents.”

- 11. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO**

RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

The contract language addresses NASA policy associated with assurances of confidentiality and the protection of information. Any proprietary data submitted in conjunction with an ECP is protected from release.

- 12. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTION OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE. THIS JUSTIFICATION 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.**

Information of a sensitive nature as described above will not be collected.

- 13. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.**

Number of Respondents	Annual Number of Responses	Estimated Time per Response	Estimated Annual Burden
200	1	30 hours	6,000 hours

- 14. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION.**

The total annual cost burden to respondents is \$290,200.00. The cost to the respondent/contractor is reimbursable through the contract.

Burden per response is calculated by multiplying 30 hours by a rate of \$48.35 (the 2013 rate of a Federal employee at the grade 13 level as a comparable employee with the same skill level in the private sector would likely prepare the ECP) for a total of \$1451.00 per ECP.

The ECP total of \$1451.00 is multiplied by the 200 estimated annual submissions for a total of \$290,200.

- 15. 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.**

NASA receives approximately 200 ECPs a year. Each is reviewed/ audited/ analyzed taking an average of 10 hours per proposal. Multiple NASA personnel may be involved in a review to include engineers, cost analysts, and contracting officers. On average, the review and analysis will be performed by personnel at the GS-14 level or a 2013 rate of \$57.13. Annual cost to NASA is 2000 hours x \$57.13 = \$114,260.

- 16. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-1.**

There are no significant program changes. The number of ECPs has increased due to more changes in NASA programs and increased funding uncertainty.

- 17. 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.**

- 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.**

NASA will display the expiration date within the PRA Statement.

- 19. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-1.**

NASA does not seek exceptions to the following statements:

The proposed collection of information –

- (a) is necessary for the proper performance of the functions of NASA, including that the information to be collected will have practical utility;*
- (b) is not unnecessarily duplicative of information that is reasonably accessible to the agency;*
- (c) reduces to the extent practicable and appropriate the burden on persons who shall provide information to or for the agency, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:*
- (1) establishing differing compliance or reporting requirements or timelines that take into account the resources available to those who are to respond;*
 - (2) the clarification, consolidation, or simplification of compliance and reporting requirements; or*
 - (3) an exemption from coverage of the collection of information, or any part thereof;*
- (d) is written using plain, coherent, and unambiguous terminology and is understandable to those who are targeted to respond;*
- (e) indicates for each recordkeeping requirement the length of time persons are required to maintain the records specified;*
- (f) has been developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected, including the processing of the information in a manner which shall enhance, where appropriate, the utility of the information to agencies and the public;*
- (g) when applicable, uses effective and efficient statistical survey methodology appropriate to the purpose for which the information is to be collected; and*
- (h) to the maximum extent practicable, uses appropriate information technology to reduce burden and improve data quality, agency efficiency and responsiveness to the public; and*
- (i) will display the required PRA statement with the active OMB control number, as validated on www.reginfo.gov*

B. Collections of Information Employing Statistical Methods.

This collection does not employ statistical methods.