

OMB No. 0704-0252
Supporting Statement

**Defense Federal Acquisition Regulation Supplement (DFARS); Use of
Government Sources by Contractors, and related clause in
Part 252**

A. Justification

1. Requirement. This justification supports an extension of OMB Control Number 0704-0252, which was previously approved by OMB on October 20, 2011, for 5,250 hours. This statement covers the burden hours related to one of the requirements at DFARS Part 251 and its associated clause. The clause at DFARS 252.251-7000, Ordering from Government Supply Sources, requires contractors to provide a copy of an authorization when the contractor places an order under Federal Supply Schedules, Personal Property Rehabilitation Price Schedules, or Enterprise Software Agreements.

This request does not seek to extend the approval for the requirement associated with the clause at 252.251-7001, Use of Interagency Fleet Management System (IFMS) Vehicles and Related Services, which requires contractors to submit requests for the use of Government vehicles when the contractor is authorized to use such vehicles. Adequate clearance for the reporting requirement of this DFARS clause is already provided in the FAR. FAR subpart 51.2, Contractor Use of Interagency Fleet Management System, and FAR clause 52.251-2, Interagency Fleet Management System Vehicles and Related Services, are covered by OMB Clearance Number 9000-0032. The FAR coverage in section 51.203 contains the same contractor reporting requirements as does the DFARS clause 252.251-7001. The DoD clause imposes no additional contractor IFMS burden beyond that already approved for the FAR coverage of IFMS reporting requirements in subpart 51.2. Since no additional burden is imposed by DFARS clause 252.251-7001, the clearance provided by OMB Clearance 0704-0252 for this DFARS clause should be removed.

2. Purpose. The information to be submitted pursuant to this requirement allows contractors to place orders under schedule contracts and requirements contracts or for Government stock when specifically authorized by the contracting officer as a means of fulfilling the contract's requirements. The information is used by the Government to verify that contractors are authorized to place such orders and use such stock.

3. Information Technology. Improved information technology is used to the maximum extent practicable. This information collection complies with the Government Paperwork Elimination Act, Pub. L. 105-277, Title XVII.

4. Duplication. As a matter of policy, DoD reviews the Federal Acquisition Regulation (FAR) to determine if adequate language already exists. The language in DFARS Part 251 applies solely to DoD and is not duplicative of the language in FAR Part 51. Similar information is not readily available to the Government.

5. Small business. The requirements imposed by the clause apply equally to small and other than small businesses. Only those contractors that wish to use less expensive and more efficient Government sources or stock need to provide the information required by the clause at DFARS 252.251-7000, Ordering from Government Supply Sources.

The burden applied to small business is the minimum consistent with applicable laws, Executive orders, regulations and prudent business practices. Although the information collection requirement does not reduce the burden on small entities, the requirement also does not require contractors to expend significant effort or cost.

6. Consequences for noncollection. DoD reviewed the frequency for collecting this information and verified that it is the minimum necessary to ensure that contractors are authorized to obtain from the Government the supplies or vehicles to enable contract performance. Every attempt has been made to keep the frequency of collection to a minimum without jeopardizing the ability of the Government to assure that contractors are authorized to place orders under Federal Supply Schedules, Personal Property Rehabilitation Price Schedules, or from Government stock.

Collecting this information less frequently could raise the cost of contract performance and, ultimately, the cost to the taxpayer.

7. Special circumstances. Collection is consistent with the guidelines in 5 CFR 1320.5(d)(2). The information will not be collected in a manner that requires an explanation of special circumstances.

8. Public comments and consultation. This information collection is consistent with the guidelines in 5 CFR 1320.5(d). Public comments were solicited in the **Federal Register** on June 13, 2014

at [79 FR 33913](#). No public comments were received in response to the notice. On August 20, 2014, DARS published a notice in the **Federal Register** at [79 FR 49289](#) stating that the proposed information collection had been submitted to OMB for approval.

9. Payment to respondents. No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

10. Confidentiality. The information collected will be disclosed only to the extent consistent with prudent business practices, current regulations, statutory and Freedom of Information Act requirements.

11. Sensitive questions. There are no questions of a sensitive nature.

12. Estimate of public burden. The estimated public burden for this information collection requirement remains unchanged. Although the burden associated with the clause at 252.251-7001, Use of Interagency Fleet Management System (IFMS) Vehicles and Related Services, is no longer included in this justification, there is no change in the overall hours estimated for this OMB clearance. Any potential reduction in burden hours is offset by the increased use authorized under DFARS clause 252.251-7000, Ordering from Government Supply Sources, in support of Operation Enduring Freedom.

DFARS 252.215-7000 burden:

Number of respondents	Note (1)	3,500
Responses per respondent	(1)	3
Total annual responses		10,500
Hours per response	(1)	0.5
Total hours		5,250
Cost per hour	Note (2)	\$31.07
Total annual cost to public		\$163,091.25

Notes:

(1) Based on information provided by DoD specialists involved in the processing of information collected. No centralized data is available concerning the number of respondents or responses.

(2) Based on GS-9, step 5 hourly rate (\$22.80) for calendar year 2014 plus 36.25 percent burden (\$8.27), equals \$31.07 per hour.

13. Estimated nonrecurring costs. We estimate that there are no

nonrecurring costs, i.e., capital and start-up, or operation and maintenance costs.

14. Estimated cost to the Government.

Total annual responses	Note (1)	10,500
Hours per response	(2)	0.5
Total annual hours		5,250
Cost per hour	(1)	\$31.07
Total annual cost to Government		\$163,091.25

Notes:

(1) Based on information provided by DoD specialists involved in the processing of information collected, the estimated 0.5 hour per response is based on the time required for the Government to receive, review, and analyze the information submitted by the contractor.

(2) Based on GS-9, step 5 hourly rate (\$22.80) for calendar year 2014 plus 36.25 percent burden (\$8.27), equals \$31.07 per hour.

15. Program changes. As discussed in paragraphs 1 and 12 above, there are some changes in the applicable requirements associated with this submission; however, there is no overall change in the number of burden hours requested. Clearance for DFARS clause 252.251-7001 is no longer required, and usage under DFARS clause 252.215-7000 is increased due in support of Operation Enduring Freedom. The adjustment in costs is the result of using the updated 2014 wage rates.

16. Publication. Results of this information collection will not be published.

17. Expiration date. DoD does not seek approval not to display the expiration date for OMB approval of this information collection.

18. Certification. There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

B. Collections of Information Employing Statistical Methods

Statistical methods will not be employed.