

JUSTIFICATION FOR CHANGE
OMB 83-C; ICR 0704-0225
DFARS Final Rule 2014-D013

DoD is issuing a final rule amending the DFARS to remove text that will become duplicative as result of FAR final rule 2012-024, Commercial and Government Entity Code, that becomes effective November 1, 2014, at which time the DFARS coverage at 204.72 and the DFARS clause 252.204-7001, Commercial and Government Entity (CAGE) Code Reporting, will be outdated. The DFARS clause had prescribed use of DD Form 2051, Request for Assignment of a Commercial and Government Entity (CAGE) Code, to obtain CAGE codes. The FAR rule includes a new FAR clause 52.204-18, Commercial and Government Entity Code Maintenance, which requires use of the DD Form 2051 only for CAGE maintenance by U.S. contractors not registered in SAM. Now that CAGE codes are obtained via SAM registration, use of the DD 2051 has significantly declined. Per FPDS about 170 DD 2051 forms were submitted for 2014 to obtain CAGE codes and request file maintenance, which equates to a total of about 20 hours a year.

Upon publication of the DFARS case and removal of DFARS clause 252.204-7001, the burden associated with this DFARS collection instrument must be removed and any burden must be accounted for under FAR clause 52.204-18 and the associated OMB clearance 9000-0187.

Below is an assessment of the number of respondents, burden hours, and cost being deleted from DFARS collection 0704-0225 resulting from publication of DFARS final rule 2013-D013 and deletion of DFARS clause 252.204-7001, Commercial and Government Entity (CAGE) Code Reporting.

This information collection requirement (ICR) was included in the January 31, 2014, request for 3-year extension of the ICR under OMB Control Number 0704-0225, DFARS part 204, Administrative Matters, and related contract clauses at DFARS 252.204. This information collection requirement was approved with an expiration date of March 31, 2017.

Deletion of DFARS clause 252.204-7001 will result in the reduction in burden under OMB Clearance No. 0704-0225 in the amount of 2,297 hours calculated as follows:

Respondents	9,188
Responses/respondent	<u>x 1</u>
Responses	9,188
Hours per response	<u>x .25</u>
Total hours	2,297
Cost per hour	<u>x \$37.21</u>
Total annual cost to public	\$85,471

Accordingly, the following details the new total estimated annual public burden associated with the removal of clause 252.204-7001:

Total respondents	3,707 (12,895-9,188)
Total responses/respondent	1
Total responses	3,707 (12,895-9,188)
Total hours per response	X 3
Total annual hours	11,121
Total annual cost to public	\$85,471 (\$427,442-\$85,471)

DARS is submitting an 83-C change notice concurrently with the submission of DFARS final rule 20145-D013 to OIRA.