

OMB No. 0704-0214
Supporting Statement
DFARS Part 217 - Special Contracting Methods

A. Justification

1. Requirement. This statement supports a request for extension of the information collection requirements in the Department of Defense (DoD) currently approved under OMB Clearance Number 0704-0214 for DFARS part 217, Special Contracting Methods, of the Defense Federal Acquisition Regulation Supplement (DFARS) and the related provisions and clauses at part 252.217.

DFARS Part 217 contains the following information collection requirements:

a. Paragraph (d)(3) of the clause at DFARS 252.217-7012 requires the contractor to show evidence of casualty, accident, and liability insurance under a master agreement for vessel repair and alteration.

b. Paragraphs (f) and (g) of the clause at DFARS 252.217-7012 require the contractor to notify the contracting officer of any property loss or damage for which the Government is liable and to submit to the contracting officer a request, with supporting documentation, for reimbursement of the cost of replacement or repair.

c. The provision at DFARS 252.217-7026 requires the apparently successful offeror to identify its sources of supply.

d. Paragraphs (c) and (e) of the clause at DFARS 252.217-7028 require the contractor to submit to the contracting officer a work request and proposal for "over and above" work.

e. Paragraph (a) of DFARS 217.7004, Exchange of Personal Property, requires that solicitations which contemplate exchange (trade-in) of personal property and application of the exchange allowance to the acquisition of similar property (see 40 U.S.C. 481), shall include a request for offerors to state prices for the new items being acquired both with and without any exchange (trade-in allowance).

f. Paragraph (b) of DFARS 217.7404-3, Undefined Contract Actions, requires the contractor to submit a "qualifying proposal" in accordance with the definitization schedule. A qualifying proposal is defined in 217.7401(c) as a proposal

containing sufficient information for the DoD to do complete and meaningful analyses and audits of the information in the proposal, and any other information that the contracting officer has determined DoD needs to review in connection with the contract.

g. Paragraph (d) of DFARS 217.7505, Acquisition of Replenishment Parts, permits contracting officers to include in sole-source solicitations that include acquisition of replenishment parts, a provision requiring that the offeror supply with its proposal, price and quantity data on any Government orders for the replenishment part issued within the most recent 12 months (see 10 U.S.C. 2452 note, Spare Parts and Replacement Equipment, Publication of Regulations).

2. Purpose. DFARS Part 217 prescribes policies and procedures for acquiring supplies and services by special contracting methods. Contracting officers use the information to:

a. Determine that the contractor is adequately insured. The requirement at DFARS 252.217-7012(d)(3) supports prudent business practice by limiting the Government's liability as a related party to the work the contractor performs.

b. Keep informed of lost or damaged property for which the Government is liable, and to determine the appropriate course of action for replacement or repair of the property as required by DFARS 252.27-7012(f) and (g).

c. Identify the apparently successful offeror's sources of supply so that competition can be enhanced in future acquisitions. The collection at DFARS 252.217-7026 complies with 10 U.S.C. 2384, Supplies: Identification of Supplier and Sources, which requires the contractor to identify the actual manufacturer or all sources of supply for supplies furnished under contract to DoD.

d. Determine the extent of "over and above" work before the work commences as specified in DFARS 252.217-7028. This requirement supports prudent business practice because it allows the Government to review the need and potential cost of pending work before the contractor begins performance.

e. Contemplate exchange (trade-in) of personal property and application of the exchange allowance to the acquisition of similar property (see 40 U.S.C. 481). DFARS 217.7004 requires contracting officers to include a request for offerors to state

prices for the new items being acquired both with and without any exchange (trade-in allowance). This allows the contracting officer to make an informed decision regarding the reasonableness of the prices for both the new and trade-in items.

f. Evaluate a contractor's "qualifying proposal" in a timely manner. The collection requirement at DFARS 217.7404-3 ensures the contracting officer has sufficient information and time to complete a meaningful analysis and audit for the purpose of determining price reasonableness in accordance with the definitization schedule.

g. Evaluate recent price increases for sole source replenishment parts. DFARS 217.7505 required the contracting officer to include a provision requiring the offeror to submit, with its proposal, price and quantity data on any Government orders for the replenishment part issued within the most recent 12 months. This provision is placed in sole-source solicitations that include the acquisition of replenishment parts.

3. Information Technology. Improved information technology is used to the maximum extent practicable. This information collection requirement may be submitted electronically where electronic submission is feasible.

4. Duplication. As a matter of policy, DoD reviews the Federal Acquisition Regulation (FAR) to determine if adequate language already exists. The guidance in DFARS 217 only applies to DoD and is not duplicative of the FAR. No similar information is available elsewhere.

5. Small Business. The burden applied to small business is the minimum consistent with applicable laws, Executive orders, regulations and prudent business practices. None of the information collection requirements are expected to have a significant impact on a substantial number of small business or other small entities. The requirement to notify the contracting officer only applies to a small number of contractors that have contracts for ship repair.

6. Consequences for non-collection. Every attempt has been made to keep the frequency of collection to a minimum without jeopardizing the ability of the Government to assure that offerors are submitting adequate responses to requests for proposal. This information is collected in response to individual solicitations. Where feasible, this information is only collected from the successful offeror, prior to contract

award. Contracting officers could not perform their administrative functions effectively and efficiently if the information were collected less frequently.

a. Failure to verify the contractor's casualty, accident, and liability insurance would place unacceptable risk on the Government.

b. Requiring the contractor to notify the contracting officer of any property loss or damage for which the Government is liable allows the contracting officer to investigate the loss or damage in a timely manner. This minimizes the potential for further loss or damage. Failure to obtain documentation to support the cost of replacement or repair would hamper the contracting officer's ability to negotiate a fair and reasonable price.

c. The authority to require a sole source vendor to identify its sources of supply enhances the Government's ability to promote competition and, possibly, negotiate a direct contract with the supplier. Without that ability, the Government's ability to promote competition would be difficult.

d. Without the authority to require the contractor to submit to a work request and proposal, the contracting officer would be unable to assess proposed "over and above" items before work commences. This could result in unnecessary work being performed or, potentially, cause the Government to reimburse the contractor for work that should have been covered by the basic contract.

e. Without the ability to obtain separate prices for new and trade-in items, the contracting officer could inadvertently overpay for a new item or receive less than a fair market value to trade-in items.

f. Failure to obtain a qualifying proposal, as defined in DFARS 217.7401(c), increases the risk of delays in definitizing a contract action. In addition, the contracting officer would be unable to negotiate a fair and reasonable price due to the lack of adequate cost or pricing data.

g. The ability to obtain information regarding price increases of 25 percent or more in the last 12 months enables the contracting officer to mitigate the impact of potentially overpriced parts. An additional benefit is the ability to focus resources during proposal evaluation. These benefits would not

be realized without the required information and could, potentially, cause the Government to overpay for some replenishment parts.

7. Special circumstances. There are no special circumstances that require the collection to be conducted in any manner listed in 5 CFR 1320.5(d)(2).

8. Public comments and consultation. As required by 5 CFR 1320.8(d), public comments were solicited in Federal Register on October 24, 2014 ([79 FR 63607](#)). No public comments were received in response to the Federal Register Notice. A second notice soliciting public comments was published in the Federal Register on January 7, 2015 ([80 FR 870](#)).

9. Payment to respondents. No payment or gift will be provided to respondents to this information collection requirement.

10. Confidentiality. This information is disclosed only to the extent consistent with prudent business practices and current regulations and statutory requirements. No assurance of confidentiality is provided to respondents.

11. Sensitive questions. No sensitive questions are involved.

12. Estimated cost. DoD specialists who are most knowledgeable of the requirements and need for the information reviewed the collection frequency. We estimated the labor burden using information from the prior clearance and the Federal Procurement Data System (FPDS). We also validated our assumptions with subject matter experts. Except where indicated in the following paragraphs, we have no reason to believe that there has been a substantial change in the number of contractors subject to these requirements. General Schedule labor rates have been updated to reflect FY 2014 rates. It should be noted, however, that the current estimate excludes locality pay. This resulted in lower costs in cases where the labor hours remain unchanged from the previous estimate.

a. DFARS 252.217-7012(d)(3) requires contractors to show evidence of insurance under master agreements for vessel repair and alteration. Based on data provided by the Navy, there are 151 master agreements for ship repair. We estimate that a contractor will take, on average, 1 hour to copy and provide the required evidence of insurance to the contracting officer. Accordingly, the estimated burden for this requirement is:

Number of Respondents (1)	151
Responses per respondent (2)	1
Number of responses	151
Average hours per response (3)	1
Estimated hours	151
Cost per hour (4)	\$31.00
Total annual public burden	\$4,681

Notes:

(1) The average number of respondents equals the number of Master Ship Repair Agreement (MSRA) and Agreement for Boat Repair (ABR) holders. According to Volume VII, Chapter 3 of the Navy's Joint Fleet Maintenance Manual, both types of agreement holders are subject to the clause 252.217-7012. The estimated number is higher than the previous estimate because ABR holders were added to this estimate.

(2) It is estimated that each agreement holder will submit proof of insurance once per year. This assumes that proof of insurance is readily available to contracting officers and, therefore, it is unnecessary to request proof of insurance on every contract action. This is the same assumption used in the previous estimate.

(3) The estimated hours per response includes the time required to gather and submit the requested insurance documentation to the contracting officer. There is no change from the previous estimate.

(4) The fully burdened rate of \$31.07 was developed using the 2014 basic hourly salary (without locality) of \$22.80 for a GS-9, step 5, plus a burden of 36.25 percent from OMB Circular A-76, attachment C, equals \$31.07, which is rounded to \$31.00.

b. DFARS 252.217-7012(f) and (g) require the contractor to notify the contracting officer of any property loss or damage for which the Government is liable, and to submit to the contracting officer a request for reimbursement of the cost of replacement or repair with supporting documentation. The estimated burden for this requirement is:

Number of Respondents (1)	151
Responses per respondent (2)	6
Number of responses	900
Average hours per response (3)	8

Estimated hours	7,200
Cost per hour (4)	\$31.00
Total annual public burden	\$223,200

Notes:

(1) The previous estimate assumed there are approximately 900 orders for loss or damage each year. There is no database or other repository that can be used to discretely identify orders involving loss or damage. However, based on discussions with Navy subject matter experts, the previously estimated number of orders appears to be reasonable. Although the total number of estimated hours for this collection remains unchanged, it should be noted that the number of respondents and average number of responses has been adjusted to reflect the current number of agreement holders identified in subparagraph 12(a). Based on feedback from Navy subject matter experts, the revised estimate is reasonable.

(2) The number of responses per respondent was calculated by dividing the number of responses by the number of respondents.

(3) We estimate that a contractor needs 8 hours to prepare and submit the notice of loss or damage to the contracting officer. This is consistent with the previous estimate.

(4) The fully burdened rate of \$31.07 was developed using the 2014 basic hourly salary (without locality) of \$22.80 for a GS-9, step 5, plus a burden of 36.25 percent from OMB Circular A-76, attachment C, equals \$31.07, which is rounded to \$31.00.

(5) The total cost associated with this collection has decreased because this estimate excludes locality pay that was included in the 2011 estimate.

c. The provision at 252.217-7026 requires the apparent successful offerors to identify their source of supplies when the acquisition is conducted under other than full and open competition. Based on FPDS data, we determined there was an average of approximately 37,384 contracts awarded under other than full and open competition between FY 2010 and FY 2013. Additionally, we estimate that a contractor will need an average of 16 hours to identify and supply the required information to the Government. The estimated burden for this requirement is:

Number of Respondents (1)	1,480
Responses per respondent (2)	24

Number of responses (3)	35,515
Average Hours per response (4)	16
Estimated hours	568,240
Cost per hour (5)	\$31.00
Total annual public burden	\$17,615,440

Notes:

(1) FPDS queries were constructed for definitive and indefinite delivery contracts. Filters were applied to exclude certain contract actions based on the clause prescription in Subpart 217. The prescription at 217.7303 requires 252.217-7026 to be used in all solicitations for supplies when the acquisition is being conducted under other than full and open competition, except when

- (i) Using FAR 6.302-5, Authorized or Required by Statute;
- (ii) The contracting officer already has the information required by the provision (e.g., the information was obtained under other acquisitions);
- (iii) The contract is for subsistence, clothing or textiles, fuels, or supplies purchased and used outside the United States;
- (iv) The contracting officer determines that it would not be practicable to require offerors/contractors to provide the information, e.g., non-repetitive local purchases;
- (v) The contract is for commercial items; or
- (vi) The contract is expected to be below the simplified acquisition threshold.

The FPDS data was used to calculate the average number of respondents (i.e., contractors) who received awards meeting the above criteria for the years FY 2010 through FY 2013. Of the estimated 37,384 contracts awarded on average per year, we estimate that only 95% of those contracts will require the successful offeror to submit a list of sources of supplies in accordance with the criteria outlined at DFARS 217.7303. We estimate that 5% of contracts awarded for major weapon systems will be excluded from this reporting requirement under one of the discretionary provisions at 217.7303(a)(2) or 217.703(a)(3), resulting in approximately 35,515 responses received.

(2) The number of responses per respondent was estimated by dividing the average number of contracts awarded during the period FY 2010 through FY 2013 by the average number of contractors receiving awards in those fiscal years (see notes 1 and 3).

(3) The estimated number of responses (i.e., solicitations) was derived by averaging the number of contracts awarded each year in FY 2010 through FY 2013. New awards were used as an analog for solicitations for the apparently successful offerors.

(4) It is estimated that it will take an average of 16 hours to assemble, review and submit a list of suppliers to the contracting officer. We estimate that many of the responses will require more time, but many responses will require less time to submit their list of suppliers because these acquisitions are either non-complex or of a repetitive nature, such as guns and ammo, etc. Therefore, the estimate has been reduced to 16 hours per response from the 24 hours previously estimated.

(5) The fully burdened rate of \$31.07 was developed using the 2014 basic hourly salary (without locality) of \$22.80 for a GS-9, step 5, plus a burden of 36.25 percent from OMB Circular A-76, attachment C, equals \$31.07, which is rounded to \$31.00.

d. DFARS 252.217-7028 requires contractors to submit a work request and a proposal for "over and above" work to the contracting officer. There is no centralized database for recording over and above work requests. However, we were able to validate the previous estimate by using FPDS data to identify basic contracts for which the clause 252.217-7028 would apply. This enables us to estimate the number of respondents. The basis for the following estimate is contained in the explanatory notes below.

Number of Respondents (1)	327
Responses per respondent (2)	156
Number of responses (3)	51,100
Hours per response (4)	4
Estimated hours	204,400
Cost per hour (5)	\$31.00
Total annual public burden	\$6,336,400

Notes:

(1) According to our research, the 2011 estimate relied on prior estimates that were developed using DD-350 data. Since there currently is no centralized database for over and above work requests, FPDS data for maintenance, repair, and overhaul contracts was used to estimate the number of respondents. The raw data used to develop this estimate was determined by analyzing queries of contract actions involving product/service

code (PSC) in categories "J", "V", and "Z2". After randomly reviewing the "Description of Requirements" in the three queries, it was determined that contracts in category "J" are most likely to involve over and above effort. This category is used for maintenance, repair, and overhaul of aircraft, missiles, vehicles, and other types of vehicles and equipment. Based on the query, an average 327 contractors were awarded new contracts each year between FY 2010 and FY 2013.

(2) Using the query described in note 1, we determined that an average of 4,303 contracts were awarded each year between FY 2010 and FY 2013. Assuming the previous estimate of 51,100 is still valid, an average of about 12 over and above work requests and proposals were submitted on each contract. Since each contractor was awarded slightly more than 13 contracts per year between FY 2010 and FY 2013, this equates to about 156 work requests per contractor (11.9 work requests x 13.2 contracts = 156.3 work requests per contractor). Based on experience, this is considered reasonable.

(3) The previous estimate of 51,100 work requests was validated using the procedures described in notes 1 and 2.

(4) It is estimated that an average of 4 hours are required to evaluate the need for an over and above work request, estimate the cost for repairs, develop a fixed-price proposal, submit the request to the contracting officer, and negotiate a price. This is consistent with the previous estimate.

(5) The fully burdened rate of \$31.07 was developed using the 2014 basic hourly salary (without locality) of \$22.80 for a GS-9, step 5, plus a burden of 36.25 percent from OMB Circular A-76, attachment C, equals \$31.07, which is rounded to \$31.00.

e. DFARS 217.70, Exchange of Personal Property, paragraph 217.7004(a) requires that solicitations that contemplate exchange (trade-in) of non-excess personal property and application of the exchange allowance to the acquisition of similar property (see 40 U.S.C. 481), shall include a request for offerors to state prices for the new items being acquired both with and without any exchange (trade-in allowance). There is no way to identify this type of contract action in FPDS or other centralized databases. However, based on a review of previous estimates by DoD subject matter experts, the 2011 estimate is still considered reasonable. In 2011, we estimated there would be 1,574 solicitations per year for exchangeable property. We estimated 4 responses per

respondent, and 1 hour per response. Accordingly, the estimated burden for this requirement is:

Number of respondents (1)	1,574
Responses per respondent (2)	4.0
Number of responses (3)	6,296
Hours per response (4)	1
Estimated hours	6,296
Cost per hour (5)	\$38.00
Total annual public burden	\$239,248

Notes:

(1) Contracts involving the exchange of personal property represent a very small percentage of the total number of contracts awarded by DoD each year. The number of contractors who are willing to accept trade-ins of personal property is also a relatively small subset of vendors who do business with DoD. According to FPDS data, the estimated number of respondents represents about 2.1 percent of the total number of unique vendors who received awards in FY 2013. Based on experience, this is considered reasonable.

(2) Based on a review of previously approved information collections, the 2011 estimate is still considered valid.

(3) According to data obtained from FPDS, the estimated number of responses represents about 0.6 percent of the contract actions for supplies in FY 2013. Based on experience, this is considered reasonable.

(4) We estimate contractors will require 1 hour to comply with this information collection.

(5) The fully burdened rate of \$37.58 was developed using the 2014 basic hourly salary (without locality) of \$27.58 for a GS-11, step 5, plus a burden of 36.25 percent from OMB Circular A-76, attachment C, equals \$37.58, which is rounded to \$38.00.

f. DFARS 217.74, Undefined Contract Actions, paragraph 217.7404-3(b). In accordance with 10 U.S.C. 2326, unless an exception in 217.7404-5 applies, paragraph (b) of section 217.7404-3, requires, the contractor to submit a "qualifying proposal" in accordance with the definitization schedule. A qualifying proposal is defined in 217.7401(c) as a proposal

containing sufficient information for the DoD to do a complete and meaningful analyses and audits of the information in the proposal, and any other information that the contracting officer has determined DoD needs to review in connection with the contract.

Although the number of undefinitized contract actions and associated qualifying proposals has decreased steadily since 2008, the estimated number of responses has increased from our last estimate. As explained in the following paragraph, this increase is the result of adding UCAs for foreign military sales (FMS) and purchases at, or below, the simplified acquisition threshold (SAT) to the estimate.

DFARS was revised in December 2012 in an effort to continue reducing the number of UCAs. Although the previous policy allowed contracting officers some discretion in applying the policy and procedures in DFARS 217 to contracts meeting the exceptions at DFARS 217.7402(a), it is now mandatory to comply with DFARS 217 in most undefinitized contract actions. In cases where it is impracticable to adhere to DFARS 217, contracting officers are required to provide prior notice to the Deputy Director, Defense Procurement and Acquisition Policy (Contract Policy and International Contracting). As a result of the new policy, this estimate includes UCAs for FMS and those below the SAT. The revised public burden is as follows:

Number of respondents (1)	1,610
Responses per respondent (2)	4.7
Number of responses (3)	7,604
Hours per response (4)	12
Estimated hours	91,248
Cost per hour (5)	\$53.00
Total annual public burden	\$4,836,144

Notes:

(1) Based on FPDS data for FY 2010 through FY 2013, an average of 1,610 contractors receive undefinitized contract actions each year.

(2) The number of responses per respondent was calculated based on the estimated number of responses and respondents (7,604 responses ÷ 1,610 respondents = 4.7 responses per respondent).

(3) Based on FPDS data, there were an average of 2,169 letter

contracts and 5,435 orders definitized each year between FY 2010 and FY 2013 for a total of 7,604 UCAs.

(4) We estimate contractors will require 12 hours to prepare and submit a qualifying proposal. This includes the time to ensure the proposal is adequate for evaluation by the Government.

(5) The fully burdened rate of \$53.31 was developed using the 2014 basic hourly salary (without locality) of \$39.31 for a GS-13, step 5, plus a burden of 36.25 percent from OMB Circular A-76, attachment C, equals \$53.31, which is rounded to \$53.00.

g. DFARS 217.75, Acquisition of Replenishment Parts, paragraph 217.7505(d) permits contracting officers to include in sole-source solicitations that include acquisition of replenishment parts, a provision requiring that the offeror supply with its proposal, price and quantity data on any Government orders for the replenishment part issued within the most recent 12 months (see 10 U.S.C. 2452 note, Spare Parts and Replacement Equipment, Publication of Regulations). This collection applies to centrally managed replenishment parts when the price of the part has increased by 25 percent or more over the most recent 12-month period.

Based on FPDS data, we estimate an average of 573 sole-source solicitations per year for acquisitions of \$1 million or more. Furthermore, we estimate 1 response per respondent, and 16 hours per response. Accordingly, the estimated burden for this requirement is:

Number of respondents (1)	395
Responses per respondent (2)	1.5
Number of responses	573
Hours per response (3)	16
Estimated hours	9,168
Cost per hour (4)	\$38.00
Total annual public burden	\$348,384

Notes:

(1) Based on FPDS data, there were an average of 573 sole-source contracts awarded each year between FY 2010 and FY 2013. We assume that 100 percent of the solicitations will result in a sole-source contract. Accordingly, sole-source contract awards

were used as an analog for sole-source solicitations.

During the period FY 2010 through FY 2013, an average of 395 contractors received sole-source solicitations for replenishment parts each year. Some of these contracts can have as many as 4,000 or more individual part numbers. Accordingly, a large percentage of those contracts will include one or more parts that have increased in price by more than 25 percent in the past year. Since we are unable to determine which contracts will have parts meeting these criteria, we have assumed that 100 percent of the solicitations have the potential to include one or more parts that meet the criteria for requiring the contractor to provide price and quantity data to the contracting officer. Given the small number of sole-source contracts for replenishment parts, we believe this approach may only slightly overstate the public burden.

(2) The number of responses per respondent was calculated based on the estimated number of responses and respondents (573 responses ÷ 395 respondents = 1.5 responses per respondent).

(3) We estimate a contractor needs an average of 16 hours to track prices paid, identify price changes on previous Government contracts, document and review the price increases, and submit the required data to the contracting officer. Our estimate is based on the assumption that most traditional defense contractors have an internal system for tracking contract prices at the line item level.

(4) The fully burdened rate of \$37.58 was developed using the 2014 basic hourly salary (without locality) of \$27.58 for a GS-11, step 5, plus a burden of 36.25 percent from OMB Circular A-76, attachment C, equals \$37.58, which is rounded to \$38.00.

h. The total estimated public burden for the information collection requirements in subparagraphs 12.a. through g. is:

Number of respondents	5,688
Responses per respondent (1)	18
Total Number of responses	102,139
Hours per response (2)	8.7
Estimated hours	886,703
Cost per hour (3)	\$33.39
Total annual public burden	\$29,603,497

Notes:

(1) The number of responses per respondent is calculated by dividing the total number of responses by the number of respondents.

(2) The hours per response was calculated by dividing the estimated hours by the total number of responses.

(3) The cost per hour was determined by dividing the total annual public burden by the total annual estimated hours.

13. Estimated nonrecurring costs. We estimate that there are no nonrecurring costs, i.e., capital and start-up operation and maintenance costs other than the hour burden detailed in section 12.

14. Estimated cost to Government. We estimate approximately 9 hours, on average, to evaluate DFARS Part 217 information requirements in subparagraphs 12.a. through h above. Our estimate considers the time required to receive, review, and analyze information submitted by contractors. We estimated the Government burden as follows:

a. DFARS 252.217-7012(d)(3):

Number of responses	151
Average hours per response	2
Estimated hours	302
Cost per hour	\$31.00
Total annual public burden	\$9,362

b. DFARS 252.217-7012(f) and (g):

Number of responses	900
Average hours per response	10
Estimated hours	9,000
Cost per hour	\$31.00
Total annual public burden	\$279,000

c. DFARS 252.217-7026:

Number of responses	35,515
Average Hours per response	3.5
Estimated hours	124,303

Cost per hour	\$31.00
Total annual public burden	\$3,853,378

d. DFARS 252.217-7028(c) and (e):

Number of responses	51,100
Hours per response	12.5
Estimated hours	638,750
Cost per hour	\$31.00
Total annual public burden	\$19,801,250

e. DFARS 217-70:

Number of responses	6,296
Hours per response	0.5
Estimated hours	3,148
Cost per hour	\$38.00
Total annual public burden	\$119,324

f. DFARS 217.74:

Number of responses	7,604
Hours per response	4.3
Estimated hours	32,697
Cost per hour	\$53.00
Total annual public burden	\$1,732,952

g. DFARS 217.75:

Number of responses	573
Hours per response	2
Estimated hours	1,146
Cost per hour	\$38.00
Total annual public burden	\$43,548

h. The total estimated Government burden for subparagraphs 14.a. through g is:

Number of responses	102,139
Hours per response (1)	7.9

Estimated hours	809,346
Cost per hour (2)	\$31.93
Total annual Government burden	\$25,839,113

Notes:

(1) The estimated hours per response is calculated by dividing the estimated hours by the number of responses.

(2) The cost per hour is calculated as a weighted average for all Information Collection requirements, which includes GS-9, GS-11 and GS-13 rates based on experience requirements. Total annual burden costs are rounded to the nearest dollar.

15. Reason for changes in burden. The estimated hours have increased from the 2011 estimate by approximately 127,105 hours. This change in burden reflects the use of FPDS data for fiscal years 2010 through 2013 and adjustments made to the average hours per response for requirements under DFARS 252.217-7026 and 217.75. First, under DFARS 217.74, Undefined Contract Actions (UCAs), paragraph 217.7404-3(b), the estimated number of respondents increased, based on FPDS data. The number of respondents and the total number of responses increased from our last estimate as a result of adding UCAs for foreign military sales (FMS) and purchases at, or below, the simplified acquisition threshold (SAT) to the estimate. Second, under DFARS 217.75, the total number of respondents increased and the estimated time to submit required data to the contracting officer (average hours per response) also increased to 16 hours from 2 hours previously estimated. Third, under 252.217-7026, we reduced the average hours per response from 24 hours to 16 hours because we estimated that approximately 50% of the contracts awarded are for non-complex, repetitive acquisitions where the contracting officer may not require the successful offeror to submit its list of sources of supplies per DFARS 217.7303(a)(2) and (a)(4). Finally, we reduced the cost per hour rates used in this estimate by excluding locality pay, which had been used in the prior estimates.

Public burden:

	<u>2014</u>	<u>2011</u>	<u>Change</u>
Hours	886,703	759,598	(+127,105)

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

17. Expiration Date. We do not seek approval to not display the expiration date for OMB approval of the information collection.

18. Certification. There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I.

B. Collections of Information Employing Statistical Methods. Results will not be tabulated. Statistical methods will not be employed.