

**Supporting Statement for Information Collection 3090-0027
Contract Administration-Part 542; and Quality Assurance-Part 546
(GSA Forms 308 & 1678)**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The information collection requirement of the General Services Administration Acquisition Regulation (GSAR) clause 552.242-70, Status Report of Orders and Shipments, was established to monitor the current delivery status of orders placed with GSA-FAS supply contractors to ensure that timely corrective action could be taken by the Government in the event the contractor's performance was delinquent. The clause is in solicitations and indefinite delivery requirements contracts for stock replenishment items. The GSA Form 1678, Status Report of Orders and Shipments, was developed for GSA-FAS supply contractors to use to meet the requirements of GSAR clause 552.242-70, which is prescribed at GSAR 542.1107. When GSA-FAS issues direct delivery orders, data from this form is the only notification to FAS that timely shipment has been made to customer agencies.

GSA consolidated all of the requirements supplementing the Federal Acquisition Regulation (FAR) clause 52.246-2, Inspection of Supplies—Fixed-Price, into two clauses (GSAR 552.246-70 and 552-246-71) and established a program providing for Government reliance on contractors to inspect supplies under certain contracts that provide for source inspection instead of relying on Government personnel to inspect supplies. GSAR clause 552.246-70, Source Inspection by Quality Approved Manufacturer, is used when source inspection is performed by a quality approved manufacturer. The use of this clause allows GSA to make the most efficient use of its inspectors by devoting them to the contracts that require inspection by the Government, to checking contracts that require inspection by the Government, to checking the contractors' inspection system, and to inspecting supplies under contracts where complaints are received regarding the quality or supplies. The GSAR clause 552.246-71, Source Inspection by Government (previously GSAR clause 552.246-72), is used when source inspection is performed by Government personnel. These clauses are prescribed at GSAR 546.302-70 and 546.302-71, respectively.

GSAR clause 552.246-70 requires contractors to report requisite information and certify performance of inspection using the DD Form 250, Material Inspection Receiving Report, or computer formatted equivalents of the DD Form 250 for shipments to military facilities and allows contractors additional alternatives (company letterhead or invoice documents) when shipping to civilian facilities. This flexibility should reduce the paperwork burden on contractors, while continuing to protect the Government interests. GSAR clause 552.246-71, requires the contractor to prepare the DD Form 250 for

delivery to military facilities (or computer formatted equivalents), or the GSA Form 308 for deliveries to civilian facilities. The reporting burden for Form DD 250 is reported by the Department of Defense and can be found at

<http://www.dtic.mil/whs/directives/forms/forminfo/forminfo2126.html>.

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.

The Contract Administration Office (CAO) reviews the information from the GSA Form 1678 to ensure that pending orders are shipped in a timely manner to customer agencies or to GSA warehouses. When shipment is delinquent, the requisite information is available to the CAO to take corrective action to prevent loss to the Government either through notice to the contractor to correct its delinquency or to recommend to the appropriate office that the contract be terminated for default.

Information contained on the DD Form 250 and GSA Form 308 is used by various contract administration offices and other support offices to document contract quality assurance, acceptance of supplies and services, shipments, and to justify payments. The information contained on the form is essential for monitoring contract progress. Contract administration cannot be effective without this information.

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.

We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This requirement is being issued under the General Services Administration Acquisition Manual. No duplication has been identified.

5. If the collection of information impacts small businesses or other small entities (item 5), describe any methods used to minimize burden.

The burden applied to small businesses is the minimum consistent with applicable laws, executive orders, regulations, and prudent business practices.

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.

Collection of the information on the GSA Form 1678 on a less frequent basis would prevent the government from taking timely action in the event of delinquent performance and, in some cases, may preclude the Government from exercising its rights in a manner that would not cause further loss to the Government.

The data reported on the DD Form 250 and GSA Form 308 is maintained by contractors as standard operating practice and is entered on the appropriate form when a shipment is made. A copy of the form accompanies the shipment with the other copies distributed pursuant to instructions provided by the Government under the contract.

7. Explain any special circumstances for this information collection.

Collection is consistent with guidelines in 5 CFR 1320.6. There are no special circumstances for collection.

8. 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.

Under the procedures established for development of the GSAM, agency and public comments were solicited before finalization of the text. Notices published in the *Federal Register* at 80 FR 13003, on March 12, 2015, and at 80 FR 34434, on June 16, 2015 made this requirement available to the public and requested comments. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than re-numeration of contractors or grantees.

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

This information is disclosed only to the extent consistent with prudent business practices and current regulations.

11. Provide additional justification for any questions of a sensitive nature.

No sensitive questions are involved.

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 differences 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;**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13; and**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

A. Status Report of Orders and Shipments (GSAR clause 552.242- 70 and GSA Form 1678).

The estimated number of respondents annually is 2,800, with each respondent responding 12 times per year. The total annual responses are estimated to be 33,600, with each response requiring 5 minutes (.08) for a total of 2,688 hours.

Number of respondents.....	2,800
Responses per respondent.....	<u>x 12</u>
Number of responses.....	33,600
Avg. hours per response.....	<u>x .08</u>
Estimated total burden hours.....	2,688

B. Source Inspection Requirements (GSAR clause 552.246-70, 552.246-71 and GSA Form 308).

The estimated number of respondents annually is 1,804 with each respondent responding 24 times per year. The total annual responses are estimated to be 43,296, with each response requiring 5 minutes (.08) for a total of 3,463.68 hours, rounded up to 3,464.

Number of respondents.....	1,804
Responses per respondent.....	<u>x 24</u>
Number of responses.....	43,296
Avg. hours per response.....	<u>x .08</u>
Estimated total burden hours.....	3,464

C. Average total (A & B) Time required to read and prepare information is estimated at 5 minutes (.08) per completion.

The estimated number of respondents annually is 4,604 with some respondents responding 24 times per year, and some 12 times per year. The total annual responses are estimated to be 76,896 (33,600 + 43,296); with each response requiring 5 minutes (.08) for a total of 6,151.68 hours, rounded up to 6,152.

Total Number of respondents.....	4,604
Number of responses Form 1682.....	33,600
Number of responses Form 308.....	43,296
Total number of responses.....	76,896
Avg. hours per response.....	<u>x .08</u>
Estimated total burden hours.....	6,152

13. Provide an estimate for 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.)

A. Status Report of Orders and Shipments (GSA Form 1678 and GSAR clause 552.242- 70).

The estimated annualized cost to the public is \$182,784 (33,600 total annual responses at .08 hours per request = 2,688 hours x \$68.00 per hour)

Number of respondents.....	2,800
Responses per respondent.....	<u>x 12</u>
Total annual responses.....	33,600
Preparation hours per response.....	<u>x .08</u>
Estimated Hours.....	2,688
Average hourly wages (\$50.00+36% overhead).....	<u>x \$68.00</u>
Total annual recordkeeping cost.....	\$182,784

B. Source Inspection Requirements (552.246-70, 552.246-71, GSA Form 308).

The estimated annualized cost to the public is \$235,530.24 (43,296 total annual responses at .08 hours per request = 3,464 hours x \$68.00 per hour)

Number of respondents.....	1,804
Responses per respondent.....	<u>x 24</u>
Total annual responses.....	43,296
Preparation hours per response.....	<u>x .08</u>
Estimated Hours.....	3,464
Average hourly wages (\$50.00+36% overhead).....	<u>x \$68.00</u>
Total annual recordkeeping cost.....	\$235,552

C. Average total (A & B) Time required to read and prepare information is estimated at 5 minutes (.08) per completion.

The estimated annualized cost to the public is \$418,336 (76,896 total annual responses at .08 hours per request = 6,152 hours*\$68 per hour)

Total Number of respondents.....	4,604
Number of responses Form 1682.....	33,600
Number of responses Form 308.....	43,296
Total number of responses.....	76,896
Avg. hours per response.....	x .08
Estimated total burden hours.....	6,152
Avg. hourly wages (\$50 +36% overhead).....	x \$68
<u>Total annual recordkeeping cost.....</u>	<u>\$418,336</u>

14. Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include qualification of hours, operational 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated cost to the Government is as follows:

The Federal Government will receive 76, 896 responses. Reviewing and processing each response is estimated to take 10 minutes each (.17); thus, the burden hours to the Federal Government are estimated at 13,073 hours per year. The estimated cost to the Federal Government is \$549,066.

Number of responses.....	76,896
Avg. hours per response.....	x .17
Estimated hours per year.....	13,073
Cost per hour.....	x \$42
Total annual Government cost.....	\$549,066

The cost of \$42 per hour is based on the GS-12, step-5 salary. (Salary Table 2015-DCB Washington-Baltimore-Northern Virginia, DC-MD-VA-WV-PA Effective January 2015).

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14.

The regulatory requirements have not changed.

However, based on current research, the number of respondents and estimated average response time per respondent for GSA form 308 is adjusted to more accurately reflect current review and response times. This adjustment also affects the total number of estimated hours, the estimated annualized cost to the public, and the estimated annualized cost to the government.

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.

Results will not be tabulated or published.

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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions".

Not applicable.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used in this information collection.