

**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION  
ACT SUBMISSION  
OMB # 1405-0050  
DEPARTMENT OF STATE ACQUISITION REGULATION  
(DOSAR)**

**A. JUSTIFICATION**

1. The information collection covers requirements of the Department of State Acquisition Regulation (DOSAR), codified in the Code of Federal Regulations (CFR), Title 48, Chapter 6. It covers both pre-award and post-award acquisition requirements.

*Pre-award actions* are those actions leading up to the award of the contract. They include evaluating the bids/proposals submitted in response to the solicitation, negotiating with prospective contractors, and awarding the contract.

*Post-award actions* are those actions taken after contract award through close-out of the contract. They include monitoring the contractor's performance, issuing modifications to the contract, dealing with unsatisfactory performance, issuing payments to the contractor, and closing out the contract upon its completion.

The majority of contractual requirements are covered in the Federal Acquisition Regulation (FAR), CFR, Title 48, Chapter 1. This information collection, therefore, deals only with requirements that are not included in the FAR but are required by the DOSAR. Where necessary, we have separated the discussion of pre- and post-award requirements.

Pre-Award

The FAR requires the issuance of written solicitation documents for all acquisitions exceeding the simplified acquisition threshold. The U.S. Government evaluates the responses to these solicitations in accordance with established criteria. This evaluation constitutes the basis for determining which bidders or offerors receive contract awards.

DOSAR solicitation provisions that require collection of data from offerors are described below:

- a. DOSAR 652.236-71, *Foreign Service Buildings Act, As Amended* – this provision requires a bidder or offeror to provide information to determine if it is an American-owned firm. Under the Foreign Service Buildings Act, American-owned firms receive a 10 percent price evaluation preference for the construction, alteration, or repair of buildings or grounds abroad exceeding \$5 million.

- b. DOSAR 652.236-72, *Statement of Qualifications for the Omnibus Diplomatic Security and Antiterrorism Act* - this provision requires bidders and offerors to provide information to determine if the bidder or offeror is a United States person or a United States joint venture person. Under the Omnibus Diplomatic Security and Antiterrorism Act of 1986, diplomatic construction or design projects abroad exceeding \$10 million are limited to United States persons or United States joint venture persons.
- c. DOSAR 652.245-70, *Status of Property Management System* – this provision requests information from offerors regarding their property management systems in order to comply with FAR 45.201(c), which states that the solicitation shall require all offerors to submit a description of the offeror’s property management system, plan, and any customary commercial practices, voluntary consensus standards, or industry-leading practices and standards to be used by the offeror in managing Government property.
- d. DOSAR 652.237-73, *Statement of Qualifications for Preference as a U.S. Person* - this provision requires bidders and offerors to provide information to determine if the bidder or offeror is a United States person or a United States joint venture person. Under the Foreign Relations Authorization Act, Fiscal Years 1990 and 1991 (22. U.S.C. 4864), United States persons or United States joint venture persons receive a 10 percent price evaluation preference for local guard contracts abroad under diplomatic security programs.

#### Post-Award

The following clauses require some data collection from contractors:

- a. DOSAR 652.232-72, *Limitation of Funds* - this clause requires contractors to notify the U.S. Government when they believe that the funds obligated on the contract are insufficient to cover the work to be performed by a certain date.
- b. DOSAR 652.236-70, *Accident Prevention* – this clause requires that construction contractors submit a written accident prevention plan.
- c. DOSAR 652.245-71, *Special Reports of Government Property* – this clause requires contractors to submit information quarterly in accordance with DOS capitalized property reporting requirements.

#### 2. Pre-Award

The information that bidders and offerors are required to submit is used by agency personnel -- contracting officers, cost and price analysts, program office technical

experts, legal advisors, and management officials -- to determine the eligibility of bidders/offerors for award.

### Post-Award

Post-award information collection requirements are required to receive plans for accident prevention on construction projects and for compliance with DOS capitalized property reporting requirements.

3. The Department allows for all information collected to be submitted via electronic submission of responses. This reduces the burden on respondents and makes it easier for the government to handle and analyze the information.
4. The collection does not duplicate any existing collection of information. Only information that is solicitation-specific and required by the FAR or DOSAR, is collected. .
5. The impact on small businesses was considered, but due to the nature of the requirements, there is no opportunity to reduce the information burden for small businesses.
6. For pre-award activities, eligibility for award must be determined for all offerors for each solicitation, so there is no opportunity to reduce or eliminate the information collection. This collection cannot be conducted on a less frequent basis. For post-award activities, the information collection requirements are only on an as-needed basis. They do not apply across the board and relate only to the occurrence of specific circumstances.
7. The Department does not require any information collection to be conducted in any of the manners listed.
8. The Department published the 60 Day Notice in the *Federal Register*, requesting public comments on April 3, 2015 at 80 FR 18274. No comments were received.
9. There are no payments or gifts to respondents.
10. The information pertaining to commercial business and other entities will be kept private to the extent permitted by FAR 3.104 and 15.207.
11. There are no questions of a sensitive nature in this information collection.
12. The estimated total aggregated burden hours to respondents are 253,914 hours. The number of estimated respondents is 1647. The number of estimated responses is 2600 (2400 pre + 200 post). The annual hour cost burden is \$8,071,926 (\$ 8,062,389 pre + \$9,537 post). The estimated weighted wage rate category for "All occupations" utilized is \$31.79 (\$22.71 BLS 2014 average wage

for all occupation x 1.4 weighted wage multiplier). Please see the Annualized Analysis (Respondents) on pages 11 through 13 for complete disaggregated information on computations.

13. The estimated annual cost burden to respondents is \$ 242,158. Please see the Annualized Analysis (Respondents) on pages 11 through 13 for complete information on computations.
14. The estimated annual cost to the Federal Government is \$530,704. The previous estimated annual cost to the Federal Government was reduced from \$1,477,372 to \$530,704 due to the fact that there was a flaw in the estimating methodology used in the previous submission. In addition, we found that some of the clauses in the previous submission were included in error and one has been removed due to a DOSAR change. Please see the Annualized Cost Analysis (Federal Government) on pages 14 through 15 for complete information on computations.
15. Based on the reasons indicated in table below, the number of burden hours has been reduced by 22,070 from 275,984 to 253,914.

<b>Pre-Award Provisions</b>	<b>Reason for Deletion/Revision</b>	<b>Original (hrs)</b>	<b>Current</b>	<b>Reduction</b>
DOSAR 652.206-70, <i>Competition Advocate/Ombudsman</i> - this provision provides a contact point for bidders or offerors who believe that a solicitation is competitively restrictive, as well as provides a contact point to hear other solicitation concerns.	This provision was included in the prior submission in error. No information is collected. This does not meet the definition stated in 5 CFR 1320.3(c)	2,400	0	2,400
DOSAR 652.219-70, <i>Department of State Subcontracting Goals</i> - this provision provides the Department's subcontracting goals and requires large business offerors to submit a subcontracting plan when requested by the contracting officer (i.e., if the offeror is included in the competitive range), to enable DOS to perform a timely review and	This provision was included in the prior submission in error.	2,400	0	2,400

negotiate an acceptable plan that complies with FAR 52.219-9.				
DOSAR 652.225-70, <i>Arab League Boycott of Israel</i> – this provision requires offerors to certify that they are not taking or knowingly agreeing to take any action with respect to the boycott of Israel by Arab League countries. This certification is required by Section 565 of the Fiscal Year 94/95 Foreign Relations Authorization Act (P.L. 103-236), which has continuing effect.	This provision was included in the prior submission in error. No information is collected.	4,800	0	4,800
DOSAR 652.228-74, <i>Defense Base Act (DBA) Insurance Rates - Limitation</i> – this provision requires bidders and offerors that are covered under the Defense Base Act (DBA) to use the rates in the Department of State contract for DBA insurance to compute the cost of the insurance.	Provision was removed due to expiration of the DOS contract with the insurance company.	2,400	0	2,400
DOSAR 652.236-71, <i>Foreign Service Buildings Act</i> , this provision requires a bidder or offeror to provide information to determine if it is an American-owned firm.		550	550	0
DOSAR 652.236-72, <i>Statement of Qualifications for the Omnibus Diplomatic Security and Antiterrorism Act</i> - this provision requires bidders and offerors to provide information to determine if the bidder or offeror is a United States		2,624	2,624	0

<p>person or a United States joint venture person. Under the Omnibus Diplomatic Security and Antiterrorism Act of 1986, diplomatic construction or design projects abroad exceeding \$10 million are limited to United States persons or a United States joint venture person.</p>				
<p>DOSAR 652.237-73, <i>Statement of Qualifications for Preference as a U.S. Person</i> - this provision requires bidders and offerors to provide information to determine if the bidder or offeror is a United States person or a United States joint venture person. Under the Foreign Relations Authorization Act, Fiscal Years 1990 and 1991 (22 U.S.C. 4864), United States persons or United States joint venture persons receive a 10 percent price evaluation preference for local guard contracts abroad under diplomatic security programs.</p>		32	32	0
<p>DOSAR 652.245-70, <i>Status of Property Management System</i> – this provision requests information from offerors regarding their property management systems in order to comply with FAR 45.201(c) which states that the solicitation shall require all offerors to submit a description of the offeror’s property management system, plan, and any customary commercial practices, voluntary consensus standards, or industry-leading</p>	<p>This provision was included in the 2013 revised information collection</p>	14	14	0

practices and standards to be used by the offeror in managing Government property.				
Other solicitation response efforts - reading and discussing the solicitation, researching the requirement, developing the project team and preparing/submitting the proposal/bid		250,394	250,394	0
<b>Post Award Clauses</b>		<b>Original</b>	<b>Current</b>	<b>Reduction</b>
DOSAR 652.204-70, <i>Department of State Personal Identification Card Policy and Procedures</i> - this clause requires contractors and subcontractors to comply with DOS Personal Identification Card Policy and Procedures for all employees requiring frequent and continuing access to DOS facilities, or information systems.	This clause was included in the prior submission in error. This item includes procedures for Department-wide ID card issuance, so it does not belong under this control number.	150	0	150
DOSAR 652.216-71, <i>Price Adjustment</i> - this clause allows the adjustment of contract prices for continuing services abroad when the host country government passes a law that affects the actual costs of direct labor.	This clause was included in the prior submission in error. No information is collected.	5	0	5
DOSAR 652.219-71, <i>8(a) Direct Awards</i> – this clause requires the contractor to notify the U.S. Government when the owner or owners upon whom 8(a) eligibility is based plan(s) to relinquish ownership or control of the firm.	This clause was included in the prior submission in error. Any information submitted by the respondent is exempt from the PRA pursuant to 5 CFR 1320.3(c).	.4	0	.4
DOSAR 652.228-71, <i>Worker’s Compensation Insurance (Defense Base Act)</i>	Information is no longer collected.	15	0	15

<p>– <i>Services</i> - this clause originally required that contractors subject to DBA insurance requirements submit a copy of the Department of Labor’s (DOL) approval if the contractor has a DBA self-insurance program approved by DOL. Upon the expiration and non-renewal of the DOS contract with the insurer, this information collection was removed from the DOSAR.</p>				
<p>DOSAR 652.232-70, <i>Payment Schedule and Invoice Submission (Fixed-Price)</i>,</p>	<p>This clause was included in the prior submission in error. No information is collected.</p>	<p>3,300</p>	<p>0</p>	<p>3,300</p>
<p>and DOSAR 652.232-71, <i>Voucher Submission (Cost-Reimbursement)</i> - these clauses provide instructions to contractors on how and where to submit requests for payment.</p>	<p>This clause was included in the prior submission in error. . This information is already covered under FAR 52.232-1, 52.232-7, 52.232-5 and 52.216-7 (OMB control numbers 9000-0070 and 9000-0069)</p>	<p>6,600</p>	<p>0</p>	<p>6,600</p>
<p>DOSAR 652.232-72, <i>Limitation of Funds</i> – this clause requires contractors to notify the U.S. Government when they believe that the funds obligated on the contract are insufficient to cover the work to be performed by a certain date.</p>		<p>50</p>	<p>50</p>	<p>0</p>
<p>DOSAR 652.236-70, <i>Accident Prevention</i> – this clause requires that construction contractors submit a written accident prevention plan.</p>		<p>150</p>	<p>150</p>	<p>0</p>
<p>DOSAR 652.245-71, <i>Special</i></p>		<p>100</p>	<p>100</p>	<p>0</p>



<i>Reports of Government Property</i> – this clause requires contractors to submit information quarterly in accordance with DOS capitalized property reporting requirements.				
TOTAL		275,984	253,914	22,070

- 16. The collection of data will not be published for statistical use.
- 17. Not applicable. We are not seeking approval to not display the expiration date..
- 18. There are no exceptions to the certification statement.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection does not employ statistical methods.

**ANNUALIZED ANALYSIS (RESPONDENTS, Items 12 and 13)**

**Estimated Total Burden Costs and Hours to Respondents, Pre- and Post-Award**

Cost Burden	=	\$ 242,158 (\$241,872 pre + \$286 post)
Burden Hours	=	253,914

These burdens are broken down as follows:

**A. Pre-Award**

The annualized cost for the total number of respondents responding to the pre-award information collection requirements is estimated to be \$241,872. This estimated figure represents the non-labor costs associated with producing the materials (paper, binders, CDs), mailing or delivery costs, storage costs, travel (if required), fee-based services for access to amendments and updates, meals (after hours, weekends, etc.)

The amount of non-labor costs is stated as a percentage of labor costs. The percentages vary slightly depending on the dollar amount of the acquisition, but the average is 3 percent. (Total labor costs = \$8,062,389 X .03 = \$241,872). The total estimated annual burden hour cost to respondent is \$8,062,389 (253,614 hours x \$31.79). [\$31.79 is derived from \$22.71 BLS 2014 average wage x 1.4 weighted wage multiplier.]

The number of labor hours required to respond was calculated as follows:

<b>Provision</b>	<b>Estimated Respondents</b>	<b>Estimated Responses</b>
652.236-71	111	275
652.236-72	69	328
652.237-73	6	64
652.245-70	6	14
Proposal Preparation	1455	1719
<b>Total</b>	<b>1647</b>	<b>2400</b>

<p><b>Provision 652.236-71</b></p> <p>Data Provided: 111 respondents, 275 responses 2 hours each preparation (average)</p>
<p><b>Provision 652.236-72</b></p> <p>Data Provided: 69 respondents, 328 responses</p>

8 hours each preparation (average)
<p><b>Calculation for Provision 652.237-73</b>  Data Provided: 16 – Solicitations/year  4 – Responses per solicitation  6 – Respondents</p> <p>16 solicitations x 4 responses = 64 total responses</p>
<p><b>Provision 652.245-70</b>  Data Provided: 6 respondents, 14 responses</p>

652.236-71 = 2 hours x 275 responses	=	550 hours
652.236-72 = 8 hours x 328 responses	=	2,624 hours
652.237-73 = 0.5 hour x 64 responses	=	32 hours
652.245-70 = 1 hour x 14 responses	=	14 hours
Proposal preparation	=	250,394 hours

**Total Estimated Annual Burden Hours for Pre-Award = 253,614**

The pre-award burden hours were reduced from 265,614 to 253,614 because, after a thorough analysis of the provisions from previous submissions, we found that three provisions were included erroneously and one was removed due to a DOSAR change.

**B. Post-Award**

The annualized cost for the total number of respondents for the DOSAR clauses is \$286. This estimated figure represents the non-labor costs, estimated at 3 percent of labor hour costs. (Total labor costs = (\$9,537 X .03 = \$286). The total estimated annual burden hour cost is \$9,537 (300 hours x \$31.79). [\$31.79 = \$22.71 BLS 2014 average wage x 1.4 weighted wage multiplier]

<b>Annual Reporting Burden (computation):</b>		
652.232-72 = 1 hr x 50 contracts	=	50
652.236-70 = 3 hrs. x 50 contracts	=	150
652.245-71 = 1 hrs. x 25 contracts x 4 times/yr.	=	<u>100</u>

**Total Estimated Annual Burden Hours for Post-Award 300**

Clause	Estimated Respondents	Estimated Responses
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652.232-72	50	50
652.236-70	50	50
652.245-71	25	100
<b>Total</b>	<b>125</b>	<b>200</b>

Calculation for Burden Estimates

31.79 = BLS 2014 weighted wage rate category for “All Occupations” (according to

U.S. Department of Labor, Bureau of Labor Statistics website (\$22.71 average wage x 1.4 multiplier)

.03 = Estimated average non-labor cost

- 253,914 annual burden hours = ( 253,614 hours for pre + 300 hours for post)

2600 total estimated responses = ( 2400 estimated pre-award responses + 200 estimated post-award responses)

97.67 hours average time per response = ( 253,914 annual burden hours / 2600 responses)

\$ 8,071,926 total estimated annual burden hours cost to respondents = (253,914 burden hours x \$31.79)

\$ 242,158 Total estimated labor cost burden to respondents = (\$ 8,071,926 Total estimated annual burden hours cost x .03)

**ANNUALIZED COST ANALYSIS (FEDERAL GOVERNMENT, Item 14)**

**Total Costs to Federal Govt., Pre- and Post-Award      \$ 530,704**

(Pre-Award Costs of \$ 522,154 + Post-Award Costs of \$8,550 = \$ 530,704)

These costs are broken down as follows:

**A. Pre-Award**

The annualized cost to the Department for reviewing and analyzing the information collected is estimated to be **\$ 522,154**. This estimated amount is based on the following:

<b>Action</b>	<b>Hours x</b>	<b>Estimated Hourly Wage =</b>	<b>Estimated Cost (Rounded)</b>
652.236-71 Proj. Ofcr. (GS-12)	275	\$36.60	\$10,065
652.236-72 Proj. Ofcr. (GS-12)	328	36.60	12,005
652.237-73 Cont. Spec. (GS-11) Cont. Ofcr. (GS-13)	32 4	30.53 43.52	977 174
652.245-70 Cont. Spec. (GS-11) Cont. Ofcr. (GS-13)	28 4	30.53 43.52	855 174
Review Proposals Cont. Spec. (GS-11) Proj. Ofcr. (GS-12)	4800 9600	30.53 36.60	146,544 351,360
<b>Total</b>	<b>15,071</b>		<b>522,154</b>

**B. Post-Award**

The annualized cost to the Department based on the individual clauses, as listed above, is **\$8,550**. The costs are broken down as follows:

<b>Clause</b>	<b>Hours x</b>	<b>Estimated Hourly Wage =</b>	<b>Estimated Cost (Rounded)</b>
652.232-72 Cont. Spec (GS-11)	1x50	\$30.53	\$30
652.236-70 Cont. Spec. (GS-11)	1x50	\$30.53	\$30

Proj. Ofcr. (GS-12)	1x50	\$36.60	<u>37</u> \$67
652.245-71 Property Ofcr. (GS-12)	1x25x4	\$36.60	\$37
<b>Total</b>	250		

The numbers for each clause vary as follows:

652.232-72 = 50 contracts/yr. x \$30	=	1,500
652.236-70 = 50 contracts/yr. x \$67	=	3,350
652.245-71 = 25 contracts/yr. x \$37 x 4 times/yr	=	<u>3,700</u>
		<b>\$8,550</b>