

**Supporting Statement for Paperwork Reduction Act Submission
3090-0262 – Identification of Products with Environmental Attributes**

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.

Several laws, Executive Orders, and Agency Directives require Federal buyers to purchase products that are less harmful to the environment when they are life cycle cost-effective. As a result, the General Services Administration Acquisition Regulation (GSAR) requires contractors that submit offers under Multiple Award Schedule solicitations to highlight environmental products under Federal Supply Schedule contracts in various communications media and to possess evidence or rely on a reasonable basis to substantiate the claim. This information will be used to assist Federal Agencies in meeting their responsibilities under a number of statutes and executive orders, including the Energy Policy and Conservation Act (42, U.S.C. 6201 et seq.), the Energy Policy Act of 1992 (Public Law 102-486), the Clean Air Act Amendments of 1990 (Public Law 101-549), the Resource Conservation and Recovery Act (42 U.S.C. 6901 et seq.), and Executive Orders 12843, 12845, 12873 and 12902.

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.

Federal Agencies will utilize this information to determine if such products will meet their needs and meet the Federal acquisition statutes in preference to other products that meet their needs, but do not have the environmental attributes.

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 General Services Administration and contractors are capable of electronic interchange, the contractors may submit information requirements 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.

We did not identify any duplication of information being collected. Our review did not identify any similar data.

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5. If the collection of information impacts small businesses or other small entities (item 5 of OMB 83-I), describe any methods used to minimize burden.

The burden applies equally to both small and large organizations that want to do business with GSA. However, it is the minimum necessary to meet the specific objectives of the solicitation or contract.

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.

Government would not be able to identify products that have environmental attributes and benefits and therefore would not be in compliance with numerous laws, statutes, and Executive Orders.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner requiring respondents to:

- **Report information to the agency more often than quarterly;**
- **Prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Submit more than an original and 2 copies of any document;**
- **Retain records, other than health, medical, government contracts, grant-in-aid, or tax records, for more than 3 years;**
- **In connection with a statistical survey, that is not designed to produce valid, reliable results that can be generalized to the universe of study;**
- **Require the use of a statistical classification that has not been reviewed and approved by OMB;**
- **Include a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

None.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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

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recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day notice was published in the Federal Register at 80 FR 23551 on April 28, 2015. No comments were received. A 30-day notice was published in the *Federal Register* at 80 FR 43439 on July 22, 2015. No comments were received.

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

GSA makes no such payments under this collection.

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

GSA makes no such assurance of confidentiality under this collection.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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.**
- **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**

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information collection activities should not be included here. Instead, this cost should be included in Item 13.

The estimated number of respondents annually is 9,000 with each response requiring 1 hour for a total of 9,000 hours.

Based on estimates of number of contracts; estimated burden hours to the public:

Estimated respondents/yr.....	9,000
Number of submissions per respondent.....	<u>x 1</u>
Total responds annually.....	9,000
Estimated hours/response.....	<u>x 1</u>
Estimated total burden hours.....	9,000

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.)

- **The cost estimate should be split into two components: (a) total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment, and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995; (2) to achieve regulatory compliance with requirements not associated with the information collection; (3) for reasons other than to provide information or keep records for the Government or (4) as part of customary and usual business or private practices.**

The estimated annualized cost to the public is \$612,000. (9000 annual responses * 1.0 hours per response = 9,000 * \$68 (\$50.00+36% overhead).

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Respondents	9000
Responses per respondent	<u>x 1</u>
Total annual responses.....	9000
Preparation hours per response.....	<u>x 1.0</u>
Total burden hours.....	9000
Average hourly wages(\$50.00+36% overhead).....	<u>x \$ 68.00</u>
Total annual recordkeeping cost.....	\$612,000

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 annual cost to the Federal Government is \$186,660.00 (4500 estimated burden hours * \$41.48). The total estimated annual burden hours to the Federal Government equals 9,000 hours. Each response should take approximately 30 minutes (.50) to process and review. The annual estimated hours require to review responses is 4500 (9000 * .50).

Number of responses.....	9,000
Avg. hours per response.....	<u>x .50 (30 minutes)</u>
Estimated Hours.....	4500
Cost per hour.....	<u>x \$ 41.48</u>
Total annual Government cost.....	\$186,660

The cost of \$41.48 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.

The General Services Administration implemented eMod and eOffer requiring vendors to submit offers and modifications (mods) electronically. Previously offers and mods were submitted manually. This change has significantly decreased the time needed to review and submit the information required by this collection. As a result, the total annual estimated burden hours (#12) and the total annual estimated cost burden (#13) for respondents has decreased. The total annual cost burden to the Federal government (#14) decreased due to the decreased number of responses and estimated review time per year although the 2015 GS 12 step 5 salary increased by .30 cents.

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.

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Data collected will be used for internal administration of contracts.

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.

GSA is not seeking such approval for this collection.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions”.

GSA has no exceptions to the certification statement.