

**Supporting Statement for Information Collection Submission
3090-0286, GSA Mentor-Protégé Program, GSA Form 3695**

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 GSA Mentor-Protégé Program is covered under GSAM Subpart 519.70, consisting of 519.7001 through 519.7017, and two clauses (GSAM 552.219-75, *GSA Mentor Protégé Program* and GSAM 552.219-76, *Mentor Requirements and Evaluation*).

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.

In accordance with the Small Business Act, it is the policy of the Government to provide maximum practicable opportunities in its acquisitions to small business, veteran-owned small business, service-disabled veteran-owned small business, Historically Underutilized Business Zone (HUBZone) small business, small disadvantaged business, and women-owned small business concerns. Such concerns must also have the maximum practicable opportunity to participate as subcontractors in the contracts awarded by any executive agency. The purpose of the GSA Mentor-Protégé Program is to encourage GSA prime contractors to assist small businesses in enhancing their capabilities to become prime contractors and successful subcontractors.

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.

GSA uses improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, 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.

There are no duplicate programs as there is only one GSA-wide Mentor-Protégé Program as described in GSAM Subpart 519.70. The Fiscal Year 2013 National Defense Authorization Act (FY13 NDAA) transfers civilian agencies' mentor protégé programs to the Small Business Administration. The SBA's proposed rule on the Small Business Mentor-Protégé Program was published to the Federal Register on February 5, 2015. The

**Supporting Statement for Information Collection Submission
3090-0286, GSA Mentor-Protégé Program, GSA Form 3695**

comment period was extended by the SBA to May 6, 2015 due to the significant interest and requests for an extension. In the meantime, GSA will continue with its Mentor-Protégé Program for at least another year past the SBA's publication of the Final Rule as permitted by the FY13 NDAA.

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

The GSA Mentor-Protégé Program is not a mandatory program. GSA has found that many businesses already have informal mentor-protégé relationships. However, if a small business chooses to participate formally through GSA's Mentor-Protégé Program, the benefits from the program outweigh the minimal information collection required by each small business.

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.

Section 15 of the Small Business Act (15 USC 657r(c)) requires civilian agencies to report to the SBA on an annual basis:

- The number of participants in the program
- The socio-economic category of the protégés, including small businesses, service-disabled veteran owned small businesses, HUBZone, and women-owned small businesses
- Assistance given by mentors to protégés
- The benefits received by the mentors
- Progress of protégés to compete for federal prime contracts and subcontracts as a result of the Mentor-Protégé Program.

This agency report was due to SBA in February 2015, who in turn reported to Congress. Failure to obtain the information from contractors will impede SBA's ability to report to Congress as required by the Small Business Act.

Internally, without this information collection GSA will be unable to adequately assess the participation and the merits of the program in order to determine if GSA will seek SBA authority to continue with its own Mentor-Protégé Program after the one year grace period following SBA's Final Rule publication.

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;**

**Supporting Statement for Information Collection Submission
3090-0286, GSA Mentor-Protégé Program, GSA Form 3695**

- **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.**

Collection is consistent with the guidelines in 5 CFR 1320.6.

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 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 27310, on May 13, 2015. One comment was received. A 30-day notice was published in the *Federal Register* at 80 FR 46583 on August 5, 2015. No comments were received.

One comment was received from the Center for Equal Opportunity. The comment suggests that the GSA Mentor-Protégé Program use neither preferences nor classifications on the basis of race, ethnicity, or sex. The program does not distinguish firms on the basis of race or ethnicity. Women-owned small business firms may be distinguished as this is a small business category recognized by statute through the Small Business Act (15 U.S.C Chapter 14a). This notice regards the information collection related to administering the GSA Mentor-Protégé Program. Any changes to the program itself would be handled separately through the rulemaking process.

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

**Supporting Statement for Information Collection Submission
3090-0286, GSA Mentor-Protégé Program, GSA Form 3695**

Not applicable.

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

Information in the Mentor-Protégé Applications and Agreements, GSA Form 3695, is confidential. As applicable, information collected will be subject to review and release in accordance with the Freedom of Information Act.

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

Annual Burden Hours

Estimated respondents per year.....	254
Responses annually per respondent.....	<u>x 4</u>
Total responses.....	1,016
Estimated hours per response.....	<u>x 3</u>
Estimated total burden hours.....	3,048
Cost per hour.....	<u>x \$41.40</u>
Estimated Burden to the Public.....	.\$126,187

**Supporting Statement for Information Collection Submission
3090-0286, GSA Mentor-Protégé Program, GSA Form 3695**

The estimated number of respondents includes both mentor and protégé and is based on the number of Mentor-Protégé agreements in 2014: 127 agreements X 2 (mentor plus protégé).

The estimated cost of \$41.40 per hour is based on the task being accomplished by midlevel personnel equivalent to a GS-14, Step 1 salary. (Salary Table 2015-GS, Effective January 2015). The estimated cost per response is estimated at \$124.20.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

GSA estimated the burden of the information collection on data obtained from subject matter experts in the Mentor-Protégé Program in GSA's Office of Small Business Utilization. The burden addressed in this information collection requirement applies to the Mentor-Protégé Application and Agreement as well as the mandatory semi-annual reports for mentors and protégés as required under GSAR 519.7015. The burden hours estimated includes the time for reviewing instructions, search existing data sources, gathering and maintaining the data needed, and completing and reviewing various responses.

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.

Government hours per response are based on the time required to review the Mentor-Protégé Application and Agreement and the semiannual reports.

Estimated responses per year.....	1,016
Review time per response.....	<u>x 1</u>
Total review time.....	1,016
Cost per hour.....	<u>x \$41.40</u>
Total Government Cost.....	\$42,062

The estimated cost of \$41.40 per hour is based on the task being accomplished by midlevel personnel equivalent to a GS-14, Step 1 salary. (Salary Table 2015-GS, Effective January 2015).

15. Explain the reasons for any program changes or adjustments reported.

Not applicable.

**Supporting Statement for Information Collection Submission
3090-0286, GSA Mentor-Protégé Program, GSA Form 3695**

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 of this collection will not be 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 the “Certification for Paperwork Reduction Act Submissions”.

Not applicable.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.