

**Supporting Statement for Information Collection Submission  
OMB Control No. 3090-0246, Packing List Clause**

**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.**

General Services Administration Acquisition Regulation (GSAR) clause 552.211-77, *Packing List*, and its Alternate I are needed to facilitate administration of Supply contracts when orders for supplies are paid by Government commercial credit card. The clause lists the minimum requirements for packing lists or other suitable shipping documents when supplies are purchased to verify placement of an order and identify the items shipped. Providing this shipping information is a normal commercial practice. The GSAR clause requires three (3) items that are not typically required in commercial packing lists when purchased with a Government commercial credit card: cardholder name, telephone number and the term "Credit Card." The additional identification is needed to verify receipt and to release payment to the contractor.

**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.**

It is a normal commercial practice to include a packing list that verifies placement of an order and identifies the items shipped. In addition to information contractors would normally include on packing lists, the clause requires the identification of cardholder name, telephone number and the term "Credit Card."

The additional information is needed by the Government commercial credit cardholder in order to track products ordered and reconcile monthly statements. Since the cardholder and the consignee in most cases will be different, the additional information is necessary to ensure that the consignee, as recipient of the packing list, notifies the cardholder that the shipment has been received. This information is particularly useful and cost effective for the government when the micro-purchase threshold has been raised in response to a contingency operation declaration under FAR subpart 18.2. Once verification of shipment has been made, the cardholder will then authorize payment for the supplies to the contractor. Without this information, cardholders will experience difficulty verifying receipt of orders, especially those placed by telephone, thus delaying payment to the contractors.

**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**

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**collection. Also describe any consideration of using information technology to reduce burden.**

Information technology is used 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.**

The nature of this requirement is such that it relates to a single procurement and cannot be duplicated.

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

The burden applied to small business is the minimum burden 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 a basis other than by individual order under Supply contracts is not practicable. Without this information, payments for shipments of supplies to the government will be delayed.

**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**

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**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.**

The vendor will have to provide the packing list information in fewer than 30 days if the shipment or delivery terms of the contract are less than 30 days. However, this is a common industry practice and does not impact the burden. Additionally, the vendor will have to include more than one packing list if the order will be shipped in multiple packages. The packing lists are used to provide identification for the consignee and this is a common industry practice that will not impact the burden to industry.

**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 record keeping, 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 76021 on December 7, 2015. No comments were received. A 30-day notice was published in the Federal Register at 81 FR 8718 on February 22, 2016.

**9. Explanation of any decision to provide any payment or gift to respondents, other than remuneration 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.

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**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 in Item 13.**
- **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.**

The annual reporting burden was calculated using actual data from the government-wide Federal Procurement Data System (FPDS) for Fiscal Year (FY) 2014, analyzing both GSA orders for supplies where the method of payment was made by government credit card, and orders for supplies placed by other agencies where both payment was by a government credit card and a GSA indefinite delivery contract for supplies was referenced:

	GSA	Non-GSA	Total
Number of government credit card orders referencing GSA indefinite delivery contracts for supplies	442	6945	7387
Spend on the orders identified within scope	\$4,641,311	\$196,823,715	\$201,465,026

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of the analysis			
Average order value	\$10,501	\$28,340	\$27,273

The total GSA and non-GSA orders against GSA indefinite delivery contracts using government credit card purchases amounted to 7,387 orders with a total spend of \$201,465,026. These orders averaged \$27,273 per order.

According to FPDS these orders were supplied by 2,623 vendors (discrete DUNS). However to compute the number of respondents per year, recognizing some vendors received more than one order in FY 2014, the agency used the actual number of orders processed in FY 2014 as the number of respondents. Thus, the 7,387 figure is a more accurate representation of “respondent” than the actual 2,623 vendors who supplied these orders in FY 2014.

Since the information collection is based on the number of packing lists for each order and data was not available, the government estimated the number of packing slips using a rough yardstick of one packing slip per \$1,000 product ordered. The average value of government-wide delivery orders was \$27,273. Thus, the agency estimated 27 packing lists per delivery order.

The agency estimates the response time to be 3 minutes to allow for review as well as input of the required information above normal business practices into the packing list.

Estimated number of respondents per year..... 7,387  
 Responses per respondent annually..... x 27  
 Total annual responses.....199,449  
 Estimated burden hours per response..... x.05  
 Estimated total burden hours..... 9,972  
 Estimated cost to public (\$16.00<sup>1</sup> + 36.45% fringe<sup>2</sup> = \$21.83).....\$217,689

**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.)**

- **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**

<sup>1</sup> The cost of \$16.00 is based on research of current rates for shipping job positions

<sup>2</sup> The 36.45% fringe benefit rate is derived from Circular A-76, Revised Supplemental Handbook (Memorandum M-07-02 dated October 31, 2007)

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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.**

There is no separate capital, operation, maintenance, or service costs incurred. See Section 12 for the calculation of the total cost associated with the hour burden of this collection.

**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.**

Reviewing and processing each response should take approximately 2 minutes; the total number of responses is estimated to be 199,449 each year x .03333 hours = 6,642 hours.

Applying the hourly rate of a procurement assistant, grade 5, step 5, paid \$18.88 per hour to the 6,642 hours results in \$79,513 estimated annualized costs to the Federal Government.

Reviewing time.....	.03333 hrs
Requests/year.....	128,947

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Review time/year.....	6,642 hrs
Average cost/hr.....	x <u>\$18.88</u>
Total Government cost.....	\$125,401

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

This submission requests an extension of OMB approval of an information collection requirement in the General Services Administration’s Regulation (GSAR). The information collection requirement in the GSAR remains unchanged. However, adjustments are made to the total burden based on updated fiscal year data from FPDS, the GS Salary table and research on the current rate for shipping job positions.

**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.