Supporting Statement for Information Collection: Proposal to Lease Space, GSA Form 1364 and Lessor's Annual Cost Statement, GSA Form 1217 (OMB Control No. 3090-0086)

A. Justification.

1. Explain the circumstances that make the collection of information necessary.

In accordance with GSAR 570.802 (c), GSA Form 1364 *Proposal to Lease Space* is used to obtain information about property being offered for lease to house Federal agencies.

In accordance with GSAR 570.802(d), GSA Form 1217 *Lessor's Annual Cost Statement* is used to obtain pricing information regarding offered services and lease commissions.

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 information is used by leasing contracting officers to evaluate lease proposals and negotiate lease contract terms and conditions in either a competitive or non-competitive environment.

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.

Currently, proposals are manually completed and submitted by offerors. The forms are electronically available and can be posted electronically for solicitation purposes. GSA is pursuing the use of electronic proposals in its leasing program but is currently not ready to implement a national Information Technology solution mandating the use of electronic proposals. In addition, the marketplace does not yet support the sole use of electronic solicitations and submission of offers.

4. Describe efforts to identify duplication.

GSA conducted a Lease Reform Initiative to improve the lease acquisition process for GSA, client agencies, and the private sector. A total of six lease contract models have been developed that are targeted to meet the needs of the national leased portfolio. Five of the lease models require offerors to complete a GSA Form 1364 and four require completion of GSA Form 1217.

The GSA Form 1364 versions (1364, 1364A, 1364A-1, and 1364WH) require the submission of information specifically aligned with certain leasing models and avoid mandating submission of information that is not required for use in evaluation and award under each model.

The GSA Form 1217 requires the submission of information specific to the services and utilities of a building in support of the pricing detailed under GSA Forms 1364.

The forms relate to individual lease procurements and no duplication exists.

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

The burden applies equally to small businesses that opt to do business with GSA. This information collected is 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.

GSA would be unable to readily and equitably evaluate offers fairly and competitively.

7. Explain any special circumstances.

No special circumstances exist. Collection is consistent with the guidelines in 5 CFR 1320.6.

8. Describe efforts to consult with persons outside the agency.

A 60-day notice was published in the *Federal Register* at 81 FR 10623 on March 1, 2016. No comments were received. A 30-day notice was published in the *Federal Register* at 81 30305 FR on May 16, 2016. No comments were received.

9. Explain 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.

Information provided through the GSA Forms 1364 and GSA Form 1217 is confidential. Information collected is disclosed only to the extent consistent with agency regulations and applicable statutes.

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.

No sensitive questions are involved.

12. Provide estimates of the hour burden of the collection of information.

GSA estimated the burden of the information collection from data obtained from subject matter experts in GSA's Office of Leasing. The estimated cost of \$61.01 per hour is based on the 2015 National Association of Realtors (NAR) Commercial Member Profile, which surveys commercial real estate brokers. The 2015 report shows an average annual income of \$126,900. When divided by 2080 hours per year, that equals \$61.01 per hour. The NAR survey results were published at www.realtor.org.

Data	Lease Model							
	Streamlin ed	Standard	Succeeding/ Superseding	Simplified	Warehous e	Total		
Total Projects	35	238	185	51	35	544		
Number of Responses Per Project	3.7	4.1	1.0	3.7	4.1			
Annual Responses	129.5	975.8	185	188.7	143.5	1,623		
Estimated Hours Per Response	4.2	4.3	3.2	3.5	4.3			
Estimated Total Burden Hours	544	4,196	592	660	617	6,609		
Average Cost Per Hour	\$61.01	\$61.01	\$61.01	\$61.01	\$61.01			
Total Cost to Public	\$33,183	\$255,994	\$36,118	\$40,294	\$37,646	\$403,236		

Estimated respondents per year	544
Estimated responses per respondent (weighted average)	2.98
Estimated total responses	1,623
Estimated hours per response (weighted average)	
Estimated total burden hours	6,609
Cost per hour	\$61.01
Estimated Burden to the Public	
The estimated cost per response is \$249.	

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

Not applicable. See response to Item 12, above.

14. Provide estimates of annualized costs to the Federal Government.

GSA estimated the annual cost to the Federal Government of the information collection from data obtained from subject matter experts in GSA's Office of Leasing. Government hours per response are based on the time required to review and evaluate the lease forms.

The estimated cost of \$41.81 per hour is based on the task being accomplished by midlevel offeror personnel equivalent to a GS-14, Step 1 salary. (Salary Table 2016-GS, Effective January 2016.

Data	Lease Model							
	Streamline d	Standard	Succeeding/ Superseding	Simplifie d	Warehouse	Total		
Total Projects	35	238	185	51	35	544		
Number of Responses Per Project	3.7	4.1	1.0	3.7	4.1			
Annual Responses	129.5	975.8	185	188.7	143.5	1,623		
Estimated Hours Per Response	3.3	3.3	2.9	3.3	3.3			
Estimated Total Burden Hours	427	3,220	537	623	474	5,280		
Average Cost Per Hour	\$41.81	\$41.81	\$41.81	\$41.81	\$41.81			
Total Cost to Government	\$17,868	\$134,634	\$22,431	\$26,036	\$19,799	\$220,76 7		

Estimated respondents per year	544
Estimated responses per respondent (weighted average)	2.98
Estimated total responses	1,623
Review time per response (weighted average)	
Total review time	
Cost per hour	\$41.81
Total Annual Government Cost	

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

The estimated burden to the public and the estimated cost to the Government have changed. The number of projects and offers per project has increased since the last information collection renewal. In addition, the costs per hour used for the calculations were increased to reflect current wage rates. The estimated number of respondents is based on the number of projects and number of offers received per project for the different lease models in 2015 that decreased.

The burden hours are based on the number of preparation hours estimated per offer to complete the forms associated with the different lease models in 2015. 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.

Finally, the GSA Form 1217 was not included in the previous information collection. The previous omission was an error that is corrected by inclusion in this information collection request.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Results of this collection will not be tabulated or published. Information 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.

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.

GSA regional leasing services officers estimated the average number of responses and hours required by the public and the government to complete, review, and evaluate the information submitted on each form. Forecasting is based on empirical data for number of actions and salaries.