

SUPPORTING STATEMENT – PART A

Supplier Self-Services – OMB Control Number 0702-0126

1. Need for the Information Collection

Defense Federal Acquisition Regulation Supplement (DFARS) requires vendors input or upload invoice data that is required for payment verification directly into Wide Area Workflow (WAWF). This data is then interfaced to the Enterprise Central Component (ECC) of the Army's ERP system, General Fund Enterprise Business System (GFEBs), where it is matched to an existing obligation to ultimately generate payment to the vendor. Unfortunately, this interface process creates many errors (~27¹% failure rate) that subsequently require costly manual correction, rework, interest penalties, and potentially a delay in payment to vendors.

As an alternative, WAWF created a DoD-portal known as "OneStop" to facilitate the interaction between WAWF and ERPs. WAWF utilizes "OneStop" to route vendors seamlessly to the Supplier Self-Services (SUS) interface while maintaining WAWF as the mandated single point of entry². SUS, a GFEBs module, systematically pre-populates invoices with pre-validated contract data that is interfaced to GFEBs ECC from Army Contracting's Standard Procurement System (SPS). By pre-populating fields with accurate, up-to-date contract information, vendors are required to input significantly less data. Additionally, the information that vendors do input is validated immediately against the existing contract, ensuring the invoicing process is more accurate, payments to vendors are faster, and costly interest penalties are avoided. DFARS Class Deviation DARS: 2016-A0001 authorizes vendors with contracts awarded at designated locations to submit invoice data in SUS.³

2. Use of the Information

Respondents to this information collection are vendors who are submitting receiving reports and/or invoices to the Army in order to collect payment for work they have performed or goods they have provided. They are not invited to participate, but rather submit their contract information at the time they are seeking payment. Only information required for payment certification is collected. The information submitted by vendors is matched within the Army's ERP to contract information interfaced from SPS. Upon a successful match, Defense Finance and Accounting Services (DFAS) certifies the invoice(s) for payment to the vendor. Matching data elements between the invoice and obligation in GFEBs are critical to generate rightful payment.

Vendors participating in the SUS pilot continue to login to WAWF at <https://wawf.eb.mil>, like they do today. They are then automatically routed to the SUS portal where they enter

¹ WAWF Document counts July 2014-March 2016

² DFARS 252.232-7003(b) Electronic Submission of Payment Requests and Receiving Reports (Appendix F)

³ Memorandum Deputy Assistant Secretary of the Army (Procurement), Subject: Class Deviation – Wide Area WorkFlow (GFEBs SUS), November 17, 2015

their contract information into an integrated web application. Information submitted in the SUS portal is posted in GFEBs to enable payment.

SUS can only be accessed via the WAWF portal. Vendors are provided the Privacy Act Statement prior to logging into WAWF and a Standard Mandatory DoD Notice and Consent Banner (page 13 of screenshots) when they are routed to SUS. The Agency Disclosure Notice (ADN) will also be displayed on page 13 of the screenshots. The ADN and OMB Control Number/OMB Expiration date will be updated on the SUS site once approval for the collection has been received so that the webmasters can do one update. Until then, an example of what the ADN will look like for this collection has been provided.

3. Use of Information Technology

100% of responses will be submitted by vendors online via SUS, an online, interactive web application. The goal of SUS is to more heavily utilize information technology to reduce manual input by vendors and prevent costly manual correction. Vendors not utilizing SUS must provide significantly more information, and the likelihood that subsequent manual correction will be required grows from <1%⁴ to 27%¹.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. Information requested of vendors in SUS is incident-specific and is the first and only submission of data recording delivery of goods or services. Rather than requiring vendors to input redundant data, SUS allows the Army to utilize vendor and contract information that is collected during the contract award process to minimize vendor input during the invoicing process. As a result, vendors utilizing SUS are no longer required to submit data elements such as item description, unit of measure, total contracted units, per unit price, etc. as those elements have been pre-populated from GFEBs ECC.

5. Burden on Small Business

In 2014, approximately 23% of DoD contracts were awarded to small businesses.⁵ An even larger proportion of SUS pilot vendors could be small businesses due to the exemption of vendors that submit via EDI (typically exceptionally large businesses).

Vendors that are classified as small businesses will particularly benefit from SUS implementation in two ways – it requires less time and effort to submit invoices than is required in the current environment, and the time from submission of invoice to vendor payment is often much shorter. Submission of invoices by the vendor is required for payment, and SUS was designed to make that process as straightforward and easy as

⁴ GFEBs data – electronically posted SUS invoices November 1, 2015 – November 1, 2016

⁵ https://www.sba.gov/sites/default/files/files/FY14_DoD_SB_Procurement_Scorecard_Public_View_2015-04-29.pdf

possible. During the SUS pilot, data collection took an average of six minutes per response (invoice) and is not anticipated to heavily burden any business, large or small. SUS pilot site, Ft. Jackson estimated 5-7 hours per week saved addressing vendor invoice questions and concerns.

6. Less Frequent Collection

Data is collected each time a vendor submits an invoice for provided goods or services. Estimated burden is based on an assumption of one submitted invoice per month (average based on current data), but vendors do have the option in SUS to submit invoices less frequently. In this event, vendors would still be required to report the quantity of goods/services provided, but would create fewer, larger invoices.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Wednesday, December 28, 2016. The 60-Day FRN citation is 81 FRN 95573. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Tuesday, February 28, 2017. The 30-Day FRN citation is 82 FRN 12083.

Part B: CONSULTATION

The recent expansion to new pilot sites in November 2015 provided perfect opportunity to consult with a new target audience. Instructions have been clarified, new training documents created, and enhancements implemented in SUS to improve the user experience.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

SUS can only be accessed via the WAWF portal. Vendors are provided the Standard Mandatory DoD Notice and Consent Banner prior logging into WAWF. Neither a SORN nor

a PIA is required because vendors do not submit any personal, proprietary, or confidential information via SUS. Because the SUS module is in pilot and will continue to be during the entirety of this PRA request, there is no archiving/disposition of documents. All records are held in perpetuity.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

1. Supplier Self-Services

- a. Number of Respondents: 2167 avg annual respondents
- b. Number of Responses Per Respondent: 12/yr
- c. Number of Total Annual Responses: 26,004
- d. Response Time: 6 min
- e. Respondent Burden Hours: 2600 hrs

2. Total Submission Burden (Summation or average based on collection)

- a. Total Number of Respondents: 2167/yr
- b. Total Number of Annual Responses: 26,004
- c. Total Respondent Burden Hours: 2600 hours

b. Labor Cost of Respondent Burden

1. Supplier Self-Services

- a. Number of Total Annual Responses: 26,004
- b. Response: 6 min
- c. Respondent Hourly Wage: \$17.45
- d. Labor Burden per Response: \$1.75
- e. Total Labor Burden: \$45,507

2. Overall Labor Burden

- a. Total Number of Annual Responses: 26,004
- b. Total Labor Burden: \$45,507

Vendor salaries range widely from company to company. We can assume that the individual at each vendor would be employed as a billing clerk or similar role earning an

approximate average annual salary of \$36,300 (\$17.45/hr)⁶. According to the U.S. Department of Labor website, billing clerk responsibilities involve the following: Compile, compute, and record billing, accounting, statistical, and other numerical data for billing purposes. Prepare billing invoices for services rendered or for delivery or shipment of goods. The Respondent hourly wage was determined using the Department of Labor Wage Website (<http://www.dol.gov/dol/topic/wages/index.htm>).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection. The software utilized to collect responses is a free online portal and the computers required to run the software are already required in the current WAWF submission process.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1. Supplier Self-Services – Goods Acceptance

- a. Number of Total Annual Responses: 26,004
- b. Processing Time per Response: 1/12 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$23.46
- d. Cost to Process Each Response: \$1.955
- e. Total Cost to Process Responses: \$50,837

2. Supplier Self-Services – Payment Certification

- a. Number of Total Annual Responses: 26,004
- b. Processing Time per Response: .25 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$23.46
- d. Cost to Process Each Response: \$5.865
- e. Total Cost to Process Responses: \$152,513

3. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 26,004
- b. Total Labor Burden: \$203,350

b. Operational and Maintenance Costs

- a. Equipment: \$569,608
- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total: \$0

⁶ <http://www.dol.gov/dol/topic/wages/index.htm>.

1. Total Operational and Maintenance Costs: \$569,608
2. Total Labor Cost to the Federal Government: \$203,350

3. Total Cost to the Federal Government: \$772,958

A thorough cost benefit analysis (CBA) was conducted to review the impacts of SUS implementation and is included in this packet. This CBA was developed in conjunction with and approved by the Deputy Assistant Secretary of the Army for Cost and Economics (DASA-CE) and indicated over \$9M in annual savings as a result of SUS implementation

15. Reasons for Change in Burden

Request revision of a previously approved collection (OMB Control Number 0702-0126). All differences in burden calculation are attributed to updated wage rates and growth in pilot population estimates (new estimated number of respondents are as follows: 2017 – 500 vendors, 2018 – 1000 vendors, 2019 – 5000 vendors).

Additionally, this burden appears to be new, but more accurately, it *replaces* the larger burden currently imposed by WAWF input (see OMB control number 0704-0248), as the two systems are owned by different DoD entities and thus require separate OMB submissions. Vendors that invoice in SUS would no longer be required to submit the same invoices in WAWF.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.