

**Supporting Statement for
Department of Veterans Affairs (VA) Acquisition Regulation (VAAR)
Part 813, Simplified Acquisition Procedures
OMB No. 2900-0393**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

This Paperwork Reduction Act (PRA) submission requests the extension of Office of Management and Budget (OMB) approval No. 2900-0393 for Department of Veterans Affairs Acquisition Regulation (VAAR) Part 813, Simplified Acquisition Procedures. This PRA submission seeks OMB approval for collections of information for both commercial and non-commercial item and service solicitations and contracts using this contract method that exceed \$25,000. The collection of procurement information is an integral part of the Federal acquisition process. VA cannot award contracts, issue purchase orders, or enter into blanket purchase agreements (BPAs) or other contract actions without the collection of information. The Federal Acquisition Regulation (FAR) contains PRA control numbers for the collection of information under FAR Parts 14, Sealed Bidding, and 15, Contracting by Negotiation. All VA invitations for bids (IFBs) (i.e., sealed bid) and requests for proposals (RFPs) (i.e., negotiated) acquisitions exceeding \$150,000 (or exceeding \$ 7 million for commercial items) are conducted in accordance with FAR Parts 14 or 15 and are covered by the FAR PRA control numbers. In addition, many of VA's commercial item acquisitions between \$150,000 and \$7 million are also conducted in accordance with FAR Parts 14 or 15. Therefore, the OMB PRA control numbers assigned to the FAR already cover VA acquisition activities under FAR Parts 14 and 15 and VAAR Parts 814 and 815. There are no separate collections of information in VAAR Parts 814 and 815 that are over and above those already required by the FAR. However, the FAR does not have an OMB PRA control number for Part 13. Thus, this VAAR PRA number 2900-0393 covers VA's acquisition activities conducted under FAR Part 13 and under VAAR Part 813, since those activities are not covered by a PRA number assigned to the FAR. This request for an extension covers the competitive acquisition of commercial and non-commercial goods or services conducted under the simplified acquisition procedures of FAR Part 13 and VAAR Part 813 that exceed \$25,000.

2. Indicate how, by whom, and for what purpose the information is to be used. Indicate actual use the agency has made of the information received from the current collection.

Acquisition information is collected by VA contracting officers from firms and individuals who wish to sell supplies, services, and construction to VA or who wish to

establish blanket purchase agreements (BPAs) or other contractually related agreements with VA. The information is used by VA contracting officers to evaluate the quotations received and to determine which quotation offers the best value to VA in terms of price and other factors. The information is collected for each acquisition and VA uses the information collected to determine to whom to award contracts or with whom to enter into BPAs or other contractually related agreements.

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.

The majority of quotations submitted to VA for contract actions in excess of \$25,000 are submitted by mail, express package delivery, or by hand delivery. A single Government-wide point of entry (GPE) (FedBizOpps) has been developed where vendors can obtain copies of requests for quotation (RFQs) electronically via e-mail.

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.

VA has had an on-going program to consolidate acquisition activities. Most, if not all, of the Veterans Health Administration's 21 Veterans Integrated Service Networks (VISNs) have an actual or virtually consolidated acquisition organization whereby one entity procures supplies, services, and construction and establishes BPAs for all of the medical centers within the VISN. This has reduced duplication and allows vendors to submit one quotation rather than multiple quotations to multiple locations within the VISNs for the same or similar supplies or services.

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

The paperwork requirements under this request could have a significant economic impact on small business. If a small business doesn't submit a quotation and the required associated paperwork, it would not be eligible for award of a contract. However, the VAAR imposes no additional burdens on small business not already required by the FAR. Any offeror, whether large or small, is required to submit the same data (e.g., the price at which the firm is offering to sell the goods or services to VA, the firm's name and address, the size of the firm, the firm's tax identification number, the terms and conditions of the sale, etc.). All of this information is required in order to determine, among other things: which firm has the best offer, price and other factors considered; whether the firm is eligible for award (in the event of a small business set-aside); and where the purchase order and the payment should be

sent; and any other information that may be needed in order to award a contract. All of the information is needed from all offerors in order to make an award and it would not be possible to minimize the burden for small businesses.

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.

Without the requested information, VA would be unable to award contracts or obtain the goods and services necessary to operate the agency. The greater the level of competition and the more quotations received, the more likely the supplies, services, or construction will be obtained at fair and reasonable prices. The Department is required by law and regulation to seek competition to the maximum extent practicable. Limiting the number of firms and the number of times the information is collected in order to reduce the paperwork burden would be a violation of that requirement and would deprive the Department of obtaining the best products and services in fulfilling its mission.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health; medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

- a. Respondents are required to submit information once for each request, not repeatedly at regular intervals.
- b. Respondents who wish to compete on acquisitions may be required to submit information in less than 30 days. FAR 5.203 provides that a notice must be published on the GPE at least 15 days before the solicitation is issued, except that, for commercial items or services, this time period may be reduced and, for combined solicitations/GPE notices, this time limit does not apply at all. The FAR provides that, following publication on the GPE, for acquisitions greater than \$25,000 but not exceeding \$150,000 or, for commercial items or services not exceeding \$7 million, offerors must be given a reasonable time to respond to the solicitation. The total time period may be less than 30 days, depending on the complexity, commerciality, and urgency of the acquisition. Requests for information covered by this PRA control number will be conducted in accordance with the FAR. The VAAR does not impose any reduced time periods for response.
- c. Solicitations generally only require offerors to submit an original copy.

- d. Solicitations do not require respondents to retain records other than Government contract-related records.
- e. The collection of information is not related to a statistical survey.
- f. The collection of information does not require the use of a statistical data classification.
- g. The collection of information does not include a pledge of confidentiality that is not supported by authority established in statute (e.g., the Privacy Act, the Freedom of Information Act).
- h. Any proprietary trade secrets or other confidential information collected would be covered by and protected by the Freedom of Information Act.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor'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 sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

Notices regarding use of this VAAR Part 13 in all applicable solicitations were published in the Federal Register on October 10, 2017 at 82 FR 47080. No comments were received.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

No efforts to consult with persons outside the agency were made.

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

No payment or gift is provided to respondents for the submission of information. However, the firm submitting the best value offer may be awarded a contract to provide the goods or services requested in the solicitation.

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

No assurance of privacy/confidentiality will be provided to respondents. The Freedom of Information Act provides a basis for protecting proprietary trade secrets or other confidential information.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include 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.

The collection of information does not involve any questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form is reported as follows:

No. of respondent	x No. of responses	x No. of minutes		Number of Burden Hours
20,845	1 per each acquisition action	60	÷by 60	20,845

b. 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 of OMB 83-1.

N/A

- c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. 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 14.**

GS Grade Level	Step	2016 annual amount	Per Hour Cost (2087 yearly work hours)	Burden Rate per Hour (Based on 36.25% of OMB Memo M-08-13)
7	1	35,009	\$17	\$23

The primary cost to a vendor to prepare and submit a quotation to VA would be for the labor hours necessary to look up or calculate the bid prices, prepare any required information on the vendor’s capabilities, enter the prices on the quotation, and sign, seal, and mail the quotation to VA. The simpler quotations (those below \$150,000, which constitute the vast majority of the actions covered by this PRA request) could be prepared by junior contract specialist staff. Quotations of \$150,000 or more (estimated to be 248 per year, based on FPDS data) might require more time and effort and more supervisory attention. On average, we estimate that the salary costs to prepare quotations would be \$23 per hour with full benefits, based on a belief that most of the time involved would be junior contract specialist staff time, at the GS-7 level. Total cost to vendors would therefore be \$ 479,435 (\$23 times 20,845 hours). Below is the link to OPM Salary Table, 2016-GS_ (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/GS.aspx>)

- 13. Provide an estimate of 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).**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

- 14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

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GS Grade Level	Step	2016 annual amount	Per Hour Cost (2087 yearly work hours)	Burden Rate per Hour (Based on 36.25% of OMB Memo M-08-13)
5	5	32,030	\$15	\$20

The primary cost to VA would be for the labor hours necessary to assist the requestor in developing the specifications, prepare the solicitation, do market research, develop a mailing list, mail out the solicitation, post notice of the solicitation on the GPE, receive the quotations, evaluate the offers received, verify the offeror's responsibility, obligate the funds, make award, and issue award notices. On average, we estimate that the salary costs to award contracts under FAR Part 13 and VAAR Part 813 would be \$20 per hour (based on the salary of a GS-5 purchasing agent, including benefits). While some of the acquisitions exceeding \$150,000 are handled by senior GS-1102s, most of the acquisitions covered by this PRA request would be handled by junior GS-1102s. VA has 733 GS-1105 purchasing agents, but only a small portion of their time is spent on the 3,790 competitive acquisition awards made under FAR Part 813. The vast majority of each junior contract specialist's time is spent on the other 3,660,000 acquisitions valued at less than \$25,000 that are awarded annually and that are not covered by this PRA request. Based on the 733 junior GS-1102s, with approximately 1,320,000 work hours available annually (approximately 1,800 hours per person), and with nearly 3,664,000 actions processed, that works out to less than .4 hours per transaction. However, the larger dollar value transactions covered by this PRA number will take more time than would the acquisitions valued at less than \$25,000. A study conducted a number of years ago by the procurement executives of nine Executive agencies estimated that, at that time, the cost to process a purchase order was approximately \$94. However, not all of that cost is related to the request for data, much of the cost is related to obligating the funds, receiving the goods or services, and paying the invoice. Based on this varied data, we estimate that it takes 4 hours of a junior GS-1102 contract specialist's time to award and administer each of the 3,790 acquisitions included in this PRA request. The cost to VA will be \$303,200 (\$20 times 4 hours times 3,790 actions, based on the salary and benefits of a GS-1102-05 level). No other significant costs are involved.

15. Explain the reason for any burden hour changes since the last submission.

There is no burden change.

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.

The results of this collection of information will not be published.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

This request seeks approval not to display the expiration date for OMB approval of the information collection on each request for information (request for quotation). VA uses a standard Government forms (Standard Form (SF) 18, Request for Quotation, SF 1449, Solicitation/Contract/Order for Commercial Items), to solicit quotes. It would be impractical to overprint an OMB Control No. assigned to VA on each SF 18 or SF 1449 issued by VA. The assigned OMB Control No. will be published in 48 Code of Federal Regulations Chapter 8, the VAAR.

18. Explain each exception to the certification statement identified in Item 19 "Certification for paperwork Reduction Act," of OMB 83-I.

No exceptions apply.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

Statistical methods will not be employed. Each request for information is unique and statistical methods cannot be used.