SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION 3090-0163, INFORMATION SPECIFIC TO A CONTRACT OR CONTRACTING ACTION (NOT REQUIRED BY REGULATION)

A. Justification

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

The General Services Administration (GSA) has various mission responsibilities related to the acquisition and provision of supplies, transportation, information technology, telecommunications, real property management, and disposal of real and personal property. These mission responsibilities generate requirements that are realized through the solicitation and award of public contracts. In Fiscal Year 2016, these contracts had values ranging from under \$100 to over \$777,000,000, including the base and all options.

Most GSA procurement-related information collections are required by the Federal Acquisition Regulation (FAR) or General Services Administration Acquisition Regulation (GSAR); each clause requiring such a collection must be individually approved by the Office of Management and Budget (OMB). However, some solicitations require contractors to submit information specific to that contracting action, such as information needed to evaluate offers (e.g. specific instructions for technical and price proposals, references for past performance) or data used to administer resulting contracts (e.g. project management plans).

This information collection is currently associated with GSA's information collection requirements contained in solicitations issued in accordance with the Uniform Contract Format under FAR Part 14, Sealed Bidding (see GSAR 514.201-1); FAR Part 15, Contracting by Negotiation (see GSAR 515.204-1); and solicitations under FAR Part 12, Acquisition of Commercial Items, when issued in accordance with the policy and procedures of FAR Part 14 and FAR Part 15 (see GSAR 512.301). This includes information collection requirements found in GSA Federal Supply Schedule (FSS) solicitations.

2. Indicate how, by whom, and for what purpose the information is to be used.

Contracting officers use the information to evaluate offers and administer resulting contracts. Such information is also necessary for program managers to make informed decisions germane to those specialized areas.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.

GSA uses improved information technology to the maximum extent practicable. Where both the GSA and contractors are capable of electronic interchange, the contractors may submit information requirements electronically.

4. Describe efforts to identify duplication.

As indicated in Item 1 above, the requirements are not mandated by regulation and usually are

germane to a particular solicitation or resulting contract(s).

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

Burdens usually apply equally to large and small businesses that want to contract with GSA. Burden is kept to the minimum necessary to meet the specific objectives of a 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.

Offers could not be properly evaluated, specific program objectives would not be met, or performance could not be measured.

7. Explain any special circumstances.

Upon occasion due to urgency of a procurement or when conducting an acquisition of commercial items, respondents may be requested to prepare a written response to a collection of information (response to solicitation for offers) in fewer than 30 days after receipt of the request. Respondents may also be required by contract to submit information more often than quarterly (e.g. monthly). An example of a monthly reporting requirement is a project progress plan.

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

A 60-day notice was published in the *Federal Register* at 82 FR 33911 on July 21, 2017. No comments were received. A 30-day notice was published at 82 FR 49209 on October 24, 2017. No comments were received.

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

GSA makes no such payments under this collection.

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

Confidentiality will be provided to contractors in accordance with prudent business practices and current regulations.

11. Provide additional justification for any questions of a sensitive nature.

No sensitive questions are involved.

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

The estimated number of respondents annually is 347,239, with one response per respondent.

Each response requires .40 hours for a total of 138,896 hours. Time estimates are based on professional judgment. The number of respondents is based on data from the Federal Procurement Data System (FPDS) for Fiscal Year (FY) 2016, which shows GSA made approximately 67,000 new awards with 347,239 offers received. Additionally, the Federal Acquisition Service, Office of Acquisition Management, determined there were 2,833 offers received for Federal Supply Schedule (FSS) contracts. FSS offers are coded uniquely in FPDS because those contracts have standing solicitations, so they were not included in the 347,239 figure.

Estimated respondents/yr	347,239
Responses per Respondent	<u>x 1</u>
Total Responses annually	347,239
Estimated hours/response	<u>x .40</u>
Estimated total burden hours	138,896

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

Estimate of the burden hours to the Federal Government is 86,810 hours. Reviewing and processing each response should take approximately 0.25 hours (15 minutes) per response; the total number of responses is estimated to be 347,239 each year. 347,239 responses multiplied by 0.25 hours equals 86,810 hours.

The total cost to the Government is \$3,758,005, based on the 86,810 burden hours to the Government, multiplied by \$43.29 hour¹.

Reviewing Time/hr	0.25 hours
Requests/year	<u>x 347,239</u>
Review Time/year	86,810 hours
Average Cost/hr	<u>x \$43.29</u>
Total Government Cost	\$3,758,005

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

The total cost burden for Item 14 increased from \$2,700,311 (2014 estimate) to \$3,758,005 (2017 estimate). The following is a comparison of the total Government cost burden elements from 2014 to 2017:

- Reviewing Time/hr: This figure, 0.25 hours, is unchanged from 2014.
- Requests/year: This figure increased from 262,995 requests/year to 347,239 requests/year, based on information obtained from the Federal Acquisition Service and the Federal Procurement Data System (FPDS) for Fiscal Year 2016.
- Review Time/year: The increase from 65,749 hours/year to 86,810 hours/year is the result of the increase in the number of requests per year.
- Average Cost/hr: The current rate, \$43.29/hour, is an increase over the previous rate of \$41.07/hour.

¹ GS 12, Step 5 hourly rate of \$43.29 in the Washington, DC/Baltimore/Northern Virginia locality (Salary Table 2017-DCB Washington-Baltimore, DC-MD-VA-WV-PA, Effective January 2017).

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

Results will not be tabulated or published. Data 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.

GSA is not seeking such approval for this collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions".

GSA has no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used in this information collection.