SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION 9000-0144, PAYMENT BY ELECTRONIC FUNDS TRANSFER

A. Justification.

1. Administrative requirements. The Federal Acquisition Regulation (FAR) contains a requirement for certain information to be provided by contractors to enable the Government to make payments under the contract by electronic funds transfer (EFT). The information necessary to make the EFT transaction is specified in two clauses at 52.232-33, Payment by Electronic Funds Transfer—System for Award Management, and 52.232-34, Payment by Electronic Funds Transfer—Other than System for Award Management.

2. **Uses of information**. The Government will use this information collection to make payments under the contract by electronic funds transfer.

3. **Consideration of information technology**. We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically.

4. **Efforts to identify duplication.** This requirement is being issued under the FAR, which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

5. If the collection of information impacts small businesses or other entities, describe methods used to minimize burden. This collection has a significant impact on a substantial number of small businesses or other small entities because the great majority of small businesses or entities have payment made by EFT under their contracts.

6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently. This collection of information is imposed upon contractors upon award of each contract. Less frequent collection would not facilitate contract payment by EFT as the standard method of payment under Government contracts. 7. **Special circumstances for collection.** Collection is generally consistent with the guidelines in 5 CFR 1320.6.

8. **Efforts to consult with person outside the agency.** A notice was published in the *Federal Register* at 82 FR 44413 on September 22, 2017. No comments were received. A 30-day notice published in the *Federal Register* at 82 FR 57600 on December 6, 2017.

9. Explanation of any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees. Not applicable.

10. Describe assurance of confidentiality provided to respondents. This information is disclosed only to the extent consistent with prudent business practices and current regulations. This collection requirement solicits sensitive information, which must be properly safeguarded (data concerning the contractor's accounts as its financial agent, such as account number).

11. Additional justification for questions of a sensitive nature. The information collection includes no questions regarding matters that are commonly considered private.

12 & 13. Estimated total annual public hours and cost burden. DoD, GSA and NASA analyzed the FY 2016 data from the Federal Procurement Data System (FPDS) to develop the estimated burden hours. The burden to provide the information required by the clause at 52.232-33, Payment by Electronic Funds Transfer— System for Award Management, is already covered by OMB Control Number 9000-0159, System for Award Management Registration (SAM). OMB Control Number 9000-0159 accounts for new registrations and renewals in SAM, which includes providing the EFT information. OMB Control Number 9000-0144 now will cover the burden for the information provided in accordance with the clause at FAR 52.232-34, Payment by Electronic Funds Transfer— Other than System for Award Management, as shown below:

Number of respondents	3,761
Number of responses per respondent	<u>x 1</u>
Total annual responses	3,761
Preparation time per response (hours)	<u>x 0.5</u>
Total response burden hours	1,881
Average wages + overhead	<u>x \$53.40</u>
Estimated cost to public	\$100,445.40

- The number of respondents are the number of contracts with an exception to the use of SAM in FPDS for FY16, which are 3,761.
- The responses per respondent are one per each (one response per contract).
- Based on the OPM (Base) GS-12/step 5 salary (\$39.19 an hour) plus 36.25 percent burden equals \$53.40 per hour. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition, as updated by OMB for the current year. Reference Salary Table 2017-RUS, Effective January 2017, found at www.opm.gov). The estimated cost per response is \$26.70.

14. **Estimated cost to the Government**. Time required for Government-wide review is estimated at 1.5 hours per response.

Annual Reporting Burden and Cost

Total annual responses	3,761
Review time per response	<u>x 1.5</u>
Total burden hours	5,641
Average wages + overhead <u>x</u>	<u>\$53.40</u>
Estimated cost to govt\$ 301	,229.40

**Based on the OPM (Base) GS-12/step 5 salary (\$39.19 an hour) plus 36.25 percent burden equals \$53.40 per hour. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition, as updated by OMB for the current year. Reference Salary Table 2017-RUS, Effective January 2017, found at <u>www.opm.gov</u>).

15. Explain reasons for program changes or adjustments reported in Item 13 or 14. The decrease of responses from 140,000 to 3,761 and the associated decrease in estimated burden hours from 70,000 hours to 1,881 hours is an adjustment due to the assumptions made for the estimate and recognizing that a portion of the burden is already covered by another OMB Control Number, 9000-0159, System for Award Management Registration (SAM).

16. Outline plans for published results of information collections. Results will not be tabulated or published.

17. Approval not to display expiration date. Not applicable.

18. **Explanation of exception to certification statement**. Not applicable.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.