

**Supporting Statement for  
Department of Veterans Affairs (VA) Acquisition Regulation (VAAR)  
Clause 852.211-70, Equipment Operation and Maintenance Manuals  
(formerly Service Data Manuals)  
OMB No. 2900-0587**

**A. JUSTIFICATION**

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

As a result of VAAR final rule RIN 2900-AP81, posted to the Federal Register on October 1, 2018 (83 FR 49302), this Paperwork Reduction Act (PRA) submission seeks to revise the contents of a currently Office of Management and Budget (OMB) approved No. 2900-0587 for one collection of information for the Department of Veterans Affairs Acquisition Regulation (VAAR) clause, as follows:

- a. Revise the title of the clause currently included under this supporting statement, to reflect a title that more appropriately reflects the content of the clause as follows:

The current clause title 852.211-70, Service Data Manuals, is revised to read, 852.211-70, Equipment Operation and Maintenance Manuals. We propose to reflect the revised title as set forth in the preamble and the amendatory language of the proposed rule.

- b. Reduce the information collection burden currently imposed on respondents as a result of revising the clause and removing the requirement to develop Government-specified service manuals. The VA has eliminated an unnecessary burden on the public by making use of commercial operation and maintenance manuals just like the general public and established commercial practices, thereby reducing by half the estimated annual hourly burden which is now estimated at 311 hours, a reduction of 310 annual hours and an annual cost savings of \$7,722 to respondents.

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

VAAR clause 852.211-70, Equipment Operation and Maintenance Manuals, is used when VA purchases technical medical equipment and devices or mechanical equipment. The clause requires the contractor to furnish both operator's manuals and maintenance/repair manuals with the equipment provided to the Government. This clause sets forth those requirements and sets forth the minimum standards

those manuals must meet to be acceptable. Generally, this is the same operator's manual furnished with each piece of equipment sold to the general public and the same repair manual used by company technicians in repairing the company's equipment. The cost of the manuals is included in the contract price or listed as separately priced line items on the purchase order. The operator's manual will be used by the individual actually operating the equipment to ensure proper operation and cleaning. The repair manual will be used by VA equipment repair staff to repair the equipment.

**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.**

Collection efforts do not involve the use of automation. There are no plans to use information technology to collect this data. The information is specific to each item of equipment and the information must accompany the delivery of the equipment. Offerors are required to provide specific information, unique to the product that they are offering, to show how that product is operated and maintained. However, the information could be furnished on disk or other electronic media.

**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.**

There are no duplicated efforts. Each reporting situation is unique and the data that must be submitted is unique to the specific construction contract involved.

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

There is no significant impact on small businesses.

**6. Describe the consequences 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.**

Failure to collect the information would have a negative impact on VA. Without the information, VA would be purchasing equipment for which it would not have proper operating instructions. This could be hazardous to VA employees and to VA patients. In addition, without maintenance manuals, VA would be unable to make

repairs to the equipment.

**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.**

The information is needed for each product offered at the time of submission of the offer and upon delivery of the item(s), rather than quarterly. The information is specific to the product offered and unique to that particular solicitation. The information is submitted for each product offered. The time for response is the same as the time for delivery of the equipment, which may be fewer than 30 days, especially for lower dollar value contracts or for commercial items. The information is normally standard company operating and service manuals and does not require any special preparation. For most equipment procurements, two copies of the maintenance manual and two copies of the operating manual will be required. One set will remain with the equipment, while the other set will go to the biomedical engineer/maintenance shop for use in repairing the equipment at that location. When a procurement will result in the initial purchase of a particular make and model of an item of equipment, the purchase order will require the contractor to furnish three additional copies of the operating and maintenance manuals to VA's Service and Reclamation Division for use in maintaining the equipment from that location.

**8a. 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.**

On March 26, 2018, proposed rule RIN 2900-AP81 was published in the Federal Register (83 FR 12922) to propose the retitle and reduction of burden hours stated in paragraph 1 of this Supporting Statement. No comments were received.

On October 1, 2018, final rule RIN 2900-AP81 was published in the Federal Register (83 FR 49302) with an effective date of October 31, 2018.

**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.**

There were no efforts to consult with persons outside the agency beyond the Federal Register posting of Proposed Rule and Final Rule.

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

No payments or gifts will be provided.

**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 assurances of privacy/confidentiality will be provided to respondents. However, should a contractor believe the information is proprietary, VA will agree to protect the material from unauthorized disclosure.

**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 request for information does not include 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 respondents	x No. of responses	x No. of minutes	÷by 60	Number of Burden Hours
3,725	1 per contract awarded	5		

**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.**

Estimated annualized cost: \$7,569.74 (311 hours at \$24.34 per hour.) The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According the latest (May 2017) available BLS data, the mean hourly wage is \$24.34 on BLS wage code – “00-0000 All Occupations.” This information was taken from the following website:

[https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000)

- 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).**

None

- 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.**

Estimated annualized cost to the Government: \$4,285.58 (311 hours at \$13.78 per hour, based on the 2017 OPM Salary Table GS-2, step 1 (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/GS.aspx>) with a base hourly rate of \$10.12 + \$3.66 Total Civilian Position Fringe Benefits rate of 36.25%).). The information is evaluated upon receipt. If acceptable, no further action is required.

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

As a result of revising the clause and removing the requirement to develop Government-specified service manuals, the VA has eliminated an unnecessary burden on the public by making use of commercial operation and maintenance manuals just like

the general public and established commercial practices, thereby reducing by half the estimated annual hourly burden which is now estimated at 311 hours, a reduction of 310 annual hours.

**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 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.**

VA is not seeking approval to omit the OMB expiration date.

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

There are no exceptions.

## **B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

Statistical methods will not be employed.