

**Supporting Statement for
Department of Veterans Affairs Acquisition Regulation (VAAR)
832.202-4, Security for Government Financing
Approved OMB Control No. 2900-0688**

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 reinstatement **without change** of Office of Management and Budget (OMB) approval No. 2900-0688, Department of Veterans Affairs Acquisition Regulation (VAAR) 832.202-4, Security for Government Financing.

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.

The information that is gathered under 832.202-4 will be used by the VA contracting officer to assess whether or not the contractor's overall financial condition represents adequate security to warrant paying the contractor in advance. FAR subpart 32.2 authorizes the use of certain types of Government financing on commercial item purchases. 41 United States Code (U.S.C.) 255(f) requires the Government to obtain adequate security for Government financing. However, FAR 32.202-4(a)(2) provides that, subject to agency regulations, the contracting officer may determine that an offeror's financial condition is adequate security. VAAR 832.202-4 Security for Government Financing specifies the type of information that the contracting officer may obtain to determine whether or not the offeror's financial condition constitutes adequate security.

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 collection of information will not involve automated, electronic, mechanical, or other technological collection techniques. However, contractors may elect to submit data 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.

There are no duplicated efforts. The information collected is specific to the given situation.

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

There will be only minimal impact on any business, whether small or large. The amount of data submitted is at the discretion of the contractor. The contractor can chose to submit no data.

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.

The consequences of not collecting the data required under VAAR 832.202-4 may be that a contractor would not qualify for advance payment under a contract and might thereby experience difficulty completing the contract.

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. Information is collected as needed, and only at the discretion of the contractor.
- b. Information may be required in less than 30 days under VAAR 832.202-4 to allow VA to make a decision on whether or not to make payments in advance. A quick decision may be necessary in order to ensure that the contractor has sufficient assets to perform the contract. A fast decision would be a benefit to the contractor.
- c. No more than an original will be required.
- d. There are no record retention requirements.

- e. This is not a statistical survey.
- f. This does not require the use of statistical data classification.
- g. This does not include a pledge of confidentiality.
- h. This does not require the submission of proprietary information.

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 these clauses in all applicable solicitations were published in the Federal Register on January 10, 2018 (83 FR 1286) and on April 10, 2018 (83 FR 15454). VA did not receive any comments.

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 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.

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 is reported as follows:

a. No. of Respondents	b. No. of Responses	c. x No. of Minutes	÷ by	d. Number of Burden Hours
10	On occasion **	60	60	10

** A response will be requested any time a contractor requests payment in advance and the contracting officer agrees to consider the request.

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.

Estimated total annual reporting burden: 10 hours.

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: \$475.68 (10 hours at \$39.64 per hour, estimated salary rate, including benefits, based on the likelihood that an individual at a level similar to a GS-12, Management Analyst will gather and prepare the data).

(Source: Bureau of Labor Statistics, May 2017 Occupational Wage Code, 13-1111, Management Analyst, Median Hourly Wage at \$39.64 <https://www.bls.gov/oes/current/oes131111.htm>).

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).

N/A

- a. There are no capital costs or operating or maintenance costs.
- b. Costs are not expected to vary widely.
- c. There are no equipment costs.

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: \$464 (10 hours at \$46.41 per hour, based on the 2017 OPM Salary Table (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/GS.aspx>) GS-12, step 5 for VA contracting officers with a base hourly rate of \$34.06 + \$12.35 Total Civilian Position Fringe Benefits rate of 36.25%). The information is evaluated upon receipt and a decision is made based on the data.

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

There are no program/burden changes.

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 will display the expiration date for OMB approval of the information collection

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

Submissions," of OMB 83-I.

This submission does not contain any exceptions to the certification statements.

B. Collection of Information Employing Statistical Methods

Statistical methods will not be employed.