

SUPPORTING STATEMENT - PART A

Certification of Qualified Products – 0704-0487

1. Need for the Information Collection

The collection of qualified product certification information is authorized by 10 U.S.C. 2319 and subpart 9.2 of the Federal Acquisition Regulation (FAR), as well as DoDM 4120.24. The purpose of qualification is to ensure continued product performance, quality, and reliability, and to provide for the completion of long or highly complex evaluations and tests prior to and independent of an acquisition or contract. As evidence that the products or processes and materials meet the specifications requirements, it is stated in policy that a self-certification must be done every two years by the manufacturer/distributor. Within the Qualification Program, the manufacturer must:

- a) Maintain adequate process and quality control procedures to ensure that the items continually comply with all specification requirements;
- b) Report any discrepancies immediately from testing, period reexaminations of its product, and production process and controls;
- c) Ensure that delivered items conform to all requirements including performance, quality, reliability, and other specification product characteristics; and
- d) Ensure that all products are manufactured and tested in a manner that was approved under the original specification (including the manufacturing process, manufacturing plant locations, and test procedures, methods, and sequences).

The DoDM 4120.24 calls out the use of DD Form 1718 for use by manufacturers to retain qualification.

2. Use of the Information

The DD Form 1718 is sent to manufacturers or distributors via email every two years by the Qualifying Activity when the applicable specification does not contain complete requalification testing. The form is filled out electronically by the manufacturer or distributor, validating that the products listed are produced under the same conditions as originally qualified. The form is then signed and returned to the Qualifying Activity by email. The Qualifying Activity reviews the forms, validates the information, and updates the QPL/QML information so that the supplier is revalidated and remains active on the listing for another two years. If the form is not returned (after due notice) to the Qualifying Activity and the certification cannot be completed, the manufacturer's products are removed from the Qualified Products List (QPL) or the Qualified Manufacturers List (QML).

3. Use of Information Technology

In 2006, the Defense Standardization Program Office (DSPO) and the Qualifying Activities automated the Qualification Program, thereby providing qualification data in near-real time. Currently, Qualifying Activities send the majority of DD 1718 Forms via email (99%) to manufacturers and distributors for the purpose of validating their products. Manufacturers and distributors either digitally sign, or print, sign, scan the form, in order to send back via email to the Qualifying Activity. Since most manufacturers and distributors have access to print and scan copying, and the ability to email, response time,

mailing, and fax costs for respondents have been greatly reduced. In very few cases are forms being mailed (1%).

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Less frequent collection of this information would compromise the ability of the Department of Defense to ensure products meet the specified requirement. The 24-month cycle complies with DoDM 4120.24.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Thursday, March 22, 2018. The 60-Day FRN citation is 83 FRN 12570. Two (2) comments were received during the comment period; however, both of these comments were found to be irrelevant to the collection.

A 30-Day FRN for the collection published on Wednesday, May 30, 2018. The 30-Day FRN citation is 83 FRN 24750.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Notice was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Records associated with this collection are designated 4155.20 Specification Files. As such, they are destroyed one (1) year after specification is revised or canceled.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. DD Form 1718

- a. Number of Respondents: 1276
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 1276
- d. Response Time: 30 minutes
- e. Respondent Burden Hours: 638 hours

2. Total Submission Burden

- a. Total Number of Respondents: 1276
- b. Total Number of Annual Responses: 1276
- c. Total Respondent Burden Hours: 638 hours

b. Labor Cost of Respondent Burden

1. DD Form 1718

- a. Number of Total Annual Responses: 1276
- b. Response Time: 30 minutes
- c. Respondent Hourly Wage: \$25.00
- d. Labor Burden per Response: \$12.50
- e. Total Labor Burden: \$15,950.00

2. Overall Labor Burden

- a. Total Number of Annual Responses: 1276
- b. Total Labor Burden: \$15,950.00

The Respondent hourly wage was determined by using the US Bureau of Labor Statistics website: <https://www.bls.gov/>.

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1. DD Form 1718

- a. Number of Total Annual Responses: 1276
- b. Processing Time per Response: 30 minutes
- c. Hourly Wage of Worker(s) Processing Responses: \$40.00
- d. Cost to Process Each Response: \$20.00
- e. Total Cost to Process Responses: \$25,520.00

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 1276
- b. Total Labor Burden: \$25,520.00

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$0
- c. Postage: \$6.37
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total: \$6.37

- 1. Total Operational and Maintenance Costs: \$6.37
- 2. Total Labor Cost to the Federal Government: \$25,520.00
- 3. Total Cost to the Federal Government: \$25,526.37

15. Reasons for Change in Burden

There has been no change in burden since the last approval of this collection.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.