

**Supporting Statement for Paperwork Reduction Act Submission
3090-0262 – Identification of Products with Environmental Attributes**

A. Justification

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

Several laws, Executive Orders, and Agency Directives require Federal buyers to purchase products that are less harmful to the environment when they are life cycle cost-effective. As a result, the General Services Administration Acquisition Regulation (GSAR) clause 552.238-72 requires contractors that submit offers under Multiple Award Schedule solicitations to highlight environmental products under Federal Supply Schedule contracts in various communications media and to possess evidence or rely on a reasonable basis to substantiate the claim. This information will be used to assist Federal Agencies in meeting their responsibilities under a number of statutes and executive order, including the Energy Policy and Conservation Act (42, U.S.C. 6201 et seq.), the Energy Policy Act of 1992 (Public Law 102-486), the Clean Air Act Amendments of 1990 (Public Law 101-549), the Resource Conservation and Recovery Act (42 U.S.C. 6901 et seq.), and Executive Order 13834.

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

Federal Agencies will utilize this information to determine if such products will meet their needs and meet the Federal acquisition statutes in preference to other products that meet their needs, but do not have the environmental attributes.

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

We use improved information technology to the maximum extent practicable. Where both the General Services Administration and contractors are capable of electronic interchange, the contractors may submit information requirements electronically.

4. Describe efforts to identify duplication.

We did not identify any duplication of information being collected. Our review did not identify any similar data.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB 83-I), describe any methods used to minimize burden.

The burden applies equally to both small and large organizations that want to do business with GSA. However, it is the minimum necessary to meet the specific objectives of the 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.

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Government would not be able to identify products that have environmental attributes and benefits and therefore would not be in compliance with numerous laws and statutes, and Executive Order.

7. Explain any special circumstances.

None.

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

A 60-day notice was published in the *Federal Register* at 83 FR 22065 on May 11, 2018. No comments were received. A 30-day notice published in the *Federal Register* at 83 FR 42499 on August 22, 2018.

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.

GSA makes no such assurance of confidentiality under this collection.

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

No sensitive questions are involved.

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

The estimated number of respondents annually is 795 with each response requiring 1 hour for a total of 795 hours. The number of annual respondents was determined by identifying the number of contracts that have at least one product with an environmental attribute that requires a response in accordance with GSAR clause 552.238-72.

Based on estimates of number of contracts; estimated burden hours to the public:

Estimated respondents/yr.....	795
Number of submissions per respondent.....	<u>x 1</u>
Total responds annually.....	795
Estimated hours/response.....	<u>x 1</u>
Estimated total burden hours.....	795

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13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

The estimated annualized cost to the public is \$41,769. (795 annual responses * 1.0 hours per response = 795 * \$52.54). The cost per response is approximately \$52.54.

The number of annual respondents was determined by identifying the number of contracts that have at least one product with an environmental attribute that requires a response in accordance with GSAR clause 552.238-72.

Respondents	795
Responses per respondent	<u>x 1</u>
Total annual responses.....	795
Preparation hours per response.....	<u>x 1.0</u>
Total burden hours.....	795
Average hourly wages.....	<u>x \$ 52.54</u>
Total annual recordkeeping cost.....	\$41,769

The total cost of \$52.54 is based on the mean hourly wage for a journeyman at the 2018 GS-12, Step 5 level (*Base Pay and Rest of US Locality Pay*) (*Salary Table 2018-GS, Effective January 2018*), with fringe of 36.25% (*OMB Memo M-08-13*).

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

The estimated annual cost to the Federal Government is \$20,911 (398 estimated burden hours * \$52.54). Each response should take approximately 30 minutes (.50) to process and review. The annual estimated hours require to review responses is 398 (795 * .50).

Number of responses.....	795
Avg. hours per response.....	<u>x .50 (30 minutes)</u>
Estimated Hours.....	398
Cost per hour.....	<u>x \$ 52.54</u>
Total annual Government cost.....	\$20,911

The total cost of \$52.54 is based on the mean hourly wage for a journeyman at the 2018 GS-12, Step 5 level (*Base Pay and Rest of US Locality Pay*) (*Salary Table 2018-GS, Effective January 2018*), with fringe of 36.25% (*OMB Memo M-08-13*).

15. Explain the reasons for any program changes or adjustments reported.

The most significant change has been a reduction in the number of annual responses. This update in the number of responses is due to improved data analysis techniques that has allowed a more accurate determination regarding the number of contractors required to submit a response.

In addition, the average cost per hour has been updated for both the government and contractor to reflect current labor costs.

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

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 the “Certification for Paperwork Reduction Act Submissions”.

GSA has no exceptions to the certification statement.