

SUPPORTING STATEMENT - PART A

DoD Enterprise-wide Contractor Manpower Reporting Application (ECMRA) – 0704-0491

Summary of Changes of the Previously Approved Information Collection

- Revision of IC title from DoD Inventory of Contracts for Services Compliance to DoD Enterprise-wide Contractor Manpower Reporting Application (ECMRA)
- Burden decreased due to the consolidation of four service systems into an Enterprise-wide application
- Use of Information Technology increased from 90% to 100%

1. Need for the Information Collection

Section 2330a of Title 10, United States Code requires the Secretary of Defense not later than the third quarter of each fiscal year to submit to Congress a summary of an annual inventory of the activities performed during the preceding year pursuant to contracted services for or on behalf of the Department of Defense. Section 2330a requires that the Department calculate contractor full-time equivalents, for the purposes of this summary, using direct labor hours. The Enterprise-wide Contractor Manpower Report Application (ECMRA), and this associated information collection requirement, was established specifically to achieve the collection of direct labor hours and associated costs in order to meet the requirements set for the by section 2330a of Title 10, United States Code.

Furthermore, ECMRA collections enable to DOD organizations to understand the extent to contracted support, the associated level of effort in achieving mission, and the reliance on contracted services necessary to facilitate their workforce planning processes, and to support statutory requirements set forth in sections 115a, 129a, 235, 2461, and 2463 of Title 10, United States Codes. .

2. Use of the Information

ECMRA supports the Department-wide program aimed at obtaining information regarding the use of contracted support by the DoD. Based upon the success of the previous approval period, DoD has further identified the ECMRA system as collecting relevant information and data to fulfill numerous requirements beyond solely the requirement established under section 2330a of Title 10, United States Code. To streamline the Department's reporting processes, 4 extant systems – 3 for each of the Military Services and one for the Office of the Secretary of Defense, Defense Agencies, DoD Field Activities, and other organization so the Department – were consolidated into a single enterprise-wide system, the ECMRA. This centralized support system for the ECMRA system reduces the burden that the reporting requirements impose and greatly reduces the burden of satisfying reporting requirements by automatically drawing on the resources of other authoritative data systems. More than half of all required data elements that ECMRA leverages are pre-populated, reducing the burden on contractors and limiting their input to that data which is not readily available elsewhere. By consolidating four extant systems into one, the Department has further reduced the reporting burden by creating a single, common use

system for capturing this collections requirement, as opposed to requiring vendors to access multiple different systems to report similar information.

This program has greatly enhanced the ability of the DoD to identify and track the services provided to the Department under contract. Other systems do not have contractor manpower data that is collected by ECMRA – i.e., Direct Labor Hours, Direct Labor Dollars and Organization supported. Existing financial and procurement systems have obligation amounts of an unknown mix of services and supplies, and DoD is not able to trace the funding to the organization supported. Like all other Federal Government agencies, DoD's reliance on service contractors has increased significantly, and as DoD will continue to have a "multi-sector workforce" consisting of Federal employees and contractor personnel, it is extremely important to have accountability for all sectors.

This information is being used to meet legislatively imposed and statutory requirements set forth in section 129, 129a, 235, 2330a, 2461, and 2463 of Title 10, United States Code. Furthermore, this information is used to support the Department's Programming, Planning, Budgeting, and Execution processes and inform the alignment of workload and resources across the Department's total force of military personnel, civilian employee, and contracted support. It enables the Department's workforce rationalization efforts, a key element of the Department's National Defense Business Operations Plan and provides data critical to achieving objectives identified in the National Defense Strategy with respect to workload alignment in order to increase lethality, promote readiness recovery, ensure force modernization and recapitalization, as well as reform the DoD's business operations.

3. Use of Information Technology

100% of all responses are collected electronically through the ECMRA system.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. The preponderance of data within ECMRA is automatically prepopulated by the Department leveraging existing authoritative data sources. Information obtained by this collection is limited to those data elements that are not otherwise captured or collected in existing DoD systems in a manner or form that enable compliance with requirements set forth in Title 10, United States Code.

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

The collection is conducted as necessary – once per year – to satisfy the reporting requirements across Title 10, United States Code. Most of the information collected is

automatically populated from other systems across the DoD. Information obtained by this collection is limited to those data elements that are not otherwise captured or collected in existing DoD systems in a manner or form that enable compliance with requirements set forth in Title 10, United States Code.

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 Tuesday, July 31, 2018. The 60-Day FRN citation is 83 FRN 36886.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, November 23, 2018. The 30-Day FRN citation is 83 FRN 59366.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register 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 are maintained indefinitely.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
[ECMRA]
 - a) Number of Respondents: 5,582
 - b) Number of Responses Per Respondent: 4
 - c) Number of Total Annual Responses: 22,328
 - d) Response Time: 5 minutes
 - e) Respondent Burden Hours: 1,860.667 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
[ECMRA]
 - a) Number of Total Annual Responses: 22,328
 - b) Response Time: 5 minutes
 - c) Respondent Hourly Wage: \$18.24
 - d) Labor Burden per Response: \$1.52
 - e) Total Labor Burden: \$33,938.56

The Respondent hourly wage was determined by using the mean wage for Office and Administrative Support Occupations from the Department of Labor's Bureau of Labor Statistics. ([https://www.bls.gov/oes/current/oes_nat.htm#43-0000])

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

The Department of Defense budgets approximately \$1.2M annually for the system sustainment, upkeep, and reporting business process support capability. This is \$1.2M dollars to help improve visibility into and governance of over \$160B (billion) in contracted services spent. These estimated costs include developmental costs, training, monthly status reports to monitor compliance, design and maintenance of the web site and a help desk.

15. Reasons for Change in Burden

The burden has decreased since the previous approval due to the consolidation of the four Service systems into a single Enterprise-wide Contractor Management Reporting

Application. This system is automatically populated and minimizes the burden imposed by reporting requirements.

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.