

**Supporting Statement for Information Collection Submission
OMB Control No. 3090-0246, Packing List Clause**

A. Justification

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

General Services Administration Acquisition Regulation (GSAR) clause 552.211-77, *Packing List*, and its Alternate I are needed to facilitate administration of Supply contracts when orders for supplies are paid by Government commercial credit card. The clause lists the minimum requirements for packing lists or other suitable shipping documents when supplies are purchased to verify placement of an order and identify the items shipped. Providing this shipping information is a normal commercial practice. The GSAR clause requires three (3) items that are not typically required in commercial packing lists when purchased with a Government commercial credit card: cardholder name, telephone number and the term "Credit Card." The additional identification is needed to verify receipt and to release payment to the contractor.

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

It is a normal commercial practice to include a packing list that verifies placement of an order and identifies the items shipped. In addition to information contractors would normally include on packing lists, the clause requires the identification of cardholder name, telephone number and the term "Credit Card."

The additional information is needed by the Government commercial credit cardholder in order to track products ordered and reconcile monthly statements. Since the cardholder and the consignee in most cases will be different, the additional information is necessary to ensure that the consignee, as recipient of the packing list, notifies the cardholder that the shipment has been received. This information is particularly useful and cost effective for the government when the micro-purchase threshold has been raised in response to a contingency operation declaration under FAR subpart 18.2. Once verification of shipment has been made, the cardholder will then authorize payment for the supplies to the contractor. Without this information, cardholders will experience difficulty verifying receipt of orders, especially those placed by telephone, thus delaying payment to the contractors.

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

Information technology is used 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.

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The nature of this requirement is such that it relates to a single procurement and cannot be duplicated.

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

The burden applied to small business is the minimum burden consistent with applicable laws, executive orders, regulations and prudent business practices.

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.

Collection of the information on a basis other than by individual order under Supply contracts is not practicable. Without this information, payments for shipments of supplies to the government will be delayed.

7. Explain any special circumstances.

The vendor will have to provide the packing list information in fewer than 30 days if the shipment or delivery terms of the contract are less than 30 days. However, this is a common industry practice and does not impact the burden. Additionally, the vendor will have to include more than one packing list if the order will be shipped in multiple packages. The packing lists are used to provide identification for the consignee and this is a common industry practice that will not impact the burden to industry.

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

A 60-day notice was published in the Federal Register at 84 FR 3446 on February 12, 2019. No comments were received. A 30-day notice was published in the *Federal Register* at 84 FR 16672 on April 22, 2019.

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

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.

This information is disclosed only to the extent consistent with prudent business practices and current regulations.

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

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No sensitive questions are involved.

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

The annual reporting burden was calculated using actual data from the government-wide Federal Procurement Data System (FPDS) for Fiscal Year (FY) 2018, analyzing both GSA orders for supplies where the method of payment was made by government credit card, and orders for supplies placed by other agencies where both payment was by a government credit card and a GSA indefinite delivery contract for supplies was referenced:

	GSA	Non-GSA	Total
Number of government credit card orders referencing GSA indefinite delivery contracts for supplies	40	8,521	8,561
Spend on the orders identified within scope of the analysis	\$1,276,944	\$160,106,810	\$161,383,754
Average order value	\$31,924	\$18,790	\$18,851

The total GSA and non-GSA orders against GSA indefinite delivery contracts using government credit card purchases amounted to 8,561 orders with a total spend of \$161,383,754. These orders averaged \$18,851 per order.

For computing the number of respondents per year (8,561), recognizing some vendors received more than one order in FY 2018, the agency used the actual number of orders processed in FY 2018 as the number of respondents.

Since the information collection is based on the number of packing lists for each order and data was not available, the government estimated the number of packing slips using a rough yardstick of one packing slip per \$1,000 product ordered. The average value of government-wide delivery orders was \$18,851. Thus, the agency estimated 19 packing lists per delivery order.

The agency estimates the response time to be 3 minutes to allow for review as well as input of the required information above normal business practices into the packing list.

Estimated number of respondents per year.....	8,561
Responses per respondent annually.....	<u> x 19</u>
Total annual responses.....	162,659
Estimated burden hours per response.....	<u> x.05</u>
Estimated total burden hours.....	8,133

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Cost per hour*\$23.91
 Estimated cost to public**\$194,460

* The estimated cost of \$23.91 per hour is based on the task being accomplished by junior level contractor personnel equivalent to a GS-5, Step 5 salary (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).

** The estimated cost per response is \$1.20

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

There is no separate capital, operation, maintenance, or service costs incurred. See Section 12 for the calculation of the total cost associated with the hour burden of this collection.

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

Reviewing and processing each response should take approximately 2 minutes; the total number of responses is estimated to be 162,659 each year x .03333 hours = 5,421 hours.

Reviewing time.....	.03333 hrs
Requests/year.....	162,659
Review time/year.....	5,421 hrs
Average cost/hr*.....	x \$23.91
Total Government cost.....	\$129,616

* The estimated cost of \$23.91 per hour is based on the task being accomplished by senior level contractor personnel equivalent to a GS-5, Step 5 salary (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 in Items 13 or 14.

This submission requests a revision of OMB approval of an information collection requirement in the General Services Administration’s Regulation (GSAR). The information collection requirement in the GSAR remains unchanged. However, adjustments are made to the total burden based on updated fiscal year data from FPDS, the GS Salary table, and research on the current rate for shipping job positions.

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

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Results will not be tabulated or published.

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.

Not applicable.

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

Not applicable.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.