

**Supporting Statement  
Federal Aviation Administration Acquisition Management System  
(FAAAMS)**

**1. Explain the circumstances making collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The information collection is for Federal Aviation Administration's Acquisition Management System (FAAAMS). The AMS establishes policies and internal procedures for FAA acquisition. Section 348 of Public Law 104-50 directed FAA to establish an acquisition system; Section 348 states, in part:

“the Federal Aviation Administration shall develop and implement, not later than January 1, 1996, an acquisition management system for the Federal Aviation Administration that addresses the unique needs of the agency and, at a minimum, provides for more timely and cost-effective acquisitions of equipment and materials.”

The information collection is necessary to solicit, award, and administer contracts for supplies, equipment, services, facilities, and real property to fulfill FAA's mission.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information collection is carried out as an integral part of FAA's acquisition process. Various portions of the AMS describe information needed from vendors seeking or already doing business with FAA. Our contracting offices collect the information to plan, solicit, award, administer and close individual contracts. Our small business office collects information to promote and increase small business participation in FAA contracts. Activities for this information collection involve reporting and recordkeeping of information. Responses are voluntary in some cases (such as responses to market surveys), but in some cases are required to obtain a benefit (such as responses to Requests for Offers leading to award of a contract).

AMS requires information collection through forms in the following areas (specific information collected varies by the nature of each form):

**IC-1 Market Surveys/Requests for Information** – In the initial stage of a procurement, these activities are used to identify products and services available to meet FAA needs, as well as obtaining vendor comments on draft requirements identified in satisfying a FAA need. The information obtained is important in determining the acquisition strategy in such areas as the evaluation criteria for competitive proposals, or whether to set the procurement aside for a particular size of business.

Forms

Business Declaration – collect information on business size of prospective vendors.  
SF-330 Architect-Engineer Qualifications- collect information from prospective architect-engineer firms on their qualifications.

Interested Parties Form- used to publicize information on prospective vendors for the purposes of subcontracting/teaming opportunities.

**IC-2 Solicitations** – In the next stage of a procurement, these activities are used to evaluate proposals with vendor-specific technical solutions, capabilities, and other qualifications such as subcontracting plans that may result in the award of a contract for a defined FAA need. The extent and nature of the information required from vendors varies depending on the nature of the goods and/or services procured, as well as the size and complexity of the FAA requirements.

Forms:

SF-30 –Amendment of Solicitation/Modification of Contract – communicate changes to FAA requirements to prospective vendors in amendments.

SF-252 Architect-Engineer Contract – award architect-engineer contracts.

SF-26- Award/Contract – award contracts.

DOT 4220.34 Contract Facilities Capital Cost of Money – vendors to provide complete information on facilities capital cost of money in their cost proposals.

DOT 4220-344- Contract Pricing Summary – vendors to provide a complete summary of their costs in their cost proposal.

SF-18/33/1447- Request for Quotations/Solicitation, Offer, and Award/Solicitation/Contract – request contractor quotes/proposals.

SF-1442 Solicitation, Offer, and Award (Construction) – vendor responses to construction, alteration, or repair solicitations.

**IC-3 Post-Award Contract Administration** –Depending on the complexity and size of the contract, various activities are ongoing after contract award in areas such as bonds (e.g. construction contracts), small business subcontracting (e.g. applying to large businesses), the tracking and management of Government Property, and invoicing. Contract modifications vary from routine administrative updates to major additions of work.

Forms

SF-30 Amendment of Solicitation/Modification of Contract –used for contract modifications of all kinds.

DOT 4220.4 Contractor’s Release – contractor release of claims for a matter under the contract.

SF-1443 – Contractor’s Request for Progress Payments – contractor request for payment based on a percentage of total cost or stage of completion.

Electronic Funds Transfer Waiver Request - contractor request for exemption from electronic funds payment process.

SF-1428 -Inventory Schedule B/Continuation Sheet –contractor inventory of Government Property.

DOT 4220.42 Material Inspection and Receiving Report – contractor invoice submittal

SF-25A – Payment Bond – required for certain construction contracts as defined in the AMS.

SF-25 – Performance Bond Annual where a performance bond is appropriate for all covered contracts.

SF-1439 -Schedule of Accounting Information – for contractor termination settlement proposal submittals.

SF-1443 -Statement and Acknowledgment – in construction contracts for each subcontract awarded.

**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.**

We use information technology to reduce the collection burden. We exchange information requests and submissions electronically through email and web portals. We also use electronic acquisition aids and rely on other existing Government-wide web portals to collect information. AMS Forms are in electronic format. All contract files must be in electronic format except for very limited exceptions such as those requiring a raised seal indicating authenticity. While not all AMS Forms require a signature, the use of electronic signatures is encouraged overall and requirements for electronic signatures have been fully specified in the AMS with the assistance of FAA Information Security.

**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.**

We continuously review existing and proposed AMS requirements to eliminate and minimize duplication in information collection. Although each contracting action is unique, data collection requirements maximize use of data already maintained or regularly submitted by vendors doing business with the Federal Government. When possible, we use information collected through other Government sources, such as vendor data in the System for Award Management (SAM). The information collected from vendors is needed to protect Government and taxpayer interests when contracting for products and services.

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

The information collection does not have a significant economic impact on small business or small entities. AMS processes were designed to minimize burden on vendors doing business with FAA, including small businesses. Flexibility in AMS allows acquisitions to be tailored to a particular set of circumstances. This has generally had a positive impact on small businesses and resulted in small businesses receiving a higher volume of contracts.

**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.**

There are policy and legal obstacles to reducing or eliminating the burden. If the collection is not conducted or collected less frequently, it would negatively impact our ability to conduct acquisitions, effectively monitor contractor performance and ensure compliance with laws, regulation, and policy. In larger terms, it could adversely affect fielding needed air traffic control systems, equipment and services and would impact our mission to provide a safe and efficient aviation system. Also, if information is not collected or is collected less frequently, the risk of waste, fraud or abuse grows substantially.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document; requiring respondents to 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;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

For example, while contractors would usually be given at least 30 days to submit proposals on larger acquisitions, Requests for Quotes (RFQ) on smaller acquisitions for commercial products as well as market survey requests for more generalized information on vendor capabilities may allow less than 30 days for responses depending on the circumstances. Generally, this is for smaller, less complex acquisitions that would not require as much time to prepare a response as a larger, more complex acquisition. Contractors always can request a time extension if they think it is needed.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A Federal Register Notice published on April 8, 2019 (84 FR 13987) solicited public comment. No comments were received.

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

We do not provide payments or gifts of any kind to respondents.

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

We do not give respondents assurance of confidentiality; however; we protect certain proprietary information and rights in data when appropriately designated by vendors and contractors.

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

There are no questions of a sensitive nature.

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

The methodology for identifying requirements for information collection relies on AMS forms and on forms completion requirements. In the present estimates, the forms are the basis for calculating the burden hours and costs, supplemented in certain cases, as necessary, by recourse to the AMS text. The information collection burden on the public based on a summary of all applicable forms is:

<b>Total # of Responses per Year</b>	<b>Average Burden Hours Per Response</b>	<b>Annual Burden Hours</b>
147,706	6.24	921,019

Any differences between the above and cumulative area information are due to rounding.

**IC-1 Market Surveys/Requests for Information**

<b>Total # of Responses per Year</b>	<b>Average Burden Hours Per Response</b>	<b>Annual Burden Hours</b>
8,572	7.94	68,044

Forms are reproduced in the “Procurement Toolbox” portion of AMS. AMS is online at: <http://fast.faa.gov>. A breakdown of burden in hours by form is as follows:

<b>Summary (Annual numbers)</b>	<b>Reporting</b>	<b>Recordkeeping</b>
<b>Business Declaration</b>		
<b># of Respondents</b>	2,830	N/A
<b># of Responses per respondent (Frequency per year)</b>	1	
<b>Time per Response</b>	1	
<b>Total # of responses</b>	2,830	

<b>Total burden (hours)</b>	2,830	
<b>SF-330- Architect-Engineer Qualifications</b>		
<b># of Respondents</b>	2,124	N/A
<b># of Responses per respondent</b>	1	
<b>Time per Response</b>	29	
<b>Total # of responses</b>	2,124	
<b>Total burden (hours)</b>	61,596	
	<b>Reporting</b>	<b>Recordkeeping</b>

<b>Interested Parties Form</b>		
<b># of Respondents</b>	3,618	N/A
<b># of Responses per respondent (Frequency per year)</b>	1	
<b>Time per Response</b>	1	
<b>Total # of responses</b>	3,618	
<b>Total burden (hours)</b>	3,618	

### IC-2 Solicitations

<b>Total # of Responses per Yea</b>	<b>Average Burden Hours Per Response</b>	<b>Annual Burden Hours</b>
28,798	20.93	602,732

Forms are reproduced in the “Procurement Toolbox” portion of AMS. AMS is online at: <http://fast.faa.gov>. A breakdown of burden in hours by form is as follows:

<b>SF-30 Amendment of Solicitation/Modification of Contract</b>		
<b># of Respondents</b>	4,428	246
<b># of Responses per respondent (Frequency per year)</b>	3	3
<b>Time per Response</b>	12	3

<b>Total # of responses</b>	13,284	748
<b>Total burden (hours)</b>	159,408	748
<b>SF-252 Architect-Engineer Contracts</b>		
<b># of Respondents</b>	2	2
<b># of Responses per respondent (Frequency per year)</b>	1	1
<b>Time per Response</b>	12	1
<b>Total # of responses</b>	2	2
<b>Total burden (hours)</b>	24	2

<b>SF-26 Award/Contract</b>		
<b># of Respondents</b>	688	688
<b># of Responses per respondent (Frequency per year)</b>	1	1
<b>Time per Response</b>	40	40
<b>Total # of responses</b>	688	688
<b>Total burden (hours)</b>	27,520	27,520
<b>DOT 4220.34 Contract Facilities Capital Cost of Money</b>		
<b># of Respondents</b>	201	201
<b># of Responses per respondent (Frequency per year)</b>	1	1
<b>Time per Response</b>	16	1
<b>Total # of responses</b>	201	201
<b>Total burden (hours)</b>	3,216	201

	<b>Reporting</b>	<b>Recordkeeping</b>
<b>DOT4220.344 Contract Pricing Summary</b>		
<b># of Respondents</b>	1,517	1,517
<b># of Responses per respondent (Frequency per year)</b>	3	1

Time per Response	12	1
<b>Total # of responses</b>	4,551	1,517
<b>Total burden (hours)</b>	54,612	1,517
<b>SF-18/33/1447- Request for Quotations/Solicitation, Offer, and Award/Solicitation Contract</b>		
# of Respondents	4,428	246
# of Responses per respondent (Frequency per year)	1	1
Time per Response	50	1
<b>Total # of responses</b>	4,428	246
<b>Total burden (hours)</b>	221,400	246

<b>SF-1442 Solicitation, Offer, and Award (Construction)</b>
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	Reporting	Recordkeeping
# of Respondents	2,124	118
# of Responses per respondent (Frequency per year)	1	1
Time per Response	50	1
<b>Total # of responses</b>	2,124	118
<b>Total burden (hours)</b>	106,200	118

### IC-3 Post Award Contract Administration

<b>Total # of Responses per Year</b>	<b>Average Burden Hours Per Response</b>	<b>Annual Burden Hours</b>
110,336	2.27	250,242.5

Forms are reproduced in the “Procurement Toolbox” portion of AMS. AMS is online at: <http://fast.faa.gov>. A breakdown of burden in hours by form is as follows:

<b>SF-30- Amendment of Solicitation/Modification of</b>
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<b>Contract</b>		
	<b>Reporting</b>	<b>Recordkeeping</b>
<b># of Respondents</b>	2,934	2,934
<b># of Responses per respondent (Frequency per year)</b>	3	3
<b>Time per Response</b>	12	1
<b>Total # of responses</b>	8,802	8,802
<b>Total burden (hours)</b>	105,624	8,802
<b>DOT 4220.4 Contractor's Release</b>		
<b># of Respondents</b>	3,802	3,802
<b># of Responses per respondent (Frequency per year)</b>	1	1
<b>Time per Response</b>	12	1
<b>Total # of responses</b>	3,802	3,802
<b>Total burden (hours)</b>	45,624	3,802
<b>SF-1443- Contractor's Request for Progress Payments</b>		
<b># of Respondents</b>	40	40
<b># of Responses per respondent (Frequency per year)</b>	1	.5
<b>Time per Response</b>	0.5	1
<b>Total # of responses</b>	40	40
<b>Total burden (hours)</b>	20	40
<b>Electronic Funds Transfer Waiver Request</b>		
<b># of Respondents</b>	30	30
<b># of Responses per respondent</b>	1	1

(Frequency per year)		
Time per Response	0.5	1
Total # of responses	30	30
Total burden (hours)	15	30
<b>SF-1428/1429- Inventory Schedule B /Continuation Sheet</b>		
# of Respondents	3,802	3,802
# of Responses per respondent (Frequency per year)	1	1
Time per Response	2	1
Total # of responses	3,802	3,802
Total burden (hours)	7,604	3,802
	<b>Reporting</b>	<b>Recordkeeping</b>
<b>DOT 4220.42 Material Inspection and Receiving Report</b>		
# of Respondents	2,934	2,934
# of Responses per respondent (Frequency per year)	12	12
Time per Response	1	1
Total # of responses	35,208	35,208
Total burden (hours)	35,208	35,208
<b>SF-25A Payment Bond</b>		
# of Respondents	2,124	118
# of Responses per respondent (Frequency per year)	1	1
Time per Response	0.5	0.5

<b>Total # of responses</b>	2,124	118
<b>Total burden (hours)</b>	1,062	59
	<b>Reporting</b>	<b>Recordkeeping</b>
<b>SF-25 Performance Bond Annual</b>		
<b># of Respondents</b>	2,124	118
<b># of Responses per respondent (Frequency per year)</b>	1	1
<b>Time per Response</b>	0.5	0.5
<b>Total # of responses</b>	2,124	118
<b>Total burden (hours)</b>	1,062	59
<b>SF-1439 Schedule of Accounting Information</b>		
<b># of Respondents</b>	3	3
<b># of Responses per respondent (Frequency per year)</b>	1	1
<b>Time per Response</b>	120	1
<b>Total # of responses</b>	3	3
<b>Total burden (hours)</b>	360	3
<b>SF-1413 Statement and Acknowledgment</b>		
<b># of Respondents</b>	413	413
<b># of Responses per respondent (Frequency per year)</b>	3	3
<b>Time per Response</b>	0.5	1
<b>Total # of responses</b>	1,239	1,239
<b>Total burden (hours)</b>	619.5	1,239

Summary of All ICs		
	Reporting	Recordkeeping
# of Respondents	40,166	17,212
# of Responses per respondent (Frequency per year)	Various	Various
Time per Response	Various	Various
Total # of responses	91,024	56,682
Total burden (hours)	837,623	83,396

We estimate that the applicable hourly burden rate for the public to produce the information required is approximately \$104 per hour. This is based on the previous submittal rate of \$98, adjusted for inflation using escalation rates from IHS Markit for wages, fringe and overhead as follows:

\$98 (burden rate for 2016 submittal)  
 x 1.0095 (prorated FY 2016 escalation)  
 \$98.93  
 x 1.02 (FY 2017 escalation)  
 \$100.91  
 x 1.025 (FY 2018 escalation)  
 \$103.43  
 x 1.008 (prorated FY 2019 escalation)  
 \$104 (rounded burdened rate)

Application of this estimated hourly rate to the burden hours allocated to the respondents / record keepers derives a total cost to the public of \$95,785,976.

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

We estimate no additional costs associated with this collection.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

Data from FAA’s PRISM System show approximately 2,934 FAA active contracts that will require the contractors to be responsible, broken down as follows:

<b>Category</b>	<b>Total Contracts</b>	<b>Contracts Over \$1 Million</b>
Small Business Contracts	1125	27
Small Business - Section 8(a) Socially and Economically Disadvantaged Business Contracts	119	2
Single Source other than Small Business	257	1
Competitive other than Small Business	1319	3
Construction Contracts	114	11
Total	2,934	44

Note: There are an additional approximately 5,996 real property lease agreements.

The number of contracts has an impact upon the cost to the Government in that it is reflected in the burden hours and resulting costs for all of activities involved in the award and administration of such contracts.

We estimate the Government’s burden to review and evaluate the information to be 500,319 hours. This figure is based on the 2016 submittal amount prorated by 60% reflecting the decrease in the number of contracts. This includes all AMS acquisition activities (solicitation, evaluation, award, and administration) requiring information and record keeping. We apply an average hourly rate of \$61.00 that includes the salary of a GS-12 step 5 as well as fringe and overhead derived from IHS Markit escalation data as follows:

\$56.89 (burden rate for 2016 submittal)  
x 1.011 (prorated FY 2016 escalation)  
 \$57.52  
x 1.0245 (FY 2017 escalation)  
 \$58.92  
x 1.028 (FY 2018 escalation)  
 \$60.57  
x 1.015 (prorated FY 2019 escalation)  
 \$61 (rounded burdened rate)

Based on this, we estimate that the Government’s total burden cost to be approximately \$30,519,459 when the rounded burdened rate is multiplied by the hours.

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

For this renewal, the burden has been updated based on a more accurate examination of information collection activities based on individual Forms, as well as changes to the contractual workload.

**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.**

There is no requirement for any information collected under AMS to be published for statistical use.

**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.**

We are seeking approval to not display an expiration date. Because many recurring forms, including standard forms, are available for both on- and off-line use, it would not be practical to keep the forms dated and to be required to destroy dated, unused stock or to change electronic versions.

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

There are no exceptions.