

# Supporting Statement for Personal Property

## Part A: Justification

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OMB No. 1910-1000

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### Collection Instruments

*Fast Report 2019*

*Exchange Sale Reporting Tool*

*Non-Federal Recipient Reporting Tool*

August, 2019

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## A.1. Legal Justification

**Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

This package contains information collections that are used by Department of Energy (DOE) leadership to exercise oversight and control over management of Government furnished personal property in the hands of DOE's management and operating (M&O) contractors and Federal Acquisition Regulation (FAR) contractors. The contractor management oversight and control function covers the ways in which DOE contractors provide goods and services for DOE organizations and activities in accordance with the terms of their contracts; the applicable statutory, regulatory, and mission support requirements of the Department; and regulations in the functional areas covered by this package.

The basic authority for these collections is the statute establishing the Department of Energy ("Department of Energy Organization Act", Public Law 95-91, August 4, 1977), which vests the Secretary of Energy with the executive direction and management functions, authority and responsibilities for the Department, including contract management.

## A.2. Needs and Uses of Data

**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**

As noted above, the information obtained from DOE contractors by these information collections is used by Departmental management at the appropriate levels to manage the contracts in the best interest of the Department and Federal Government.

The Exchange/Sale Report is a General Services Administration (GSA) mandated annual report in accordance with the Federal Management Regulation (FMR) 41 CFR 102-39.85. This report identifies Government personal property that was either sold or exchanged whereby proceeds received were used to replace similar personal property items.

The Excess Personal Property Furnished to Non-Federal Recipients is a GSA mandated annual report in accordance with FMR 41 CFR 102-36.295 and 102-36.300. The report identifies personal property that was donated or transferred to non-federal recipients.

The Agency Report of Motor Vehicle Data is a federally mandated report in accordance with FMR 41 CFR 102-34.335, the Energy Policy Act of 1992, and Executive Order 13693. All agencies are required to report motor vehicle inventories, acquisitions, operating cost, miles traveled and fuel used using the online Federal Automotive Statistical Tool (FAST) database.

The Annual Motor Vehicle Fleet Report is a federally mandated annual report in accordance with the Office of Management and Budget's Circular A-11. Motor vehicle data is collected electronically using the Federal Automotive Statistical Tool (FAST). Information reported consists of projected cost data for three years and a supporting textual narrative with respect to acquiring and maintaining motor vehicles.

### **A.3. Use of Technology**

**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, e.g., permitting electronic submission of responses.**

The data for the Exchange/Sale Report and the Report of Excess Personal Property Furnished to Non-Federal Recipients is collected using GSA's online system, Personal Property Reporting Tool. Motor vehicle data is collected electronically using the Federal Automotive Statistical Tool (FAST).

### **A.4. Efforts to Identify Duplication**

**Describe efforts to identify duplication.**

The information identified in this package is collected on an annual basis and consists of separate and discrete programs, therefore, duplication is unlikely. The information collected in this package is held by DOE's contractors. There are no other sources to collect the information as required by regulation and OMB Circular A-11.

### **A.5. Provisions for Reducing Burden on Small Businesses**

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

Impact of the collection of information on small businesses is considered in the development of the contract requirements document and is minimized to the extent permitted by applicable statutory requirements and other legal and management constraints.

### **A.6. Consequences of Less-Frequent Reporting**

**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.**

If these information collections were not conducted, proper management of Government furnished personal property, M&O contractors, and FAR contractors would be difficult and would hinder statutory requirements to be carried out. It would also be difficult to respond to the annual GSA and OMB reporting requirements noted in item #2.

### **A.7. Compliance with 5 CFR 1320.5**

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of 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; (h) 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.

Information collections in this package have been reviewed and justified by Departmental management requirements, statutes, external regulations or interagency reporting requirements, Departmental orders, or other internal DOE requirements and are collected in a manner consistent with OMB guidelines.

### **A.8. Summary of Consultations Outside of the Agency**

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE 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 report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning modification of this collection in the Federal Register on May13, 2019, volume 84, number 92, and page number 20870. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments on the information collection were received.

### **A.9. Payments or Gifts to Respondents**

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

There is no remuneration given for submission of any of the information other than the fact that the expense of responding is treated as an allowable cost under a Government contract.

#### **A.10. Provisions for Protection of Information**

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

Where confidential information is involved in an information collection, the provisions for dealing with this are set forth in the contract documents and the related Departmental regulations and are normal to the handling of management and program information by the Department.

#### **A.11. Justification for Sensitive Questions**

**Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no collections in this package which involve questions of a sensitive, personal, or private nature.

#### **A.12. Estimate of Respondent Burden Hours**

**Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.**

The estimated burden, expressed in burden hours, is the sum of the burden reported by Departmental elements and field organizations as compiled from their respective contractors or estimated by expert personnel familiar with these collections. Computations are based on the number of respondents times the annual reporting frequency times the hours per response.

The estimated hours increased due to more reporting requirements for sustainability for FAST. The requirements for the FAST consists of four annual reports: OMB Forward-looking Budget Call and Fleet Management Plan (May); EPA Act Section 701 Waivers and EISA 246 Reports (June); OMB Circular A-11 Fleet Budget Call (August); Fiscal Year-end FAST Report (October).

**Table A1. Estimated Respondent Burden**

Form Number/Title	Annual Reporting Frequency	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours
Exchange / Sale	1	92	92	2.00	184
Non Federal Recipients	1	92	92	2.00	184
Federal Automotive Statistical Tool	1	92	92	18.00	1,656
			0		0
			0		0
			0		0
			0		0
			0		0
<b>TOTAL</b>		<b>276</b>	<b>276</b>		<b>2,024</b>

**A.13. Annual Cost to Respondents**

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

The estimated total annual cost burden to respondents resulting from the information collection in this package is based on an assumed standard cost of \$28.00 per burden hour. This cost was derived from U.S. Department of Labor Wage Determination occupation code 05000. The total estimated cost is \$28.00/burden hour x 2024 annual burden hours = \$56,672.

**A.14. Annualized Costs to the Federal Government**

**Provide estimates of annualized cost to the Federal government.**

The DOE Organizational Property Management Officers are responsible for compiling and verifying the data submitted by DOE contractors. The estimated annualized cost to the Department for this information collection package is based on an assumed standard rate of \$127 per hour (GS-13) and an additional 25-30% for employee fringe benefits and an additional 30% overhead cost.

Government Cost:

- o Exchange/Sale Report: \$127/burden hrs x 184 hrs= \$23,368

- o Excess Personal Property Furnished to Non-Federal Recipients: \$127/burden hrs x 184 hrs = \$23,368
- o FAST Fleet Reports: \$127/burden hrs x 1,656 hrs = \$210,312.

The total estimated cost for the government is \$257,048.

**Table A2. Changes in Burden**

Form Number/Title	Annual Reporting Frequency	Number of Respondents (Previously Approved)	Number of Respondents (Requested)	Annual Number of Responses (Previously Approved)	Annual Number of Responses (Requested)	Burden Hours Per Response (Previously Approved)	Burden Hours Per Response (Requested)	Annual Burden Hours (Previously Approved)	Annual Burden Hours (Requested)	Annual Number of Responses			Annual Burden Hours		
										Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment	Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment
Exchange / Sale	1	76	92	76	92	2.0	2.0	152	184	16		16	32		32
Non Federal Recipients	1	76	92	76	92	2.0	2.0	152	184	16		16	32		32
FAST	1	76	92	76	92	18.0	18.0	1,368	1,656	16		16	288		288
				0	0			0	0	0		0	0		0
				0	0			0	0	0		0	0		0
				0	0			0	0	0		0	0		0
				0	0			0	0	0		0	0		0
<b>TOTAL</b>			<b>228</b>	<b>276</b>	<b>228</b>	<b>276</b>		<b>1,672</b>	<b>2,024</b>	<b>48</b>	<b>0</b>	<b>48</b>	<b>352</b>	<b>0</b>	<b>352</b>



### A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB

The changes reported reflect an increase in FAST respondents. This increase is due to completion of projects at some sites which resulted in an increase in vehicle users which necessitated a requirement for FAST reporting.

The increase in burden hours from 1,672 to 2,024 reflects the increase in users reporting data in the Agency Report for Motor Vehicle and the Annual Motor Vehicle Fleet Report, both of which are pulled from the FAST. The number of respondents changed from 228 to 276 due to an increase in the number of users allocated to the GSA Personal Property Reporting Tool online system. Overall the number of burden hours per respondent remained the same.

The difference of cost per burden hour for FY 2016 is due to inaccurate information. For FY 2019 the cost per burden hours came from the Department of Labor Determination Rate; which is \$28.00 per burden hour.

**Table A3. ICR Summary of Burden**

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	276	0	48	228*
Total Time Burden (Hr)	2024	0	352	1672
Total Cost Burden to Respondents	56672	0	77088	133760**

\*Figure was incorrectly entered into ROCIS in 2016. 152 respondents were reported, but it should have been 228.

\*\*Figure was not entered into ROCIS in 2016, but the Supporting Statement lists a burden of \$133,760..

### A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

The information collected is published by GSA on their website for public viewing. The online aforementioned systems automatically tabulate the data.

### A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Approval for non-display of OMB expiration date is not being requested.

### A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions identified in Item 19.